

Longbridge Financial, LLC
Privacy Notice
(California Residents)

Effective Date: January 1, 2020.

This Privacy Notice (the “Notice”) applies to the collection, use and processing of personal information by Longbridge Financial, LLC (“Longbridge Financial” or “Company”) of job applicants, employees, owners, directors, officers, and contractors who are residents of California (“you” or “Employees”). This Notice describes our practices regarding the categories of personal information we collect, our use of such information, and your obligations with respect to that information. We may update this Notice from time to time in the event of changes in these personal information practices. We will post this Notice, along with any updates, in the Employee Handbook and will notify you of any significant changes.

Types of Personal Information We Collect

Company may collect the following categories of personal information about you:

(A) Identifiers such as a real name, alias, postal address, unique identification numbers (including employee ID), online identifier, internet protocol address, email address, account name, social security number, driver’s license or state identification card number, passport number, and other similar identifiers.

(B) Personal information described in Cal. Civ. Code Section 1798.80(e) (the California Customer Records statute), which includes any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, the identifiers listed in (A) above, as well as an individual’s physical characteristics or description, telephone number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.

(C) Characteristics of protected classifications under California or federal law, such as race, color, sex, sexual orientation, age (40 and older), national origin, religion, marital status, medical conditions, disability status, genetic information, military or veteran status, political affiliation and citizenship status.

(D) Commercial information, including records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

(E) Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interactions with internet websites, applications, or advertisements.

(F) Geolocation data.

(G) Audio, electronic, visual, or similar information, such as photographs and information captured on security systems, including CCTV.

(H) Professional or employment-related information. This may include:

- Details necessary to perform human resource functions including, but not limited to: name, address, date of birth, employee medical information, social security numbers, employee driver's license numbers and details (including motor vehicle records), state identification card numbers and bank account information for auto-depositing of paychecks, nationality, photo, employee ID number and immigration status;
- Details applicable to your employment with Company, such as date of hire, title/position, work-related contact details, work history, technical skills and training courses attended, salary, bonuses and incentives;
- Application-related information, such as your curriculum vitae (CV), cover letter, employment history, education history, qualifications and skills, references, desired salary, interview notes and background screening information;
- Information from other employees relating to job performance, and other personal information relevant for the purposes of employee disciplinary matters;
- Sick pay, records of work absences, vacation entitlement and requests, performance appraisals, disciplinary and grievance procedures;
- Investment accounts, insurance and other related benefits information (which may include information about your spouse, children and other eligible dependents and beneficiaries);
- Date of resignation or termination, reason for resignation or termination, other information relating to termination of employment;
- Information about your use of our systems, for example, your use of our IT systems and electronic devices used by, or allocated to, you;
- Any information needed to comply with local legislation, court requests or law enforcement authorities.

(I) Education information, 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. Sec. 1232g; 34 C.F.R. Part 99), such as institutions attended and performance.

(J) Inferences drawn from any of the information identified in this subdivision to create a profile about a person reflecting the person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

How we Use Your Personal Information

We may use your information to fulfill the usual human resources functions and obligations, such as:

- personnel administration;
- compensation, payroll, tax, insurance, pension and benefit planning and administration;
- termination and recruitment;
- management of health and safety concerns;

- to manage disciplinary actions and terminations;
- talent and performance management, and advancement and succession planning;
- conducting employee surveys and other similar HR initiatives;
- to administer programs and/or benefits offered to employees.

We also use personal information to facilitate administrative functions and information technology operations, such as:

- management and operation of Information Technology and communications systems, and business continuity, disaster recovery, data archive and back-up;
- monitoring and protecting the security and use of our networks, communications and systems, offices and facilities, reports, property and infrastructure;
- protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- maintenance of records relating to business activities;
- budgeting and financial management and reporting;
- obtaining and maintaining licenses, permits and authorizations applicable to Company's business operations.

We use personal information to comply with legal requirements, and to exercise our legal rights, including:

- to respond to requests in connection with litigation and from law enforcement and government authorities pursuant to valid legal process.
- dispute and complaint resolution, internal investigations and reviews, auditing, compliance, and risk management;
- compliance with record-keeping and reporting obligations;
- establishing, exercising or defending against legal claims.

To the extent we anticipate using your information for purposes other than those set forth above, we will communicate that to you as required by law.

How we Share your Personal Information

Your personal information may be disclosed to the following categories of recipients:

- our agents and service providers (e.g., Company's affiliates and third parties providing services, including IT maintenance and support, and personal data storage).
- courts, litigants and advisors;
- law enforcement or government authorities pursuant to valid legal process;
- In the event that a Company business is sold or integrated with another business, your details may be disclosed to our advisers and any prospective purchaser's advisers and may be passed to the new owners of the business.

You may contact the Human Resources department at 201-252-8826 with any questions regarding this Notice, or to update your information.