

# CCPA COLLEAGUE PRIVACY NOTICE

Effective July 23, 2024

**CITY NATIONAL BANK**

 AN RBC COMPANY



The California Consumer Privacy Act of 2018 (“CCPA”), as amended by the California Privacy Rights Act (“CPRA”), affords Consumers residing in California certain rights with respect to their Personal Information. We provide you this notice because under the CCPA, California Residents who are employees, employee applicants, or contractors qualify as Consumers. For purposes of this CCPA Colleague Privacy Notice, when we refer to Consumers, we mean you to the extent you are a California employee, employee applicant, or contractor. Where we refer to “employment” or “engagement” in this Notice, we do so for convenience only, and this should in no way be interpreted as purporting to confer employment status on non-employees to whom this Policy also applies. This Notice does not form part of any contract of employment or engagement, does not confer any employment status or contractual right on any Personnel or place any contractual obligation on us.

## **Applicability of Other Policies/Notices**

This Notice does not cover our processing of personal information collected from you as a City National Bank customer or a visitor of our websites. To learn more about City National Bank’s data collection practices in these cases, please visit the City National Bank Privacy Policy at <https://www.cnb.com/privacy-security/california-consumer-privacy-notice.html>.

In some cases, you may provide personal information to third parties with whom we work. This could be, for example, when you opt-in at your own discretion to services or benefits programs provided by third parties to our Colleagues. By participating in such services or benefits programs, you understand that your personal information is governed by separate privacy policies which are not under our control. Please contact such third parties for questions regarding their privacy practices.

## Categories of Personal Information that City National Bank Has Collected in the Last 12 Months

We may collect Personal Information from CA Consumers in a variety of different situations, including, but not limited to on any of our websites, your mobile device, through email, in physical locations, through the mail, over the telephone, and/or in any other situation where we interact with you. More specifically, City National Bank collects the following categories of Personal Information from you as a CA Consumer, which will depend on the particular business purpose for which we collect it:

Category	Examples
Identifiers	Real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.
Personal information as defined in the California Customer Records Act, Cal. Civ. Code §1798.80	First and last name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, education, employment, employment history, financial information, or medical information.
Protected classifications under California or federal law	Age (40 years or older), date of birth, race, color, ancestry, national origin, citizenship, religion or creed, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, or sexual orientation), veteran or military status.
Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
Internet or similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
Geolocation data	Physical location or movements including accessing company facilities and workstations via ID badges and other devices
Audio, electronic, visual or similar information	Call and video recordings
Professional or employment-related information	Current or past job history or performance evaluations
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades and transcripts.
Inferences drawn from other Personal Information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

**Monitoring:** We reserve the right to monitor the use of, and access to our premises, equipment, devices, computers, mobile devices, network, applications, software, and similar assets and resources. In the event such monitoring occurs, it may result in the collection of personal information about you. Some City National Bank's facilities are equipped with surveillance equipment such as cameras and CCTV which may capture your image or information about your movements, and which may be used to protect the safety of City National Bank's staff, visitors and property. This is not meant to suggest that all Personnel will in fact be monitored, but to alert you that when using City National Bank equipment and resources, you should not have any expectations of privacy with respect to your use of such equipment or resources. We will ensure that any personal information generated by this monitoring is treated in accordance with this Notice.

**Sensitive Information:** There are “special” or “sensitive” categories of personal information which require a higher level of protection. Please note that we may collect, store and use, where permitted, such “special” or “sensitive” categories of personal information, which may include, subject to applicable law: health and medical related data e.g., number of sick days, workplace accidents, disabilities (if voluntarily disclosed), symptoms of, or risk of exposure to, certain illnesses (e.g., contact with others who may be sick or relevant travel history), and pregnancy related information; religious or philosophical beliefs; racial or ethnic origin; biometric data for the purpose of uniquely identifying an individual; data concerning a person’s sex life or sexual orientation; social security, driver’s license, state identification card, or passport number; precise geolocation; and data relating to criminal convictions and offenses. We collect this information for specific purposes, such as health/medical information in order to accommodate a disability or illness and to provide benefits, and diversity-related personal information (such as gender, race or ethnicity) in order to comply with legal obligations and internal policies relating to diversity and anti-discrimination.

The provision of personal information as described in this Notice is partly a statutory requirement, partly a contractual requirement under your employment contract, and partly a requirement to carry out the employment or contractor relationship with you. In general, you are required to provide the personal information, except in limited instances when we indicate that the provision of certain information is voluntary (e.g., in connection with satisfaction surveys, or equal opportunities and diversity monitoring and initiatives). Not providing the personal information may prevent City National Bank from carrying out the employment or contractor relationship with you and, in certain exceptional cases, may require City National Bank to terminate your employment where permitted by applicable law.

If you provide City National Bank with personal information about your spouse, domestic civil/partner, and/or dependents (e.g., for emergency contact, security screening, or benefits related purposes) (“Dependents”), please make sure to inform them accordingly, about - inter alia - their rights with respect to our processing of their personal information (as included in this document) and that you may disclose their personal information to City National Bank for these employment purposes. You should also obtain the consent of these individuals (unless you can provide such consent on their behalf, e.g., children) if such consent is required by law for the collection, use, storage, transfer, and processing of their personal information.

CNB does not share Sensitive Personal Information for purposes of cross-context behavioral advertising.

### **How Does City National Collect These Categories of Personal Information?**

City National collects the Personal Information above from the following categories of sources:

- Directly from CA colleagues/applicants
- Service providers
- Publicly available sources and registries
- City National affiliates
- Business partners
- Third parties authorized to share information with us
- Government entities

## Why Does City National Collect These Categories of Personal Information?

City National uses the Personal Information above for the following business purposes:

- **Recruitment**, such as evaluating your application for employment, conducting interviews, conducting background checks for security purposes (when we have your consent or as permitted by applicable law), and deciding terms of an employment offer;
- **Personnel management**, such as monitoring assignments, evaluating performance, training Colleagues, tracking presence in company facilities, communicating with you and responding to your requests, inquiries, and comments, scheduling your working hours or engaging with you about job-related information;
- **Operational purposes**, such as distributing payroll and company benefits, updating personnel files, conducting audits, and processing work-related claims, providing IT support and other troubleshooting;
- **Benefits administration purposes**, such as administering and maintaining group health insurance benefits and additional wellness programs, retirement plans, life insurance, disability insurance, leave programs, and other City National Bank-offered benefit programs;
- **Marketing activities**, including marketing photos, billboards, website content, videos, social media posts, research and development of new products and services, and other related marketing activities, for which we will only use your personal information in creating this content with your consent;
- **Statistical and analytical purposes** to understand and improve worker satisfaction and performance to gauge efficiency of company resources;
- **Administration of our applications, software and systems**, including ensuring the security of our workforce, guests, property and assets;
- **Legal and compliance purposes**, such as implementing internal policies and ensuring adherence to same, detecting and responding to suspected fraud, security incidents, or other activity which is illegal or violates City National Bank's policies, protecting City National Bank's and others' rights and property, exercising a legal claim, cooperating with law enforcement investigations and complying with applicable laws, regulations, legal processes, or governmental requests;
- **Professional licensing and continuing education requirements**, such as providing evidence of workplace activities to licensing bodies to demonstrate compliance with professional license requirements.
- **As necessary in order to protect the vital interests of Colleagues or of another natural person**, such as during an emergency where the health or security of Colleagues are in danger, or to prevent imminent physical harm or financial loss, or to comply with our legal obligations;
- **As necessary to comply with corporate financial responsibilities**, including audit requirements (both internal and external), accounting, and cost/budgeting analysis and control;
- **As necessary and appropriate to provide reasonable workplace accommodations, leaves of absence, and pay related benefits**, including requests for time off;
- **As necessary for the performance of a contract** or in order to take steps at the request of our Personnel prior to entering into a contract, such as to arrange for payments; and
- **To enable solely internal uses** in a lawful manner that are reasonably aligned with expectations of Colleagues based on our work relationship and that are compatible with the context in which the information was provided to City National Bank. This information can be used to terminate your employment with City National Bank.
- City National may also use the Personal Information referenced above for any one of the specific "business purposes" described in the CCPA.

## **With Whom Does City National Disclose Personal Information?**

City National may share the Personal Information above with the following parties:

- Affiliates and subsidiaries
- Our parent company – Royal Bank of Canada (“RBC”)
- Service providers
- Third parties with whom you authorize or direct us to share your information
- Government entities and others with whom we share information for legal or necessary purposes

## **How Does City National Safeguard Personal Information?**

City National maintains physical, electronic and procedural safeguards to protect against unauthorized access to Personal Information. In addition, City National limits access to Personal Information to those with a need to know. All employees with access to Personal Information complete annual Privacy & Security training.

## **How Long Does City National Retain Personal Information?**

City National will not retain Personal Information longer than necessary to accomplish the business purpose for which the Personal Information was collected and processed or as required by the terms of a client contract or applicable law.

## **The CCPA provides California consumers with certain additional rights regarding their Personal Information.**

Subject to certain limitations, you have the right to (1) request to know more about the categories and specific pieces of Personal Information we collect, use, disclose, and sell, and to access your information, (2) request deletion of your Personal Information, (3) request correction of your Personal Information and (4) not be discriminated against for exercising these rights, (5) limit processing of Sensitive Personal Information.

### **Right to Know**

You have the right to know what Personal Information CNB has collected about the you, including the categories of Personal Information, the categories of sources from which the Personal Information is collected, the business or commercial purpose for collecting, selling, or sharing Personal Information, the categories of third parties to whom CNB discloses Personal Information, and the specific pieces of Personal Information CNB has collected about you.

We will disclose the applicable information upon receipt of your verifiable consumer request (see “Submitting a Verifiable Consumer Request” section below).

### **Right to Deletion**

You have the right to request that we delete any of your Personal Information subject to the various exceptions provided in the CCPA (see “Submitting a Verifiable Consumer Request” section below).

We may deny your deletion request under certain circumstances and will inform you of the basis for the denial.

### **Right to Correction**

You have the right to request that we correct information that is inaccurate. (See “Submitting a Verifiable Consumer Request” section below).

### **Right to Opt-Out**

Our use of tracking technologies may be considered a “sale” under California law. You can opt-out of being tracked by these third parties by clicking the “Do Not Sell or Share My Personal Information” link at the bottom of our webpage.

## Right to Nondiscrimination

We will not discriminate against you because you elect to exercise any of your rights under the CCPA including, but not limited to:

- Denying goods or services to you
- Charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties on you
- Providing a different level or quality of goods or services to you
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services

## Submitting a Verifiable Consumer Request

In order to protect your information, we can only honor requests to know, correct or delete upon receipt of a verifiable consumer request.

You may submit a verifiable consumer request by completing the Colleague Request Web Form at <https://www.cnb.com/colleaguerequest> or calling (800) 773-7100 from Monday through Friday between 8:00 a.m. and 4:30 p.m. Pacific Time. Individuals who are authorized to submit a request on behalf of another individual may also do so through the Privacy Web Form.

Upon receiving your request, we will respond via email with a request for certain information required to verify your identity. You are responsible to respond to the request from us for additional information to enable us to verify your identity within 10 business days or your request will be rejected.

## Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to an additional 45 days), we will inform you of the reason and extension period in writing.

We will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

For any questions related to City National Bank's privacy policies and information practices, you may contact the Privacy Office at [CompliancePrivacy@cnb.com](mailto:CompliancePrivacy@cnb.com). For any questions related to City National Bank's HR policies or practices, you may contact Human Resources at [CNBHRCompliance@cnb.com](mailto:CNBHRCompliance@cnb.com).

## Changes to Our CCPA Colleague Privacy Notice

We may change this privacy notice from time to time. If we make changes to this privacy notice, we will notify you by revising the Effective Date at the top of this policy. **We encourage you to review this statement regularly to stay informed about our information practices and the choices available to you.**

City National Bank is a subsidiary of Royal Bank of Canada.