

# California Privacy Rights Act Disclosure for California Applicants and Employees of The Money Source Inc.

Under the California Privacy Rights Act (CPRA), businesses subject to the California Consumer Privacy Act (CCPA), must provide their workers with both (a) a notice of collection at or before the point of collection of their personal information; and (b) a privacy policy describing the personal information collected in the past 12 months, explaining the worker rights under the CCPA and how to exercise them.

The Money Source Inc. (TMS) is providing the below information to its applicants and employees regarding employment related personal and sensitive personal information collected, used, and retained.

#### **Information We Collect & Business Purpose**

We have collected, and will collect, the following personal information about our California applicants and employees over the past 12 months:

Category	Examples	Do We Collect?	Business Purpose
Identifiers	Legal name, postal address, IP address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers	Applicants: Yes Employees: Yes	Human Resources Operations; Contacting Applicants and Employees; Validating Employment Eligibility; Background Checks; Payroll Processing
Characteristics of protected classifications under California or federal law	Race, color, age, sex, national origin, disability, military status	Applicants: Yes Employees: Yes	Human Resources Operations; Required EEOC Reporting; Diversity Efforts <b>Note:</b> Provision of this information is optional only, with the exception of age
Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	Νο	Not applicable
Biometric Information	Fingerprints	Executive Officers Only	Regulator review and approval

# **Employment Related Personal Information Collected**



Internet Activity	Interactions with our website, and/or advertisements, browsing and search history	Applicants: No Employees: Yes	Detecting security incidents or fraud; Detecting adherence to IT and Acceptable Usage Policies
Geolocation Data	IP address, Geofencing data-location information	Applicants: No Employees: Yes	Detecting security incidents or fraud; Detecting adherence to IT and Acceptable Usage Policies; Electronic Timesheet Usage
Sensory Information	Recorded phone calls	Applicants: No Employees: Yes	Loan servicing; Legal and regulatory recordkeeping obligations; Auditing and quality control
Professional or employment- related Information	Education, employment, employment history	Applicants: Yes Employees: Yes	Human Resources Operations; Contacting References; Validating Employment Eligibility; Background Checks
Inferences drawn from Personal Information	Information about your consumer preferences	No	Not applicable

# **Employment Related Sensitive Personal Information Collected**

Category	Examples	Do We Collect?	Business Purpose
Identifiers	Social security, driver's license, state identification card, or passport number	Applicants: Yes Employees: Yes	Human Resources Operations; Contacting Applicants and Employees; Validating Employment Eligibility; Background Checks; Payroll Processing
Financial Account Access	Consumer account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account	No	Not applicable
Geolocation Data	A consumer's precise geolocation	Applicants: No Employees: Yes	Electronic Timesheet Usage



Protected Classifications	A consumer's racial or ethnic origin, religious or philosophical beliefs, or union membership	Applicants: Yes Employees: Yes	Required EEOC Reporting; Diversity Efforts <b>Note:</b> Provision of this information is optional only.
Personal Communications	The contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication	Applicants: No Employees: No, unless viewed or received on a work computer or other company owned device	Detecting security incidents or fraud; Detecting adherence to IT and Acceptable Usage Policies
Genetic Data	Consumer genetic data	Applicants: No Employees: No	Not applicable
Biometric Information	Fingerprints	Executive Officers Only	Regulator review and approval
Personal Information - Health	Personal information collected and analyzed concerning a consumer's health	Applicants: No Employees: Yes, if related to employer sponsored health insurance	Employer sponsored health insurance coverage and processing
Personal Information – Sex	Personal information collected and analyzed concerning a consumer's sex life or sexual orientation	Applicants: No Employees: No	Not applicable

## **Sources of Information**

We obtain the categories of personal information listed above from the following categories of sources:

Directly from you - the California applicant or employee or your authorized representative(s)

Our websites, HR systems, and recruitment tools

Third Parties involved in the processing of your employment application, background or credit check, or payroll processing

Public records or other publicly available sources

#### **Information Sharing**

We may disclose your personal information to a third party for a business purpose, such as those described in the chart above. Please know that we treat your information with the utmost



care. We do not share information with third parties unless the relationship is governed by a legal contract that protects the confidentiality of the information shared and requires careful treatment and protection of such information in line with applicable laws and regulations and industry best practices. **We do not sell any employment related personal information.** 

#### **Retention**

**Applicants:** Applicant records are retained by TMS for four (4) years following the date of application. If the Applicant is hired by TMS, then the application material becomes part of the personnel record and is subject to the corresponding retention policy.

Employees: Personnel records are retained by TMS for six (6) years after employment ends.

### **Your Rights**

California consumers have the right to request that a business that collects a consumer's personal information disclose to that consumer the categories and specific pieces of personal information the business has collected.

California consumers also have the right to request that a business delete any personal information about the consumer which the business has collected from the consumer, subject to certain exceptions.

To exercise these rights and request that TMS supply or delete specific employment related information, please email us at <u>TMSHR@themoneysource.com</u>