

As part of the recruitment and employment processes at Cetera Financial Group, Inc. and its affiliates (collectively, “Cetera,” “we” or “our”), Cetera collects and processes personal information of its applicants, employees, contractors, directors and officers (collectively, “Workforce Members,” “you” or “your”).

What Information Do We Collect from Workforce Members?

Cetera may collect the following information, including sensitive personal information:

- **Personal identifiers:**
 - We collect your personal contact details, such as name, title, addresses, telephone numbers and personal email addresses.
 - You may provide us with bank account details and tax status information.
 - We may collect your driver’s license number, passport number, nationality/visa status, or related information to verify your employment eligibility and to provide travel arrangements for you.
 - We collect your Social Security Number for tax purposes.
 - We collect some information about your health, such as medical conditions and health, sickness and vaccination records, when you report this information to the company. This includes details of any absences (other than holidays) from work, including time on statutory parental leave and sick leave; information related to biological screenings or testing for controlled substances; records related to administering and maintaining your healthcare and other benefits; and information about a condition needed for pensions and permanent health insurance purposes when you leave employment and the reason for leaving is related to your health. During a pandemic, epidemic or outbreak of an infectious disease, we may collect additional information about your health, including information related to temperature or other applicable health screenings (which may be required to enter or remain in company offices), and information related to symptoms of the infectious disease. We may collect information related to accommodations or exceptions to any vaccination requirements, including information related to medical or religious exceptions to such requirements.
- **Protected classifications:** We collect your date of birth and gender in order to verify your identity. We collect your marital status and dependents for tax and benefits administration purposes. We may also collect and maintain information about your racial and ethnic origin, disability status, or sexual orientation if you choose to provide it during the application or onboarding processes or during subsequent employment. We use this information only to support our efforts to attract and maintain a diverse workforce, including reporting required by federal law.
- **Biometric information:** We may collect your fingerprint information to provide to the Financial Industry Regulatory Authority (FINRA) and to satisfy our regulatory obligations.
- **Internet or other electronic network activity information:** We collect information about your use of Cetera’s computers and networks, including your use of the internet and your e-mail communications using company computers or systems.
- **Geolocation data:** We may collect geolocation data about you if, for example, you are operating a company-issued vehicle or device, such as a company-issued mobile phone, as part of the fulfillment of your employment duties.
- **Audio, electronic, visual, thermal, olfactory, or similar information:** We store photographs of you for identity verification, and we may record you on building security cameras. Your telephone calls may be monitored or recorded when accessing company resources, such as IT services. In addition, when using Cetera’s systems or devices, your calls may be monitored or recorded if you are interacting with a customer, registered representative or other affiliated person, or member of the public in a customer service capacity. We do not collect any of your thermal, olfactory or similar information.
- **Professional or employment-related information:** We collect information about your professional and employment-related background through the recruitment process (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of your application to work at Cetera). We collect information regarding your salary, annual leave, retirement, work performance, disciplinary actions, and/or grievance information. We also may collect information regarding job titles, salary history, work history, working hours, holidays, absences, training records and professional memberships. For purposes of administering employee benefits, we collect health information, your marital status, and dependent information.
- **Education information:** Your employment records include information you provided during the employment process about the educational institutions you have attended or your level of education. We also collect and maintain information about any professional licenses you hold, certifications you receive, or additional education or training you undertake during your employment.

Cetera may collect this information in a variety of ways, including but not limited to: online application forms, resumes and interviews. Cetera may also collect personal information from third parties, such as former employers, social media or networking services, recruitment services, and background screening services.

How Do We Process Workforce Members' Personal Information?

Workforce Members' personal information is stored in Cetera's systems, including in its applicant and employee files and in other Human Resources (HR) and Information Technology (IT) systems.

Cetera must process Workforce Members' personal information to comply with legal and regulatory obligations, for example, to confirm employment eligibility and to comply with FINRA rules. Cetera also has a legitimate interest in processing personal information during the recruitment process and for keeping records throughout a Workforce Member's employment, for example, to enable Cetera to assess and confirm an applicant's suitability for employment.

Cetera may use your personal information for:

- **Decisions related to your employment**, including reviewing your performance; evaluating your development as an employee; setting your job duties and assessing our staffing needs; assessing your qualifications for other roles within the company or promotion; determining salary and compensation for grievance or other disciplinary procedures, including termination; dealing with legal disputes involving you or other employees and contractors, including accidents at work; and ascertaining your fitness for work.
- **Business purposes**, including conducting data analytics studies to review and better understand employee retention and attrition rates; and ascertaining and fulfilling education, training, and development requirements.
- **Administering payments, benefits, or gifts**, including making tax and other required deductions and making decisions about salary and compensation.
- **Security measures and complying with health and safety obligations**, including ensuring the physical safety of our facilities, resources, employees, and other people from threats; preventing fraud and to secure our systems, data, resources, and facilities from unauthorized access or exploitation; monitoring compliance with our IT policies; ensuring network and information security, including preventing unauthorized access to our computer and electronic communications systems, and preventing malicious software distribution; and investigating theft and other illegal activities.
- **Compliance with legal and regulatory obligations**, including verifying that you are legally permitted to work in the United States.

We may use any and all of the information collected for any of the purposes described in this privacy notice, unless limitations are listed. In some circumstances, we may de-identify your personal information so that it can no longer be associated with you, in which case, we may use such information without further notice to you.

If an applicant's employment application is unsuccessful, Cetera may retain the applicant's personal information and may contact the applicant if future opportunities arise that may be of interest to the applicant.

Who Has Access to Workforce Members' Personal Information?

Workforce Members' personal information may be accessible to Cetera's HR department, members of the department to which an applicant applies and other interviewers, managers in an employee's department, Cetera's leadership and management teams, IT staff (as necessary to support Cetera's systems, networks, applications and devices) and other Cetera employees (as necessary to perform their job functions).

We may disclose personal information that we collect or you provide as described in this privacy policy:

- **To service providers**, which are companies we use to support our business and who are bound by law and contractual obligations to keep your personal information confidential. Service providers may use information we share with them only for the purposes for which we disclose it to them. The categories of service providers that we share information with and the services they provide are:
 - **Payroll services providers** that assist us in calculating and disbursing your salary and other compensation.
 - **Auditing and accounting firms**, such as firms that assist us in the creation of our financial records.
 - **Professional services consultants**, such as firms that perform analytics, assist with improving our business, provide legal services, or supply project-based resources and assistance.
 - **Recruitment vendors** that assist with the application process, including assessing candidate qualifications and providing the platform through which candidates submit their candidacy.
 - **Analytics services**, including entities that analyze traffic to and on our website and assist with identifying and communicating with potential customers.
- **Security vendors**, such as entities that assist with security incident verification and response, service notifications, and fraud prevention.

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- **IT vendors**, such as entities that assist with website design, hosting and maintenance; data and software storage; and network operation.
 - **Suppliers of goods and services**, such as businesses that facilitate the provision or delivery of office supplies or gifts.
 - **To other external parties:**
 - When required by law, regulation, subpoena or regulatory inquiry or examination or to protect Cetera or other persons, as described in this privacy policy.
 - In the context of a business negotiation or transaction relating to Cetera, such as further to a merger, reorganization, liquidation or any other business transaction, including negotiations related thereto.
 - When Cetera determines such disclosure is necessary or appropriate to prevent physical harm, unauthorized access to data or financial or other loss.
 - In connection with an investigation of suspected or actual illegal activity.

We do not sell your personal information to any third parties. However, we may disclose aggregated or de-identified information without restriction.

What If an Applicant Chooses Not to Provide Personal Information?

Applicants are under no obligation to provide personal information to Cetera during the recruitment process. However, if an applicant opts not to provide such information, Cetera may not be able to process or fully evaluate the application.

How Do We Protect Children's Privacy?

Cetera does not knowingly solicit personal information from children under the age of 16 and does not knowingly market to children under the age of 16. If Cetera learns that it has received information directly from a child who is under the age of 16, Cetera will delete the information in accordance with applicable law.

Special Information for California Residents

This section describes your rights under the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA). The sections above describe how we collected, used, disclosed, and otherwise processed your personal information over the past 12 months. Below, we cover additional rights you may have with respect to your personal information. This section does not reflect our processing of personal information where an exception applies.

Under the CCPA and CPRA, "Personal Information" means "information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular" California resident. Certain information we collect may be exempt from the CCPA and CPRA because it is considered public information (because it is made available by a government entity) or covered by a federal privacy law, such as the Gramm–Leach–Bliley Act, the Health Insurance Portability and Accountability Act, the Fair Credit Reporting Act, or any other statutory exemption.

To the extent that we do collect personal information about you that is subject to the CCPA and CPRA, that information, our practices, and your rights are described below. To protect your Personal Information, we are required to verify your identity before we can act on your rights under the CCPA and CPRA.

- **Right to Access:** 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 with respect to the following:
 - The categories of personal information we collect about you.
 - The categories of sources for the personal information we collect about you.
 - Our business or commercial purpose for collecting that personal information.
 - The categories of third parties with whom we share that personal information.
 - The specific pieces of information we collect about you.

As a current employee of Cetera, you can also access our human resource systems to obtain certain personal information of yours.

- **Request Deletion of Information:** You have the right to request in certain circumstances that we delete Personal Information that we have collected directly from you. It should be noted that we may not be able to delete certain Personal Information due to business, employment, benefit, regulatory, legal, and compliance reasons.
- **Right to Opt-Out of Sale of Personal Information to Third Parties:**
 - Under the CCPA and CPRA, "selling" personal information refers to disclosing it to an external party for monetary or other benefit. You have the right to opt out of any sale of data by Cetera to third parties.
 - Cetera does not sell your Personal Information; however, we may share your Personal Information for the purposes of

targeted advertising (e.g., for recruiting purposes), which under CCPA and CPRA, may be considered a “sale.” We provide details below regarding how you can opt-out of such sharing or “selling.” Please note that your right to opt out does not apply to our sharing of data with service providers, who are parties we engage to perform a function on our behalf and are legally and contractually obligated to use the data only for that function.

- **Right to Correct:** You have the right to request that we correct inaccuracies in the personal information we collect about you.
- **Right to Limit Use/Disclosure of Sensitive Personal Information:** You have the right to limit the use/disclosure of your sensitive personal information.
- **Right to Non-Discrimination:** You have the right to not be denied employment or services, provided with different compensation or benefits, or receive a different level or quality of support or services, as a result of exercising the above rights.

How to Submit a Request – You may submit a request to exercise your California privacy rights through any one of these means:

- (1) By filling out a Consumer Data Request Form available at www.cetera.com/ccpa, or
- (2) By calling us at 888.443.6380.

Verification Procedures – In order to process your request to know about, correct, or delete personal information, we collect, disclose, or share, we must first verify your identity. We do this by requesting that you provide personal identifiers, which we can match against information we may have collected from you previously. We may also request you to confirm your request using the email or telephone account stated in the request.

Requests by Authorized Agent – You may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf. We require that you provide legal documentation confirming the identity and authority of an authorized agent to act on your behalf. Such documentation may include, but is not limited to, a power of attorney, conservatorship or guardianship documentation, letters testamentary, or notarized statements (as may be appropriate under the circumstances). Parents of minor children may be required to submit a birth certificate of the child, in order to make requests on the child’s behalf.

Retention of Personal Information – We retain your personal information in accordance with our record retention schedules and policies. Personal information, including sensitive personal information, is retained as long as necessary to meet business, legal, and regulatory requirements or protect ours or others’ interests. Retention may be extended in connection with litigation or investigations. Retention categories in our schedules and policies may include records that contain your personal information, including identifiers, professional or employment-related information, and payroll and benefits information. The length of time your personal information is retained will vary depending on the retention period of the category in which such personal information is contained. When establishing retention duration for retention categories, we take into consideration various criteria, including tax and legal requirements for the retention of records, issues related to the exercise or defense of legal claims, and legitimate business needs.

Notice of California Employee Data Collection and Sharing Practices

We collect the categories of information described in the “What Information do We Collect About Workforce Members” section above. The categories we use to describe the information are those enumerated in the CCPA and CPRA.

Changes to this Privacy Policy

If Cetera makes material changes to this Workforce Privacy Policy, the “Last Updated” date at the top of this page will be revised. Any material changes to this Workforce Privacy Policy will become effective when the revised version is posted.

Contact Us

For questions regarding this Workforce Privacy Policy, you may contact us at:

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