

# 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 partners 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 in a contractor role, such as captive or independent agents.

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, during regular recruitment activities 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 prospective and current candidates. 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 are discussed in their respective privacy policies.

### Disclosure

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

- **To our service providers:** To fulfill your request or to complete an operational function for Thrivent, such as administering benefits.
- **To government agencies and regulators:** To demonstrate Thrivent’s compliance with various laws and regulations.
- **For 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 free-form 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) or 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.

## 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 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 our intranet, weThrive, or our independent producer hub. We may also collect the following identifying information:

- **Dependent information:** We use 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 webpages.

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 name, for certain positions on one or more of our boards of directors. This information is necessary to ensure we are meeting 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 they do not violate antifraud 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 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 a qualifying purpose.

## 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 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.

## 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 a link to your LinkedIn profile. You are not required to 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 only 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 customer 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.

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 ensure 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 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 third party, 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 names of any educational institutions you attended, the locations, years attended and degrees obtained. This is so 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 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, including vaccine status and immunization records, 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/or 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 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 login, 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 is disclosed 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 you can 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 you can update your personal information without Workday access**

It is important to update your contact information. Even post-termination, it is important to keep your contact information current so Thrivent can appropriately administer any benefits 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: 800-847-4836, say "Directory" and enter extension 6414 when prompted.

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

#### **How 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 third-party vendors for the purpose of enabling them to store such data in connection with the permitted uses of your information under this Privacy Policy. Our third-party providers 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, 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**