

California Consumer Privacy Act Notice

This notice describes the categories of personal information (“PI”) collected by Navient Corporation and its affiliated companies, including but not limited to Navient Solutions, LLC, Pioneer Credit Recovery, Inc., Duncan Solutions, Inc., Gila LLC, Xtend Healthcare, LLC and Earnest LLC (together, “Company”) and the purposes for which Consumer PI may be used. We are providing this notice to you in accordance with California Civil Code Sec. 1978.100(b).

Categories of Personal Information Collected	Purposes Personal Information is Used
<p><u>Identifiers and Contact information.</u> This category includes names, addresses, telephone numbers, mobile numbers, email addresses, dates of birth, Social Security numbers, driver’s license or state identification numbers, bank account information, and other similar contact information and identifiers.</p>	<ul style="list-style-type: none"> • Collect and process employment applications, including confirming eligibility for employment, background and related checks, and onboarding • Processing payroll and employee benefit plan and program administration including enrollment and claims handling • Maintaining personnel records and record retention requirements • Communicating with employees and/or employees’ emergency contacts and plan beneficiaries • Complying with applicable state and federal labor, employment, tax, benefits, workers compensation, disability, equal employment opportunity, workplace safety, and related laws • Preventing unauthorized access to or use of the Company’s property, including the Company’s information systems, electronic devices, network, and data • Ensuring employee productivity and adherence to the Company’s policies • Investigating complaints, grievances, and suspected violations of Company policy
<p><u>Protected classification information.</u> This category includes characteristics of protected classifications under California or federal law.</p>	<ul style="list-style-type: none"> • Complying with applicable state and federal Equal Employment Opportunity laws • Design, implement, and promote the Company’s diversity and inclusion programs
<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, intranet activity, email communications, social media 	<ul style="list-style-type: none"> • Facilitate the efficient and secure use of the Company’s information systems • Ensure compliance with Company information systems policies and procedures • Complying with applicable state and federal laws • Preventing unauthorized access to, use, or disclosure/removal of the Company’s property, records, data, and information

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<p>postings, stored documents and emails, usernames and passwords</p> <ul style="list-style-type: none"> all activity on communications systems including phone calls, call logs, voice mails, text messages, chat logs, app use, mobile browsing and search history, mobile email communications, and other information regarding an Employee's use of company-issued devices 	<ul style="list-style-type: none"> Enhance employee productivity Investigate complaints, grievances, and suspected violations of Company policy
<p><u>Geolocation data.</u> This category includes GPS location data from personal mobile devices when utilizing Navient systems.</p>	<ul style="list-style-type: none"> Preventing unauthorized access, use, or loss of Company property and data
<p><u>Biometric information.</u> This category includes fingerprint cards and scans.</p>	<ul style="list-style-type: none"> Permits providing services under certain federal government contracts.
<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 including salary history, employment history, employment recommendations, etc. background check and criminal history; work authorization fitness for duty data and reports performance and disciplinary records salary and bonus data benefit plan enrollment, participation, and claims information leave of absence information including religious and family obligations, physical and mental health data concerning employee and his or her family members 	<ul style="list-style-type: none"> Collect and process employment applications, including confirming eligibility for employment, background and related checks, and onboarding Employee benefit plan and program design and administration, including leave of absence administration Maintaining personnel records and complying with record retention requirements Communicating with employees and/or employees' emergency contacts and plan beneficiaries Complying with applicable state and federal labor, employment, tax, benefits, workers compensation, disability, equal employment opportunity, workplace safety, and related laws Business management Preventing unauthorized access to or use of the Company's property, including the Company's information systems, electronic devices, network, and data Ensuring employee productivity and adherence to the Company's policies Recruiting Investigating complaints, grievances, and suspected violations of Company policy
<p><u>Education information.</u> This category includes education history.</p>	<ul style="list-style-type: none"> Evaluate an individual's appropriateness for a participation position at the Company, or promotion to a new position.

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<u>Inferences drawn from the PI in the categories above.</u>	The Company may engage 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. Such Human Capital Analytics are conducted anonymously.

To carry out the purposes outlined above, the Company may share information with third parties, such as background check vendors, third-party human resources and information technology vendors, outside legal counsel, and state or federal governmental agencies. The Company may add to the categories of PI it collects and the purposes it uses PI. In that case, the Company will inform you.

If you have questions about the Company’s privacy policies and procedures, rights you may have concerning your personal information, you may go to <https://www.navient.com/Navient-Online-Consumer-Information-Privacy-Policy> for Navient’s Online Consumer Information Privacy Policy or to <https://www.earnest.com/privacy> for Earnest’s Privacy Policy.