

# LPL Financial Personnel Privacy Policy

MAY 11, 2020

This privacy policy (“Privacy Policy”) describes the ways LPL Financial LLC and its affiliates and subsidiaries (“We”, “Us”, or “LPL Financial”) collect, store, use, disclose, and protect personal information relating to employees, contract workers (such as contingent or statement of work workers) or job applicants (collectively, “personnel”). We use the term “personal information” to describe information that can be associated with you and can be used to identify you. Personal information does not include information that does not identify a specific person.

You agree to the practices regarding your personal information described in this Privacy Policy when you provide us with personal information or where we otherwise collect personal information about you, whether online or offline.

## **Information We Collect**

As part of your application for employment with LPL Financial, onboarding as a LPL Financial employee or contract worker, continuing relationship with LPL Financial or ending of your relationship with LPL Financial, we may collect personal information about you. This personal information may include:

- Identifiers, such as your name, email address or physical address
- Customer Records, such as your telephone number, Social Security number, other government-issued identification number, employment information, employment history, or payment information
- Protected Classification Characteristics, such as your age, race, color, national origin, citizenship, marital status, physical or mental disability, sex, sexual orientation, or veteran or military status,
- Commercial Information, such as products or services you may purchase or order
- Biometric Information
- Internet/Network Information, such as your username, password, or website interaction
- Sensory Data, such as audio, visual or olfactory information
- Professional or Employment-Related Information, such as current or past job history

### *Other Information We May Collect*

In addition, we may collect information that may not identify you personally, such as your Internet Protocol (IP) address and/or domain, the type and version of your Internet browser software and operating system you use, the date, time, and duration of your online services access, the specific pages, buttons, images, links, and forms that you access while visiting online services, the type of device you use to access online services, your mobile carrier and/or Internet Service Provider. Collection of this data may not personally identify you. We may also use third party applications and services to collect and analyze this information in the aggregate.

### **Why We May Collect and Use Personal Information**

We may collect personal information about you for several reasons, most of which relate to compliance with legal or regulatory obligations or facilitating your employment or application. Reasons we may collect and use personal information include to:

- Facilitate the recruiting of employees, including to conduct background screening and checks
- Monitor and oversee employees and contractors relating to our securities or other licenses or charters
- Administer employment benefits, such as medical, dental, optical, commuter, and retirement benefits, including recording and processing eligibility of dependents, absence and leave monitoring, insurance and accident management and provision of online total reward information and statements
- Pay compensation and reimburse for expenses, including salary administration, payroll management, payment of expenses and, to administer other compensation-related payments, including assigning amounts of bonus payments to individuals
- Conduct performance-related reviews, including performance appraisals, career planning, skills monitoring, job moves, promotions and staff re-structuring
- Monitor work-related licenses and credentials, including provisioning software licenses for use in the course of an employee's work related responsibilities, ensuring compliance, training, examination and other requirements are met with applicable regulatory bodies
- Provide human resources management services, including providing employee data maintenance and support services, administration of separation of employment, approvals and authorization procedures, administration and handling of employee claims, and travel administration
- Maintain contact information
- Assist in case of emergency, including maintenance of contact details for you, and your dependents in case of personal or business emergency
- Monitor eligibility to work in applicable jurisdictions, which means monitoring and ensuring compliance of employees' ability to work applicable jurisdictions
- Conduct healthcare-related services, including conducting pre-employment and employment-related medical screenings for return to work processes and medical case management needs; determining medical suitability for particular tasks; identifying

health needs of employees to plan and provide appropriate services, including operation of sickness policies and procedures; and providing guidance on fitness for travel and fitness for expatriation

- Facilitate a better, safe and efficient working environment, which includes conducting staff surveys, providing senior management information about other employees, and conducting training as well as actions relating to disciplinary actions, and code of conduct processes and investigations
- Maintain the security of company online assets, which includes hosting and maintenance of computer systems and infrastructure; management of LPL Financial software and hardware computer assets; systems testing, such as development of new systems and end-user testing of computer systems; training; and monitoring email and internet access
- Provide information about our products and services or the products or services of other companies that may be of assistance in the performance of job functions with LPL Financial
- Monitor, detect, mitigate and prevent fraud or other criminal activities
- Otherwise comply with applicable law or regulatory requirements, such as legal and internal company reporting obligations, including headcount, management information, demographic and regulatory reporting.

## **Sharing Personal Information in Connection with LPL Financial Services**

We may share personal information relating to prospective investors with entities that perform services on our behalf, such as employment-related services, compensation or benefits administration, compliance functions, mailing, technology and support services, legal or consulting services, customer service, fraud prevention, marketing, analytics, or other business functions. We may also share some of your personal information as otherwise permitted or required by law or as authorized by you. LPL Financial does not share, sell, or make available information on personnel to outside parties to use for their own purposes.

## **Updating and Correcting Your Personal Information**

Keeping your information accurate and up to date is very important. If your personal or account information is incomplete, inaccurate or not current, please contact us at: (855) 575-myHR or x6947.

## **Storage and Protection of Personal Information**

We maintain administrative, technical, and physical safeguards that are designed to protect the privacy and security of personal information. However, there is no guarantee that information may not be accessed, disclosed, altered, or destroyed by breach of any of our administrative, technical, and physical, or other operational, safeguards. You play a critical role in protecting your information. Steps you take to ensure the security of your computer, computer passwords, or other personal identifier authentication mechanisms are key components of the protection of your personal information. For more information on protecting your electronic information, please visit our Privacy/Security page.

## **Notice to Persons Accessing the LPL Financial Site Outside the United States**

If you access the LPL Financial online services outside the United States, any information you provide to us through the LPL Financial online services will be transferred out of that jurisdiction and into the United States. If you do not want your personally identifiable information to leave that jurisdiction, do not provide the information to us. By providing personally identifiable information to us, you explicitly consent to the transfer of your information to the United States.

## **Contacting Us About Privacy Questions**

If you have questions or concerns regarding this Privacy Policy, you should contact us by email at [Security.Mailbox@lpl.com](mailto:Security.Mailbox@lpl.com).

## **Changes to this Privacy Policy**

This Privacy Policy is subject to change. Please review it periodically. If we make changes to the Privacy Policy, we will revise the “Last Updated” date at the top of this Policy. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the site. Your use of LPL Financial services following these changes means that you accept the revised Privacy Policy.