



Notice at Collection of Personal Information

Effective as of: January 1, 2020

Last Updated: December 2023

California residents — Your privacy rights regarding actual or prospective employment

What we collect and how we collect it

We collect information from employees and prospective employees ("individuals") that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked to, directly or indirectly, a person or household ("personal information") as defined by California law. Sensitive personal information is a subset of personal information that can include the individual's government identifiers, financial information, precise geolocation, race, religion, philosophical beliefs or union membership, communications, genetics, biometrics, health, sexual orientation, or citizenship and immigration status.. Specifically, CIBC collects the following categories of personal information and sensitive personal information:

Personal Information

Category	Examples
Identifiers	A real name, alias, email, telephone number, residential or business address, employee identification number for data and benefits analysis
Demographic information	Age, marital status, gender
Professional, employment - related information	Current or past job history related to an individual, professional credentials, and education
Beneficiary Information	Beneficiary information collected in relation to certain benefits such as 401(k) plan
Internet or other similar network activity	Browsing history, cookie information
Correspondence	Records related to correspondence sent and received by CIBC regarding employment status
Geolocation	To help serve the appropriate CIBC website or provide suggestions based on physical location
Audio, electronic, visual, or similar information	Audio or visual recordings of workplace conversations (e.g., telephone conversations), business meetings or training sessions may be captured by CIBC for various reasons, such as to facilitate accurate information gathering, provide absent parties with access to meeting content, or respond to workplace accommodation needs

Personal Information

Sensitive Personal Information

Government issued identification numbers	An individual's Social Security Number or Social Insurance Number, driver's license, state identification card, or passport number, including issue and expiry dates and personal address, as applicable
Financial Information	Bank account number, credit card number, debit card number, background checks, financial institution account number, banking information, financial transaction history, credit history, credit bureau, or any other financial information
Protected characteristics	Race, ethnicity, sex life or sexual orientation collected as part of inclusion and diversity initiatives, or as necessary to comply with applicable laws
Biometrics	Fingerprints to manage physical access to secure areas
Citizenship and immigration status	To ensure employment eligibility and comply with immigration law

CIBC may obtain the categories of personal information listed, both directly and indirectly:

- Directly from you. For example, from forms you complete or benefit selections you may choose.
- Indirectly from you. For example, from observing your actions on our website.
- From business partners. For example, we may use third parties to run background checks as a condition of your employment or contract for services; other employees may provide information about you, such as performance or evaluation information from a People Leader or other member of management. We may combine information that we collect from different sources.

How we use and retain your information

We may use the personal information we collect for one or more business purposes as described below:

- To create, maintain, customize, and secure your payroll and benefits with us.
- For performance management, internal reporting and other administrative processes.
- To defend our company, property, and others.
- To manage and secure our assets and premises and maintain the health and safety of 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 permitted by law.

We do not use or disclose sensitive personal information, as defined by California law, for inferring characteristics or for purposes other than those permitted by law. We keep personal information as long as it is necessary or relevant for the purposes for which it was collected. We also keep information as required by law.

What we disclose and to whom

We disclose several categories of personal information with service providers for a business purpose:

- Identifiers
- Demographic information

- Professional or employment-related information
- Health information
- Beneficiary Information
- Internet or other similar network activity
- Geolocation
- Financial information

For example, these service providers include vendors that help us administer payroll and benefits and that provide tools and technologies to help us run our business.

We will also disclose personal information if we think we have to in order to comply with the law or to protect ourselves. For example, we may share information in response to a court order or subpoena, or to a request made by a government agency or investigatory body, including U.S. and non-U.S. law enforcement or regulatory authorities.

As part of a merger, acquisition, or other sale or transfer of all or some of our assets, or as part of a bankruptcy or financing we may disclose all categories of personal information.

How to exercise your rights

You can exercise your CCPA rights or ask for more information in two ways:

- Fill out and submit the [CIBC Individual Rights Form](#)
- Call one of our agents at 800-662-7748

We can't respond to your request or provide you with personal information if we can't confirm your identity or authority to make the request and confirm the personal information relates to you. You don't need to have an account with us to make a verifiable request.

Your California privacy rights

As a California resident, you have certain rights with respect to your personal information. You may directly exercise these rights or designate an authorized agent to make a request on your behalf. If you are a minor under 16 years of age, your parent may make a verifiable request on your behalf.

You may only make a verifiable request for access twice within a 12-month period. The verifiable request must include certain criteria:

- Enough information that lets us reasonably confirm you're the person about whom we collected personal information or an authorized representative
- Enough detail in your request that lets us properly understand, evaluate and respond to it

Access to specific information rights

Subject to certain exceptions, you have the right to know what personal information CIBC has collected about you and our use of your personal information for the period during which we retain the personal information for business purposes. Once we receive and confirm your verifiable request, we'll provide you with this information:

- 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 that personal information
- The categories of third parties with whom we disclose that personal information
- The specific pieces of personal information we collected about you
- If we disclosed your personal information for a business purpose, we'll provide a separate list of disclosures for a business purpose. We'll identify the personal information categories that each category of recipient received

Deletion request rights

You have the right to ask us to delete any of the personal information we collected from you and kept, with certain exceptions. Once we receive and confirm your verifiable request, we'll delete your personal information from our records, unless there's an exception.

Correction rights

Subject to certain exceptions, you have also have the right to ask us to correct any inaccurate personal information we collected from you and kept. Once we receive and confirm your verifiable request, we'll correct your personal information within our records.

Antidiscrimination rights

You have the right to not receive discriminatory treatment for exercising your privacy rights.

Do not sell or share rights

CIBC doesn't sell personal information, meaning under California law, that we do not provide personal information to a third party for monetary or other valuable consideration. We do not sell personal information of minors under the age of 16. We also do not share personal information, meaning under California law, that we do not provide personal information to third parties for cross-context behavioral advertising.

General questions

If you have questions, please contact CIBC HR Contact Center at 800-668-0918 or your human resources representative. Job applicants may contact mailbox.careers-carrieres@cibc.com.

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