

## E\*TRADE California Employee/Contractor/Applicant Data Collection Notice

Last Updated: December 31, 2019

### California Employee/Contractor/Applicant Data Collection Notice

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This California Employee/Contractor/Applicant Data Collection Notice ("Notice") covers the following affiliated companies in the E\*TRADE family of companies: E\*TRADE Financial Corporation, E\*TRADE Securities LLC, E\*TRADE Futures LLC, E\*TRADE Capital Management, LLC, E\*TRADE Financial Corporate Services, Inc. (including products and services branded with Gradifi), E\*TRADE Bank, and E\*TRADE Savings Bank (including products and services branded with E\*TRADE Advisor Services). Together, these entities are referred to as "E\*TRADE," "our affiliates," "we," "us," and "our" in this Notice.

#### **We care about your privacy.**

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We are committed to maintaining the privacy and confidentiality of your personal information. This Notice explains what personal information we collect about you when you apply for full-time or part-time employment at E\*TRADE; seek contractor/contingent, consultant or outsourced (together, "contractor") positions at E\*TRADE; receive an offer of employment or a work or services agreement from E\*TRADE; accept an offer of employment or enter into a work or services agreement with E\*TRADE; or work at E\*TRADE as an employee or contractor. This Notice also explains the purposes for which we collect your personal information. Certain rights, requirements, and disclosures in this Notice may be subject to exemption or otherwise may not apply to you based, for example, on applicable law or regulations.

For general information about our privacy practices, including personal information we collect about customers, website and mobile application users, and other individuals who interact with E\*TRADE, how we use and share that information, and individual's rights in connection with that information, including limiting certain uses and sharing of personal information, see our [E\\*TRADE Privacy Statement](#).

#### **1. Information We Collect**

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As described in this Notice, we may collect personal information from or about you as part of the E\*TRADE recruitment, job application, background check, and employee/contractor onboarding processes, as well as during the period you work as an employee or contractor of E\*TRADE. For purposes of this Notice, personal information generally includes information that may be used to identify you.

This section describes the categories of personal information we may collect as part of our employment and contracting processes and why we may collect that information. The categories of personal information we may collect may depend on the processes you participate in and the nature of your interactions with E\*TRADE as part of those processes. Please note that we are required to collect certain categories of personal information to enable us to process job applications, perform background checks, offer you a work or services agreement as a contractor, or make you an offer of employment, and, if hired or selected as a contractor, continue to employ you or use your services. We only collect personal information in accordance with applicable law.

**We do not sell personal information and have not sold personal information in the past twelve months.**

Categories of Personal Information We Collect	Examples of Personal Information We May Collect	Purposes of Collection
Identifiers	Name, alias, home and work addresses, home and work phone numbers, mobile phone number, social security number, driver's license number, passport number, tax identification number, other government-issued identification numbers, alien registration number, date of birth, email address, username and password, social media name, signature, IP address, electronic device identifier, device type, browser type, platform type, cookies, pixels, beacons, eye color, hair color, height, weight	<ul style="list-style-type: none"> <li>• Recruit job applicants and candidates for employment</li> <li>• Obtain and verify background checks</li> <li>• Track time and attendance</li> <li>• Process payroll, equity compensation, expense reimbursements, and related payments</li> <li>• Manage and evaluate employee performance of their job duties, including promotions, discipline, and/or termination</li> <li>• Administer and maintain health, wellness and financial benefits programs</li> <li>• Monitor and enforce compliance with E*TRADE policies</li> <li>• Protect against unauthorized access, security incidents, fraud, and other malicious or illegal activity</li> <li>• Conduct workplace investigations</li> <li>• Comply with legal and regulatory obligations</li> <li>• Maintain commercial insurance policies and coverages, including for worker's compensation and other liability insurance</li> <li>• Engage in corporate transactions, including evaluating merger and acquisition activity</li> </ul>

Categories of Personal Information We Collect	Examples of Personal Information We May Collect	Purposes of Collection
Financial information	Financial account number, credit card number, debit card number, account balance, trading activity, transactions, equity compensation, loan number, loan amount, 529 plan account number, account history, salary, incentive compensation payments, income, debt, assets, revenue, credit history, credit score	<ul style="list-style-type: none"> <li>• Evaluate job applicants and candidates for employment</li> <li>• Process payroll, equity compensation, expense reimbursements, and related payments</li> <li>• Manage and evaluate employee performance of their job duties, including promotions, discipline, and/or termination</li> <li>• Administer and maintain health, wellness and financial benefits programs</li> <li>• Monitor and enforce compliance with E*TRADE policies</li> <li>• Conduct workplace investigations</li> <li>• Comply with legal and regulatory obligations</li> <li>• Engage in corporate transactions, including evaluating merger and acquisition activity</li> </ul>
Protected classifications under California or federal law (“Protected Class Information”)	Age, sex, gender, national origin, citizenship, race, ethnicity, marital status, disability status, and other protected class information	<ul style="list-style-type: none"> <li>• Administer and maintain health, wellness and financial benefit programs</li> <li>• Conduct workplace investigations</li> <li>• Comply with state and federal law and regulations</li> </ul>
Biometric information	Fingerprint, palm scan, and voiceprint	<ul style="list-style-type: none"> <li>• Obtain and verify background checks</li> <li>• Protect against unauthorized access, security incidents, fraud, and other malicious or illegal activity</li> <li>• Conduct workplace investigations</li> <li>• Comply with legal and regulatory obligations</li> </ul>

Categories of Personal Information We Collect	Examples of Personal Information We May Collect	Purposes of Collection
Internet or similar network activity	Browsing history, search history, clickstream data, session information, navigation paths, and other information about how you interact with websites and mobile applications we monitor	<ul style="list-style-type: none"> <li>• Monitor and enforce compliance with E*TRADE policies</li> <li>• Protect against unauthorized access, security incidents, fraud, and other malicious or illegal activity</li> <li>• Conduct workplace investigations</li> </ul>
Geolocation data	Physical location or movements	<ul style="list-style-type: none"> <li>• Monitor and enforce compliance with E*TRADE policies</li> <li>• Protect against unauthorized access, security incidents, fraud, and other malicious or illegal activity</li> <li>• Conduct workplace investigations</li> </ul>
Sensory data	Audio recordings, video recordings, and photographs	<ul style="list-style-type: none"> <li>• Track time and attendance</li> <li>• Manage and evaluate employee performance of their job duties, including promotions, discipline, and/or termination</li> <li>• Monitor and enforce compliance with E*TRADE policies</li> <li>• Protect against unauthorized access, security incidents, fraud, and other malicious or illegal activity</li> <li>• Conduct workplace investigations</li> <li>• Comply with legal and regulatory obligations</li> </ul>

Categories of Personal Information We Collect	Examples of Personal Information We May Collect	Purposes of Collection
Professional or employment-related information	Employment information (including, among other things, employer name), employment history, professional licenses, registrations or memberships, employment identification number, performance reviews, reference letters	<ul style="list-style-type: none"> <li>• Recruit job applicants and candidates for employment</li> <li>• Evaluate job applicants and candidates for employment</li> <li>• Obtain and verify background checks</li> <li>• Manage and evaluate employee performance of their job duties, including promotions, discipline, and/or termination.</li> <li>• Conduct workplace investigations</li> <li>• Comply with legal and regulatory obligations</li> </ul>
Education information	Academic record, degrees, and schooling	<ul style="list-style-type: none"> <li>• Recruit job applicants and candidates for employment</li> <li>• Evaluate job applicants and candidates for employment</li> <li>• Obtain and verify background checks</li> </ul>

We may collect other personal information that we are not required to disclose in this Notice, including, for example, protected health information collected under the Health Insurance Portability and Accountability Act (“HIPAA”). In addition, we may compile aggregate, anonymous, or de-identified data from various sources. This data, which we may use for our business purposes consistent with applicable law, does not identify an individual and is not personal information.

## 2. Accessibility

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To obtain a copy of this Notice in Braille or in large print, please call our accessibility technical support line at 866-284-2145 or email us at [techsupport@etrade.com](mailto:techsupport@etrade.com).

## 3. Updates to this Notice

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We will update this Notice if we collect additional categories of personal information from you that are not currently listed or use personal information we have collected from you for a materially different purpose than described in this Notice. We will provide this Notice to you in advance of such changes.

## 4. Contact Us

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For more information about our privacy practices, or if you have questions or concerns, please email us at [cpo@etrade.com](mailto:cpo@etrade.com) or contact us by mail at E\*TRADE Financial Corporation, P.O. Box 484, Jersey City, NJ 07303-0484.