

## HR Privacy Notice

**California law requires that we provide you this notice about the collection and use of your personal information. We encourage you to read it carefully.**

This Privacy Notice describes the practices of Celebrity Home Loans, LLC and its subsidiaries and affiliates (collectively “Celebrity Home Loans”, “we,” “us” or “our”) regarding Celebrity Home Loans’ human resources (HR) privacy practices. This privacy policy (the “Policy”) explains the collection, use, and sharing of information from or about you, including personal information for human resources, employment, benefit administration, health and safety, business-related purposes, and to be in legal compliance.

For the purposes of this Notice, “personal information” has the meaning given in the California Consumer Privacy Act of 2018 (the “CCPA”) but excludes information exempted from the CCPA’s scope.

This Notice does not create or form part of any employment contract.

### **The data we collect about you:**

Personal data, or personal information, means any information that relates to an identifiable individual. It does not include data where all means of determining the individual’s identity has been removed (anonymous data).

We may collect, use, store and transfer the following categories of personal data about you, where permitted by local laws:

Category of Data	Examples
Contact and Identifying Information	<ul style="list-style-type: none"><li>• Personal contact information:<ul style="list-style-type: none"><li>○ Name</li><li>○ Address</li><li>○ Personal telephone number(s)</li><li>○ Personal email addresses</li></ul></li><li>• Date of birth</li><li>• Gender</li><li>• National identifiers, such as SSN, passport and visa information, and immigration status and documentation</li><li>• Driving license or other photo identification and photocopy</li><li>• Passport details and photocopy</li><li>• Details of family members, such as:<ul style="list-style-type: none"><li>○ Next of kin and emergency contact information</li><li>○ Marital status</li><li>○ Dependents and beneficiaries</li></ul></li><li>• Photographs</li></ul>
Demographic Data	<ul style="list-style-type: none"><li>• Race</li><li>• Ethnic origin</li></ul>

	<ul style="list-style-type: none"> <li>• Marital status</li> <li>• Disability</li> <li>• Veteran or military status</li> </ul>
Employment Data	<ul style="list-style-type: none"> <li>• Job titles</li> <li>• Compensation</li> <li>• Hire date/End date</li> <li>• Location of employment</li> <li>• Performance and disciplinary records</li> <li>• Grievance information</li> <li>• Vacation and sick leave records</li> <li>• Training and education programs and records</li> <li>• Professional memberships</li> <li>• Details of work travel</li> </ul>
Candidates and New Hire Data	<ul style="list-style-type: none"> <li>• Professional qualifications</li> <li>• Education and work history</li> <li>• Copies of right to work documentation</li> <li>• References</li> <li>• Interview notes</li> <li>• Pre-employment checks such as criminal records, academic and professional qualifications, media searches, sanction list searches, and credit history, if applicable.</li> <li>• Other information included in a resume/CV or cover letter or as part of the application process</li> </ul>
Financial Data	<ul style="list-style-type: none"> <li>• Bank account details</li> <li>• Payroll information</li> <li>• Tax information</li> <li>• Withholdings</li> <li>• Expenses, including expenses incurred on a company credit card and expenses submitted for reimbursement</li> </ul>
Sensitive Personal Data	<p>In limited circumstances we may need to process personal data that may be deemed to be sensitive under local law. Where that is the case, we will only process this type of data where local law allows.</p> <ul style="list-style-type: none"> <li>• Special categories of personal data that we may collect and use include: <ul style="list-style-type: none"> <li>○ Racial and ethnic origin</li> <li>○ Political opinions or affiliations</li> <li>○ Trade membership</li> <li>○ Any biometric data (where used to confirm your identity) i.e. facial recognition, fingerprints, iris or retina scans, keystrokes, or other physical patterns</li> <li>○ Physical and mental health data</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ Information related to criminal offenses, convictions, and any related legal actions</li> </ul>
Technical Data	<ul style="list-style-type: none"> <li>● Details about your own technology you use to access our systems, collected through log files, endpoint security and monitoring software, and similar means: <ul style="list-style-type: none"> <li>○ Device information, such as unique device identifier, browser, and operating system type and version</li> <li>○ IP address</li> <li>○ Login data</li> <li>○ Device location (where you give permission for this)</li> </ul> </li> </ul>
Geolocation data	<ul style="list-style-type: none"> <li>● Time and physical location related to use of: <ul style="list-style-type: none"> <li>○ An internet website</li> <li>○ Application</li> <li>○ Device</li> <li>○ Physical access to a company office location</li> </ul> </li> </ul>
Sensory or Surveillance Information	<ul style="list-style-type: none"> <li>● COVID-19 related temperature checks</li> <li>● Call Monitoring</li> <li>● Video Surveillance</li> </ul>
Other information provided by you	<p>You may provide us with a variety of other information in the context of an employment or similar relationship with us, including responses to surveys where inferences are drawn from any of the above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes</p>

We may also collect, create, use, and share data on an aggregated basis such as statistical or demographic data.

**How is your personal data collected?**

We collect personal information about individuals in the following ways:

- information provided by you
- information obtained from third parties (where permitted under local laws), such as:
  - former employers
  - employment agencies
  - personal references
  - credit reference agencies
  - other background check agencies
  - international sanctions list from governments and monitoring agencies
  - insurance agencies
  - social security funds

- third party service providers (such as payroll providers, medical providers, leasing companies, telecom operators, other)
- public records sources ☒ information provided by recruiters or individuals who refer an individual for a job
- information provided from your managers and peers
- information provided to us by public authorities, courts or tribunals
- information provided to us by our personnel regarding dependents and beneficiaries
- data created or observed by us in the course of job-related activities during your employment/engagement with us.

If you fail to provide certain information when requested, we may not be able to hire you, perform all our legal or contractual obligations or carry out all activities regarding your employment or engagement such as verification of eligibility for employment, payroll, benefits, tax and insurance, and to ensure health and safety. It is important that the personal information that we hold about you is accurate and up-to-date. You should keep us informed if your personal information changes and wherever possible update your records on the self-service systems available to you.

## **How we use your personal data?**

We may use your personal data for the following purposes:

### **Human resources management**

We use personal data for purposes of human resources management, including recruitment, establishment, maintenance and termination of employment relationship, career development, training, education, talent management, performance management, appraisals and disciplinary and grievance management, management forecasts and planning changes in our group structure, and providing information and references to potential or actual future employers.

### **Conducting employment-related checks**

We use personal data to conduct employment-related checks, such as background checks, credit checks, anti-fraud checks, checks to prevent fraud and money laundering, and drug tests, in all cases to the extent permitted under applicable local law.

### **Staff administration and operational purposes**

We use personal data for staff administration and operational purposes, such as managing absences, pay, benefits, compensation, stock administration, business travel, maintaining employee directories, and administering corporate expenses and reimbursements (including reviewing details of transactions made using corporate credit cards, corporate travel, and expenses submitted for reimbursement).

### **IT administration and security**

We use personal data to administer and provide security for our IT assets, for instance controlling and enabling access to our systems and resources, managing authorization controls and user access, ensuring the security of our systems and resources, maintaining internal networks and IT systems, providing IT support, IT security monitoring, and incident response.

### **Physical security management**

We use personal data to administer and manage physical security, including controlling and enabling access to our premises and physical assets.

### **Maintaining business records**

We use personal data in connection with maintaining business records, including by storing staff communications, records, and work product, including as necessary or appropriate to operate Celebrity Home Loans' business.

### **Monitoring**

We use personal data in connection with our monitoring activities, such as where we monitor for compliance with Celebrity Home Loans' policies provided to you and to take action against staff who breach these policies, including through monitoring of IT and telephony usage and communications, checking which apps and files you use and which websites you visit and checking email addresses to which emails are sent and the content of the email (as permitted by local law), as well as how long you spend on different tasks online and monitoring of the physical premises solely to the extent permitted by applicable law, for purposes including to ensure that Celebrity Home Loans' systems and premises are used primarily for business purposes, have sufficient capacity for the needs of the business and are protected against cybersecurity threats such as malware and to see if staff are working in an efficient manner and to facilitate performance improvement.

### **Automated Decisions**

We will collect personal data (whether provided by you or collected by us from third parties) prior to your employment or engagement with us and as part of our continuing checks throughout your employment or engagement. We only do this where it is required by contract or law for the purposes of sanctions screening, anti-money laundering checks, background checks and assessment of your skill set for certain positions. No automated decision is made about your employment or engagement with us, as each decision is made with human involvement. For example, you will be automatically screened against international sanctions lists, and if you are identified as a listed in one of these lists, one of our representatives will check the accuracy of the automatic search and make the decision manually as to whether your application is able to proceed. Checking methods are regularly tested to make sure that they remain fair, effective, and unbiased.

### **Emergency management**

We use personal data in managing and responding to emergencies, including by contacting emergency contacts, family members, dependents, or other individuals in the event of an emergency.

### **Complying with our legal obligations or where necessary for exercising, establishing, or defending legal claims**

We use personal data to comply with our legal obligations and to exercise, establish, or defend legal claims. This may include the disclosure of your personal data to third parties in connection with proceedings or investigations anywhere in the world, such as public authorities, law enforcement agencies, regulators, and third-party litigants.

### **When changing our business structure**

We may use personal data when changing our business structure, such as in the event of a business sale or corporate restructuring, where we may disclose your personal data to any potential acquirer of, or

investor in, any part of our business (and to their legal advisors and consultants) for the purpose of that acquisition or investment. If required by applicable laws, we will obtain your express consent prior to disclosing your personal data to any such third party.

### **Carrying out obligations under client contracts**

We may use personal data to comply with our contractual obligations with our customers. This may involve co-listening, recording of telecommunications between contact center agents and clients' customers, providing recordings to clients and/or client's customers.

### **Surveys and marketing activities**

We may use personal data in connection with carrying out employee surveys, developing and carrying out marketing activities for products and services of the company (including introducing client referral programs), subject to our obtaining your consent where we are required to do so by applicable laws.

### **Who we share your personal data with?**

We may share your personal data with any of the following for purposes consistent with this Privacy Notice, to the extent permitted by law:

- Any third party where we are required by law to do so (such as tax authorities and similar government authorities);
- Background check agencies that provide credit reference checks, criminal history checks, identification and information verification
- Fraud protection and risk management agencies.
- Third party vendors engaged to host, manage, maintain, and develop our IT systems.
- Our professional advisers, including lawyers and auditors.
- Any third party that you have given us permission to use including healthcare providers.
- Vendors we use to supply services in connection with any and all recruiting activities, and the management or administration of staff, payroll, benefits, or otherwise in connection with our engagement with you.
- Potential clients for marketing purposes with respect to recorded telecommunications.
- Potential buyers, transferees or merger partner or seller and their advisers in connection with an actual or potential transfer or merger of part or all of Celebrity Home Loans' business or assets, or any associated rights or interests, or to acquire a business or enter a merger with it (subject to our obtaining your consent where we are required to do so by applicable laws).

### **Other information about this Notice**

#### *Third parties*

This Notice does not address, and we are not responsible for, the practices of any third parties, which have their own rules for how they collect and use your personal information. Our links to third party websites or services are not endorsements.

### **Your obligations**

It is your responsibility to ensure that information you submit does not violate any third party's rights.

You should keep your personal information on file with the Company up to date and inform us of any significant changes to it.

## Your Rights and Choices

The CCPA provides you, as a California resident, with specific rights regarding your personal information, as described below.

### Accessing, correcting, or deleting your information

In some jurisdictions, applicable law may provide certain rights to individuals regarding their personal data, such as:

- **Access.** You may ask us if we are processing your personal data and, if so, for a copy of the personal data we hold about you over the past 12 months.
- **Correction.** If any personal data we hold about you is incomplete or inaccurate, you can request that we correct it, though we may need to verify the accuracy of the new data you provide to us.
- **Deletion.** You may ask us to delete or remove personal data where permitted and feasible.
- **Restriction.** You may ask us to suspend our use of your personal data in certain scenarios provided by law.

To inquire about accessing, correcting, or deleting your information, please contact us at [AskHR@celebrityhomeloans.com](mailto:AskHR@celebrityhomeloans.com) or as otherwise specified below. We may not be required to honor your request in all circumstances, and we will provide you with an explanation if we do not grant your request.

## Complaints

If you have a complaint about our handling of your personal data, you may contact our data protection officer at [security-group@celebrityhomeloans.com](mailto:security-group@celebrityhomeloans.com) or as otherwise specified below. We request that a complaint be made in writing. Please provide details about your concern or complaint so that our data protection officer can investigate it. We will take appropriate action in response to your complaint, which may include conducting internal discussions with relevant business representatives. We may contact you for additional details or clarification about your concern or complaint. We will contact you to inform you of our response to your complaint. You also may have a right to file a complaint with a national or local regulatory agency.

## Security measures

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

## Changes to this Privacy Notice

Celebrity Home Loans may update or make changes to our Privacy Policy at any time. When we make changes to this Privacy Policy, we will post the changes to our career website and employee intranet.

Your continued use of our career website and employee intranet following the posting of any changes constitutes your acceptance of such changes.

## **Contact Us**

If you have any questions about this privacy policy, please send a letter to:

Celebrity Home Loans, LLC  
Attn: Human Resources  
One Mid America Plaza, Suite 800  
Oakbrook Terrace, IL 60181

You can also reach us at 855.667.9442 or send an e-mail inquiry to [AskHR@celebrityhomeloans.com](mailto:AskHR@celebrityhomeloans.com).