



# New American Funding Workforce Notice About Your Personal Information

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## 1. Overview

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This Notice explains your rights under the California Consumer Privacy Act of 2018 (“CCPA”) (Cal. Civ. Code § 1798.100 *et seq.*) and helps you understand how New American Funding (“NAF”) collects, stores, uses, shares, and secures your personal information in compliance with the CCPA. In this Notice, the terms “NAF,” “company,” “us,” “we,” and “our” refer to NAF and its affiliates and subsidiaries.

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## 2. Who This Notice Applies To

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The CCPA provides rights to individuals who provide services to the company, including current and former employees; owners/directors/officers; or contractors (“Workforce” or “you”).

Additionally, the CCPA protects the personal information you provide NAF on other individuals, like an emergency contact’s personal information and the personal information that is necessary to administer benefits to your dependent(s) and spouse.

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## 3. What We Collect and Why

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As further described in the table below, the company collects information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with our Workforce (“Personal Information”). Personal Information **does not** include publicly available information from government records, deidentified information, or aggregated information.

In addition, Personal Information does not include information that is created based on activities performed on company assets. **You do not have an expectation of privacy or rights under the CCPA** with respect to the following:

- (1) Information created, collected, or maintained on any technology assets owned, leased, or operated in whole, or in part, by the company. NAF’s technology assets consist of all electronic devices, software, and means of electronic communication, including but not limited to, computers and workstations, laptop computers, computer hardware, as well as computer software applications, associated files, and data that grant access to services like the Internet, email, phone, voicemail, and instant messages. All information created, collected, or maintained by the company’s technology assets are company property and provided to you solely for your use in conducting company business.
- (2) The information NAF collects when monitoring premises, equipment, devices, computers, network, applications, software, or similar company assets and resources, for the purpose of protecting its worksites, employees, and computer systems.



The following chart details the purposes for which we collected Personal Information in the last twelve (12) months, and the categories of information we collected for each purpose. We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without first providing you notice.

<b>Personal Information NAF Collected</b>
<b>Recruiting, Hiring, Onboarding, Termination, Or Resignation</b>
<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Characteristics of protected classifications under California or federal law</li> <li>• Professional or employment-related information</li> <li>• Education Information</li> <li>• Inferences drawn from any of the personal information above that is used to create a profile about the workforce member reflecting the workforce member’s preferences, characteristics, psychological trends, predispositions, behaviors, attitudes, intelligence, abilities, and aptitude</li> </ul>
<b>HR Benefits Management</b>
<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Characteristics of protected classifications under California or federal law</li> <li>• Professional or employment-related information</li> <li>• Health Insurance Information</li> </ul>
<b>Wage And Payroll Processing</b>
<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Characteristics of protected classifications under California or federal law</li> <li>• Professional or employment-related information</li> <li>• Health Insurance Information</li> <li>• Financial Information</li> </ul>
<b>Building and Network Security</b>
<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Internet or network activity information</li> <li>• Biometric data</li> <li>• Audio, visual, or similar information</li> </ul>
<b>Evaluating Leave and Accommodation Requests</b>
<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Medical Information</li> </ul>
<b>Government Reporting</b>
<ul style="list-style-type: none"> <li>• Characteristics of protected classifications under California or federal law</li> <li>• Financial Information</li> </ul>



## 4. Where We Get Your Personal Information From

We collect your Personal Information from the following sources:

- **You:** Primarily, we collect Personal Information directly from you. For example, during the application process or when you sign up for direct deposit or benefits.
- **Third parties:** When we collect your Personal Information from third parties, it is because you have provided consent either to us or to the third party. To the extent you use third-party websites, the sites may be governed by separate terms of use and privacy policies, which are not under our control and are not subject to this Notice. Please contact the third parties for questions regarding their privacy practices, as well as to exercise your rights.

## 5. When We Share Your Personal Information

NAF does not and will not sell your Personal Information to third parties. NAF may disclose your Personal Information to businesses and service providers in connection with providing the benefits and services the company offers its employees. For example, NAF may share your Personal Information with applications and services including:

- Human Resources information systems that help us manage employee data;
- Third party administrators that administer employee benefits;
- Insurance brokerage services; and
- Payroll processors.

## 6. What Rights You Have to Request Your Personal Information

Effective January 1, 2021, you will have the right to request additional information about what NAF has collected about you, request a copy of your Personal Information, and request to delete certain Personal Information. NAF will inform you of its policies and procedures related to such rights as soon as they become available. Until then, employees have inspection rights pursuant to the Labor Code.

## 7. How We Retain Your Personal Information

To the extent permitted by applicable law, NAF will retain your Personal Information in accordance with its retention schedule, and only for as long as the company believes it is necessary to fulfill the purposes for which it was collected, including for the purpose of meeting any legal, accounting, or other reporting requirements or obligations, and other legitimate and essential business purposes.

## 8. How You Are Protected Against Discrimination and Retaliation

NAF will not unlawfully discriminate against you for exercising any of your rights under the CCPA. This commitment applies to all persons involved in NAF operations and prohibits unlawful



discrimination by any employee of NAF, including supervisors and coworkers. Employees found to be engaging in unlawful discrimination will be subject to disciplinary action, up to and including termination of employment. If you have questions or concerns about any type of discrimination or retaliation, please bring these issues to the attention of your Human Resources representative.

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## **9. How Other NAF Policies & Disclosures Apply**

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This Notice is in addition to the policies and disclosures found in the NAF Employee Handbook. If you are unsure whether this Notice applies to you, please contact your Human Resources representative.

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## **10. Disclaimer**

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Nothing in this Notice restricts NAF's ability to otherwise:

- Comply with federal, state, or local laws;
- Comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities;
- Cooperate with law enforcement agencies concerning conduct or activity that the business, service provider, or third party reasonably and in good faith believes may violate federal, state, or local law; or
- Exercise or defend legal claims.

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## **11. Changes to this Notice**

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This Notice is reviewed and updated annually to ensure it accurately captures our practices and procedures. The effective date of each version of this Notice is identified below.

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## **12. Resolving Concerns and How to Contact Us**

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If you have questions or concerns regarding this Notice, the handling of your Personal Information, or have information about potential data breaches involving Personal Information please contact [HumanResources@nafinc.com](mailto:HumanResources@nafinc.com) or call (949) 791-3635.

**Effective January 1, 2020**