

BNY MELLON PRIVACY NOTICE FOR CALIFORNIA EMPLOYEES

Effective Date: January 1, 2023

Last Updated: December 7, 2022

The BNY Mellon affiliate responsible for your personal information will be your employing entity or the BNY Mellon affiliate identified in your employment contract or contract for services (“**BNY Mellon**”, “**we**”, and “**us**”).

This **California Personal Information Privacy Notice (“Notice”)** supplements the information contained in any other BNY Mellon policy or notice and applies solely to employees who reside in the State of California (“**you**”). This Notice identifies the types of personal information we collect in connection with your employment. We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“**CCPA**”) and the California Privacy Rights Act of 2020 (“**CPRA**”) and any implementing regulations and subsequent supplements, amendments, or replacements to the same. Any terms defined in the CCPA and CPRA have the same meaning when used in this notice.

We may amend this Notice from time to time to keep it up to date with legal requirements and the way in which we operate our business. If we make changes to this Notice, we will seek to inform you by notice on the BNY Mellon intranet or email.

INFORMATION WE COLLECT

We may collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular employee or device (“**personal information**”). Under the CPRA, personal information further includes “**sensitive personal information**” such as Social Security number, driver’s license number, passport number, financial data, biometric data, racial and ethnic origin, and information collected concerning a consumer’s health.

Category	Examples
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, signature, or other similar identifiers.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Identifiers listed in the preceding category A and physical characteristics or description, telephone number, 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.
C. Protected classification characteristics under California or federal law.	Age (e.g., 40 years or older as defined in the Age Discrimination in Employment Act of 1967), 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).
D. 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.
E. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
F. Geolocation data.	Physical location or movements.
G. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.
H. Professional or employment-related information.	Current or past job history or performance evaluations.
I. 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 lists, student schedules, student identification codes, student financial information, or student disciplinary records.
J. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
K. Household Information	Information pertaining to household age, estimated income identifier, number of persons in household, number of cars owned, household college education, dwelling type, among other information capable of being linked to a household.
L. Sensitive Personal Information categories	<p>A Social Security number, driver's license, state identification card, passport number; account log-in in combination with any required security or access code, password, or credentials allowing access to an account; consumer's precise geolocation; consumer's racial or ethnic origin, religious or philosophical beliefs, or union membership; consumer's genetic data; the processing of biometric information for the purpose of uniquely identifying a consumer; and personal information collected and analyzed concerning a consumer's health.</p> <p>Some sensitive personal information included in this category may overlap with other categories.</p> <p>We limit the use of sensitive personal information to only the purposes necessary to manage our employment relationship with you.</p>

USE OF PERSONAL INFORMATION

BNY Mellon collects and maintains employee personal information to manage the employee relationship. Typically, it will be necessary for us to process your personal information in connection with your employment with BNY Mellon or to further our legitimate interests related to BNY Mellon's business operations. The main purposes for which we may use employee personal information include but are not limited to:

- Workforce planning, recruitment, staffing, and budgeting;
- Workforce administration, payroll, compensation and benefits programs, travel and expense processing, internal health, and safety programs;
- Performance and career management, learning and development;
- Complaint and issue management, including grievances and disciplinary procedures;
- Business management and operations activities, including administration of information systems required as part of employment, auditing, internal reporting;
- Compliance with legal, regulatory, audit, or fiscal obligations such as anti-bribery, corruption, tax, and social security requirements, employees' right to work, litigation and other legal proceedings;
- Equality and diversity information to ensure equal opportunities within BNY Mellon's workforce;
- Protection of BNY Mellon's workforce and the general public against injury, theft, legal liability, fraud, abuse, or threat to the security of our networks, communications, systems, facilities and infrastructure;
- Ensuring the health and safety of BNY Mellon's workforce by utilizing health and safety audits, health and safety screening requests, vaccination status, risks assessments, and incident reports;
- Monitoring access and use of BNY Mellon systems, networks and equipment, including building access records, closed circuit television footage, download and print records, call records, information sent or received using BNY Mellon's email or equipment, information captured by IT security programs and filters; and
- Other customary purposes related to the execution of an employment contract.

STORING AND RETAINING YOUR PERSONAL INFORMATION

BNY Mellon will retain your personal information for as long as required for the purposes for which it was collected and in compliance with our obligations under legal, regulatory, tax, accounting, and necessary technical requirements. BNY Mellon may retain your personal information for longer periods of time if required to do so according to our regulatory obligations or where we believe necessary to establish, defend, or protect our legal rights or those of others.

Your personal information will be subject to a corporate retention schedule which incorporates the factors above. For more information on the retention of your personal information, please submit an [eRequest](#) or call us at 1-844-545-1259.

SALE AND SHARE OF PERSONAL INFORMATION

BNY Mellon does not sell personal information. We may share personal information when we participate in online advertisements using third party cookies on our websites. You can opt out of the use of such third party cookies through the “Do Not Share My Personal Information” or “Manage Cookies” link that is specified in the relevant BNY Mellon website’s footer.

RIGHTS AVAILABLE TO HELP MANAGE YOUR PRIVACY

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have certain rights in relation to your personal information. We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal information requested to you.

Subject to legal and other permissible considerations, we will use reasonable efforts to honor your request promptly or inform you if we require further information to fulfill your request.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

Right to access your personal information

You have the right, subject to certain exceptions defined in the CCPA, CPRA, and other applicable laws and regulations, to request that BNY Mellon disclose certain information to you about our collection and use of your personal information over the past 12 months. 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,
- Our business or commercial purpose for collecting that personal information,
- The categories of third parties with whom we share that personal information,
- The categories of personal information that each recipient received, and
- The specific pieces of personal information we collected about you.

Right to correct or delete your personal information

You have the right to request correction of any inaccurate information relating to you and deletion of any personal information we hold about you, subject to certain exceptions defined in the CCPA, CPRA, and other applicable laws and regulations.

For example, we are not required to comply with your request to delete personal information if the processing of your personal information is necessary for compliance with a legal obligation, or for the establishment, exercise, or defense of legal claims.

EXERCISING YOUR RIGHT TO ACCESS, CORRECT, AND DELETE

To exercise the access, correction, and deletion rights described above, please submit a verifiable employee request to us by either:

- Visiting the [Individual Request Page](#); or
- Calling us at 1-844-545-1259; or
- Submitting an [eRequest](#).

The verifiable employee request must:

- Provide sufficient information that allows us to verify, to a reasonably high degree of certainty, that you are the person about whom we collected personal information. This may include requesting that you provide us with at least two or more pieces of personal information to match against personal information about you that we may or may not maintain and which we have determined to be reliable for the purpose of verification.
- Describe your request with sufficient detail that allows 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. Making a verifiable employee request does not require you to create an account with us. We will only use personal information provided in a verifiable employee request to verify the requestor's identity or authority to make the request.

AUTHORIZED AGENT

Only you, or a person you have designated in writing as your authorized agent, or who is registered with the California Secretary of State to act on your behalf, or whom you have provided power of attorney pursuant to California Probate Code sections 4000 to 4465, ("Authorized Agent"), may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

If you wish to have an Authorized Agent make a verifiable consumer request on your behalf, they will need to provide us with sufficient written proof that you have designated them as your Authorized Agent and we will still require you to provide sufficient information to allow us to reasonably verify that you are the person about whom we collected personal information.

NON-DISCRIMINATION

You have the right not to receive discriminatory treatment for exercising any of your CCPA and CPRA rights.

CONTACT INFORMATION

If you have any questions or comments about this notice, the ways in which BNY Mellon collects and uses your personal information, please do not hesitate to submit an [eRequest](#) or call us at 1-844-545-1259.