

# Farm Credit Foundations

## Privacy Policy for California Residents

**Effective Date:** January 1, 2021

**Last Reviewed on:** December 11, 2020

This **Privacy Policy for California Residents** applies solely to employees residing in the State of California if their employers are receiving payroll services and/or support for the benefits they offer to their employee from or through Farm Credit Foundations (“Foundations”). Such employees are referred to in this Policy as “consumers” or “you.” We adopt this Policy to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Policy.

### Information We Collect

Foundations collects certain information as the payroll and benefit support provider for your employer. This information identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

<b>Category</b>	<b>Examples</b>
A. Identifiers.	A real name, alias, postal address, email address, Social Security number, or other similar identifiers.
B. Personal information categories listed in the California Customer	A name, Social Security number, address, telephone number, bank account number, or any other financial information, medical information, or health insurance information.  Some personal information included in this category may overlap with other categories.

Category	Examples
Records statute (Cal. Civ. Code § 1798.80(e)).	
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, national origin, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), or veteran or military status.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete (e.g., employment forms, job applications).
- Indirectly from you. For example, from your Human Resources department.

**Use of Personal Information**

We may use or disclose the personal information we collect for one or more of the following purposes:

- Payroll processing
- Benefit administration
- Government compliance reporting – For example, Affirmative Action plan reporting.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

**Sharing Personal Information**

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. We share your personal information with the following categories of third parties:

- Service providers. For example, Blue Cross Blue Shield of Illinois and Delta Dental.

***Disclosures of Personal Information for a Business Purpose***

In the preceding twelve (12) months, Foundations has disclosed the following categories of personal information for a business purpose:

- Category A: Identifiers. See the California Consumer Privacy Notice for list of identifiers.
- Category B: California Customer Records personal information categories.
- Category C: Protected classification characteristics under California or federal law.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers.
- The government (for reporting purposes).

### ***Sales of Personal Information***

In the preceding twelve (12) months, Foundations has not sold personal information.

### **Your Rights and Choices**

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

### ***Access to Specific Information and Data Portability Rights***

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, a list identifying the personal information categories that each category of recipient obtained.

### ***Deletion Request Rights***

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).

5. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
6. Comply with a legal obligation.
7. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### ***Exercising Access, Data Portability, and Deletion Rights***

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 1-800-892-7924
- Emailing us at [TeamHRIS@FarmCreditFoundations.com](mailto:TeamHRIS@FarmCreditFoundations.com)
- Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To designate an authorized agent, contact [TeamHRIS@FarmCreditFoundations.com](mailto:TeamHRIS@FarmCreditFoundations.com).

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or you are an authorized representative of that person. At a minimum, this includes your full name and employee ID.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password-protected account sufficiently verified when the request relates to personal information associated with that specific account.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

### ***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 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, 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 data portability requests, we will select a format to provide your personal

information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### ***Non-Discrimination***

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you services or impose penalties on you.
- Provide you a different level or quality of services.
- Suggest that you may receive a different level or quality of services.

### ***Changes to Our Privacy Policy***

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will post the updated notice on the Website and update the policy's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

### ***Contact Information***

If you have any questions or comments about this policy, the ways in which Foundations collects and uses your information described here, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

**Phone:** 1-800-892-7924

**Website:** <http://www.farmcreditfoundations.com/>

**Email:** TeamHRIS@FarmCreditFoundations.com

**Postal Address:**

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