

## NOTICE AT OR BEFORE COLLECTION FOR CALIFORNIA EMPLOYMENT-RELATED PERSONS

Last Updated on January 1, 2020

We are providing you with this notice under the California Consumer Privacy Act of 2018 (“CCPA”) to explain the categories of, and our commercial or business uses for, certain types of personal information that we collect.

**This notice only applies to California residents who are job applicants, employment candidates, employees, directors, officers, members, owners, or contractors (collectively “Employment-related Persons,” or, alternatively, “you,” or “your”) of Midland Credit Management, Inc. and Atlantic Credit & Finance, Inc. (collectively, “we,” “us,” or “our”). Other California consumers who are not Employment-Related Persons should refer to our CCPA Notice for California Consumers, available at [www.midlandcredit.com/consumerprivacy](http://www.midlandcredit.com/consumerprivacy), or on the individual homepages of our affiliate companies at [www.midlandcredit.com](http://www.midlandcredit.com), [www.midlandfunding.com](http://www.midlandfunding.com), and [www.atlanticcreditfinance.com](http://www.atlanticcreditfinance.com).**

### Personal Information Under the CCPA

The CCPA applies to certain information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“Personal Information”). However, Personal Information does not include publicly available information from government records or de-identified or aggregated consumer information. In addition, the CCPA does not apply to some specific types of information that are expressly excluded from the CCPA, like (1) health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; or (2) personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

### Personal Information We May Collect

Unless exempt from the CCPA, we may collect the following categories of Personal Information from Employment-Related Persons. **PLEASE NOTE: Although we may generally collect Personal Information from these categories to the extent described below, we may not necessarily collect all of the specific pieces of Personal Information described within a particular category of Personal Information for any individual Employment-Related Person, and may not collect any of such information at all for some Employment-Related Persons:**

Category	Specific Pieces of Personal Information in This Category, Per Cal. Civ. Code § 1798.140(o)(1)(A)-K	Collected?
A. Identifiers	“Identifiers such as 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 Cal. Civ. Code § 1798.80(e)	The categories of information listed in section 1798.80 of the California Civil Code including, among other things, name, signature, Social Security number, address, telephone 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.	YES
C. Protected classifications under California or federal law	The categories of protected classes under California or federal laws including, among other things, race, color, sex/gender, age, and other classifications protected by law.	YES
D. Commercial information	"Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies."	NO
E. Biometric information	Physical or behavioral human characteristics that can be used to digitally identify a person to grant access to systems, devices, or data.	YES
F. Internet or other electronic network activity	"Internet or other electronic network activity information, including, but not limited to, browsing history, search history, or information on a consumer's interaction with a website, application, or advertisement."	YES
G. Geolocation data	Information that can be used to identify an electronic device's physical location.	YES
H. Audio, electronic, visual, thermal, olfactory, or similar information	"Audio, electronic, visual, thermal, olfactory, or similar information."	YES
I. Professional or employment-related information	Information such as 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. § 232g, 34 C.F.R. Part 99))	Information such as education records directly related to a student maintained by an educational institution or party acting on its behalf.	YES
K. Inferences drawn from other personal information	Inferences drawn from any of the above categories to create a profile about the consumer "reflecting the consumer's preferences, characteristics, psychological trends,	YES

	predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.”	
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### Sources of Personal Information

To the extent we collect any Personal Information that is not exempt from the CCPA, we collect each of the above-listed categories from the following categories of sources:

- Directly from you. For example, from job applications and/or employment forms.
- Indirectly from you. For example, through your interaction with biometric access devices, internet browsing activity on company-provided devices, and/or geolocation settings on company-provided devices.
- Indirectly from you through third party employment sources. For example, from information you posted on LinkedIn or other internet employment boards or sources.
- Directly from our third parties. For example, from third parties that provide employment background check services and/or drug testing services related to employment prerequisites.
- Directly and indirectly from activity on our website. For example, from submissions through our website portal or website usage details collected automatically.

### Use of Personal Information

To the extent we collect any Personal Information that is not exempt from the CCPA, we may disclose or use Personal Information from each of the above-listed categories for one or more of the following business purposes, if permitted by applicable law:

- To fulfill or meet the reason for which the information is provided. For example, if you have provided Personal Information to us, or to a third party that we contract with to perform employment-related services for us, we will use that information for the purpose for which it was provided.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
- To improve our website and present its contents to you.
- For testing, research, analysis and development.
- As necessary or appropriate to protect the rights, property or safety of us, our affiliates, or others.

- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

We 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 notice.

#### We Do Not Sell Any Personal Information

We do not sell any Personal Information, including without limitation any Personal Information of minors under the age of 16 either with or without affirmative authorization.

#### Contact Information

If you have any questions or comments about this notice or the ways in which we collect and use Personal Information, please do not hesitate to contact us at:

Email: [HRSupport@mcmcg.com](mailto:HRSupport@mcmcg.com)

Website: [www.midlandcredit.com](http://www.midlandcredit.com)