



California Consumer Privacy Act Notice for Human Resources Covered Individuals

This California Consumer Privacy Act Notice for Human Resources (“HR”) Covered Individuals (the “CCPA HR Notice”) describes the types of personal information United Services Automobile Association (USAA) and its family of companies, including companies identified with the USAA name and Garrison Property and Casualty Insurance Company (collectively, “USAA,” “we,” or “us”), collect, use, retain and disclose about HR Covered Individuals. “HR Covered Individuals” (also referred to as “you”) are California residents who are any of the following: (1) prospective, current, or former employees, applicants for employment, owners, directors, officers, or contractors, service providers, or similar personnel, of United Services Automobile Association and its affiliates (collectively, “USAA Personnel”); (2) emergency contacts of USAA Personnel; and (3) individuals related to USAA Personnel for whom USAA administers benefits. This CCPA HR Notice only applies to HR Covered Individuals.

USAA Personnel are responsible for providing this CCPA HR Notice to any HR Covered Individual whose personal information is provided to USAA by USAA Personnel. Certain terms used in this CCPA HR Notice have the meanings given to them in the California Consumer Privacy Act of 2018 (as amended by the California Privacy Rights Act of 2020), and its implementing regulations (collectively, the “CCPA”).

What is Personal Information?

Under the CCPA, “Personal Information” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Covered Individual or their household. This CCPA HR Notice only applies to information collected, used, retained and disclosed in connection with your capacity as a HR Covered Individual.

1. Categories of Personal Information We Collect

USAA may collect (and may have collected during the 12-month period prior to the Last Updated date of this CCPA HR Notice) the following categories of personal information about HR Covered Individuals:

- **Identifiers:** Identifiers, such as real name, alias, postal address, unique personal identifier (e.g., device identifier, employee number, unique pseudonym, user alias/ID), telephone number, online identifier, internet protocol address, email address, employee account name, Social Security number, driver’s license number, passport number, date of birth, and other similar identifiers.
- **Personal Information Described in Cal. Civ. Code § 1798.80(e):** Personal information, as defined in the California safeguards law, such as signature, physical characteristics or description, state identification card number, insurance policy number, education, bank account number, credit card number, debit card number, other financial information, medical information, and health insurance information.
- **Protected Classifications:** Characteristics of protected classifications under California or federal law, such as race, color, national origin, religion, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, medical condition, ancestry, genetic information, disability, citizenship status, and military and veteran status.
- **Biometric Information:** Biometric information, such as fingerprints.

- **Internet or Network Activity Information:** Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding HR Covered Individuals' interaction with websites or applications.
- **Geolocation Data:** Geolocation data, such as device location, and geographic coordinates of employee work address.
- **Audio, Electronic, Visual, or Similar Information:** Audio, electronic, visual or similar information, such as call and video recordings.
- **Professional or Employment Information:** Professional or employment-related information, such as compensation, benefits and payroll information (e.g., salary-related information, tax-related information, benefits elections and details regarding leaves of absence), information relating to an HR Covered Individual's position (e.g., job title and job description), performance-related information (e.g., evaluations and training certificates), talent management information (e.g., résumé information, occupation details, education details, certifications, professional association affiliations, historical compensation details, previous employment details, pre-employment screening details, and background check information, including criminal records information), emergency contact information, and dependent information.
- **Education Information:** Education information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99).
- **Inferences:** Inferences drawn from any of the information identified above to create a profile about HR Covered Individuals reflecting their preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
- **Sensitive Personal Information:** Personal information that reveals a HR Covered Individual's: Social Security, driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in connection with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic group, religious or philosophical beliefs, or union membership; contents of mail, email and text messages unless we are the intended recipient of the communication; and genetic data. Sensitive Personal Information also includes biometric information processed for the purpose of uniquely identifying a HR Covered Individual, as well as personal information collected and analyzed concerning a HR Covered Individual's health, sex life, or sexual orientation.

USAA only collects and processes personal information that is considered to be sensitive personal information under the CCPA for the purposes set forth in Section 3.

2. Categories of Sources from Which Personal Information is Collected

During the 12-month period prior to the Last Updated date of this CCPA HR Notice, USAA may have obtained personal information about HR Covered Individuals from the following categories of sources:

- Directly from HR Covered Individuals;
- HR Covered Individuals' devices;
- Family or friends who provide information about HR Covered Individuals, for example, in connection with our provision of benefits or services;
- Our affiliates and subsidiaries;
- Service providers, contractors and other vendors who provide services on our behalf;
- Survey research or business partners who provide information about HR Covered Individuals, such as when they provide feedback;
- Internet service providers ("ISPs");

- Operating systems and platforms;
- Government entities; and
- Data brokers, such as credit bureaus, credit reporting service providers, and background check services.

3. Purposes for Collection of Personal Information

USAA may use (and may have used during the 12-month period prior to the Last Updated date of this CCPA HR Notice) HR Covered Individuals' personal information for the business purposes of carrying out and supporting HR functions and activities, including the purposes described below and those specified in the CCPA.

- Managing work and employment-related activities and USAA Personnel generally, including: recruiting; performing background checks; determining suitability for employment or promotion; determining physical and/or mental fitness for work; managing onboarding activities; reviewing and evaluating performance; pay and compensation activities; determining eligibility for and processing salary increases, bonuses, and other incentive-based compensation; offering and managing retirement plans; providing references; managing attendance, absences, leaves of absence, and vacations; administering payroll services; reimbursing expenses; administering health, dental, and other benefits for HR Covered Individuals; accommodating disabilities or illnesses; training and talent development, including professional licenses, certifications and other designations; facilitating employee relocations and international assignments; making travel arrangements; securing immigration statuses; monitoring staff; creating staff directories; managing headcount, work planning, and office allocation; performing research, analysis and data analytics; investigating suspected misconduct or non-performance of duties; managing disciplinary matters, grievances, and terminations; reviewing staffing decisions; managing and providing access to facilities and other infrastructure; managing communications and relations with HR Covered Individuals; and carrying out obligations under employment contracts.
- Ensuring business continuity; protecting the health and safety of HR Covered Individuals and others; safeguarding, monitoring, and maintaining our information technology ("IT") infrastructure, office equipment, facilities, and other property; providing technical support; detecting or preventing theft or fraud, or attempted theft or fraud; and facilitating communication with HR Covered Individuals in an emergency.
- Operating and managing our IT, communications systems and facilities, and monitoring the use of these resources; performing data analytics; improving our services; allocating and managing company assets and human resources; strategic planning; project management; compiling audit trails and other reporting tools; and maintaining records relating to business activities, budgeting, and financial management.
- Complying with legal requirements, such as tax, record-keeping and reporting obligations; conducting audits, management and resolution of health and safety matters; complying with requests from government or other public authorities; responding to legal process, such as subpoenas and court orders; pursuing our legal rights and remedies; defending litigation and managing internal complaints or claims; conducting investigations; and complying with our internal policies and procedures.
- Performing services, including: maintaining or servicing accounts; providing services to HR Covered Individuals; processing transactions and payments; verifying HR Covered Individuals' information; providing data and analytics services; providing storage; or providing similar services.
- Auditing, including auditing compliance.
- Certain short-term, transient uses.
- Helping to ensure security and integrity.

- Debugging to identify and repair errors that impair existing intended functionality.
- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance such services or devices.

In addition to the business purposes identified above, we may use (and may have used during the 12-month period prior to the Last Updated date of this CCPA Notice) a HR Covered Individual’s personal information in connection with corporate transactions and USAA’s due diligence activities for a potential or actual transaction between USAA and another business, such as proposed or actual mergers, acquisitions or divestitures.

To the extent we process deidentified information, we will maintain and use the information in deidentified form and will not attempt to reidentify the information unless permitted by applicable law.

4. Retention of Personal Information

We retain personal information about HR Covered Individuals for the time period reasonably necessary to achieve the purposes described in this CCPA HR Notice, or any other notice provided at the time of collection, unless a longer retention period is required or permitted by applicable law, taking into account applicable statutes of limitation and our records retention requirements and policies.

5. Categories of Personal Information Disclosed for Business and Commercial Purposes

The table below sets forth each category of personal information (as described in more detail in Section 1) that we may have disclosed for the business purposes described in Section 3 during the 12-month period prior to the Last Updated date of this CCPA HR Notice. The table also shows the categories of third parties to whom each category of personal information was disclosed. We also may have disclosed the categories of personal information listed within the table to service providers who provide services on our behalf and to our affiliates.

Category of Personal Information	Category of Third-Party to Whom We Disclosed Personal Information
<ul style="list-style-type: none"> ▪ Identifiers ▪ Personal Information Described in Cal. Civ. Code § 1798.80(e) ▪ Protected Classifications ▪ Biometric Information ▪ Internet or Network Activity Information ▪ Geolocation Data ▪ Audio, Electronic, Visual, or Similar Information ▪ Professional or Employment Information ▪ Education Information ▪ Inferences ▪ Sensitive Personal Information 	<ul style="list-style-type: none"> ▪ Survey research firms ▪ Social networks ▪ Internet Service Providers ▪ Data analytics providers ▪ Government entities ▪ Data brokers, such as credit bureaus, credit reporting agencies and background check providers

In addition to the categories of third parties identified above, during the 12-month period prior to the Last Updated date of this CCPA Notice, we may have disclosed Personal Information about you to government entities and third-party businesses and organizations in connection with corporate transactions and USAA's due diligence activities for a potential or actual transaction between USAA and another business, such as proposed or actual mergers, acquisitions or divestitures.

USAA does not (and has not during the 12-month period prior to the Last Updated date of this CCPA HR Notice) sell or share (for cross-context behavioral advertising purposes) personal information about HR Covered Individuals.

We do not have actual knowledge that we sell or share the personal information of minors under 16 years of age.

6. HR Covered Individual Privacy Rights

You have certain rights regarding your personal information, as described below. We may decline to grant access to, delete, or correct your personal information as permitted by applicable law, for example, if we are required by law to retain the information we have collected from you or retaining the information is necessary for us to, for example, detect or investigate security incidents, or protect against fraud.

- **Know and Access:** You have the right to request that we disclose to you the personal information we have collected, used, disclosed, and sold or shared about you. We do not have to provide this information to you more than twice in any 12-month period.
- **Correct:** You have the right to request that we correct the personal information we maintain about you, if that information is inaccurate.
- **Delete:** You have the right to request that we delete certain personal information we have collected from you.
- **Non-Discrimination:** You have the right to be free from unlawful discrimination for exercising your rights under the CCPA.

How to Submit a Request: You may exercise your rights by submitting a request to know and access, correct, or delete your Personal Information by phone or email by contacting us at: 1-800-210-8722 or send a message to HumanResources@usaa.com. To submit a request as an authorized agent on behalf of an HR Covered individual, please send a message to HumanResources@usaa.com. Authorized agents must provide proof that a HR Covered Individual gave the authorized agent written permission to submit a request for the HR Covered Individual or that they are otherwise authorized to act on behalf of a HR Covered Individual. We may verify the identity of an authorized agent and we may also require the HR Covered Individual to verify their own identity with us and/or directly confirm with us that they have given the authorized agent permission to submit the request.

Verifying Requests: To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. We may verify your identity by requiring you to sign into your USAA human resources management system. If you do not have a profile within a USAA human resources management system and you request access to, or correction or deletion of, your personal information, we may require you to provide your email address and information about your employment dates with USAA, communication with USAA, or other details about your work for, or relationship to USAA. In addition, if you do not have a profile within a USAA human resources management system and you ask us to provide you with specific pieces of personal information, we may require you to sign a declaration under penalty of perjury that you are the HR Covered Individual whose personal information is the subject of the request.

7. How To Contact Us

If you have any questions regarding this CCPA HR Notice or our privacy practices, please contact us at HumanResources@usaa.com.

Last Updated: December 14, 2023