

California Consumer Privacy Act Notice at Collection

(Job Applicant/Employee Notice)

This Notice at Collection ("Notice") is provided as required by the California Consumer Privacy Act ("CCPA") and applies to individuals that are California residents as defined in the CCPA. This Notice applies to job applicants, employees, contractors, shareholders, directors, or officers where the personal information we collect about those individuals relates to their current, former, or potential role at HCN Bank.

Personal information, under the CCPA, is information that identifies, relates to, or could reasonably be linked directly or indirectly with a California resident.

We collect any or all of the following categories of personal information.

- Identifiers. Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier,
 Internet Protocol (IP) address, email address, account name. This category includes the collection of sensitive personal information including social security number, driver's license, state identification card, or passport number.
- Additional Data Subject to California Civil Code Section 1798.80 such as your telephone number, signature, medical and health insurance information.
- Characteristics of protected classifications under California or federal law such as age, sex, and marital status. This category includes the collection of sensitive personal information including racial or ethnic origin.
- Commercial Information such as bank information and account numbers.
- **Biometric Information** such as fingerprints and voiceprints. This category includes the collection of sensitive personal information including hand/palm scans.
- Internet or Network Activity such as IP address, username, and interactions with our website.
- **Geolocation Data** such as device location and IP address location.
- Sensory Information, audio, electronic, visual, and similar information, such as call and video recordings.
- Professional or Employment-Related Information such as income, employment history and prior employer contact information.
- **Education Information** such as school and related information.
- Inferences. Inferences based on information about an individual to create a summary about, such as an individual's preferences, intelligence, abilities, and aptitudes.

We use or disclose the personal information we collect for one or more of the following purposes.

- To process employment applications, including evaluating job applicants and conducting reference and background checks.
- To verify and authenticate identity and use of systems.
- To manage compensation and employment-related expenses including tracking time and attendance, processing payroll, consideration for promotions, processing workers' compensation claims, conducting workplace investigations, and providing job related notifications.
- To administer and maintain benefits, including health and retirement benefits.
- To comply with legal obligations, government reporting including tax reporting and anti-discrimination laws.
- To comply with or monitor compliance with company policies, any applicable law or regulation and regulatory examinations.
- To detect and prevent fraud and security incidents.
- Other routine business and lawful purposes.

In the ordinary course of business, we collect and use sensitive personal information such as social security numbers, driver's license, state identification numbers and passport numbers, racial or ethnic origin, and hand scan data. This sensitive information is used to verify identity, authenticate use of our systems, for government reporting, administering benefits and to detect and prevent fraud and security incidents.

We do not sell or share (as defined in the CCPA) any personal information, including any sensitive personal information. We retain this data as long as necessary in order to fulfill the various administrative and similar purposes set forth above, and as required by any applicable law.

We may update this Notice from time to time, in which case the revised Notice will be posted to the ADP portal or provided to you in writing, by email, or mail. For more information, including information about rights that California residents have under the CCPA, please see our California Consumer Privacy Act Policy at https://www.hcnbank.com/California-Consumer-Privacy

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