

FOR CALIFORNIA RESIDENTS

Applicant CCPA Notice

Last Updated: March 2023

This notice describes the categories of personal information collected by Navient Corporation and its affiliated companies, (together “The Company”) and the purposes for which such information may be collected and used. It also provides information concerning the Company’s record retention practices and rights you may have under the CCPA. The Company values your trust and is committed to protecting your personal information. For more complete information about the Company’s Privacy Policy, please see [here](#).

We retain your personal information for as long as necessary in accordance with applicable law and the Company’s data retention schedule. We may retain your personal information for longer if it is necessary to comply with our legal obligations or reporting obligations or as permitted or required by applicable law. We may also retain your personal information in a deidentified or aggregated form so that it can no longer be associated with you. To determine the appropriate retention period for your personal information, we consider various factors such as the amount, nature, and sensitivity of your information; the potential risk of unauthorized access, use or disclosure; the purposes for which we collect or process your personal information; and applicable legal requirements. Personal Information does not include certain categories of information, such as publicly available information from government records, deidentified or aggregated consumer information, and information subject to HIPAA or the California Confidential Medical Information Act.

Categories of Personal Information Collected
<p><u>Identifiers and Contact information.</u> This category includes names, addresses, telephone numbers, mobile numbers, email addresses, signature, account name, date of birth, bank account information, and other similar contact information and identifiers.</p>
<p><u>Protected classification information.</u> This category includes characteristics of protected classifications under California or federal law.</p>
<p><u>Internet or other electronic network activity information.</u> This category includes without limitation:</p> <ul style="list-style-type: none">• all activity on the Company’s information systems, such as internet browsing history, search history, email communications, usernames and passwords, and• all activity on communications systems including phone calls, call logs, voice mails, text messages, chat logs, and app use.
<p><u>Geolocation data.</u> This category includes GPS location data from company-issued mobile devices and company-owned vehicles.</p>
<p><u>Audio, electronic, visual, thermal, olfactory, or similar information.</u> This category includes, for example, information collected from camera, thermometers, and similar devices.</p>
<p><u>Biometric information.</u> This category includes information such as an individual’s physiological, biological, or behavioral characteristics used or is intended to be used singly or in combination with each other or with other identifying data, to establish individual identity.</p>
<p><u>Professional and employment-related information.</u> This category includes without limitation:</p> <ul style="list-style-type: none">• data submitted with employment applications and/or resumes including employment history, recommendations, etc.,• background check and criminal history,

- work authorization, and
- fitness for duty data and reports.

Education information. This category includes education history.

Limited medical information. This category includes without limitation:

- fitness for duty data and reports, and
- leave of absence information (including information related to family obligations), and physical and mental health data concerning applicant and his or her family members.

Sensitive Personal Information. This category includes sensitive information such as:

- social security, driver’s license, state identification card, passport number, or US Visa documents,
- precise geolocation,
- racial or ethnic origin, religious or philosophical beliefs, or union membership,
- genetic data, and
- information concerning health and biometric information for the purpose of uniquely identifying a consumer.

Inferences drawn from the Applicant Personal Information in the categories above. This category includes engaging in human capital analytics, including but not limited to, identifying certain correlations about individuals and success on their jobs, analyzing data to improve retention, and analyzing employee preferences to inform HR Policies, Programs and Procedures.

Purposes Personal Information, Including Sensitive Personal Information, is Used

- Collect and process employment applications, including confirming eligibility for employment, background and related checks, onboarding, and related recruiting efforts.
- To maintain physician records and occupational health programs.
- Maintaining personnel records and record retention requirements.
- Communicate with you about your application.
- Complying with applicable state and federal health, labor, employment, disability, equal employment opportunity, and related laws, guidance, or recommendations.
- Preventing unauthorized access to, use, or disclosure/removal of the Company’s property, including the Company’s information systems, electronic devices, network, and data.
- To permit providing services under certain federal government contracts.
- Protect the legal rights, privacy, safety or property of Company or its employees, agents, contractors, customers or the public.
- Protect against fraud or other illegal activity or for risk management purposes.
- Enforce the Company’s website’s terms of use.
- Design, implement, and promote the Company’s diversity and inclusion programs.

- Facilitate the efficient and secure use of the Company's information systems.
- Ensure compliance with Company information systems policies and procedures.
- Improve safety of employees, customers and the public with regard to use of Company property and equipment.
- Evaluate an individual's appropriateness for a particular position at the Company, or promotion to a new position.
- To respond to and manage any legal claims against the Company and/or its personnel, including civil discovery in litigation.
- To facilitate other business administrative functions and strategic activities, such as risk management, information technology and communications, financial management and reporting, workforce and succession planning, mergers and acquisition activities; and maintenance of licenses, permits and authorization applicable to Company operations.
- Other legitimate business purposes.

Sources of Personal Information

We may collect your Personal Information from the following sources:

- *You.* We may collect Personal Information directly from you or your device, such as through your use of our website, facilities or systems, when you send us an email, contact us by phone, or otherwise communicate or interact with us. We collect information when you are an applicant for employment with us or employed by us.
- *Related Entities and Affiliates.* We may collect information about you from our related parties and affiliates.
- *Social media and related services.* We may collect information about you through your social media services consistent with your settings on such services.
- *Third parties.* We may collect information about you from third parties such as your references, background check vendors, staffing agencies, Company clients, or other third-party sources that are lawfully entitled to share your data with us. This may include service providers or contractors who collect or process your Personal Information on our behalf.

Disclosures of Your Personal Information

To carry out the purposes outlined above, we may disclose your Personal Information to our affiliates, service providers and contractors, and government entities. We may also disclose your personal information to third parties, if necessary, to: (1) comply with federal, state, or local laws; (2) comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities; (3) cooperate with law enforcement agencies concerning conduct or activity that we reasonably and in good faith believe may violate federal, state, or local laws; or (4) exercise or defend legal claims.

Lastly, we may transfer personal information to a third party as part of a merger, acquisition, bankruptcy, or other transaction in which the third party assumes control or acquires all or part of the assets of our business.

Categories of Personal Information	Categories of Third Parties to Whom Disclosed
<p>Address and other identifiers – such as name, postal address, email address, phone number, account name, date of birth, Social Security number, driver’s license number, photograph, passport number, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers</p> <p>NOTE: The information in this category may include the following elements of Sensitive Personal Information: Social Security number, driver’s license number, state identification card number, and/or passport number.</p>	<p>Third parties as directed by you. We may disclose your personal information to the third parties to whom you direct.</p> <p>Affiliates.</p> <p>Our business partners. For example, we might disclose your personal information to one of our business partners for purposes of collaborating on providing services to you.</p> <p>Company clients.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including marketing companies, professional service providers, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.</p> <p>Governmental entities, legal service providers.</p>
<p>Protected status – such as citizenship, ethnic background, gender, or other similar identifiers</p> <p>NOTE: The information in this category may include the following elements of Sensitive Personal Information: racial, ethnic, or national origin.</p>	<p>Third parties as directed by you. We may disclose your personal information to the third parties to whom you direct.</p> <p>Affiliates.</p> <p>Our business partners. For example, we might disclose your personal information to one of our business partners for purposes of collaborating on providing services to you.</p> <p>Company clients.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including marketing companies, professional service providers, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.</p> <p>Governmental entities, legal service providers.</p>

<p>Financial information – such as bank account details, credit history, income details or other similar identifiers</p> <p>NOTE: The information in this category may include the following elements of Sensitive Personal Information: log-in, financial account in combination with any required security or access code, password, or credential allowing access to an account.</p>	<p>Third parties as directed by you. We may disclose your personal information to the third parties to whom you direct.</p> <p>Affiliates.</p> <p>Our business partners. For example, we might disclose your personal information to one of our business partners for purposes of collaborating on providing services to you.</p> <p>Company clients.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including marketing companies, professional service providers, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.</p> <p>Governmental entities, legal service providers.</p>
<p>Education or professional information, including veteran status or other similar identifiers</p> <p>NOTE: The information in this category may include the following elements of Sensitive Personal Information: union membership.</p>	<p>Third parties as directed by you. We may disclose your personal information to the third parties to whom you direct.</p> <p>Affiliates.</p> <p>Our business partners. For example, we might disclose your personal information to one of our business partners for purposes of collaborating on providing services to you.</p> <p>Company clients.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including marketing companies, professional service providers, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.</p> <p>Governmental entities, legal service providers.</p>
<p>Internet or other electronic network activity – such as browsing history, search history, a consumer’s interaction with an internet website, application, or advertisement</p> <p>NOTE: The information in this category may include the following elements of</p>	<p>Third parties as directed by you. We may disclose your personal information to the third parties to whom you direct.</p> <p>Affiliates.</p>

<p>Sensitive Personal Information: the contents of mail, email, or text messages, to which the business was not the intended recipient.</p>	<p>Our business partners. For example, we might disclose your personal information to one of our business partners for purposes of collaborating on providing services to you.</p> <p>Company clients.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including marketing companies, professional service providers, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.</p> <p>Governmental entities, legal service providers.</p>
<p>Geolocation data</p> <p>NOTE: The information in this category may include the following elements of Sensitive Personal Information: precise geolocation.</p>	<p>N/A</p>
<p>Audio, electronic, visual or similar information.</p>	<p>Third parties as directed by you. We may disclose your personal information to the third parties to whom you direct.</p> <p>Affiliates.</p> <p>Our business partners. For example, we might disclose your personal information to one of our business partners for purposes of collaborating on providing services to you.</p> <p>Company clients.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including marketing companies, professional service providers, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.</p> <p>Governmental entities, legal service providers.</p>
<p>Biometric Information</p> <p>NOTE: Biometric information is considered an element of Sensitive Personal Information.</p>	<p>Third parties as directed by you. We may disclose your personal information to the third parties to whom you direct.</p> <p>Affiliates.</p>

	<p>Our business partners. For example, we might disclose your personal information to one of our business partners for purposes of collaborating on providing services to you.</p> <p>Company clients.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including marketing companies, professional service providers, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.</p> <p>Governmental entities, legal service providers.</p>
<p>Inferences drawn from personal information – such as individual profiles, preferences, characteristics, behaviors or other similar identifiers</p> <p>NOTE: The information in this category may include the following elements of Sensitive Personal Information: racial or ethnic origin, religious or philosophical beliefs, union membership, health information.</p>	<p>Third parties as directed by you. We may disclose your personal information to the third parties to whom you direct.</p> <p>Affiliates.</p> <p>Our business partners. For example, we might disclose your personal information to one of our business partners for purposes of collaborating on providing services to you.</p> <p>Company clients.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including marketing companies, professional service providers, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.</p> <p>Governmental entities, legal service providers.</p>
<p>Commercial information – such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies or other similar identifiers</p>	<p>Third parties as directed by you. We may disclose your personal information to the third parties to whom you direct.</p> <p>Affiliates.</p> <p>Our business partners. For example, we might disclose your personal information to one of our business partners for purposes of collaborating on providing services to you.</p> <p>Company clients.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers,</p>

	<p>including marketing companies, professional service providers, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.</p> <p>Governmental entities, legal service providers.</p>
<p>The Company does not sell or share, as those terms are defined under applicable law, the above categories of Personal Information. The Company may add to the categories of personal information it collects and the purposes it uses personal information. In that case, the Company will inform you.</p>	

California Resident Individual Rights Requests. Individuals who are residents of the State of California have certain individual rights. Upon receipt of a verifiable consumer request (see below), and as required by applicable law, we will provide a response to such requests.

Right To Know About Personal Information Collected or Disclosed. In addition to what is described above, as a California resident, you also have the right to request more information regarding the following topics, to the extent applicable:

- the categories of personal information,
- the categories of sources from which the personal information is collected,
- the business or commercial purpose for collecting, selling, or sharing personal information, if applicable,
- the categories of third parties to whom the business discloses personal information, and
- the specific pieces of personal information the business has collected about you.

Right To Request Deletion Of Your Personal Information. You have the right to request that we delete the personal information we collected or maintained about you. Once we receive your request, we will let you know what, if any, personal information we can delete from our records, and we will direct any service providers and contractors with whom we disclosed your personal information to also delete your personal information from their records.

There may be circumstances where we cannot delete your personal information or direct service providers or contractors to delete your personal information from their records. Such instances include, but are not limited to, enabling solely internal uses that are reasonably aligned with your expectations based on your relationship with the Company and compatible with the context in which you provided the information or to comply with a legal obligation.

Right to Request Correction. You have the right to request that the Company correct any inaccurate personal information we maintain about you, taking into account the nature of that information and purpose for processing it.

Right to Non-Discrimination for the Exercise of Your Privacy Rights. We will not discriminate or retaliate against you for exercising any of your rights as described above.

Submitting Consumer Rights Requests. To submit a California Consumer Rights request as outlined above, please complete the form located [here](#), or call the designated CCPA toll-free number at **1-866-439-0996**. We reserve the right to only respond to verifiable consumer requests to know, delete, or correct.

We reserve the right to amend this Notice at any time without advance notice.

If you have questions about this notice, you may email Privacy_Events@Navient.com.