



California Resident's Job Applicant Privacy Notice and Policy

Effective Date: 3/16/2023

In compliance with the California Consumer Privacy Act, as amended from time to time, ("CCPA"), Tioga-Franklin Savings Bank, (referred to herein as "we" or "us" or "our") is providing this California Resident's Job Applicant Privacy Notice and Policy ("Applicant Privacy Notice"), which describes the Personal Information (as defined below) we may collect from you when you apply for a job position with us. This Applicant Privacy Notice applies only to residents of the state of California.

If you are also our customer for a financial product or service, please also see our California Resident's Customer Privacy Notice and Policy available [Here](#).

What is Personal Information?

For purposes of this Privacy Note, "Personal Information" is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a natural person who resides in California.

What is Not Considered Personal Information?

While Personal Information is broadly defined, other categories are specifically excluded from this definition including:

- Publicly available information or lawfully obtained, truthful information that is a matter of public concern.
 - For the purposes of this notice "publicly available" means:
 - information that is lawfully made available from federal, state, or local government records;
 - information that we have a reasonable basis to believe is lawfully made available to the general public by you or from widely distributed media, or by you; and/or

- information made available by a person to whom you have disclosed the information, so long as you have not restricted the information to a specific audience.
- Personal Information does not include information that is Deidentified or Aggregated as those terms are defined under the CCPA.

Personal Information We Collect and Our Purpose for Collection

While applying for a position with our company, we may collect the following categories and types of Personal Information. We collect this information from you and from a variety of sources, including online job platforms and social networks, government entities, data analytics providers, data brokers, background check providers, recruiting firms, and other service providers.

This information may be used for the following identified purposes during the application process:

Category	Personal Information We Collect	Purpose(s) for Collection
Identifiers and Professional or Employment-Related Information	<p>Identifiers: real name, preferred name or alias, postal address, telephone number, government identification, e-mail address, and signature.</p> <p>Professional or Employment Related Information: membership in professional organizations, professional certifications, licensure information, portfolio, and employment history (including, name of past employers, dates employed, and job title).</p>	<p>We may use this Personal Information to:</p> <ul style="list-style-type: none"> • evaluate an applicant’s qualifications for employment, • conduct conflicts checks, • arrange and manage our sponsored job fairs and recruiting events, • create a talent pool for future job opening, • comply with our recordkeeping obligations and policies, • demonstrate applicants’ agreement to, or acceptance of documents presented to them, or acceptance of

		documents presented to them, and <ul style="list-style-type: none"> • conduct market research, evaluate, and improve our recruiting process.
<p>Protected Classifications under California or Federal Law</p> <p>We collect this category of Personal Information on a purely voluntary basis, except where collection is required by law, and use the information only in compliance with applicable laws and regulations.</p>	Gender, ethnicity, military status, disability	<p>We may use this Personal Information for the following purposes:</p> <ul style="list-style-type: none"> • for research and analytics, • to report on diversity and inclusion, • to participate in studies and research project, and • to comply with legal obligations, including the reporting requirements of the federal Equal Employment Opportunity Act (EEOC) and California’s Fair Employment and Housing Act.
Commercial Information	Products and services related to food, lodging and transportation.	<p>We may use this Personal Information to:</p> <ul style="list-style-type: none"> • to reimburse applicants for expenses related to travel, lodging and other approved expenses.
Sensory or Surveillance Data	Footage from video surveillance cameras in and around our offices, and voicemail recordings	<p>We may use this Personal Information to:</p> <ul style="list-style-type: none"> • protect the safety and security of our facilities and personnel through video surveillance, and • communicate and receive messages with applicants.
Education Information	Education history, such as where and when an applicant attended educational institutions or records, such as transcripts	<p>We may use this Personal Information to:</p>

		<ul style="list-style-type: none"> • evaluate applicants' qualifications for employment.
Profile Data	Inferences drawn from Personal Information to create a profile about in applicant reflecting applicant's intelligence, abilities, aptitudes, or characteristics/behavior	<p>We may use this Personal Information to:</p> <ul style="list-style-type: none"> • evaluate an applicant's qualifications for employment with our company and the specific position applied for.
Internet or other electronic network activity	We collect an applicant's browsing history, interactions with our website, search history, device level data, online or mobile activity data and other information when visiting our websites or downloading any of our mobile apps.	<p>We may use this Personal Information to:</p> <ul style="list-style-type: none"> • protect against fraud, security, and business risks, • advertise, marketing and recommendations, • conduct analytics and research and improving our website, and • carrying out legal and business purposes.
Sensitive Personal Information	Gender and ethnicity	<p>We may use this Personal Information as described above under Protected Classifications.</p> <p>Applicants voluntarily provide their gender and ethnicity.</p> <p>Applicants may limit our use and disclosure of this information by electing not to provide it.</p>

Other Purposes Potentially Applicable to Any Categories of Personal Information Listed Above

We may also use your Personal Information and Sensitive Personal Information to facilitate administrative and other service functions, information technology and security operations, corporate transactions, and for legal reasons. These functions may include:

- to manage or respond to litigation, legal disputes or inquiries involving our company; and to meet legal and regulatory requirements,
- to protect you, the integrity of your information, our company, assets, and any individual or entity we feel, in our discretion, is at risk of being harmed,
- in connection with a corporate transaction, sale, assignment or transfer of assets, merger, divestiture, or other changes of control of our company or any of its subsidiaries or affiliates;
- to manage licenses, permits and authorizations applicable to our business operations;
- to process applications, facilitate onboarding and to track and measure various recruiting metrics; and
- to make you aware of other job openings that might be of interest to you.

Disclosure of Personal Information for a Business Purpose

We disclose Personal Information in a variety of different contexts as described below.

- **Authorized Third Parties.** We will disclose Personal Information to a third party with your consent. We may receive your Personal Information from a third party you authorized to share or disclose your information, like a recruiting agency, career services company, or job site.
- **Service Providers, Vendors or Contractors.** We may disclose Personal Information to service providers or contractors, or they may disclose, store, access, transfer, or otherwise collect your Personal Information on our behalf to identify, track, recruit, compare, and rank your application or job profile. We require service providers or contractors to implement reasonable organizational controls to maintain the privacy and security of Personal Information provided to them.
- **Marketing and Marketing Analytics.** We do not sell or share your Personal Information. We may disclose Personal Information to third parties for marketing purposes, analytics, (ex: Adobe Analytics) and to jointly market products, services, promotions, events, or new career opportunities we believe may interest you.
- **Social Media Pages or Forums.** Our applicant portal allows you to submit an application for a job by first logging-in to a social media account. By doing so you consent to disclosing certain information related to your social media usage with us. Each social media platform has its own privacy policies and disclosures that may also apply to you. Still, we may provide opportunities for you to publicly post reviews, questions, comments, or suggestions, which may include Personal Information, such as your name or username. Anything you disclose in a public forum is public, so think carefully before you decide to disclose any Personal Information.

- Government, Regulatory, and Legal Entities. We may disclose Personal Information with government, regulatory, and legal entities to respond to their inquiries, enforce our terms and conditions, exercise or defend a claim or if we determine disclosure is necessary or appropriate to protect the life, safety, or property of ourselves or others.
- Other Business Purposes. We may disclose Personal Information when performing services on behalf of the business, including maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business.

Your Rights and How to Exercise Your Rights

CCPA requires we create a way for eligible California residents to exercise their rights under CCPA, and to fulfill those consumer privacy rights regarding their Personal Information. These rights include the:

1. right to know your Personal Information;
2. right to delete Personal Information collected from you, the applicant;
3. right to opt-out of the sale or sharing of Personal Information (if applicable);
4. right to non-discriminatory treatment or no retaliation for exercising any rights;
5. right to initiate a private cause of action for data breaches;
6. right to correct inaccurate Personal Information; and
7. right to limit use and disclosure of Sensitive Personal Information.

To exercise your rights please complete the request form [here](#). We must verify your identity before we process any request. We may ask for your name, address, social security number, telephone number and/or additional information you may have submitted as part of your application to verify your identity. If we require additional information to verify your identity, you will receive an email from a member of our privacy team. If we are unable to verify your identity, then we will not be able to fulfill your request.

Additionally, we may not fulfill a request in accordance with applicable exemptions under state and federal laws or regulations where we are not required to do so.

California law permits California residents to use an authorized agent to make privacy rights requests. We require any such authorized agent to provide us with proof of the California resident's written permission (for example, a power of attorney) that shows the authorized agent has the authority to submit a request for the California resident. An authorized agent must follow the process described above to make a request. The authorized agent must also verify his/her own identity. We will confirm the agent's authority with the California resident about whom the request was made.

You may also submit a request by emailing: privacy@tfbmtg.com or calling 833-663-1590.

Information You Provide About Other Individuals

If you provide us with Personal Information of a reference or any other individual as a part of your application, it is your responsibility to inform them of this Applicant Privacy Notice prior to providing the information to us.

We will not contact any third-party individuals listed in your application for a purpose inconsistent with of your application process.

We will not sell, share, or send marketing and advertising communication to third-party individuals you list in your application.

Retention of your Personal Information and Sensitive Personal Information

We retain your Personal Information throughout the application process and thereafter only for as long as required to fulfil the purposes for which it was collected. However, in some circumstances we may retain Personal Information for longer periods of time, for instance when we are required to do so in accordance with legal, regulatory, tax, and accounting requirements.

Change of Control

Notwithstanding any privacy notice or disclosure which list information to the contrary, we may use, disclose, receive, or transfer your Personal Information in connection with a sale, merger, acquisition, dissolution, divestiture, joint venture, bankruptcy, or any similar transaction where the control and responsibility of your information changes to or from us.

Changes to this Notice

We will review and revise this Applicant Privacy Notice on an annual basis or at our discretion. Updates to this Applicant Privacy Notice take effect at the time of posting. Your continued interest in obtaining employment with us after such changes take effect will constitute your consent to such changes.

Contact Us

For Questions about this Applicant Privacy Notice or questions about privacy generally, please contact us by:

Email: privacy@tfbmtg.com

Phone: 888-681-0018

Mailing Address: Tioga-Franklin Savings Bank – Mortgage Division

Attn: Privacy Compliance Officer

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