



PRIVACY POLICY – EMPLOYEES & PROSPECTIVE EMPLOYEES

This Privacy Policy applies to the personal information Optimal Blue, LLC (“Optimal Blue” or “we”) collects, how we use the information and with whom we share it, and your rights and choices regarding our use of the information. By applying to an opportunity (prospective employee) and/or accepting a position (employee) with Optimal Blue, you consent to the collection and use of your information as described in this Policy.

Information We Collect

Optimal Blue collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a specific consumer (“personal information”). We have collected and will continue to collect the following categories of personal information from prospective employees and employees over the past 12 months.

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, 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, 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 similar network activity.	Browsing history, search history, information on an employee's interaction with a website, application, or advertisement.	Yes
G. Geolocation data.	Physical location or movements.	No
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

<p>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)].</p>	<p>Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.</p>	<p>No</p>
<p>K. Inferences drawn from other personal information.</p>	<p>Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	<p>Yes</p>

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information exempted from the California Consumer Privacy Act (CCPA), such as:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA).
 - Personal information covered by certain privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

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

- Directly from prospective and current employees through online systems for recruiting, background check, payroll, benefits, expense reimbursement/travel scheduling, and other IT related business practices.

Use of Personal Information

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

- Recruiting – communication, scheduling interviews, creating offer letters, initiating background checks, preemployment screening
- Employee onboarding – direct deposit, I-9, updated/corrected address
- Payroll administration and payment – tax information, bank information
- Expense Reporting - bank information
- Travel arrangements – date of birth, personal cell phone, emergency contact, personal email
- Benefits Administration – medical, pharmacy, dental, vision, life insurance, flexible spending, 401k, short term disability, long term disability, COBRA
- Taxes – state, federal, city, county (as applicable)
- Pre-employment assessment – cognitive aptitude (problem solving, critical thinking and learning ability)
- Pre-employment assessment – general personality assessment that measures twelve personality traits, achievement, assertiveness, competitiveness, conscientiousness, cooperativeness, extroversion, managerial, motivation, openness, patience, self-confidence, stress tolerance, active directory, email address and building access
- Shipment of equipment for remote employees
- Two (2) factor authentication to ensure security for employees attempting to access to business systems remotely/outside of the company's network
- In response to law enforcement requests, court orders, or government investigations.

Optimal Blue 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 advance notice.

Selling Personal Information

Optimal Blue, LLC does not sell any personal information to third parties.

Data Retention

Optimal Blue, LLC will retain your personal information for as long as reasonably necessary to fulfill the purposes for which we collected it, and to satisfy any applicable legal, regulatory, or reporting requirements.

CA RESIDENTS ONLY

Your Rights under the CCPA

The CCPA provides consumers with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Personal Information

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. Once we receive and verify your 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.
- The 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 personal information we collected about you.
- If we disclosed your personal information for a business purpose, a list identifying the personal information categories that each category of recipient obtained.

Deletion Requests

You have the right to request that we delete any personal information collected from you and retained, unless retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers, subcontractors, and consultants to delete) your personal information, unless an exception applies.

Exercising Your Rights

To request access to your personal information or request deletion, please submit a verifiable consumer request through one of the following methods: email (hr@optimalblue.com), telephone (972-781-0200 select HR), US mail: Optimal Blue, Attention: HR, 5340 Legacy Dr., Building 2, 2nd floor, Plano, TX 75024.

Only you or a person authorized to act on your behalf may make a consumer request related to your personal information.

You may only request a copy of your data twice within a 12-month period. The request must:

- Provide sufficient information to allow us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail to allow 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 the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

Optimal Blue's goal is to respond to a verifiable consumer request within 45 days of its receipt. If we require more time, 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. Any disclosures we provide will cover only the 12-month period preceding the request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. We will provide your personal information in a format that is readily useable and should allow you to transmit the information without hindrance.

We will not charge a fee to process or respond to your request unless it is excessive or repetitive. If we determine that the request warrants a fee, we will provide you with the basis for that decision and a cost estimate before completing your request.

Non-Discrimination

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

Changes to This Privacy Policy

Optimal Blue 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 notify you through a notice on our web site.

Contact Information

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact Human Resources (hr@optimalblue.com; 972-781-0200 select HR; or Optimal Blue, Attn: HR, 5340 Legacy Dr. Building 2, 2nd floor, Plano, TX 75024).