

## PARS Privacy Notice for California Residents

Effective Date: January 1, 2023

Public Agency Retirement Services (“**PARS**” or “**we**,” “**our**,” or “**us**”) provides this Privacy Notice for California residents to supplement the information contained in our Electronic Systems Access Policy found in your PARS Employee Handbook provided to you at the time you were hired. This Notice applies solely to Employees of PARS who reside in California (“**you**” and “**your**”). We adopt this Notice primarily to comply with the California Privacy Rights Act (“**CPRA**”) and any terms defined in the CPRA have the meanings assigned by the CPRA when used in this Notice.

### I. Information We Collect

Through our employment and payroll provider, Paylocity, our employee benefits enrollment tool, Ease, our retirement plan administrator, Vanguard/Ascensus, and other employment or benefits recordkeeping tools (the “**Employment Portals**”) and offline, we collect certain information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“**personal information**”). Personal information does not include publicly available information from government records or deidentified or aggregated information.

The following table lists the categories of personal information established by the CPRA, with examples of the types of specific information each category represents, and states whether PARS has collected any personal information belonging to each category within the past twelve (12) months from California residents.

Category	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, 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, marital status, medical condition, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), or veteran or military status.	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, or similar information	YES
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 lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES
K. Sensitive Personal Information	Social Security number, driver's license, state identification card, or passport number, account log-in, financial account, password, or credentials allowing access to an account, consumer's racial or ethnic origin, union membership, or health.	YES
L. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

PARS collects the categories of personal information listed above from the following types of sources:

- Directly from you – such as through web forms or during account setup.
- Indirectly from you – such as information sent automatically by your web browser.
- Directly from your current or former Employer
- From third parties such as employment references and background or credit checks.

## **II. Use of Personal Information**

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

- To fulfill the reason you provided the information.
- To create, maintain, customize, and secure your account on the Employment Portals.
- To provide technical or customer support. To communicate with you regarding changes to or new terms for accounts, conduct surveys, and other issues.
- To comply with our obligations under applicable law.
- To administer and protect our business and our websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).
- To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.
- To administer our staffing, hiring, and employment needs and provision of benefits.
- To select and manage our outside vendors, service providers and agents.
  
- For the reasons described to you when collecting your personal information.
- To process your requests, inquiries, or transactions, such as requests for plan information.

### **Processing Sensitive Personal Information**

We collect and process Sensitive Personal Information for the purposes disclosed at the time we collect this information. We do not process this information for purposes other than the purpose for which it was originally collected unless required by law. We use and process Sensitive Personal Information collected from California employees, job applicants or vendors (including racial or ethnic origin, physical health diagnosis, or citizenship or immigration status) to comply with laws including anti-discrimination laws and disability accommodation laws. We use Sensitive Personal Information from other consumers (including racial or ethnic origin, or citizenship or immigration status) to provide disability accommodations.

## **III. Disclosing Personal Information**

From time-to-time PARS discloses your information as described below. This includes disclosing information to our service providers via the Employment Portals, professional advisers such as lawyers, bankers, auditors, and accountants, and, when required by law, regulators, or law enforcement.

### **A. Disclosure of Personal Information for a Business Purpose.**

PARS may disclose your personal information to service providers for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, PARS has disclosed the following categories of personal information to a service provider for a business purpose:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category C: Protected classification characteristics under California or federal law.

Category I: Professional or employment-related information.

Category J: Non-public education information.

Category K: Sensitive Personal Information (via the Employment Portals).

We may have disclosed certain sensitive personal information in connection with the operation of our business. This includes disclosing Social Security number or tax payer identification number of employees, contractors or service providers to our third party accounting and professional service providers and taxing authorities and, with respect to employees, to benefits providers, including via the Employment Portals; disclosing financial account information to service providers such as payment processors and payroll services for purposes of processing payments and payroll; disclosing racial or ethnic origin or union membership to our third party staffing and professional providers and, when required by law, to government regulators to establish that we do not engage in discriminatory practices; disclosing health information to benefits providers or government agencies to comply with state, federal or local health requirements; and disclosing information to services providers for purposes of identity verification and security.

## B. Selling Personal Information

We do not sell personal information for monetary consideration, but we may transfer your information to a third party that provides us with services such as helping us with data analysis and security, which may fall under the definition of for “other valuable consideration” and which may therefore be considered a “sale” under the CPRA. In the preceding twelve (12) months we may have disclosed the following categories of information for a business purpose which falls within the definition of a ‘sale.’

Category A: Identifiers.

Category F: Internet or other similar network activity.

We do not sell the personal information of individuals we actually know are less than sixteen (16) years of age. Please see below for opting out of having your information sold.

C. Sharing Personal Information for Behavioral or Cross-Context advertising.

**We do not share personal information with third parties who may use it for cross-context or behavioral advertising purposes.**

## IV. Your Rights and Choices

The CPRA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CPRA rights and explains how to exercise those rights.

### A. Information Access Rights

You have the right to request that we disclose to you certain information relating to our collection and disclosure of your personal information over the past twelve (12) months. In addition, you have the right to request a copy of the specific information we collected about you. Specifically, you may request that we disclose to you:

- Our information collection practices:
  - 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 or selling that personal information.
  - The categories of third parties with whom we share that personal information.
  - This disclosure will cover, at your option, either our practices during the twelve (12) months preceding your request or during the period beginning January 1, 2022, up to the date of your request.
- Our information disclosure practices:

- If we sold or disclosed your personal information for a business purpose, or if we shared your information with a third party for cross-context or behavioral advertising purposes
- For information sales: we will identify the categories of personal information we sold and the category of recipients of the information.
- For information shared for cross-context or behavioral advertising purposes: we will identify the categories of personal information we shared and the category of recipients of the information.

For disclosures for a business purpose: we will identify the categories of personal information we disclosed for a business purpose, the business purpose for the disclosure and the category of recipients of the information.

- This disclosure will cover, at your option, either our practices during the twelve (12) months preceding your request or during the period beginning January 1, 2022, up to the date of your request.
- The specific pieces of personal information we collected about you (also called a data portability request):
  - We will provide you with a copy of the specific information we collected about you.
  - This will not include data generated to help ensure security and integrity or as prescribed by regulation.
  - This disclosure will cover, at your option, either our practices during the twelve (12) months preceding your request or during the period beginning January 1, 2022, up to the date of your request.

## **B. Information Correction Rights**

You have the right to request that we correct information that we hold which is inaccurate. We will use commercially reasonable efforts to make the requested corrections. In some cases, for instance if you have an account with us, you can update your information by logging into your account.

## **C. Information Deletion Rights**

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. We will also direct our service providers and contractors to delete your personal information from their records unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) 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, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, 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 et. seq.).
- 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.

#### **D. Opt-Out Rights**

You have the right to tell us not to sell or share your personal information and to tell us to limit processing of Sensitive Personal Information. Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in at any time by:

- Calling Bret Griffin at: (800) 540-6369 x114
- Emailing Bret Griffin at: [bgriffin@pars.org](mailto:bgriffin@pars.org)
- By mail post to:  
Public Agency Retirement Services  
Attn: Human Resources Department / CPRA  
P.O. Box 12919  
Newport Beach, CA 92658

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

- **Do Not Sell My Personal Information.**

- If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the "right to opt-in") from either the consumer who is at least 13 but not yet 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

- **Do Not Share My Personal Information**

- You have the right to opt out of having your personal information shared for cross-context or behavioral advertising purposes. Sharing your personal information means making it available to a third party so that they can use it to display targeted or cross-context behavioral advertisement to you.
- Cross-context behavioral advertising means that we display an advertisement to you that is selected based on personal information about you that we obtained or inferred over time from your activities across other companies' websites, applications, or online services that we use to predict your preferences or interests. This does not include using your interactions with us or information that you provide to us to select advertisements to show you.
- **We do not share your personal information with third parties for cross-context or behavioral advertising purposes.**

- **Limit Processing of Sensitive Personal Information**

- You have the right to tell us not to process Sensitive Personal Information for any purpose other than the purpose for which we originally collected it.

- **We only process Sensitive Personal Information for the purpose for which we originally collected it.**

## **E. How to Exercise These Rights**

Access, Correction and Deletion. To exercise the access, correction, and deletion rights described above, please submit a verifiable consumer request to us by one of the following means:

- Calling Bret Griffin at: (800) 540-6369 x114
- Emailing Bret Griffin at: [bgriffin@pars.org](mailto:bgriffin@pars.org)
- By mail post to:  
Public Agency Retirement Services  
Attn: Human Resources Department / CPRA  
P.O. Box 12919  
Newport Beach, CA 92658

If you have an existing account, you may log into your account to correct your information.

Only you or someone legally authorized to act on your behalf may make a request to access, correct, or delete your personal information. You may only make access requests twice within any twelve (12) month period. You may make correction or deletion requests at any time.

The CPRA requires us to respond to consumer requests to exercise the rights described in this Notice only when the request can be verified. 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. Your request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include:
  - Your current or former employer and your full name.
  - Your home address.
  - Your contact information (email or phone number).
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.
- If you are requesting a copy of information we have collected about you, correction of your information or deletion of your information we may also request that you sign and return an identity verification declaration.
- You are not required to create an account for the purpose of making a request as described in this Notice. If we request that you provide personal information in order to make a verifiable consumer request, we will only use that personal information to verify your identity or authority to make the request.

Opt-Out Rights. To opt out of the sale of your personal information, you (or your authorized representative) may submit a request to us by clicking the following link: "Do Not Sell My Personal Information".

You may also opt out by activating a user-enabled global privacy control, such as a browser plug-in or privacy setting, device setting, or other mechanism, that communicates or signals your choice to opt-out of the sale and sharing of personal information. When we receive such a signal, we will stop setting third party, analytics, or advertising partner cookies on your browser. This will prevent the sale or sharing of information relating to that specific device through cookies to our advertising or analytics partners. This option does not stop all sales or sharing of your information because we cannot match your device's identification or internet protocol address

with your personally identifiable information like your name, phone number, email address or ZIP Code. If you delete cookies on your browser, any prior do not sell or do not share signal is also deleted and you should make sure that your user-enabled setting is always activated

You may make Do Not Sell requests at any time.

**You do not need to opt out of sharing information or to limit processing of Sensitive Personal Information because we do not engage in these activities.**

## **F. Our Responses**

We will provide an email to you acknowledging receipt within ten (10) days of receipt of a request for access, correction, or deletion. This will explain how we will verify a request which will vary depending on the type of request made. We endeavor to respond to a verifiable consumer request for access, correction, or deletion within forty-five (45) days of its receipt. If we require more time (up to 45 days), we will inform you of the reason and extension period in writing. For a request not to sell or share your information or to limit processing of sensitive information, we will respond as soon as feasibly possible, but no later than 15 days from the date we receive the request.

We will deliver our written response by mail or electronically, at your option. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, specifically a text file.

Any disclosures we provide may only cover the twelve (12) month period preceding the verifiable consumer request's receipt. However, you may request that we disclose the required information beyond the twelve (12) - month period, and we will honor that expanded request unless doing so proves impossible or would involve a disproportionate effort. Your right to request required information beyond the twelve (12) month period, and our obligation to provide that information, shall only apply to personal information collected on or after January 1, 2022.

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.

## **V. Statement of Non-Discrimination**

We will not discriminate against you for exercising any of your CPRA rights. Unless permitted by the CPRA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

## **VI. Changes to This Privacy Notice**

We reserve the right to amend this Notice at our discretion at any time. When we make changes to this Notice, we will post the updated notice on the Employment Portals and update the Notice's effective date.

**Your continued use of our Employment Portals following the posting of changes constitutes your acceptance of such changes.**



## **VII. Contact Information**

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

- Calling Bret Griffin at: (800) 540-6369 x114
- Emailing Bret Griffin at: [bgriffin@pars.org](mailto:bgriffin@pars.org)
- By mail post to:  
Public Agency Retirement Services  
Attn: Human Resources Department / CPRA  
P.O. Box 12919  
Newport Beach, CA 92658