

CA Personnel Policy

This California Personnel Policy (“Personnel Policy”) applies to the employees, former employees, independent contractors and job applicants (including, in each case, individuals associated with their personnel records (e.g., beneficiaries and dependents)) of One Capital Management, LLC (“OCM”, “we”, “us” or “our”) who are residents of California (collectively, “California Personnel”, “you” or “your”).

This Personnel Policy is designed to meet our obligations under the California Consumer Privacy Act (“CCPA”), as amended by the California Privacy Rights Act (“CPRA”), and sets forth our policies for the collection, use, storage, sharing, disclosure and protection of personal information of California Personnel, as required for all California employers. If any OCM policy, statement or notice and this Personnel Policy conflict, then this Personnel Policy will prevail as to California Personnel, unless stated otherwise.

This Personnel Policy does not apply to personal information that OCM collects from or about clients, business partners or any non-California Personnel.

Under the CPRA, personal information includes information that identifies and describes who you are, as well as information that relates to or is capable of being associated with, or could reasonably be linked to you, one of your devices, and/or a member of your household. In this Personnel Policy, we refer to the information subject to the CPRA as “Employee Personal Information.”

You have the right to receive information on OCM’s privacy practices, including why we collect Employee Personal Information, from whom it is collected, and for what purpose.

OCM collects and uses Employee Personal Information for human resources, employment, benefits administration, health and safety, and business-related purposes and to be in compliance with applicable statutes and regulations. Below are the categories of Employee Personal Information we collect and the purposes for which we intend to use this information.

OCM MAY COLLECT THE INFORMATION BELOW:

- Identifying information, such as your full name, gender, date of birth, and signature.
- Demographic data, such as race, ethnic origin, marital status, sexual orientation, disability, and veteran or military status.
- Contact information, such as your home address, telephone numbers, email addresses, and emergency contact information.
- Dependent’s or other individual’s information, such as their full name, address, date of birth, and Social Security numbers (“SSN”).
- National identifiers, such as SSN, passport and visa information, and immigration status and documentation.
- Educational and professional backgrounds, such as your work history, academic and professional qualifications, educational records, references, and interview notes.
- Employment details, such as your job title, position, hire dates, compensation, performance, and disciplinary records, and vacation and sick leave records.
- Financial information, such as banking details, tax information, payroll information, and withholdings.
- Health and Safety information, such as health conditions (if relevant to your employment), job restrictions, workplace illness, and injury information, and health insurance policy information.
- Information Systems (IS) information, such as your login credentials and information, search history, browsing history, and IP addresses on our information systems and networks.
- Biometric information, such as facial recognition, fingerprints, iris or retina scans, keystrokes, or other physical patterns.
- Geolocation data, such as time and physical location related to the use of an internet website, application, device, or physical access to an OCM office and/or branch office location.
- Sensory or surveillance information, such as COVID-19-related temperature checks and call monitoring and video surveillance.
- Profile or summary about an applicant or employee’s preferences, characteristics, attitudes, intelligence, abilities, and aptitudes.

OCM COLLECTS EMPLOYEE PERSONAL INFORMATION TO USE OR DISCLOSE AS APPROPRIATE TO:

- Comply with all applicable laws and regulations.
- Recruit and evaluate job applicants and candidates for employment.
- Conduct background checks.
- Manage your employment relationship with us, including for:
 - onboarding processes.
 - timekeeping, payroll, and expense report administration.
 - employee benefits administration.
 - employee training and development requirements.
 - the creation, maintenance, and security of your online employee accounts.

