



**BANK LEUMI USA & LEUMI INVESTMENT SERVICES INC.
CALIFORNIA EMPLOYEE PRIVACY NOTICE**

Effective February 11, 2020

This California Employee Privacy Notice (this “**Notice**”) applies solely to all visitors, users, and others who are considered residents of the State of California (“**Consumers**”, “**you**”, or “**your**”) who are considered employees, job applicants, contractors or similar individuals to Bank Leumi USA and its subsidiary Leumi Investment Services Inc. (“**we**”, “**us**”, or “**our**”). We adopt this Notice to comply with the California Consumer Privacy Act of 2018 (“**CCPA**”), and any terms defined in the CCPA shall have the same meaning when used in this Notice.

TABLE OF CONTENTS	
<u>INFORMATION WE COLLECT</u>	1
<u>USE OF PERSONAL INFORMATION</u>	2
<u>SHARING PERSONAL INFORMATION</u>	3
<u>SALES OF PERSONAL INFORMATION</u>	3
<u>CHANGES TO THIS PRIVACY NOTICE FOR CALIFORNIA RESIDENTS</u>	4
<u>CONTACT INFORMATION</u>	4

INFORMATION WE COLLECT

We collect information that 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.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope, such as 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 other certain sector-specific privacy laws, including the Fair Credit Reporting Act (“**FCRA**”).

CATEGORIES OF PERSONAL INFORMATION COLLECTED FROM CONSUMERS

We have collected the following categories of Personal Information from Consumers within the last 12 months:

Category	Examples	Collected
A. Identifiers.	A 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.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card 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	YES

	health insurance information. Some personal information included in this category may overlap with other categories.	
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Physiological, biological or behavioral characteristics, including an individual's deoxyribonucleic acid (DNA), that can be used, singly or in combination with each other or with other identifying data, to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.	YES
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	NO
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. 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, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Consumer data resellers.
- Social media services, like LinkedIn or Facebook.
- Government databases.

USE OF PERSONAL INFORMATION

We may use or disclose the Personal Information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to respond to a job posting, we will use that Personal Information to respond to your inquiry. If you provide your Personal Information to apply for a job, we will use that information to assess your candidacy for employment.
- To perform due diligence and background checks, including drug tests and other screenings, to confirm candidacy for employment.
- To create, maintain, customize, and secure your candidate and/or employment profile with us.
- To process your requests, transactions, and payments.

- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- To provide, support, personalize, and develop our Website, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.

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 service provider 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.

The CCPA prohibits third parties who purchase the Personal Information we hold from reselling it unless you have received explicit notice and an opportunity to opt-out of further sales.

In the preceding 12 months, we disclosed the following categories of Personal Information for a business purpose:

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category C: Protected classification characteristics under California or federal law.
- Category E: Biometric information.
- Category I: Professional or employment-related information.
- Category J: Non-public education information.
- Category K: Inferences drawn from other personal information.

We disclose your Personal Information for a business purpose to the following categories of service providers:

- Our affiliates.
- Service providers, including operating systems and platforms.
- Consumer data resellers.
- Government entities.
- Social networks, like LinkedIn or Facebook.

SALES OF PERSONAL INFORMATION

In the preceding 12 months, Bank Leumi USA has not sold Consumer Personal Information.

CHANGES TO OUR PRIVACY NOTICE

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

CONTACT INFORMATION

If you have any questions or comments about this notice, the ways in which Bank Leumi USA collects and uses your information described below and in this Notice, 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: 1-800-892-5430 (Option 7)

Website: www.leumiusa.com/privacy

Email: privacy.requests@leumiusa.com

Postal Address:

Bank Leumi USA
Attn: Compliance Department
350 Madison
New York, NY 10017