CALIFORNIA CONSUMER PRIVACY ACT NOTICE

This Privacy Notice explains what types of personal information may be collected by SVB Financial Group ("SVB") about our current and former employees, temporary employees, agents, subcontractors, consultants, and vendors who are California residents and how that information may be used and disclosed. This Privacy Notice also applies to California residents who are designated by our employees as emergency contacts or benefits recipients.

1. Categories of Personal Information Collected: We collected and / or stored the following categories of personal information during the last 12 months:

   A. Identifiers, such as name, government-issued identifier (e.g., Social Security number), and unique identifiers (e.g., employee ID);
   B. Personal information, as defined in the California Records Law, such as contact and financial information;
   C. Characteristics of protected classifications under California or federal law, such as age, gender, medical conditions, and marital status;
   D. Commercial information, such as transaction information and purchase history (e.g., in connection with travel or other reimbursements);
   E. Biometric information, such as fingerprints (e.g., in connection with timekeeping systems that use such measures);
   F. Internet or network activity information, such as browsing history and interactions with our online systems and websites;
   G. Geolocation data, such as device location;
   H. Audio, electronic, visual, and similar information, such as call and video recordings;
   I. Professional or employment-related information, such as work history and prior employer;
   J. Non-public education information; and
   K. Inferences drawn from any of the Personal Information listed above to create a profile or summary about, for example, an individual’s preferences and characteristics.

Depending on the particular California resident’s interactions with us, we may not have collected each of these categories of Personal Information about that person.

2. Sources of Personal Information. We collect Personal Information directly from California residents themselves, as well as from prior employers, references, recruiters, job-related social media platforms, and third-party sources.

Depending on the particular California resident’s interactions with us, we may not have collected Personal Information from each of these categories of sources.

3. Uses of Personal Information. We may use Personal Information:
   - To operate, manage, and maintain our business;
   - For our employment purposes;
   - To otherwise accomplish our business purposes and objectives including, for example:
     o Conducting research, analytics, and data analysis;
     o Maintaining our facilities and infrastructure;
     o Quality and safety assurance measures;
     o Conducting risk and security controls and monitoring;
Detecting and preventing fraud;
Performing identity verification;
Performing accounting, audit, and other internal functions, such as internal investigations;
Complying with the law, legal process, and internal policies;
Maintaining records; and
Exercising and defending legal claims.

Depending on the particular California resident’s interactions with us, we may not have used Personal Information about that person for each of these purposes.

4. Disclosures of Personal Information. We disclosed the following categories of Personal Information to third parties, such as our service providers and affiliates, for our operational business purposes:

A. Identifiers, such as name, government-issued identifier (e.g., Social Security number), and unique identifiers (e.g., employee ID);
B. Personal information, as defined in the California Records Law, such as contact and financial information;
C. Characteristics of protected classifications under California or federal law, such as age, gender, medical conditions, and marital status;
D. Commercial information, such as transaction information and purchase history (e.g., in connection with travel or other reimbursements);
E. Biometric information, such as fingerprints (e.g., in connection with timekeeping systems that use such measures);
F. Internet or network activity information, such as browsing history and interactions with our online systems and websites;
G. Geolocation data, such as device location;
H. Audio, electronic, visual, and similar information, such as call and video recordings;
I. Professional or employment-related information, such as work history and prior employer;
J. Non-public education information; and
K. Inferences drawn from any of the Personal Information listed above to create a profile or summary about, for example, an individual’s preferences and characteristics.

Depending on the particular California resident’s interactions with us, we may not have disclosed each of these categories of Personal Information about that person for these purposes.

5. Sales of Personal Information. We do not sell your Personal Information.


In addition to the above, SVB utilizes Microsoft Workplace Analytics. Deidentified SVB activity and communications data is collected from SVB managed systems and application such as Microsoft Outlook and Teams. The type of data collected is collaboration habits of SVB workforce, such as percentage of employees working after hours, average weekly meeting hours per week, average percentage of collaboration time with external collaborators.

This data is collected in an ongoing manner, and used to assess aggregated collaboration habits of SVB’s workforce and provide the Human Resources department better visibility into SVB workforce habits, so as to guide Executive level management in best supporting their teams.
This data is accessed only by a select and limited group in the Human Resources department to generate reports of aggregated team habits. While Executive level management will receive aggregated reporting, they do not have the ability to view any of the underlying data or have access to the platform directly. Further, no identifiable data is shared directly with Executive level management; the data is aggregated at a team level.