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### **CCPA Employment Notice at Collection**

Last Updated January 2023

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 Truist's [CCPA Notice at Collection](#), Truist's [Consumer Privacy Notice](#) and [Statement of Online Privacy Practices](#) informs 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 Truist 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 visit [www.truist.com/privacy](http://www.truist.com/privacy). This Notice does not apply to Truist subsidiaries and affiliates unless such subsidiary or affiliate links to this policy.

The following charts provide specifics about Truist's practices related to the collection, use and selling or sharing of personal information relating to employment:

**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>- 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>	<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 health insurance information.</p>		
<p><b>C. Characteristics of CA or Federal Protected Classifications:</b> For example, race, religion, citizenship or 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>		
<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>	N/A	N/A
<p><b>E. Biometric Information:</b> For example, physiological, biological or behavioral characteristics that can be used to establish individual identity. Biometric information includes, but is not limited to, fingerprint, face, hand, palm, and 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>	<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>
<p><b>F. Internet or Other Similar Network Activity:</b> For example, browsing history, search history, and information regarding a</p>	<ul style="list-style-type: none"> <li>- Manage fraud and financial crimes</li> <li>- Manage and optimize internal operations purposes</li> </ul>	<p>- Share for all purposes from "purpose for collection"</p>

person's interaction with an Internet Web site, application, or advertisement	- Support and optimize channels and interactions	
<b>G. Geolocation Data:</b> For example, information that can be used to determine a device's physical location	N/A	N/A
<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 individual or household	- To assess and manage risk - To meet regulatory or compliance requirements - Manage and Optimize Internal Business Operations - Support and Optimize Channels and Interaction	- Share for all purposes from "purpose for collection"
<b>I. Professional or Employment-Related Information:</b> For example, compensation, evaluations, performance reviews, personnel files and current and past job history.	- Manage hiring and ongoing employment needs such as benefits - Manage teammate and organizational performance and staffing - Maintain records around continuing education - Perform services on behalf of another entity or business - Meet legal, regulatory or compliance requirements	- Share for all purposes from "purpose for collection"
<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.		
<b>K. Profile Data:</b> For example, inferences drawn from personal information to create a profile about an individual reflecting their preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	N/A	N/A

We may also disclose personal information for other purposes at your direction or with your consent.

### Sensitive Personal Information

Categories of Sensitive Personal Information	Purpose for Collection	Purpose for Disclosure
<b>SSN, Driver's License, State ID Card, Passport Number</b>	<ul style="list-style-type: none"> <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>- 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>	N/A	N/A
<b>Racial or ethnic origin, religious or philosophical beliefs, or union membership</b>	<ul style="list-style-type: none"> <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 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>	- Share for all purposes from "purpose for collection"
<b>Contents of an employee's personal mail, e-mail and text message accounts (where Truist isn't the intended recipient)</b>	N/A	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>	- Collected when voluntarily disclosed in order to manage employment needs such as supporting diversity, equity and inclusion efforts	N/A

**Selling to Third Parties / Sharing with Third Parties for Cross-Context Behavioral Advertising and Sharing with Third Parties for Business Purposes**

We have not sold or shared with third parties, personal information for cross-context behavioral advertising, in the preceding 12 months as disclosed in the table below. We do 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</b>
<b>A. Identifiers</b>	N/A	<ul style="list-style-type: none"> <li>- Affiliates and other entities in the Truist 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, such as when you use a third-party service to help manage your financial information across financial institutions or when you transfer funds from Truist</li> <li>- Credit reporting agencies to report on or learn about your financial circumstances for Truist branded corporate cards or personal credit cards issued by Truist</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	
<b>C. Characteristics of CA or Federal Protected Classifications</b>	N/A	
<b>D. Commercial Information</b>	N/A	N/A
<b>E. Biometric Information</b>	N/A	<ul style="list-style-type: none"> <li>-Affiliates and other entities in the Truist family</li> <li>- Service Providers that provide various services to us</li> </ul>
<b>F. Internet or Other Similar Network Activity</b>	N/A	<ul style="list-style-type: none"> <li>- Affiliates and other entities in the Truist family</li> <li>- Service Providers that provide various services to us</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>
<b>H. Sensory Data or Recordings</b>	N/A	<ul style="list-style-type: none"> <li>- Affiliates and other entities in the Truist family</li> <li>- Service providers that provide various services to us</li> </ul>
<b>I. Professional or Employment-Related Information</b>	N/A	<ul style="list-style-type: none"> <li>- Affiliates and other entities in the Truist 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>J. Education Information</b>	N/A	<ul style="list-style-type: none"> <li>- Service Providers that provide various services to us</li> </ul>
<b>K. Profile Data</b>	N/A	<ul style="list-style-type: none"> <li>- Service Providers that provide various services to us</li> </ul>

**Sensitive 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</b>
<b>Social Security Number, Driver's License, State Identification Card, or Passport Number</b>	N/A	<ul style="list-style-type: none"> <li>- Affiliates and other entities in the Truist 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>Account log-in, financial account, debit card, or credit card number when provided with any required security or access code, password, or credentials allowing access to an account</b>	N/A	<ul style="list-style-type: none"> <li>- Service Providers that provide various services to us</li> </ul>
<b>Precise geolocation</b>	N/A	N/A
<b>Racial or ethnic origin, religious or philosophical beliefs, or union membership</b>	N/A	<ul style="list-style-type: none"> <li>- Service Providers that provide various services to us</li> </ul>
<b>Contents of an employee's personal mail, email, and text message accounts (where Truist isn't the intended recipient)</b>	N/A	N/A
<b>Genetic data</b>	N/A	N/A
<b>Biometric information for the purpose of unique identification</b>	N/A	<ul style="list-style-type: none"> <li>- Affiliates and other entities in the Truist family</li> <li>- Service Providers that provide various services to us</li> </ul>
<b>Health information</b>	N/A	<ul style="list-style-type: none"> <li>- Affiliates and other entities in the Truist 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>- Government entities and other third parties as needed for legal or similar purposes</li> </ul>
<b>Information concerning sex life or sexual orientation</b>	N/A	N/A

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

CCPA affords certain consumers the right to limit use of sensitive personal information. However, Truist only uses the sensitive personal information of employees, applicants and contractors for business purposes exempted from such right to limit.

## **Retention of Personal Information**

Truist 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**

Truist 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
- Government entities

## **Rights Under the CCPA**

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

You have the right to request that Truist 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 Truist. In many instances, such updates are best made by logging into your online account or employee portals, calling 1-844-4TRUIST, or visiting a branch, and 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. Truist also provides the [Privacy Center](#) and privacy request line as described below.

### **Right to Delete**

You have the right to request deletion of personal information that Truist 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 Request**

Individuals are welcome to submit right to know, correction, or deletion requests by visiting our [Privacy Center](#) or by calling 888-294-2265.

All requests must be verified prior to receiving a response, using Truist 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 individual whose information is being requested. This will require the submission of a valid Power of Attorney, Birth Certificate, approved Truist authorization form, Guardianship Order, or other court order granting authority to receive information, as appropriate.

Upon submission of a request, requestors 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 requestor will receive notice and an explanation for the extension).

### **Opt Out Preference Signals for visitors to careers.truist.com**

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, the Truist careers website will recognize this signal and process your preference automatically as it pertains to tags, cookies and pixels that collect personal information when you visit careers.Truist.com. Please note the signal is processed at the browser-level and is not applied if you visit careers.Truist.com from a different browser or device that does not have the GPC signal enabled.

### **Non-Discrimination**

The submission of any CCPA request will have no impact on your treatment at Truist. It will not result in retaliation against an employee, applicant, or independent contractor.

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

Truist may collect the personal information of children under the age of 16 in connection with your employment relationship (e.g., information about your benefits/dependents). However, Truist does not knowingly sell such personal information or share it for cross-contextual advertising.

### **Privacy Center for Requests and Updating Preferences**

Through the Truist [Privacy Center](#), you can submit requests to see, delete and edit information we've collected and update your sharing and marketing preferences.

### **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 888-294-2265. You can also visit [www.truist.com/privacy](http://www.truist.com/privacy) for additional information.