

CAPITAL ONE WORKFORCE CALIFORNIA CONSUMER PRIVACY ACT DISCLOSURE

Effective: January 1, 2020

This Capital One Workforce California Consumer Privacy Act Disclosure (“Workforce CCPA Disclosure”) supplements the information contained in the [Capital One Online Privacy Policy](#) and applies solely to California residents.

It explains how Capital One Financial Corporation and its U.S. affiliates (collectively, “Capital One,” “we,” “us,” or “our”) collect and use personal information in the context of a person’s role as a job applicant, employee, associate, contractor, or other member of the Capital One workforce (“Workforce Member”).

What Personal Information Is Covered by the CCPA?

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 California resident or household.

The CCPA does not apply to certain information, such as information subject to the Health Insurance Portability and Accountability Act (HIPAA) and certain other state or federal privacy laws. This Workforce CCPA Disclosure also does not apply to information that we collect in connection with non-Workforce Members. For more information about how we collect, use, and disclose personal information about non-Workforce Members, please visit capitalone.com/identity-protection/privacy.

Categories of Personal Information We Collect

We collect the following categories of personal information, as defined in the CCPA, relating to Workforce Members who are California residents:

CCPA Category	Illustrative Examples
Identifiers	Name, address, online identifiers, Internet Protocol address, email address, Social Security number, or other similar identifiers
Personal information as defined in the California Customer Records Act, Cal. Civ. Code § 1798.80	Contact information, health information, insurance information, and financial information
Protected classifications under California or federal law	Age, race, color, citizenship, marital status, medical condition, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), and veteran or military status
Commercial information	Information about past transactions or purchases
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, voiceprints, or other physical patterns
Internet or similar network activity information	Browsing history, search history, information on an interaction with a website, application, or advertisement
Geolocation data	Device location
Audio, electronic, visual, or similar information	Call and video recordings

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Professional or employment-related information	Information such as work history and performance evaluations
Education information	Education records and date of graduation
Inferences drawn from other personal information	Certain inferences concerning an individual's preferences, abilities, aptitudes, and characteristics

We collect personal information relating to Workforce Members who are California residents in a variety of contexts, including in connection with applications for employment, Human Resource activities, marketing activities, our websites and mobile applications, and certain Capital One locations. The categories of personal information that we collect and use about a California resident will depend on our specific relationship or interaction with that individual, and the examples provided in each category above are for illustrative purposes only.

Purposes for which We Use Personal Information

We may use personal information relating to Workforce Members who are California residents for one or more of the following business purposes:

- Evaluating employment applications and employee performance
- Providing and maintaining our Workforce Member related services
- Conducting background checks
- Protecting against security risks
- Advertising and marketing
- Conducting research and data analysis
- Maintaining our facilities, systems, and infrastructure
- Improving our Workforce Member related services
- Carrying out our legal and business purposes, such as complying with federal, state, or local laws, responding to civil, criminal, or regulatory lawsuits or investigations, exercising our rights or defending against legal claims, resolving complaints and disputes, performing compliance activities, performing institutional risk control, and otherwise operating, managing, and maintaining our business
- As otherwise disclosed to you at or before the point of collecting your personal information

We may also use personal information relating to California residents for one or more of the specific "business purposes" listed in the CCPA:

- Auditing related to a Workforce Member
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity

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- Debugging to identify and repair errors that impair existing intended functionality
- Short-term, transient use
- Performing services on behalf of Capital One or its service providers, including maintaining or servicing Workforce Member's accounts, providing Workforce Members service, processing or fulfilling orders and transactions, verifying Workforce Members' information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of Capital One or its service providers
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of a service that is owned or controlled by Capital One, and to improve, upgrade, or enhance the service that is owned or controlled by Capital One

Changes to This Workforce CCPA Disclosure

We may change or update this Workforce CCPA Disclosure in the future. When we do, we will post the revised Workforce CCPA Disclosure on our website. This Workforce CCPA Disclosure was last updated and became effective on the date posted at the top of this page.