



ISRAEL DISCOUNT BANK OF NEW YORK JOB APPLICANT AND EMPLOYEE PRIVACY NOTICE

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I. INTRODUCTION

The Israel Discount Bank of New York Job Applicant and Employee Privacy Notice ("Notice") explains what personal information that Israel Discount Bank of New York ("IDB Bank" or "the Bank") and its subsidiaries (collectively, "our", "we" or "us") collects about you, and how the Bank uses, discloses and protects your personal information.

This Notice is applicable to our job applicants, full-time employees, employee beneficiaries and emergency contacts, board members, and independent contractors and/or consultants (collectively, "Covered Individuals").

II. WHAT PERSONAL INFORMATION WE COLLECT AND OUR PURPOSE FOR COLLECTION

Under the California Consumer Privacy Act ("CCPA"), personal information is defined as information that identifies, relates to, describes, is reasonably capable of being associated, or could reasonably be linked, directly or indirectly, with a particular consumer or household in California.

We may collect the following categories of personal information and sensitive personal information about Covered Individuals listed in the table below. While processing your collected personal information, we may disclose it with third party vendors (such as ADP and Smart Recruiters) for our own business purposes, to provide you with requested services, or for any other purposes as permitted by law (such as to comply with applicable laws and legal requirements or in response to court orders, subpoenas, government inquiries, other legal processes, to defend against claims and allegations, or to protect property, personnel, or members of the public).

In the preceding twelve (12) months, we have neither sold nor shared personal information to a third party for cross-context behavioral advertising or any other benefits. We do not have actual knowledge that we sell the personal information of minors under the age of 16.

Category of Personal Information We May Collect	Examples of Personal Information We May Collect	Our Purpose(s) for Collection and Processing
Personal Identifiers	Your name, postal address, email address, bank account number, bank account name, social security number, driver's license information, passport number, and other similar identifiers.	<ul style="list-style-type: none">• Recruiting, hiring, performance and talent management• Managing and administering personnel services, benefits, and compensation• Verifying eligibility to work in the United States• Ensuring a safe working environment for our personnel and visitors

		<ul style="list-style-type: none"> • Carrying out equal opportunity monitoring and reporting, as applicable • Conducting internal investigations, addressing disciplinary matters, and ensuring compliance with legal, regulatory and policy requirements • Addressing education, training and development needs
Financial Information	Financial account number and income information	<ul style="list-style-type: none"> • Recruiting, hiring, performance and talent management • Managing and administering personnel services, benefits, and compensation • Monitoring, managing and securing resources, property, and personnel • Conducting internal investigations, addressing disciplinary matters, and ensuring compliance with legal, regulatory and policy requirements
Internet or Network Activity	IP addresses, online identifiers, device IDs, or other similar identifiers; information regarding interaction with a website or application (including time and duration of internet and network connections and how you use our technology); browsing history	<ul style="list-style-type: none"> • Recruiting, hiring, performance and talent management • Managing and administering personnel services, benefits, and compensation • Monitoring, managing and securing resources, property, and personnel • Conducting internal investigations, addressing disciplinary matters, and ensuring compliance with legal, regulatory and policy requirements
Protected Classification Characteristics Under California or Federal Law	Your age, race, ethnic origin, national origin, citizenship, sex, veteran or military status	<ul style="list-style-type: none"> • Recruiting, hiring, performance and talent management • Managing and administering personnel services, benefits, and compensation • Monitoring, managing and securing resources, property, and personnel

		<ul style="list-style-type: none"> • Carrying out equal opportunity monitoring and reporting • Conducting internal investigations, addressing disciplinary matters, and ensuring compliance with legal, regulatory and policy requirements
Professional or Employment-Related Information	Past or current employment history and information (including employer name), professional license or registration information and salary or compensation information	<ul style="list-style-type: none"> • Recruiting, hiring, performance and talent management • Providing client services and/or operating our business • Managing and administering personnel services, benefits, and compensation • Monitoring, managing and securing resources, property, and personnel • Addressing education, training and development needs • Carrying out equal opportunity monitoring and reporting • Conducting internal investigations, addressing disciplinary matters, and ensuring compliance with legal, regulatory and policy requirements
Education Information	Academic record information, degree information, schooling history	<ul style="list-style-type: none"> • Recruiting, hiring, performance and talent management • Monitoring, managing and securing resources, property, and personnel • Addressing education, training and development needs • Carrying out equal opportunity monitoring and reporting • Conducting internal investigations, addressing disciplinary matters, and ensuring compliance with legal, regulatory and policy requirements
Audio, Electronic, Visual, or Similar Information	Videos from company or recruiting events, photographs, voicemail and other telephone	<ul style="list-style-type: none"> • Recruiting, hiring, performance and talent management

	recordings, CCTV footage or other video technology recordings	<ul style="list-style-type: none"> • Providing client services and/or operating our business • Managing and administering personnel services, benefits, and compensation • Monitoring, managing and securing resources, property, and personnel • Providing security over Bank property • Marketing and corporate communications purposes • Conducting internal investigations, addressing disciplinary matters, and ensuring compliance with legal, regulatory and policy requirements
Sensitive Personal Information*	Social security number, driver's license information, state identification card, passport number, health information, health insurance information, citizenship, Green Card, and/or Visa information	<ul style="list-style-type: none"> • Recruiting, hiring, performance and talent management • Providing client services and/or operating our business • Managing and administering personnel services, benefits and compensation • Conducting internal investigations, addressing disciplinary matters, and ensuring compliance with legal, regulatory and policy requirements • To provide short-term, transient and non-personalized advertising • To ensure the physical safety of our personnel, customers, and others

*Please note: IDB Bank does not infer characteristics about you based on your sensitive personal information.

III. SOURCES OF PERSONAL INFORMATION

The sources of personal information collected of you include:

1. Self-disclosure by you – during communications between you and IDB Bank, its service providers, contractors, and vendors. Examples include onboarding documentation, timekeeping and payroll documentation, benefits documentation, requests for leaves of absence, requests for



use of paid sick leave or other paid time off, requests for accommodation, performance reviews, self-assessments, requests for reimbursements or from services we provide to you, such as health and welfare benefits.

2. Indirectly from you – such as monitoring information that your work computer or mobile device transmits when interacting with our applications and website.
3. Monitoring personnel – as well as monitoring, managing and securing resources and property (including the usage of IDB Bank email systems, telephone systems, and computer networks).
4. Recruiters, references, and background check providers when you apply for a position with us.
5. Workers' compensation carriers.
6. Social media platforms (from when you interact with our social media pages and accounts).
7. Public and governmental sources and records.
8. Records and property to which we have lawful access, e.g., device inventories for company property or documents stored on our systems.

IV. RETAINING YOUR PERSONAL INFORMATION

We retain your personal information for the period necessary to fulfill the purposes outlined in this Notice, and in general for a period of [8 years] subject to details outlined in the below table. We may retain personal information for longer where required by our regulatory obligations, or where we believe it is necessary to establish, defend or protect our legal rights and interests, or those of others.

The below table illustrates our retention periods by category of your personal information:

Category of Personal Information We May Collect	Examples of Personal Information We May Collect	Retention Period
Personal Identifiers	Your name, postal address, email address, bank account number, bank account name, social security number, driver's license information, passport number, and other similar identifiers	Up to 7 years
Sensitive Personal Information	Social security number, driver's license information, state identification card, passport number, health information, health insurance information, citizenship, Green Card, and/or Visa information	Up to 7 years
Financial Information	Financial account number, income information	Up to 8 years
Protected Classification Characteristics Under California or Federal Law	Your age, race, ethnic origin, national origin, citizenship, sex, veteran or military status	1 to 8 years
Professional or Employment-Related Information	Past or current employment history and information (including employer name), professional license or registration information and salary or compensation information	1 to 8 years
Education Information	Academic record information, degree information, schooling history	1 year



V. HOW YOUR PERSONAL INFORMATION IS PROTECTED

We take protecting your personal information very seriously and maintain physical, electronic, and procedural safeguards and controls that are designed to protect your information. While your personal information is in our possession, we prevent its loss, damage, misuse, or modification and unauthorized access.

Our employees are trained to comply with our internal Privacy Policy, Information Security Program and related internal policies and procedures. We work to limit access to your personal information to only authorized employees, contractors, consultants or vendors that need it to perform their business functions.

VI. YOUR PRIVACY RIGHTS

If you are a California resident ("consumer"), you may have rights under the CCPA regarding your personal information.

California residents should be aware that this section does **not** apply to:

1. Sector-specific laws and regulations, such as the Gramm-Leach-Bliley Act, Fair Credit Reporting Act, California Financial Information Privacy Act, and others.
2. Information collected about you when you apply for or obtain financial products and services for personal, family or household purposes.
3. Other information subject to CCPA exceptions.

Description of Your Rights

Subject to certain exceptions, you have the following rights regarding covered personal information that we collect from or about you:

- **Right to request access to personal information:** You have the right to request pieces of information that we collect about or from you. You can request the following information from us:
 - Specific pieces of personal information that we have about you;
 - Categories of personal information collected about you, sold, shared, and disclosed (as applicable);
 - Categories of sources from which your personal information is collected;
 - Categories of third parties with whom your personal information was sold, shared or disclosed (as applicable); and
 - The purpose(s) for collecting, selling, sharing, or disclosing your personal information.
- **Right to request we delete personal information:** You have the right to request that we delete personal information collected from or about you.
- **Right to correct personal information:** You have the right to request that we correct inaccurate personal information maintained about you.
- **Right to non-discrimination:** You have the right to not be discriminated against as a result of exercising any of the aforementioned rights.

VII. HOW TO EXERCISE YOUR PRIVACY RIGHTS

1. California residents can exercise their privacy rights by dialing the Bank's toll-free number, (888) 695-3661, by emailing their privacy rights requests and inquiries to privacyinquiries@idbny.com or by visiting the privacy-designated page on our website, www.idbny.com.



2. **Verifying Requests:** Prior to processing a consumer request, we must verify the authenticity of the requesting party by matching data points provided by the consumer with data points maintained by us. For requests to correct your personal information, we may also require documentation relating to the accuracy of the information. We must also be able to verify that the consumer is a California resident. We will require authentication of the consumer that is reasonable in light of the personal information requested, but we will not require the consumer to create an account in order to verify its request.

A verifiable consumer request must:

- A. Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- B. 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 that the personal information relates to you. We will only use personal information and documentation provided for a verifiable consumer request to verify the requestor's identity or authority to make the request, and to comply with the record-keeping obligations under the CCPA and regulations thereunder.

3. **Response Format:** We will deliver our written response to your request via email. The response we provide will also explain the reasons we cannot comply with a request, if applicable.
4. **Timeline for Responding to Requests:** We endeavor to respond to verifiable consumer requests within the timeframe provided by CCPA and regulations thereunder. If we require more time, we will inform you or your authorized agent in writing of the reason as to why and our extension period. We do not charge a fee to process or respond to your verifiable consumer request(s) unless it is excessive, repetitive, or manifestly unfounded. If we determine that your request warrants a fee, we will tell you why we have made that decision and provide you with a cost estimate before completing your request.
5. **Using an Authorized Agent:** Requests made by an authorized agent must include a written, notarized declaration which documents the authorized agent's authority to act on the consumer's behalf. The declaration must certify that:
 - A. The authorized agent is a natural person over the age of 18 or a business entity;
 - B. The agent is authorized to make a request on behalf of the consumer; and
 - C. That such authorization is still in full force and effect.

The declaration must further enclose an authorization to request personal information on behalf of the identified consumer along with a copy of the consumer's valid government-issued photo identification. Declarations must include the sentence "I UNDERSTAND THAT THE INFORMATION PROVIDED HEREIN IS TO BE RELIED UPON BY [CLIENT NAME] TO RESPOND TO A CALIFORNIA CONSUMER PRIVACY REQUEST IN ACCORDANCE WITH THE LAW". An authorized agent must submit the written declaration to privacyinquiries@idbny.com and respond to any questions required for us to verify the consumer's identity.



VIII. OTHER IMPORTANT INFORMATION

Changes to this Notice

We reserve the right to amend and change this Notice at our discretion. Should we make changes to this Notice, we will update its "Last Modified" date. Any changes to the Notice will become effective when published, unless specified otherwise.