

PARS Privacy Notice for California Residents

Effective Date: January 1, 2020

Public Agency Retirement Services (“**PARS**” or “**we**,” “**our**,” or “**us**”) provides this Privacy Notice for California Residents to supplement the information contained in our Privacy Policy, available at <https://myaccount.pars.org/policy/PrivacyPolicy>. This Notice applies solely to residents of California (“**you**” and “**your**”). We adopt this Notice primarily to comply with the California Consumer Privacy Act of 2018 (“**CCPA**”) and any terms defined in the CCPA have the meanings assigned by the CCPA when used in this Notice.

I. Information We Collect

Through our website, <http://myaccount.pars.org> (the “**Portal**”), 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 CCPA, 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 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, credit card number, debit card 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, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	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, thermal, olfactory, or similar information.	NO
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. 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.

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 Portal.
- To provide technical or customer support.
- To comply with our obligations under applicable law.
- For the reasons described to you when collecting your personal information.
- To process your requests, inquiries, or transactions, such as requests for plan information.

III. Sharing Personal Information

PARS does not sell your personal information to third parties for their use. However, we 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 D: Professional or employment-related information.

Category E: Non-public education information.

IV. Your Rights and Choices

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

A. Access to Specific Information

You have the right to request that we disclose to you certain information relating to our collection and use of your personal information over the past twelve (12) months. Specifically, you may request that we disclose to you:

- 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.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

B. 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. Once we receive and confirm your verifiable consumer request (see Paragraph D, [Our Responses](#), below), we will delete your personal information from our records, and will direct our service providers 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.

C. How to Exercise These Rights

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

- Calling us at: (800) 540-6369
- Emailing us at: plansupport@pars.org
- By mail post to:
Public Agency Retirement Services
Attn: Privacy Department / CCPA
P.O. Box 12919
Newport Beach, CA 92658

Only you or someone legally authorized to act on your behalf may make a request to access or delete your personal information. You may only make such requests twice within any 12-month period.

The CCPA 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, your full name and your complete Social Security Number; or
 - Your current or former employer, your full name, the last four digits of your Social Security Number AND two additional items of identifying information.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

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.

D. Our Responses

We endeavor to respond to a verifiable consumer request 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.

We will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. 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.

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.

E. Right to Opt-Out and Opt-In to Sale of 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.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by clicking the following link:

"Do Not Sell My 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 to personal information sales at any time by:

- Calling us at: (800) 540-6369
- Emailing us at: plansupport@pars.org
- By mail post to:
Public Agency Retirement Services
Attn: Privacy Department / CCPA
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.

V. Statement of Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, 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 Portal and update the Notice's effective date.

Your continued use of our Portal 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 us at: (800) 540-6369
- Emailing us at: plansupport@pars.org
- By mail post to:
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