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### **CCPA Privacy Notice / Notice At Collection**

Updated April 2024

The purpose of this Employment Notice at Collection is to provide you with timely notice, at or before the point of collection, of the details about our practices concerning the privacy of your personal information. This notice, as well as the CCPA Notice at Collection and Statement of Online Privacy of TIH, inform individuals how we will interact with your personal information. This Notice is directed to employees, applicants and contractors who reside in the state of California “you”) and relates to personal information covered by the California Consumer Privacy Act (CCPA). Specifically, this Notice provides comprehensive information about our online and offline practices, along with details concerning how you may exercise your California privacy rights and make requests to access, correct or delete the information that TIH holds about you. We will not collect additional categories of personal information without providing you a new Notice at Collection disclosing these categories. The CCPA does not apply to certain information, such as information subject to the Health Insurance Portability and Accountability Act (HIPAA) and certain other state or federal privacy laws. This Employment Privacy Notice also does not apply to information that we collect for non- employment purposes. For more information about how we collect, use and disclose personal information for non-employment purposes, please review the Notices on this Site. This Notice does not apply to TIH subsidiaries and affiliates unless such subsidiary or affiliate links to this policy. The following charts provide specifics about TIH’s practices related to the collection, use and selling or sharing of personal information relating to employment:

The following charts provide specifics about TIH’s practices related to the collection, use and selling or sharing of personal information:

## General Personal Information

| Categories of Personal Information Collected & Disclosed  | Purpose for Collection   | Purpose for Disclosure                                       |
|---|--|--|
| <p><b>A. Identifiers:</b> For example, real name or alias, address, online identifier, IP address, email address, account name, SSN, driver's license number, passport number, or other similar identifiers.</p>  | <ul style="list-style-type: none"> <li>- Deliver, manage and support products and services, manage relationships and maintain accounts</li> <li>- Assess and manage risk</li> <li>- Manage fraud and financial crimes</li> <li>- Manage hiring and ongoing employment, such as benefits, and to manage teammate / organizational performance and staffing</li> <li>- Meet legal, regulatory, or compliance requirements</li> <li>- Market our products and services</li> <li>- Perform services on behalf of another business or entity</li> <li>- Manage and optimize internal operations purposes</li> <li>- Support and optimize channels and interactions</li> </ul> | <p>-Share for all purposes from "purpose for collection"</p> |
| <p><b>B. Personal Information Categories from Cal. Civ. Code § 1798.80I:</b> For example, name, signature, SSN, physical characteristics or description, address, phone number, passport number, driver's license or state ID card number, policy or account numbers, education, employment, employment history, credit or debit card numbers, or any other financial, medical or</p> | <ul style="list-style-type: none"> <li>- Deliver, manage and support products and services, manage relationships and maintain accounts</li> <li>- Assess and manage risk</li> <li>- Manage fraud and financial crimes</li> <li>- Manage hiring and ongoing employment, such as benefits, and to manage teammate / organizational performance and staffing</li> <li>- Meet legal, regulatory, or compliance requirements</li> <li>- Market our products and services</li> <li>- Perform services on behalf of another business or entity</li> <li>- Manage and optimize internal operations purposes</li> <li>- Support and optimize channels and interactions</li> </ul> | <p>-Share for all purposes from "purpose for collection"</p> |

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| health insurance information.  |  |   |
| <p><b>C. Characteristics of CA or Federal Protected Classifications:</b> For example, race, religion, national origin), age (40 and over), gender, sexual orientation, medical condition, ancestry, pregnancy (includes childbirth, breastfeeding and/or related medical conditions), familial status, disability, veteran status, or genetic information.</p> | <ul style="list-style-type: none"> <li>- Deliver, manage and support products and services, manage relationships and maintain accounts</li> <li>- Assess and manage risk</li> <li>- Manage fraud and financial crimes</li> <li>- Manage hiring and ongoing employment, such as benefits, and to manage teammate / organizational performance and staffing</li> <li>- Meet legal, regulatory, or compliance requirements</li> <li>- Market our products and services</li> <li>- Perform services on behalf of another business or entity</li> <li>- Manage and optimize internal operations purposes</li> <li>- Support and optimize channels and interactions</li> </ul> | <p>-Share for all purposes from “purpose for collection”</p>  |
| <p><b>D. Commercial Information:</b> For example, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>   | <ul style="list-style-type: none"> <li>- Deliver, manage and support products and services, manage relationships and maintain accounts</li> <li>- Assess and manage risk</li> <li>- Manage fraud and financial crimes</li> <li>- Manage hiring and ongoing employment, such as benefits, and to manage teammate / organizational performance and staffing</li> <li>- Meet legal, regulatory, or compliance requirements</li> <li>- Market our products and services</li> <li>- Perform services on behalf of another business or entity</li> <li>- Manage and optimize internal operations purposes</li> <li>- Support and optimize channels and interactions</li> </ul> | <p>-Share for all purposes from “purpose for collection”</p>  |
| <p><b>E. Biometric Information:</b> For example, physiological, biological or behavioral characteristics, including DNA, that can be used to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and</p>  | <ul style="list-style-type: none"> <li>- Assess and manage risk (fraud and security detection through identity verification)</li> <li>- Manage hiring and ongoing employment, such as benefits, and to manage teammate / organizational performance and staffing</li> </ul>  | <p>- Share for all purposes from “purpose for collection”</p> |

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| <p>voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.</p> |  |   |
| <p><b>F. Internet or Other Similar Network Activity:</b> For example, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement</p>   | <ul style="list-style-type: none"> <li>- Deliver, manage and support products and services, manage relationships and maintain accounts</li> <li>- Assess and manage risk</li> <li>- Manage fraud and financial crimes</li> <li>- Meet legal, regulatory, or compliance requirements</li> <li>- Market our products and services</li> <li>- Perform services on behalf of another business or entity</li> <li>- Manage and optimize internal operations purposes</li> <li>- Support and optimize channels and interactions</li> <li>- Manage hiring and ongoing employment needs</li> </ul> | <p>- Share for all purposes from "purpose for collection"</p> |
| <p><b>G. Geolocation Data:</b> For example, information that can be used to determine a device's physical location</p>  | <ul style="list-style-type: none"> <li>- Deliver, manage and support products and services, manage relationships and maintain accounts</li> <li>- Manage and optimize internal operations purposes</li> <li>- Support and optimize channels and interactions</li> <li>- Manage hiring and ongoing employment needs</li> </ul>  | <p>- Share for all purposes from "purpose for collection"</p> |
| <p><b>H. Sensory Data or Recordings:</b> For example, audio, electronic, visual, thermal, olfactory, or similar information that can be linked or associated with a particular consumer or household</p>  | <ul style="list-style-type: none"> <li>- To assess and manage risk</li> <li>- To meet regulatory or compliance requirements</li> <li>- Manage and Optimize Internal Business Operations</li> <li>- Support and Optimize Channels and Interaction</li> </ul>  | <p>- Share for all purposes from "purpose for collection"</p> |

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| <p><b>I. Professional or Employment-Related Information:</b> For example, compensation, evaluations, performance reviews, personnel files and current and past job history.</p>  | <ul style="list-style-type: none"> <li>- Assess and manage risk</li> <li>- Deliver, manage and support products and services, managing relationships and maintaining accounts</li> <li>- Manage hiring and ongoing employment needs such as benefits</li> <li>- Manage teammate and organizational performance and staffing</li> <li>- Maintain records around continuing education</li> <li>- Perform services on behalf of another entity or business</li> <li>- Meet legal, regulatory or compliance requirements</li> </ul> | <p>- Share for all purposes from “purpose for collection”</p> |
| <p><b>J. Education Information</b> (<i>defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99)</i>): Education records directly related to a student maintained by an education institution or party acting on its behalf, for example, non-public information that can be used to distinguish or trace an individual’s identity in relation to an educational institution either directly or indirectly through linkages with other information.</p> | <ul style="list-style-type: none"> <li>- Assess and manage risk</li> <li>- Deliver, manage and support products and services, managing relationships and maintaining accounts</li> <li>- Manage hiring and ongoing employment needs such as benefits</li> <li>- Maintain records around continuing education</li> <li>- Perform services on behalf of another entity or business</li> <li>- Meet legal, regulatory or compliance requirements</li> </ul>  | <p>- Share for all purposes from “purpose for collection”</p> |
| <p><b>K. Profile Data:</b> For example, inferences drawn from personal information to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends,</p>  | <ul style="list-style-type: none"> <li>- Deliver, manage and support products and services, manage relationships and maintain accounts</li> <li>- Assess and manage risk</li> <li>- Manage fraud and financial crimes</li> <li>- Market our products and services</li> <li>- Manage and optimize internal operations purposes</li> <li>- Support and optimize channels and interactions</li> </ul>  | <p>- Share for all purposes from “purpose for collection”</p> |

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| predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. |  |  |
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We may also disclose personal information for other purposes at your direction or with your consent.

### **Sensitive Personal Information**

| <b>Categories of Sensitive Personal Information</b>  | <b>Purpose for Collection</b>   | <b>Purpose for Disclosure</b>                          |
|--|---|--|
| <b>SSN, Driver’s License, State ID Card, Passport Number</b>   | <ul style="list-style-type: none"> <li>- Deliver, manage and support products and services manage relationships and maintain accounts</li> <li>- Assess and manage risk</li> <li>- Manage fraud and financial crimes</li> <li>- Manage hiring and ongoing employment, such as benefits, and to manage teammate / organizational performance and staffing</li> <li>- Meet legal, regulatory, or compliance requirements</li> <li>- Perform services on behalf of another business or entity</li> </ul> | - Share for all purposes from “purpose for collection” |
| <b>Account Login, financial account, debit or credit card number when provided with any security or access code, password or credentials allowing access to an account</b> | <ul style="list-style-type: none"> <li>- Deliver, manage and support products and services, manage relationships and maintain accounts</li> <li>- Manage fraud and financial crimes</li> <li>- Manage and optimize internal operations purposes</li> </ul>  | - Share for all purposes from “purpose for collection” |
| <b>Precise geolocation</b>   | <ul style="list-style-type: none"> <li>- Deliver, manage and support products and services, manage relationships and maintain accounts</li> <li>- Manage and optimize internal operations purposes</li> <li>- Support and optimize channels and interactions</li> <li>- Manage hiring and ongoing employment needs</li> </ul>   | - Share for all purposes from “purpose for collection” |
| <b>Racial or ethnic origin, religious or philosophical beliefs, or union membership</b>  | <ul style="list-style-type: none"> <li>- Deliver, manage and support products and services, manage relationships and maintain accounts such as fair lending legal requirements</li> <li>- Assess and manage risk</li> <li>- Manage hiring and ongoing employment, such as benefits, and to manage teammate / organizational performance and staffing, such as collecting demographic data to ensure employee diversity, equity and</li> </ul>   | - Share for all purposes from “purpose for collection” |

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|  | <ul style="list-style-type: none"> <li>inclusion or to conduct insurance underwriting</li> <li>- Meet legal, regulatory, or compliance requirements</li> <li>- Perform services on behalf of another business or entity</li> </ul>  |  |
| <b>Contents of a consumer's mail, email and text messages (unless TIH is the intended recipient)</b> | <ul style="list-style-type: none"> <li>- Requested in limited circumstances to investigate potential violations of law, regulation or policy in connection with litigation or threatened litigation</li> </ul>  | N/A  |
| <b>Genetic Data</b>  | N/A   | N/A  |
| <b>Biometric information for the purpose of unique identification</b>                                | <ul style="list-style-type: none"> <li>- Assess and manage risk (fraud and security detection through identity verification)</li> <li>- Manage hiring and ongoing employment, such as benefits, and to manage teammate / organizational performance and staffing</li> <li>- Manage and Optimize Internal Business Operations</li> </ul> | - Share for all purposes from "purpose for collection" |
| <b>Health information</b>  | <ul style="list-style-type: none"> <li>- Manage ongoing employment needs such as benefits</li> <li>- Deliver, manage and support products and services such as insurance underwriting</li> <li>- Perform services on behalf of another business or entity</li> </ul>  | - Share for all purposes from "purpose for collection" |
| <b>Information concerning sex life or sexual orientation</b>   | <ul style="list-style-type: none"> <li>- Collected when voluntarily disclosed in order to manage employment needs such as supporting diversity, equity and inclusion efforts</li> </ul>   | N/A  |

**What we may share with Third Parties for Business Purposes**

We may share personal information for business purposes with the third parties described below.

**General Personal Information**

| <b>Categories sold to or shared with third parties over the last 12 months</b> | <b>Categories of third parties to whom this category of personal information has been sold or shared</b> | <b>Categories of Third Parties to whom the information was shared for business purposes that are not</b> |
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|  |  | <b>considered a sale or share under CA law</b>   |
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| <b>A. Identifiers</b>  | <ul style="list-style-type: none"> <li>- Ad servers, networks, &amp; exchanges</li> <li>- Social media platforms</li> <li>- Online publishers</li> <li>- Data analytics providers</li> <li>- Data providers and aggregators</li> <li>- Advertising services platforms</li> <li>- Market research companies</li> <li>- Consumer survey companies</li> </ul> | <ul style="list-style-type: none"> <li>- Affiliates and other entities in the TIH family</li> <li>- Service Providers that provide various services to us</li> <li>- Other parties when you authorize or direct us to share your information</li> <li>- Credit reporting agencies to report on or learn about your financial circumstances</li> <li>- Government entities and other third parties as needed for legal or similar purposes</li> </ul> |
| <b>B. Personal Information Categories from Cal. Civ. Code § 1798.80(e)</b> | N/A  | <ul style="list-style-type: none"> <li>- Affiliates and other entities in the TIH family</li> <li>- Service Providers that provide various services to us</li> <li>- Other parties when you authorize or direct us to share your information</li> <li>- Credit reporting agencies to report on or learn about your financial circumstances</li> <li>- Government entities and other third parties as needed for legal or similar purposes</li> </ul> |
| <b>C. Characteristics of CA or Federal Protected Classifications</b>       | N/A  | <ul style="list-style-type: none"> <li>- Affiliates and other entities in the TIH family</li> <li>- Service Providers that provide various services to us</li> <li>- Other parties when you authorize or direct us to share your information</li> <li>- Credit reporting agencies to report on or learn about your financial circumstances</li> <li>- Government entities and other third parties as needed for legal or similar purposes</li> </ul> |
| <b>D. Commercial Information</b>   | <ul style="list-style-type: none"> <li>- Ad servers, networks, &amp; exchanges</li> <li>- Social media platforms</li> <li>- Online publishers</li> <li>- Data analytics providers</li> <li>- Data providers and aggregators</li> <li>- Advertising services platforms</li> <li>- Market research companies</li> <li>- Consumer survey companies</li> </ul> | <ul style="list-style-type: none"> <li>- Affiliates and other entities in the TIH family</li> <li>- Service Providers that provide various services to us</li> <li>- Other parties when you authorize or direct us to share your information</li> <li>- Credit reporting agencies to report on or learn about your financial circumstances</li> <li>- Government entities and other third parties as needed for legal or similar purposes</li> </ul> |
| <b>E. Biometric Information</b>  | N/A  | <ul style="list-style-type: none"> <li>-Affiliates and other entities in the TIH family</li> <li>- Service Providers that provide various services to us</li> </ul>  |
| <b>F. Internet or Other Similar Network Activity</b>                       | <ul style="list-style-type: none"> <li>- Ad servers, networks, &amp; exchanges</li> <li>- Social media platforms</li> <li>- Online publishers</li> <li>- Data analytics providers</li> <li>- Data providers and aggregators</li> <li>- Advertising services platforms</li> <li>- Market research companies</li> <li>- Consumer survey companies</li> </ul> | <ul style="list-style-type: none"> <li>- Affiliates and other entities in the TIH family</li> <li>- Service Providers that provide various services to us</li> <li>- Other parties when you authorize or direct us to share your information</li> </ul>  |
| <b>G. Geolocation Data</b>   | N/A  | <ul style="list-style-type: none"> <li>- Service Providers that provide various services to us</li> </ul>  |



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| <b>H. Sensory Data or Recordings</b>                     | N/A   | -Affiliates and other entities in the TIH family<br>- Service providers that provide various services to us  |
| <b>I. Professional or Employment-Related Information</b> | N/A   | - Affiliates and other entities in the TIH family<br>- Service Providers that provide various services to us<br>- Other parties when you authorize or direct us to share your information<br>- Credit reporting agencies to report on or learn about your financial circumstances<br>- Government entities and other third parties as needed for legal or similar purposes |
| <b>J. Education Information</b>                          | N/A   | - Service Providers that provide various services to us  |
| <b>K. Profile Data</b>                                   | - Ad servers, networks & exchanges<br>- Social media platforms<br>- Online publishers<br>- Data analytics providers<br>- Data providers and aggregators<br>- Advertising services platforms<br>- Market research companies<br>- Consumer survey companies | - Service Providers that provide various services to us  |
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**Notice of Right to Opt Out of Sale / Sharing**

You may at any time direct TIH to stop selling or sharing your personal information, which is called the “Right to Opt Out.” Once you make an opt out request, TIH will comply within 15 business days, and will wait at least 12 months before asking you to reauthorize sales or sharing.

**You may exercise your Right to Opt Out of Sale / Sharing in the following ways:**

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| To opt out of tags, cookies, pixels that collect information when you visit TIH’s website | <ul style="list-style-type: none"> <li>Click <a href="#">insert “Do Not Sell or Share My Personal Information” link here Create a TIH One Trust Link</a>) or at the bottom of the TIH homepage to use the interactive form, or</li> <li>Submit your request through a preference signal, described further in the section titled “Opt Out Preference Signals”</li> </ul> |
| To opt out of other personal information sold to or shared with third parties             | Submit a request to <a href="mailto:tihcompliance@truist.com">tihcompliance@truist.com</a> or <ul style="list-style-type: none"> <li>Call the TIH Privacy Line at 866-858-5158</li> </ul>  |

**Notice of Right to Limit Use of Sensitive Personal Information**

TIH only collects/processes sensitive personal information for permissible purposes that do not infer characteristics about a consumer, therefore there is not an opt out for the use of sensitive personal information.

### **Retention of Personal Information**

TIH has established product and business-level criteria for retention and disposal according to business requirements, laws, regulations, and applicable industry standards.

### **Sources of Personal Information**

TIH collects information from various sources, including:

- Directly from you or your guardians/representatives
- Service providers that support our business operations (e.g., data analytics providers)
- Websites, mobile applications, and social media
- Our affiliates or subsidiaries
- Outside merchants or business partners such as credit card or lending partnerships, or corporate clients
- Public records or publicly available data
- Data brokers
- Advertising networks
- Government entities

### **Consumer Rights Under the CCPA**

#### **Right to Know / See Data Request**

You have the right to request that TIH disclose categories or specific pieces of personal information we have collected about you over the last 12 months, the categories of sources from which that information was collected, the business or commercial purpose(s) for which the information was collected, sold, or shared with third parties for cross context behavioral advertising, and the categories of third parties with whom we share personal information.

#### **Right to Correct**

You have the right to request correction of inaccurate personal information maintained by TIH . In many instances, such updates are best made by logging into your online account or employee portals, calling 866-858-5158 , or by sending an email to [tihcompliance@truist.com](mailto:tihcompliance@truist.com). Some corrections may require specific documentation to be provided as required by law. If you provide us documentation, it will only be used or maintained for the purpose of correcting the information and complying with our recordkeeping requirements under the CCPA.

#### **Right to Delete**

You have the right to request deletion of personal information that TIH has collected, subject to certain exceptions. For example, we may deny your request if retaining the information is necessary for us to complete a transaction you requested or comply with our legal obligations.

### **Submitting a Verified Consumer Request**

Consumers are welcome to submit right to know, correction, or deletion requests by emailing [tihcompliance@truist.com](mailto:tihcompliance@truist.com) or by calling 866-858-5158.

All requests must be verified prior to receiving a response, using TIH authentication protocols. Requesters will be asked to supply certain basic personal information to enable us to verify the request against our records, such as name, Social Security number, and address. Information submitted for verification purposes will only be used to verify the requestor's identity and/or authority to make a request on another's behalf.

Requests made on another person's behalf can only be accepted upon receipt of documentation that the requestor is an authorized agent, parent, or legal guardian of the consumer whose information is being requested. This will require the submission of a valid Power of Attorney, Birth Certificate, approved TIH authorization form, Guardianship Order, or other court order granting authority to receive information, as appropriate.

Upon submission of a request, consumers will receive an initial confirmation of receipt within 10 days. We will respond to your request within 45 days (unless an extension of up to 45 additional days is requested, upon which the consumer will receive notice and an explanation for the extension).

Please note TIH is also a service provider to business clients and may not fulfill requests pertaining to personal information we process on their behalf. If you are an employee, customer, representative, or otherwise associated with one of these clients, we encourage you to reach out to the business directly to exercise your rights specific to this information.

### **Opt Out Preference Signals**

Your internet browser may give you more control over your privacy preferences via a Global Privacy Control (GPC) signal. This is a setting in your browser that notifies the websites you visit of your preferences to opt out of selling or sharing your personal information under California law. If you have opted out via the GPC signal, TIH sites will recognize this signal and process your preference automatically as it pertains to tags, cookies and pixels that collect personal information when you visit TIH sites. Please note, you will need to enable the signal on each browser that you use, as the signal is processed at the browser-level and is not applied if you visit TIH sites from a different browser or device that does not have the GPC signal enabled. When you have authenticated into the TIH site from a browser which is GPC enabled, will automatically apply that opt out preference to offline data that we have about you. To opt out without GPC enabled, see the section Notice of Right to Opt Out of Sale/Sharing above.

### **Non-Discrimination**

The submission of any CCPA request will have no impact on the service and/or pricing you receive from TIH. It will not result in any denial of goods or services, or different prices, rates or quality of goods or services, nor will it result in retaliation against an employee, applicant, or independent contractor.

TIH products and services are not intended for consumers under the age of 16, and we do not knowingly collect information from children under the age of 16 without consent. TIH does not knowingly sell the personal information of minors under the age of 16 or share such information for cross-contextual advertising.

## **Consumers Under 16 Years of Age**

TIH does not knowingly sell the personal information of minors under the age of 16 or share such information for cross-contextual advertising.

## **Updates**

This Notice may be revised from time to time, so please review this page periodically. Any changes will become effective when we post the revised notice on the site (please note the effective date listed at the top of this page).

## **Contact Us**

If you have any questions or comments on this notice or our privacy practices generally, please contact us at 866-858-5158. You can also request additional information via email to [tihcompliance@truiist.com](mailto:tihcompliance@truiist.com).

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