



NOTICE TO APPLICANTS/EMPLOYEES

Effective: April 3rd 2023

Last Updated: March 28th 2023

This notice is provided pursuant to the CCPA and explains how Poppy Bank collects, uses, and discloses Personal Information (PI) of California residents that are employees or are applying to a job position at Poppy Bank.

For more information on Poppy Bank's policies please refer to Poppy Bank's employee handbook.

Collection and Disclosure of Personal Information

In the past 12 months Poppy Bank has collected and disclosed the following categories of Personal Information:

- Name
- Address
- Date of birth
- Telephone number
- Email address
- Signature
- Corporate unique identifiers (e.g., employee ID)
- Commercial information, such as transaction information and purchase history (e.g., in connection with travel or other reimbursements [or purchases from Poppy Bank])
- Professional or employment-related information, such as work history and prior employer
- Non-public education information shared by the applicant or employee
- Information about your education and employment history
- Internet or network activity information, such as browsing history and interactions with our online systems and websites and any Personal Information that you provide while accessing Poppy Bank's technology systems
- Audio, electronic, visual, and similar information

In the past 12 months Poppy Bank has also collected and disclosed the following categories of Sensitive Personal Information:

- Social Security Number

- Passport number
- Federal identification authorizing work in the United States
- Insurance Policy Number
- Geolocation data, such as device location from usage of the Poppy Bank devices
- Corporate access/password information
- Biometric information related to access to Poppy Bank's secured access points.
- Bank account number and other financial information
- Information regarding your healthcare insurance including medical information
- Characteristics of protected classifications under California or federal law, such as age, marital status, gender, sex, race, color, disability, citizenship, primary language, immigration status, military/veteran status, disability, request for leave, and medical conditions
- Internet or network activity information, such as browsing history and interactions with our online systems and websites and any Sensitive Personal Information that you provide while accessing Poppy Bank's technology systems including, if applicable, personal credit card information and passwords.

Poppy Bank collects Personal Information and Sensitive Personal information from a variety of sources including Personal and Sensitive Personal information collected directly from you; from prior employers, references or recruiters; third-party sources of demographic information; and third-party companies, such as background check companies and drug testing facilities.

Poppy Bank collects Personal Information and Sensitive Personal Information for a range of purposes including the following:

- To operate, manage, and maintain our business
- For hiring, retention, and employment purposes
- To otherwise accomplish our business purposes and objectives, including, for example:
 - Emergency services
 - Maintaining our facilities and infrastructure
 - Quality and safety assurance measures
 - Conducting risk and security controls and monitoring
 - Protecting confidential and trade secret information
 - Detecting and preventing fraud
 - Performing identity verification
 - Performing accounting, audit, and other internal functions, such as internal investigations
 - Complying with the law, legal process, and internal policies
 - Maintaining records
 - Claims processing
 - Responding to legal requests for information and subpoenas
 - Exercising and defending legal claims
- Any other purposes authorized by the California Privacy Protection Agency, the state of California, or Federal law.

Poppy Bank shares Personal Information or Sensitive Personal Information collected with our service providers and vendors who provide services to support our business activities.

Poppy Bank has not sold Personal Information or Sensitive Personal Information collected in the preceding 12 months to any third party.

Retention of Personal Information

Poppy Bank takes into account the following criteria when defining the duration for which your Personal Information and Sensitive Personal Information will be retained:

- We will retain your Personal Information and Sensitive Personal Information for as long as you are an employee of Poppy Bank or for as long as you participate in the recruiting process of Poppy Bank as an applicant. After termination, former employee Personal Information and Sensitive Personal Information will be stored during a predefined period for the reasons explained below.
- We will retain your Personal Information and Sensitive Personal Information for as long as it is required by any applicable law or regulation.
- Additionally, we might retain your Personal Information and Sensitive Personal Information in connection to any relevant legal claim for the periods necessary to sustain those claims and in relation to any potential regulatory audits or investigations or any other relevant legal matter.

Non discrimination

Poppy Bank shall not discriminate against an employee or applicant because the employee or applicant exercised any of the rights under CCPA described above.

Your Rights as a California Resident

If you are a California resident you have the rights described below, with respect to the Personal Information and Sensitive Personal Information we have collected or disclosed about you as an employee or an applicant to a job position at Poppy Bank.

- Right to Know and Right to Request Information

You have the right to request that we disclose what personal information we collect, use, disclose or sell. You have the right to request information about the personal information we've collected about you within the last twelve months. You may request to know if we have collected, sold or shared with third parties for a business purpose the following information:

- The categories of personal information we have collected about you.
- The categories of sources of personal information we collected about you.

- Our business or commercial purpose for collecting or selling personal information about you.
- The categories of third parties with whom we share personal information.
- The specific pieces of personal information we have collected about.
- Whether we have sold your personal information and if so the categories of personal information that each category of recipient purchased.
- Whether we have disclosed your personal information for a business purpose and if so, the categories of personal information that each category of recipient received.

You may request this information no more than two times per year.

- Right to Request Correction

You have the right to request that we correct inaccurate Personal Information that we maintain about you.

- Right to Request Deletion

You have the right to request that we delete your personal information. Under certain circumstances we may be unable to delete your personal information, for example, to comply with legal obligations, or to fulfill our obligations as an employer.

Alternatively, you can exercise your rights by emailing privacy@poppy.bank or writing us at

Poppy Bank
438 First Street
Attention: Compliance Department
Santa Rosa, CA 95401

Please identify which privacy right(s) you would like to exercise, include your name, address and a detailed description of your current or previous relationship with Poppy Bank.

You have the right to have someone you authorize make a request on your behalf. If this is the case, we might request proof of authorization.

Poppy Bank will process requests within 30 days.

Changes to this CCPA Privacy Policy

Changes to this policy may be made at any time. When changes are made, the revised Policy will be communicated to all employees and will include a new “Effective” date.

If you have questions regarding your rights under the CCPA, please email us at privacy@poppy.bank or writing us at:

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