

JANNEY Employee Notice of Collection for CA Employees, Contractors, and Job Applicants

This California Employee Privacy Policy and Notice at Collection (“**Notice**”) explains what types of personal information Janney Montgomery Scott LLC (“Janney”) may collect about its employees, job applicants, and contractors in the ordinary course of business and how that personal information may be used. It also provides instructions for employees to submit data subject requests. It applies only to information collected about applicants, current employees, and past employees residing in California. It provides information required under the California Consumer Privacy Act of 2018 and as amended by the California Privacy Rights Act of 2020 (collectively, the CCPA”), and related regulations.

At Janney we recognize the importance of, and are fully committed to protecting, the information we collect about our associates, including temporary staff and contractors, even after the termination of the contractual relationship with Janney, where applicable.

If you are unable to review or access this Policy due to a disability, you may contact privacyofficer@janney.com.

Definitions Specific to this Policy

- “Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular household. Personal Information also includes “Sensitive Personal Information,” as defined below.
- “Sensitive Personal Information” means Personal Information that reveals an individual’s:
 - 1) Social Security, driver’s license, state identification card, or passport number; 2) Account log-in, financial account number, debit card number, or credit card number in combination with any required security or access code, password, or credential allowing access to the individual’s account; 3) Precise geolocation; 4) Racial or ethnic origin; 5) Religious beliefs; 6) Union membership; 7) Contents of email or text messages, unless we are the intended recipient; 8) Genetic data; 9) Biometric information used to uniquely identify the individual, and 10) Health, sex life, or sexual orientation.

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- “Sell,” “Sale,” or “Sold” means renting, releasing, or transferring an individual’s Personal Information to a Third Party for money or other valuable consideration.
- “Share,” “Shared,” or “Sharing” means transferring and individual’s Personal Information to a Third Party for behavioral advertising purposes, whether or not for money or other valuable consideration.
- “Third Party” means a person or organization which is not a consumer, applicant, employee, former employee, Vendor, or an entity owned or controlled by us and as defined by the CCPA.
- “Vendor” means a “service provider,” or “contractor,” which collects, stores, or otherwise handles data for us, as those terms are defined in the CCPA.

These definitions apply, whether terms are capitalized or not. Other terms used in this Policy may be defined under the CCPA, and they shall have the meanings described therein.

This Privacy Notice is effective as of January 31, 2022.

The Personal Information We Collect and Disclose

The chart below shows the categories of Sensitive Personal Information we may collect, examples of personal information in each category, and the business purposes for which each category of personal information is collected.

Categories of Personal Information Collected	Purposes Personal Information is Used
<p><u>Identifiers and Contact information.</u> This category includes names, addresses, telephone numbers, mobile numbers, email addresses, dates of birth, Social Security numbers, driver’s license or state identification numbers, bank account information, dependent and beneficiary information (names, dates of birth, Social Security numbers) and other similar contact information and identifiers.</p>	<ul style="list-style-type: none"> • Collect and process employment applications, including confirming eligibility for employment, background and related checks, and onboarding • Process payroll and employee benefit plan and program administration including enrollment and claims handling • Maintain personnel records and record retention requirements • Communicate with employees and/or employees’ emergency contacts and plan beneficiaries

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	<ul style="list-style-type: none"> • Comply with applicable state and federal labor, employment, tax, benefits, workers' compensation, disability, equal employment opportunity, workplace safety, and related laws • Prevent unauthorized access to or use of Janney property including Janney information systems, electronic devices, networks, and data • Ensure employee productivity and adherence to company policies • Investigate complaints, grievances, and suspected violations of company policy
<p><u>Protected classification information.</u> This category includes characteristics of protected classifications under California or federal law.</p>	<ul style="list-style-type: none"> • Comply with applicable state and federal Equal Employment Opportunity laws • Design, implement, and promote Janney's diversity and inclusion programs • Investigate complaints, grievances, and suspected violations of company policy
<p><u>Internet or other electronic network activity information.</u> This category includes without limitation:</p> <ul style="list-style-type: none"> • all activity on Janney's information systems, such as internet browsing history activity, search history, intranet activity, email communications, social media postings, stored documents, and emails, usernames, and passwords 	<ul style="list-style-type: none"> • Facilitate the efficient and secure use of the Janney's information systems • Ensure compliance with Janney information systems policies and procedures • Comply with applicable state and federal laws • Prevent unauthorized access to, use, or disclosure/removal of Janney property, records, data, and information • Enhance employee productivity
<ul style="list-style-type: none"> • all activity on communications systems including phone calls, call logs, voice mails, text messages, chat logs, app use, mobile browsing and search history, mobile email communications, and other information regarding an Employee's use of Janney-issued devices 	<ul style="list-style-type: none"> • Investigate complaints, grievances, and suspected violations of company policy
<p><u>Geolocation data.</u> This category includes GPS location data from Janney-issued mobile devices and computers</p>	<ul style="list-style-type: none"> • Prevent unauthorized access, use, or loss of company property • Improve efficiency, logistics, and supply chain management • Ensure employee productivity and adherence to company policies

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	<ul style="list-style-type: none"> • Investigate complaints, grievances, and suspected violations of company policy
<p><u>Professional and employment-related information.</u> This category includes without limitation:</p> <ul style="list-style-type: none"> • data submitted with employment applications including, employment history, employment recommendations, etc. • background check and criminal history • work authorization • professional licenses • educational degrees • fitness for duty data and reports (upon return from a medical leave of absence) • performance and disciplinary records • salary and bonus data • benefit plan enrollment, participation, and claims information • leave of absence information including religious and family obligations, physical and mental health data concerning employee and his or her family members 	<ul style="list-style-type: none"> • Collect and process employment applications, including confirming eligibility for employment, background and related checks, and onboarding • Employee benefit plan and program design and administration, including leave of absence administration • Maintain personnel records and comply with record retention requirements • Communicate with employees and/or employees' emergency contacts and plan beneficiaries • Comply with applicable state and federal labor, employment, tax, benefits, workers compensation, disability, equal employment opportunity, workplace safety, and related laws • Business management • Prevent unauthorized access to or use of the company property, including company information systems, electronic devices, network, and data • Ensure employee productivity and adherence to company policies • Recruit • Investigate complaints, grievances, and suspected violations of Janney policy

The personal information compiled by Janney is not sold or shared with any third parties.

Retention of Data

Janney intends to retain each category of personal information described above only for as long as necessary to fulfill the purpose for which it was collected, or a related and compatible purpose consistent a reasonable person's expectation, and to apply with applicable laws and regulations. We consider the following criteria when determining how long to retain personal information: why we collected the personal information; the nature of the personal information; the sensitivity of the personal information; our legal obligations related to the personal information, and risks associated with retaining the personal information.

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Sources of Information

In most cases, Janney will collect information directly from you, although sometimes we will obtain information about you from alternative sources including but not limited to: other affiliates and service providers (such as recruitment agents and background checking services to the extent permitted by applicable law) and government bodies where required by law (such as tax authorities).

If the requested information is not provided, we may be unable to conduct certain business operations or comply with the applicable legislation.

Information Security and Accuracy

Janney takes the protection of personal information seriously and we intend to protect your personal information and to maintain its accuracy. Janney implements reasonable physical, administrative, and technical safeguards to help us protect your personal information from unauthorized access, use and disclosure. We also require that our suppliers protect such information from unauthorized access, use and disclosure.

Your Rights to Your Personal Information

Subject to certain limitations, if you are a California resident, you have the right to submit requests related to the personal information we have collected about you. You may make such a request twice in a 12-month span. Please note there are circumstances when we may not be able to comply with your request. For example, we may not be able to verify your request, or we may find that providing a full response conflicts with other legal obligations or regulatory requirements. We will notify you if this is the case.

Right to Receive Information on Privacy Practices. You have the right to receive the following information at or before the point of collection:

- The categories of personal information to be collected;
- The purposes for which the categories of personal information are collected or used;
- Whether or not that personal information is sold or shared with Third Parties or disclosed to Vendors;
- If the business collects Sensitive Personal Information, the categories of Sensitive Personal Information to be collected, the purposes for which it is collected or used, and whether that information is Sold or Shared; and

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- The length of time the business intends to retain each category of personal information, or if that is not possible, the criteria used to determine that period.

We have provided such information in this Policy, and you may request further information about our privacy practices by using the contact information provided below.

Right to Know and Right to Access. You have the right to request certain information we have collected about you. You have the right to request:

- Specific pieces and categories of personal information we collected about you;
- The categories of sources from which personal information was collected;
- The purposes for which personal information was collected, shared, sold, or processed
- The categories of personal information we shared, sold, or disclosed; and
- The categories of Vendors or Third Parties with whom we shared, sold, or disclosed personal information.

If you would like to make a request to know or to access your personal information, you can use the email address or phone number listed under “Instructions to Exercise your Right Below”.

Right to Delete. You have the right to request that we delete certain personal information that we have collected. If you would like to make a request to delete your personal information, you can use the email address or phone number listed under “Instructions to Exercise your Right Below”.

Right to Correct. You have a right to request that we correct any inaccurate personal information we may retain about you. If you would like to make a request to correct your personal information, you can use the email address or phone number listed under “Instructions to Exercise your Right Below”.

Right to Opt-Out of the Sale and Sharing of Your Personal Information. You have the right to opt-out of the sale and sharing of your personal information with Third Parties. However, we do not sell or share personal information about

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applicants, employees, or former employees with Third Parties. We also do not knowingly sell or share personal information of any individuals under 16 years of age.

Right to Limit the Use of Your Sensitive Personal Information. You have the right to instruct us to limit the use and disclosure of your Sensitive Personal Information to only that which is necessary to perform the services or provide the goods reasonably expected by average consumers, or for specific business purposes defined by applicable law. However, we do not use Sensitive Personal Information for purposes beyond those authorized by the CCPA.

Right to non-discrimination. You have a right to exercise the above rights and we will not discriminate against you for exercising these rights. Please note that a legitimate denial of a request to access, delete, or opt-out is not discriminatory, nor is charging a fee for excessive or repetitive requests.

Instructions to Exercise your Rights. If you would like to make any of the data requests listed above, please contact us at privacyofficer@janney.com or 1-800-JANNEYS. If you use the email address, we may email you to request additional information from you to verify your request.

You may designate an authorized agent to exercise your rights under the CCPA on your behalf. Such individual must have power of attorney, or be an authorized agent registered with the relevant Secretary of State.

Right to Appeal. If you submit a request under this Policy and it is denied, you have the right to appeal that decision. If you choose to appeal, your request will move from HR/Privacy to our Legal Department for review. If you would like to appeal a decision regarding your data request, please email privacyofficer@janney.com. Please note that your request is an “Appeal” and describe the date and nature of your original request.

Verification Process

When you submit a request to exercise your data subject rights, we may ask you to provide information that will enable us to verify your identity.

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If you designate an authorized agent to exercise your rights on your behalf, we may require that you or the authorized agent do the following:

- Verify your identity with us directly
- Provide proof of your signed written permission for the authorized agent to submit a request on your behalf.

We may deny a request from an agent purportedly acting on your behalf if we request, and the agent does not submit, proof that he, she, or it has been authorized by you to act on your behalf.

Changes to our Privacy Statements

We may occasionally update this Privacy Notice, as well as any other specific privacy statement. When making changes to this Privacy Notice we will add a new date at the top of this Privacy Notice.

For Inquiries and/or to Submit Requests for Information, Deletion or Correction

Please contact us at PrivacyOfficer@Janney.com