

# CALIFORNIA CONSUMER PRIVACY ACT NOTICE FOR CALIFORNIA APPLICANTS AND EMPLOYEES



Last Updated: February 2, 2024

Effective Date: January 1, 2024

## Changes to Our California Privacy Notice

PNC will update this notice in response to changing legal, technology, or business developments. We will post the most up-to-date notice on [Pathfinder CCPA Privacy Notice](#). You can see when the notice was last updated by checking the "last updated" date displayed at the top. If you have questions about changes, please contact PNC through our website or the details below.

## Contents:

1. INTRODUCTION
2. CATEGORIES OF PERSONAL INFORMATION COLLECTED AND DISCLOSED
3. PURPOSES FOR COLLECTION, USE AND DISCLOSURE
4. YOUR RIGHTS AND CHOICES
5. CHANGES TO PRIVACY NOTICE
6. CONTACT INFORMATION

## 1 INTRODUCTION

1.1 PNC Financial Services Group, Inc. (collectively, "we", "our", "us", "PNC") is committed to protecting the privacy of personal information of individuals. This Privacy Notice supplements the information contained in the Privacy Policy of PNC and its subsidiaries and applies solely to PNC applicants, employees, contractors, and agents who are residents of the State of California ("CA Persons" or "you"). California Consumer Privacy Act (CCPA) and the regulations promulgated thereto, each as amended, including pursuant to the California Privacy Rights Act of 2020 (the "CPRA") Any terms defined in the CCPA have the same meaning when we use them in this notice.

1.2 This Notice does not apply to or describe information that is not personal information or is otherwise exempt from the CCPA, including:

- Publicly available information from government records.
- Information that a business has a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely distributed media.
- De-identified or aggregated information relating to one or more CA Persons.
- Information excluded from the CPRA'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.

## 2 CATEGORIES OF PERSONAL INFORMATION COLLECTED AND DISCLOSED

2.1 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 CA Person ("personal information"). In particular, we have collected and processed the following categories of personal information (as defined by the CCPA) as listed in Section 2.2 from CA Persons within the last twelve (12) months.

2.2 While our processing of personal information varies based upon our relationship and interactions with CA Persons, the table below identifies, generally, the categories of personal information (as defined by the CCPA) that we have collected about CA Persons, as well as the categories of third parties to whom we may disclose this information for a business or commercial purpose. Please note that not all examples listed in the table below are collected from every CA Person.

Category	Examples*
----------	-----------

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.
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 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 or immigration status, 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).
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
E. Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.
F. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
G. Geolocation data	Such as precise physical location or movements within 1850 feet.
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.
I. Professional or employment-related information	Current or past job history or performance evaluations.
J. Education Information	Information, such as education history for job applicants or student loans.
K. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
L. Sensitive Personal Information	Personal information that reveals a consumer's social security, driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication; or genetic data.

\*We may not collect all items listed as examples in a particular category.

2.3 PNC does not “sell” or “share” (as defined by the CCPA) personal information or sensitive personal information about California residents, including those we know to be under sixteen (16) years of age.

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

- Directly from you or your authorized agents — for example, from documents that our CA Persons provide to us related to the establishment and maintenance of an employment and/or work relationship with PNC.

- Indirectly from you or your authorized parties and from third parties that interact with us in connection with the employment and/or work relationship — for example, through information we collect from our recruitment agencies, your managers, Human Resources, benefits providers or others.

2.5 We retain the personal information we collect only as reasonably necessary for the purposes described in this Notice or otherwise disclosed to you at the time of collection. The length of time varies depending upon the circumstances, including the type of information, purposes of collection, and applicable compliance, risk management and legal obligations.

### 3 PURPOSES FOR COLLECTION, USE AND DISCLOSURE

3.1 Subject to Section 3.2, we may collect, use and disclose the personal information we collect about CA Persons for one or more of the following business purposes:

- To fulfill the employment and/or work relationship with you, including for the purposes of operating payroll and administering employment benefits or maintaining an employee directory.
- To meet the purposes of business process execution and internal management, travel and expense management, business reporting, systems reporting and access, analyses, performance review purposes, training, administering compensation programs, disciplinary purposes and other business purposes related to the management of PNC's workforce, for facilities and IT systems and infrastructure management, safeguarding the security of our infrastructure, premises, assets, and office equipment, including the prevention of criminal activity.
- 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.

3.2 Notwithstanding Section 3.1, we only use and disclose sensitive personal information as reasonably necessary (i) to perform our services requested by you, (ii) to help ensure security and integrity, including to prevent, detect, and investigate security incidents, (iii) to detect, prevent and respond to malicious, fraudulent, deceptive, or illegal conduct, (iv) to verify or maintain the quality and safety of our services, (v) for compliance with our legal obligations, (vi) to our service providers who perform services on our behalf, and (vii) for purposes other than inferring characteristics about you. We do not use or disclose your sensitive personal information other than as authorized pursuant to section 7027 of the CCPA regulations (Cal. Code. Regs., tit. 11, § 7027 (2022)).

3.3 The CCPA also requires that we disclose how we 'sell' and 'share' personal information. Under the CCPA, a 'sale' is defined broadly to include disclosing or making available personal information to a third-party in exchange for monetary compensation or other benefits or value, and 'share' broadly includes disclosing or making available personal information to a third-party for purposes of cross-context behavioral advertising. While we do not disclose or make available personal information in exchange for monetary compensation, we may share identifiers, internet and other network activity information with advertising networks and third-party ad companies, data analytics providers and social networks, in order to improve and evaluate our marketing and advertising campaigns and better reach customers and prospective customers with more relevant ads and content. However, we do not sell or share personal information (including sensitive personal information) of consumers we know to be under sixteen (16) years of age.

3.4 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.

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

- Our affiliates and subsidiaries
- Service providers
- Third parties to whom you authorize us, directly or indirectly, to disclose your personal information in connection with your employment and/or work relationship with us
- Government or regulatory authorities

3.6 In the preceding twelve (12) months, we have not sold any personal information.

3.7 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.

## 4 YOUR RIGHTS AND CHOICES

4.1 The CCPA provides CA Persons with specific rights regarding their personal information, as further described in this Section 4. PNC will respond to your requests as required by and subject to certain exceptions and limitations set forth in the CCPA. Please review this section for a description of your CCPA rights and how you make exercise those rights.

### 4.2 Access to Specific Information and a Copy of Personal Information (Right to Know)

You have the right to request, up to twice per year, that we disclose certain information to you about our collection and use of your personal information and to request a copy of the specific pieces of personal information that we have collected about you (collectively, referred to as your “access” right). Once we receive and confirm your verifiable CA Person request, 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 or commercial purpose for collecting or selling that personal information;
- The categories of third parties with whom we have shared or share that personal information;
- The categories of personal information we disclosed or shared with a third party for a business purpose; and
- The specific pieces of personal information we collected about you (also called a data portability request).

### 4.3 Deletion Request Rights

You have the right to request we delete any of your personal information we collected from you and retained, subject to certain exceptions and limitations. Once we receive and confirm your verifiable CA Person request, 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 an exception applies, such as regulatory obligations or required for business reasons.

### 4.4 Correction Rights

You have the right to request the correction of inaccurate personal information. Once we receive and confirm your verifiable CA Person request, we will correct the information. The nature of the information and its purpose will be considered when making corrections.

We may deny your correction request if an exception applies, such as regulatory obligations or required for servicing the account.

### 4.5 Do-Not-Sell or Share Rights

CA Persons also have the right to opt-out of the sale or sharing of their personal information by us. As noted above, we do not currently “sell” or “share” personal information about CA Persons, including those that we know to be under 16 years old.

### 4.6 Limit Use and Disclosure of Sensitive Personal Information Right

You also have the right to direct PNC to limit certain uses and disclosures of your sensitive personal information, which go beyond those specifically authorized pursuant to the CCPA. However, as stated in Section 4.2 above, we do not use and disclose sensitive personal information about CA Persons beyond these authorized purposes.

### 4.7 Submitting Request to Know/Access, Correct, and Delete

To exercise your right to know/access, correct, or delete as described above, please submit a verifiable CA Person request (as described more fully below) to us by either:

- Calling us at 1-888-PNC-BANK (1-888-762-2265).
- Visiting [pnc.com/privacy](https://www.pnc.com/privacy).

Only you, or a person registered with the California Secretary of State who you authorize to act on your behalf, may make a verifiable CA Person request related to your personal information. Pursuant to the CCPA, authorized agents may also submit a verifiable request on behalf of another consumer for whom they have been duly appointed. Authorized agents will be required to provide proof of their authorization and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent.

A verifiable CA Person request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will take steps to verify your request and to identify our relevant records that contain your personal information. We will process your request based upon the personal information in our records that is linked or reasonably linkable to the information provided in your request. In some cases, we may request additional information in order to verify your request or where necessary to process your request. 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 that the personal information relates to you.

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

We endeavor to respond to a verifiable CA Person request for access to personal information within 45 days of receiving it. If we require more time (up to 90 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.

The response we provide will also explain the reasons we cannot comply with a request, if applicable.

#### 4.8 Non-Discrimination

CA Persons have the right to exercise their CCPA rights without being subject to discriminatory treatment or retaliation, and to receive transparent disclosures about any financial incentives a business offers them with regard to the collection, use and disclosure of their personal information.

Discrimination may exist where a business takes or suggests that it will take the following actions in response to a CA Person exercising rights under the CCPA, unless doing so is reasonably related to the value provided to the CA Person by the CA Person's data:

- Deny access to or use of goods or services.
- Charge different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide a different level or quality of goods or services.

## 5 CHANGES TO OUR PRIVACY NOTICE

We may amend this privacy notice from time-to-time. We will provide notice of any material changes we make to this privacy notice, such as by through a notice on our website homepage.

## 6 CONTACT INFORMATION

If you have any questions or comments about this notice, our Privacy Policy, or the ways in which we collect and use your personal information, please do not hesitate to contact us at:

Phone: 1-877-968-7762, option 4

Email: [pncpathfinder@pnc.com](mailto:pncpathfinder@pnc.com)