

**Effective Date:** 01/01/2020

**Last Reviewed:** 1/19/2021

This Privacy Notice applies to personal information collected during the recruitment, hiring, and employment process. We adopt this notice to comply with the California Consumer Privacy Act (CCPA) and any terms defined in the CCPA have the same meaning when used in this notice.

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## **Introduction**

Monevo is an award-winning service which connects consumers with a marketplace of third party lenders and financial service providers. In order to provide employment or assess your eligibility for employment, we collect and process your information. We work extremely hard to be good stewards of your information at all times.

This document is here to help you understand what information we collect, why we collect it, and how you can update, manage, export, and delete it.

## **Information We Collect**

We collect personal information you provide to us, such as:

- Contact data, such as your first and last name, email address, residential address and phone number.
- Demographic information, such as age and date of birth
- Characteristics of protected classifications under state or federal law, such as gender
- Financial data, such as your bank name, bank account number, ABA routing number, type of account, and direct deposit information
- Identity data, such as your social security number, driver's license or state ID number, licensing state, and date of birth.
- Credit history, such as your estimated credit score and credit background
- Employment data, such as your current and previous employer names
- Background and criminal information, such as background check data, criminal convictions, drug screening results
- Individual preferences and characteristics, such as cover letter objectives
- Education data, such as the education level you have obtained and degree granting institution
- Other information that we may collect which is not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

We collect personal information from other sources. We may combine personal information we receive from you with information we obtain from other sources, such as:

- Background reporting companies

- Credit reporting companies
- Previous employers
- References you have provided to us
- Other publically available sources, such as LinkedIn

### **Use of Personal Information**

We may use the personal information we collect for one or more of the following purposes:

- To assess or process your candidacy for employment
- To communicate with you regarding employment opportunities
- To provide employment
- To fulfill legal requirements, comply with applicable laws, lawful requests, and legal processes
- To meet the criteria outlined in Monevo's recruitment process
- To conduct business analysis for operational improvement
- To provide you with services related to employment including but not limited to
  - Paycheck deposit services
  - Retirement benefits
  - Insurance benefits (medical, dental, visual)
  - Other services or benefits related to employment
- With your consent. We may otherwise use your information with your consent or at your direction.

We will only use your Personal Information in the way we specified when it was collected (including as described in this Privacy Policy).

Monevo 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.

If you decline to provide certain information that is needed to assess or eligibility of employment or offer employment, we may not be able to assess your candidacy or employ you.

### **Sharing Personal Information**

Monevo will not sell your personal information.

Monevo may disclose your personal information with the following parties and as otherwise described in this Privacy Policy or at the time of collection.

- Service providers (such as Trinet, WeWork, TransAmerica, and People)
- Parent or subsidiary companies (such as Quint Group Ltd)
- Professional advisors (such as lawyers, bankers, auditors or insurers)
- To other parties when required by law

**Personal information that we collect, use and share.**

The chart below summarizes how we collect, use and share Personal Information by reference to the categories specified in the CCPA, and describes our practices during the 12 months preceding the effective date of this Privacy Policy.

Category of personal information	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 health insurance information. Some personal information included in this category may overlap with other categories.	Yes
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.	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.	No
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes
G. Geolocation data.	Physical location or movements.	Yes
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	Yes

	lists, student schedules, student identification codes, student financial information, or student disciplinary records.	
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

## **Your Rights as a California Resident**

As a California resident, you have the rights listed below. **These rights are not absolute and subject to certain exceptions; we may decline your request in certain cases as permitted by law.**

- Information. You can request the following information about how we have collected and used your Personal Information during the past 12 months:
  - The categories of Personal Information that we have collected.
  - The categories of sources from which we collected Personal Information.
  - The business or commercial purpose for collecting and/or selling Personal Information.
  - The categories of third parties with whom we share Personal Information.
  - Whether we have disclosed your Personal Information for a business purpose, and if so, the categories of Personal Information received by each category of third party recipient.
  - Whether we've sold your Personal Information, and if so, the categories of Personal Information received by each category of third party recipient.
- Access. You can request a copy of the Personal Information that we have collected about you during the past 12 months. We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to forty-five (45) days, we will inform you of the reason and extension period in writing. If applicable, the response we provide will explain the reasons we cannot comply with a request. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.
- Deletion. You can ask us to delete the Personal Information that we have collected from you. We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to forty-five (45) days, we will inform you of the reason and extension period in writing. If applicable, the response we provide will explain the reasons we cannot comply with a request.
- Opt-out of sales. If we sell your Personal Information, you can opt-out.
- Nondiscrimination. You are entitled to exercise the rights described above free from discrimination in the form of legally prohibited increases in the price or decreases in the quality of our service.

If you have requested to remove your information from our database or opt-out of the sale of your information, these requests will only apply to the information received by Monevo prior to the request being made. If, at a later date, you provide your information for the purposes of employment

consideration, any new or additional submission of your information will be considered newly provided information. Therefore, a new deletion or opt out request will need to be submitted for the newly provided information. Any future deletion or information requests will only include information obtained since the previous request.

How to exercise your rights. You may exercise your California privacy rights described above as follows:

- Right to information, access, deletion, and opt out. You can request to exercise your information, access, deletion, and opt out rights by:
  - Submitting a request through our Privacy Portal
  - Emailing SupportUSA@Monevo.com

We reserve the right to confirm your identity and California residency status to process your requests to exercise your information, access or deletion rights. As part of this process, government identification may be required.

**These rights are not absolute and subject to certain exceptions; we may decline your request in certain cases as permitted by law.**

### **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights.

### **Alternative Format of Privacy Notice for California Residents**

If you have a disability that prevents or limits your ability to access this CCPA Notice, please email us at SupportUSA@Monevo.com or call us at (858) 630-5386. We will work with you to provide this notice in an alternative format.

### **Changes to Our Privacy Notice**

Monevo reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will provide the updated notice and update the notice's effective date.

### **Contact Information**

If you have any questions or comments about this notice, the ways in which Monevo collects and uses your information described, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

**Website:** <https://www.monevo.us/>

**Email:** SupportUSA@Monevo.com

**Postal Address:** 8910 University Center Lane, Suite 400, San Diego CA 92122

Monevo

Attn: Compliance Department

8910 University Center Lane, Suite 400, San Diego CA 92122