

# Workforce Privacy Policy

Thrivent is committed to safeguarding the information we collect. Information we gather is only disclosed to outside organizations that are performing services for us or on our behalf, or as permitted by law. Please review this Policy to help you better understand our views and practices regarding the collection, protection, disclosure and use of information collected as part of one or more workforce processes.

## Scope

This Workforce Privacy Policy is being provided by Thrivent and select affiliates, referred to in this Policy as “Thrivent.” The information provided here is applicable to individuals who are involved in recruitment activities, applying for employment, have been hired or were previously a member of Thrivent’s workforce, including spouses/ domestic partner and dependents of current or former workforce members, when spouse/domestic partner and dependent information is necessary to complete an employment process. For purposes of this Policy only, “workforce” and “employment” include the above-identified individuals and groups, individuals who are serving on a Thrivent Board of Directors, and individuals who are performing services for Thrivent as an independent contractor.

For all other consumers, you can review our privacy practices by accessing our consumer [Privacy Policy](#). If you have a previous or existing business relationship with Thrivent, you would be considered a customer, and information about the privacy of your information can be found in our [Privacy Notices](#).

## Personal information

### How it is collected, used and disclosed

Thrivent may collect personal information (information that can be used to identify you as an individual), including sensitive personal information, as described further in this Policy.

### Collection methods

Most personal information is collected directly from you or from others you have authorized to provide information to us on your behalf. However, we may leverage third-party sources including social media platforms (such as LinkedIn) and websites (such as job boards) to collect publicly available personal information about you.

If you have a social media profile on sites such as LinkedIn, Twitter or Facebook that’s visible to the public, we may review them and use available contact information to contact you. The public availability and use of your personal information by these social media and third-party websites is discussed in their respective privacy policies.

### Disclosure

For all categories of information discussed below, information is disclosed:

- **To our service providers and contractors:** To fulfill your request or to complete an operational function for Thrivent, such as administering benefits.
- **To government agencies and regulators:** As required by applicable laws and regulations.
- **For a legal proceeding or action:** Information may be disclosed as required by a legal proceeding, litigation or subpoena.

### Use

In addition to the detail provided below, Thrivent may collect and use any of the information in the referenced categories for business purposes or processes, such as:

- Retention and supervision of written correspondence. This includes freeform text fields on our website, any email sent to or from a Thrivent email domain, any messages sent via a chat functionality, and any text messages sent or received through one of Thrivent’s approved text message platforms. This retention and supervision is required to comply with legal obligations. Additional uses of the content of any written correspondence are discussed below.
- Collection and processing of information using artificial intelligence (AI), and algorithms, including machine learning and robotic process automation (RPA), to streamline internal business processes.

- Data and analytics, to determine if members of our workforce are adequately performing in their role, engaged, meeting organizational expectations, and making decisions in the best interest of our clients.

Please note that Thrivent has the right to access, log, archive, monitor and restrict all aspects of its information and systems. An individual’s use of Thrivent’s tools, reports and applications may be tracked, shared, recorded and used for business, training and quality control purposes. Users should have no expectation of privacy while using Thrivent’s information and systems.

### Retention

Within the scope of this Policy, any information collected is retained according to Thrivent’s record retention policy and applicable laws and regulations.

## Categories of personal information

### Identifiers

For all employment types, we will collect your name, address, email address, phone number and social security number. In general, this is to ensure that we have the correct information to contact you, to verify your identity and employment eligibility, or to provide you access to Thrivent systems, such as Workday on thrivent.com or our independent producer hub. We may also collect the following identifying information:

- **Dependent information**—We utilize this information to administer Thrivent-sponsored benefits.
- **Thrivent ID**—Upon hire, members of the internal workforce are assigned a Thrivent identification number. This number will be used to authenticate your access to Thrivent technology as well as to track your interactions with various Thrivent applications and web pages.

Basic identifying information, such as name

and contact information, may be disclosed to others, including but not limited to:

- Meeting organizers, as an attendee for virtual or live events.
- Other Thrivent employees, as part of an internal employment profile(s).
- For marketing purposes, with any client preferences being honored, as applicable.

### Protected classifications

Thrivent is an Equal Opportunity Employer. While we may collect personal information related to protected classes, such as race, age, sex or ethnicity, please rest assured that this information is collected and used only to fulfill legal requirements, such as reporting on the demographic makeup of our workforce, to complete background checks, verify citizenship status, complete internal pay equity studies, or to determine eligibility for certain benefits.

We may also request information regarding your religious affiliation, such as church congregation, for certain positions on one or more of our board of directors. This information is necessary to ensure that we are meeting the criteria necessary to retain our status as a fraternal benefit society.

### Commercial information

Information related to your commercial affairs, including records of personal property, products or services purchased, obtained or considered, or other purchasing or consuming histories or tendencies, may be requested or collected to ensure compliance with Thrivent policy or regulatory obligations. Some examples may include:

- **Expense reimbursement**—We will request itemized receipts of your purchases.
- **Investment practices**—Trade practices of “supervised” and “access” persons are monitored to ensure that they do not violate anti-fraud rules, such as insider trading.
- **Background checks**—This process may reveal information related to previous bankruptcy filings or financial fraud incidents. This information may be used to exclude or limit your ability to perform certain roles based on laws and regulations.
- **Garnishment actions**—If any personal legal proceedings result in liens or other garnishment actions being issued against you, Thrivent may be required to collect and/or disclose additional information about you, your employment status and compensation, and judgment details related to the garnishment action as permitted by applicable law.
- **Adoption assistance**—Reimbursement under our adoption assistance benefit will necessitate itemized receipts to

prove that expenses were made for qualifying purposes.

### Biometric information

Biometric information may be collected and disclosed to comply with specific legal requirements, such as when fingerprints are collected and provided to the FBI and FINRA in order to complete required background check requirements.

Certain applications that you have access to as part of your employment relationship with Thrivent may allow for use of biometrics for more expedited authentication. In these cases, Thrivent does not collect the biometric information but instead relies on a service provider to determine authenticated access. Concerning authentication through Thrivent owned equipment, biometric information will be collected. Images of your fingerprint are not stored.

### Internet or electronic network activity

Internet or electronic network activity could include items such as browsing history, search history and information regarding your interactions with a website, application or advertisement. When you apply for a position at Thrivent we ask if you would like to provide us with a link to your LinkedIn profile. It is not required that you do so. This information is reviewed for additional hiring criteria only. This information is not disclosed.

### Geolocation data

Information, such as precise geolocation, may be collected to ensure that certain documents and restricted areas are accessed only by authorized personnel; precise geolocation is utilized by Thrivent only as a security validation tool.

### Audio, electronic, visual, thermal or olfactory information

Thrivent collects audio information in the form of call recordings. While Thrivent will not record calls for employment-related inquiries, if you work in one of our client call centers or you interact with a call center as part of your job duties, your voice will be recorded as part of any transaction. Voice recordings are not disclosed, except by legal request. Virtual or video meetings may be recorded with the knowledge and agreement of all participants. Participating in recorded meetings may result in your voice and image being recorded.

Thrivent also uses silent monitoring techniques to monitor its workforce. All activities conducted while on premises or while using Thrivent equipment, including email, are subject to monitoring. Monitoring provides Thrivent the ability to: assure quality service, protect the company, conduct investigations and centrally organize business-related materials and records across users.

### Professional or employment information

When you apply for any job with Thrivent, we will request that you provide details about your previous employment, including any licenses or training to perform specific roles. This information is necessary so that we can validate that you have the necessary experience and credentials to perform the role. In addition, professional information may be collected in the following scenarios:

- **Licensed persons**—If you have one or more security licenses, we will request that you provide information to us about your involvement with other business entities. We will need to understand your role and the nature of the business to ensure that we, and in effect, you, are in compliance with outside business activity laws.
- **Background checks**—As part of your application, we may inquire about any previous misconduct in a professional setting. In addition, Thrivent, through a service provider or contractor, may conduct a background check on prospective workforce members and periodic checks on current workforce members. This process will gather information about you, including professional/employment information, from multiple sources. This information may be used to exclude or limit your ability to perform certain roles based on risk and compliance considerations.
- **Military service**—If you request to take a leave from your employment with Thrivent to fulfill military service orders, we will request to obtain details regarding your orders for documentation purposes.

### Education information

When you apply for any position with Thrivent, we will request that you provide details about your education, such as the name of any educational institutions you attended, the location, years attended, and degrees obtained. This is so that we can validate that you have the necessary educational qualifications to perform the job responsibilities. Below is an example of when we may collect additional information related to your education.

- **Tuition assistance**—If you are eligible and request to take advantage of our tuition assistance program, we will collect information from you regarding your enrollment, degree progress and transcripts to ensure that you're in compliance with the tuition assistance policy.

### Other categories of personal information

This category covers personal information, not included in other categories, such as signature, bank account number, credit card number, debit card number or any other financial information, medical information or health insurance information.

The other types of personal information that Thrivent may collect during the course of any employment relationship include:

- **Signatures**—Thrivent may collect a digital or wet signature on various forms required to be gathered as part of the onboarding process.
- **Bank account numbers**—Thrivent requires that you provide bank routing and account numbers for direct deposit of your paycheck or expense reimbursement.
- **Medical/health information**—This information is collected from or about you only to the extent that such information is related to an applicable law/regulation or public health matter. This could include, but is not limited to, requests or claims made under the Family and Medical Leave Act, Americans with Disabilities Act, workers' compensation statutes, or the Occupational Safety and Health Act. The specific pieces of information collected and the detail necessary varies depending on the circumstances.
- **Exclusions**—While Thrivent does provide employer-sponsored health, life and disability income insurance, Thrivent does not receive any identifiable health information regarding workforce, spouse/ domestic partner or dependent medical care or payment for care. This includes information you choose to provide to any quoting or estimation tools available for your use when determining insurance coverage needs.

### Inferences drawn to create a profile

We may collect any or all the information above to create an employment profile for you. This may include your preferences, aptitudes, abilities, attitudes or behaviors that we can determine from the information you provide, background check results, performance or quality assurance reviews, and an analysis of data related to your Thrivent work history and sales practices, as applicable. We collect this information so we can ensure we have individuals in the roles that best align with their skills and we, as an employer, can assure our regulators that those members of our workforce who represent Thrivent have the necessary skills, training and values.

### Sensitive personal information

Sensitive Personal Information is a subset of personal information described previously. This could include one or more of the following examples: (A) Social Security number (SSN), driver's license, state identification card or passport number; (B) account log-in, financial account, debit card or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; (C) precise geolocation; (D) racial or ethnic origin, religious or

philosophical beliefs, or union membership; (E) the contents of mail, email and text messages, unless the business is the intended recipient of the communication; (F) genetic data; (G) biometric information; (H) health information; or (I) sex life or sexual orientation.

As part of your employment relationship with Thrivent, we may collect one or more of these data elements, as is discussed in relevant categories above.

### Anonymous information

On occasion, aggregate and anonymous data about our workforce are shared for analysis and research purposes. This could include, for example, industry comparison studies regarding compensation or an independent evaluation of key-employee insurance coverage.

### How can you update your personal information through Workday?

By accessing your Workday profile, you can update your professional and contact information, such as résumé, address, email address and phone number. You may also update other information retained in your Workday profile, such as dependents, beneficiaries or benefits elections. However, some of these actions may require additional validation by Thrivent before changes can become effective.

### How can you update your personal information without Workday access?

For all workforce members, it is important that you keep your contact information current. Even post-termination, it is important to keep your contact information current so that Thrivent can appropriately administer any benefits that you are entitled to.

If you do not have access to make changes to your personal information via Workday, you can contact the Thrivent Human Resources Helpline:

Internal: 628-6414 or 844-6414.

External: 1-800-847-4836, say the word "Directory" and enter extension 6414 when prompted.

Email: [human.resources@thrivent.com](mailto:human.resources@thrivent.com).

### Information for California residents

The following section applies to members of Thrivent's workforce residing in California and who are provided specific privacy rights under the California Consumer Privacy Act as modified by the California Privacy Rights Act (collectively, the "CCPA"). As a California resident, you

have the right to know about the personal information we collect, use, and disclose. These sections do not apply to California residents who are Thrivent customers. If you are a Thrivent customer, please refer to our [Privacy Notice](#) for a description of your rights.

### Sale and sharing of personal information

Thrivent does not sell or share, under definitions provided by the CCPA, your personal information.

### Sensitive personal information

While Thrivent may collect sensitive personal information as described in this Workforce Privacy Policy, we do not use that information to infer characteristics about you. Therefore, no additional rights are provided to you regarding the use of your sensitive personal information.

### Disclosure of personal information

All categories of personal information we collect may be disclosed for a business purpose. Generally, this involves disclosures to service providers and contractors under the following circumstances: to administer employee benefits, payroll, auditing, compliance with regulatory inquiries or requests, detecting and preventing security incidents, and technical functionality improvements.

### Minors under 16

We do not knowingly share or sell the personal information of minors under the age of 16.

### Rights granted

Residents of California also have the following rights regarding personal information collected from you or collected about you from other sources. You, or your designated authorized agent, may elect the following:

- **Right to access.** You may request that we provide you with specific pieces of personal information we have collected about you.
- **Right to know.** You may request that we disclose to you:
  - The categories of information we collected about you.
  - The categories of sources from which your personal information is collected.
  - The business or commercial purpose for collecting your personal information.
- **Right to opt out of sale or sharing.** Thrivent does not sell or share your personal information with third parties, as defined in the CCPA.
- **Right to correct.** You may request correction of inaccurate personal information.

- **Right to delete.** You may request the deletion of personal information we collected about you, which we will comply with unless it is necessary for us to retain the information, in accordance with exceptions provided by law.

To make any of the above requests, please click [here](#) or call us at 800-847-4836 extension 628-2359.

### **Antidiscrimination**

Rest assured that we will not discriminate against you if you choose to exercise any rights prescribed to you by law.

### **Authorized agents**

While the CCPA allows an authorized agent to act on your behalf, we may request written permission from you before honoring any requests made by an authorized agent. Any identity verification, noted below, will still need to be completed by you directly.

### **Verification**

If there is a need to verify your identity prior to releasing information in accordance with your request, we will contact you at the phone number you provided in your request submission. At that time, we will conduct additional knowledge-based authentication to ensure that only those people who have a legal right to obtain information can do so.

## **How do we secure the information we collect?**

Thrivent has standards of security to protect your data by putting in place physical, technical and administrative safeguards. The technology we use to protect your data is reviewed and improvements are implemented as needed.

Authorized employees and representatives are permitted to access and use data about you for approved business purposes. All members of our workforce must complete all required training to ensure they understand and follow established policies and laws when using your data.

Your information may be accessible by service providers and contractors for the purpose of enabling them to store such data in connection with the permitted uses of your information under this Privacy Policy. Our service providers and contractors have an obligation to maintain the confidentiality of the information, except where disclosure is required by law.

## **Questions or comments?**

If you have questions regarding this Workforce Privacy policy, please call the Thrivent Privacy Office at [920-628-2359](tel:920-628-2359), or email us at [privacy@thrivent.com](mailto:privacy@thrivent.com).

You can also send a written inquiry to:

**Thrivent**  
**Attn: Privacy Office**  
**4321 N. Ballard Rd.**  
**Appleton, WI 54919**