

## **CALIFORNIA EMPLOYEE AND APPLICANT PRIVACY NOTICE**

Last Updated: May 30, 2023

Safety National Casualty Corporation and its Subsidiaries (Collectively “**Safety National**,” “**we**,” “**us**,” or “**our**”) provides this Privacy Notice (“**Notice**”) to explain our practices regarding the collection and use of personal information about California job applicants, employees, owners, directors, officers, contractors, and their dependents, beneficiaries, and emergency contacts (collectively, “**Personnel**”). This Notice explains what personal information we collect about California Personnel, why we collect it, how we use and share it, and the rights you have relating to your personal information under the California Consumer Privacy Act, as modified by the California Privacy Rights Act of 2020 (the “**CCPA**”). This Notice applies in addition to the disclosures regarding HR Data that are found in our [Privacy Policy](#).

As used in this Notice, the term “**personal information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you. Personal information does not include information that is publicly available, de-identified, or aggregated. This Notice does not apply to personal information regulated under certain other privacy laws such as medical and health information covered by the Health Information Portability and Accountability Act.

This Notice is not a contract for employment and does not alter the employment at-will relationship between us and any employee.

### **I. How and Why We Collect Your Personal Information**

Generally, we collect personal information about our Personnel as follows. Note that the specific pieces of personal information we collect about you may vary depending on the nature of your relationship with us and may not include all of the examples listed below.

<b>Category of Personal Information</b>	<b>Categories of Sources from which Collected</b>	<b>Purposes for Collection / Use</b>
<b>Identifiers</b> including real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers	Directly from you Automatically when you use our electronic systems Created by us (e.g., your username and Safety National email address) From service providers that help us to run our business From third parties	To open and maintain your application records To communicate with you To assess your eligibility for employment To onboard and enroll you as an employee To manage job duties, evaluate performance, and operate our business To provide compensation and benefits To comply with applicable laws and regulations To manage the security of our property and systems To detect and prevent malicious, deceptive, fraudulent, or illegal activity
<b>Personal information described in Cal. Civ.</b>	Directly from you	To open and maintain your application records

<p><b>Code § 1798.80(e)</b>, including your name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number or other financial information, medical information, or health insurance information</p> <p>Note that some personal information included in this category may overlap with other categories.</p>	<p>From service providers that help us to run our business</p> <p>From third parties</p>	<p>To communicate with you</p> <p>To assess your eligibility for employment</p> <p>To onboard and enroll you as an employee</p> <p>To manage job duties, evaluate performance, and operate our business</p> <p>To process your purchases through the company store</p> <p>To provide compensation and benefits</p> <p>To comply with applicable laws and regulations</p> <p>To manage the security of our property and systems</p> <p>To detect and prevent malicious, deceptive, fraudulent, or illegal activity</p>
<p><b>Characteristics of protected classifications</b> under California or federal law, including race, age (40 years and older), citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information)</p>	<p>Directly from you</p> <p>From service providers that help us to run our business</p> <p>From third parties</p>	<p>To comply with applicable laws and regulations</p>
<p><b>Commercial information</b>, including records of products or services purchased</p>	<p>Directly from you</p> <p>From service providers that help us to run our business</p> <p>From third parties</p>	<p>To reimburse you for business-related expenses, including expenses associated with the use of your personal mobile device, or expenses incurred when you travel for an interview</p>
<p><b>Internet or other electronic network activity information</b>, including browsing history, search history, and information regarding your interactions with our websites, applications, or advertisements</p>	<p>Automatically when you use our electronic systems</p>	<p>To facilitate your use of our websites, set default options, and provide you with a better job application experience</p> <p>To manage corporate information technology</p> <p>To manage the security of our property and systems</p>

		To detect and prevent malicious, deceptive, fraudulent, or illegal activity
<b>Geolocation data</b>	Automatically when you use our electronic systems (e.g., based on your IP address or use of our electronic building access control systems)	To facilitate your use of our websites, set default options, and provide you with a better job application experience To manage corporate information technology To manage the security of our property and systems To detect and prevent malicious, deceptive, fraudulent, or illegal activity
<b>Sensory data</b> , including closed-circuit images, photographs and video of you as may relate to your application or job functions (for example if you answer phone calls on a recorded line or use our videoconferencing systems)	Directly from you Automatically while you are on Safety National property or when you use our phone, videoconferencing, or other similar systems	To conduct interviews by phone or video To manage job duties, evaluate performance, and operate our business To manage the security of our property and systems
<b>Professional or employment-related information</b> , including: Individual data such as foreign language skills, relevant tax identification number(s), information contained in a governmental employment eligibility form, prior employers, education, prior employment history, results of criminal background screening, visa information, emergency contact information, name change information, etc.; Job-related data such as your payroll and salary information, benefits and pension information, dependent and beneficiary information you provide, tax and government reporting information, information about your performance on the job, including reviews, appraisals, warnings, individual and management development plans and reviews, and information relating to promotions and	Directly from you From service providers that help us to run our business From third parties	To open and maintain your application records To assess your eligibility for employment To onboard and enroll you as an employee To manage job duties, evaluate performance, and operate our business To provide compensation and benefits To comply with applicable laws and regulations To manage the security of our property and systems To detect and prevent malicious, deceptive, fraudulent, or illegal activity

<p>position changes (including requests), information regarding your compliance with company policies and certifications;</p> <p>Any additional personal information that may be included on documents you submit or we obtain as part of your employment application or throughout the course of your employment, such as information contained on any employment application or cover letter, curriculum vitae or resume, diploma, transcript, license, statement of good behavior, background screening, employment contract, any related documents, reference check, identification card, request for leave, benefits, wage garnishment and other similar court-ordered information, etc., and information collected from publicly available resources, professional license databases, and credit agencies, where applicable.</p>		
<p><b>Non-public education information</b>, including education records, files, documents, and other materials directly related to a student or maintained by an educational agency or institution or by a person acting for such an agency or institution, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records</p>	<p>Directly from you</p> <p>From service providers that help us to run our business</p> <p>From third parties</p>	<p>To open and maintain your application records</p> <p>To assess your eligibility for employment</p> <p>To onboard and enroll you as an employee</p> <p>To detect and prevent malicious, deceptive, fraudulent, or illegal activity</p>
<p><b>Inferences</b> used to create a profile reflecting preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes</p>	<p>Drawn from the other categories of personal information we collect</p>	<p>To assess your eligibility for employment</p> <p>To manage job duties, evaluate performance, and operate our business</p> <p>To manage corporate information technology</p>

		To detect and prevent malicious, deceptive, fraudulent, or illegal activity
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Our collection of personal information about Personnel includes the following categories of **sensitive personal information**. We do not use or disclose sensitive personal information for purposes to which the right to limit use and disclosure applies under the CCPA.

<b>Category of Sensitive Personal Information</b>	<b>Categories of Sources from which Collected</b>	<b>Purposes for Collection / Use</b>
Social security, driver's license, state identification card, or passport number	Directly from you From service providers that help us to run our business From third parties	To assess your eligibility for employment To onboard and enroll you as an employee To provide compensation and benefits To comply with applicable laws and regulations To manage the security of our property and systems To detect and prevent malicious, deceptive, fraudulent, or illegal activity
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	Directly from you	To open and maintain your application records To manage corporate information technology To manage the security of our property and systems To detect and prevent malicious, deceptive, fraudulent, or illegal activity
Precise geolocation	Automatically when you use our electronic systems	To manage the security of our property and systems To detect and prevent malicious, deceptive, fraudulent, or illegal activity
Personal information that reveals racial or ethnic origin, religious or philosophical beliefs, or union membership	Directly from you From service providers that help us to run our business From third parties	To comply with applicable laws and regulations
Personal information collected and analyzed concerning your health	Directly from you From service providers that help us to run our business From benefits providers	To manage job duties, evaluate performance, and operate our business To provide benefits To comply with applicable laws and regulations

Personal information collected and analyzed concerning sex life or sexual orientation	Directly from you From service providers that help us to run our business From benefits providers	To comply with applicable laws and regulations To provide benefits
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In addition to the purposes described above, we may use and disclose any category of personal information or sensitive personal information we collect to respond to law enforcement requests, or as otherwise required or authorized by applicable law, court order, or governmental regulations; to protect our rights and interests and those of others; to resolve any disputes; to enforce our policies; and to evaluate or conduct a merger, sale, or other acquisition of some or all of our assets.

## **II. How Long We Keep Your Personal Information**

We keep the categories of personal information described above for as long as necessary or permitted for the purposes described in this Notice or otherwise authorized by law. This generally means holding the information for as long as one of the following apply:

- Your personal information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the information;
- Your personal information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the personal information was collected;
- The personal information is reasonably necessary to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case); or
- We are otherwise required or permitted to keep your personal information by applicable laws or regulations.

Where personal information is used for more than one purpose, we will retain it until the purpose with the latest period expires.

## **III. Disclosures of Personal Information**

Within the preceding 12 months, we have not sold or shared for cross-context behavioral advertising the personal information of California Personnel. We may disclose any category of personal information we collect to our service providers and contractors for business purposes that relate to our purposes for collection described above, including as necessary for:

- Performing services (including processing, maintaining, or collecting personal information) on our behalf (e.g., providing communications, technical, analytical, web hosting, cloud hosting and application support, support, among other services)
- Ensuring security and integrity of personal information
- Debugging to identify and repair errors that impair existing intended functionality
- Short-term, transient use
- Providing advertising and marketing services
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain quality or safety
- Compliance with applicable laws and regulations
- Detecting or protecting against malicious, deceptive, fraudulent, or illegal activity

We disclose sensitive personal information for more limited purposes, which include compliance with applicable laws and regulations, services performed on our behalf relating to the purposes

for our collection of each category of sensitive personal information, and detecting or protecting against malicious, deceptive, fraudulent, or illegal activity.

#### **IV. Submitting Requests Relating to Your Personal Information**

If you are a resident of California, you have the right to submit certain requests relating to your personal information as described below. To exercise any of these rights, please submit a request through our [webform](#) or call us at 1-877-270-1126. You will be asked to provide personal information that we will match against our records to verify your identity. You may designate an authorized agent to make a request on your behalf; however, you will still need to verify your identity directly with us before your request can be processed. An authorized agent may submit a request on your behalf using the webform or toll-free number listed above.

**Right to Know.** You have the right to know what personal information we have collected about you, which includes:

- The categories of personal information we have collected about you
  - The categories of sources from which the personal information was collected
  - Our business or commercial purposes for collecting or disclosing personal information
  - The categories of recipients to which we disclose personal information
  - The categories of personal information that we disclosed for a business purpose, and for each category identified, the categories of recipients to which we disclosed that particular category of personal information
- The specific pieces of personal information we have collected about you

**Right to Delete Your Personal Information.** You have the right to request that we delete personal information we collected from you, subject to certain exceptions. Where deidentification is used to satisfy a deletion request, we commit to maintaining and using the information in deidentified form and will not attempt to reidentify the information.

**Right to Correct Inaccurate Information.** If you believe that personal information we maintain about you is inaccurate, you have the right to request that we correct that information.

**Right to Non-Discrimination for the Exercise of Your Privacy Rights.** If you choose to exercise any of your privacy rights under the CCPA, you also have the right not to receive discriminatory treatment by us, including retaliation against you in relation to your employment or potential employment with us. *Safety National is an equal opportunity employer.*

#### **V. How to Contact Us**

If you have any questions about how Safety National handles your personal information or if you need to access this notice in an alternative format or language, please contact us at:

Phone: 1-877-270-1126

Email: [DataPrivacy@safetynational.com](mailto:DataPrivacy@safetynational.com)

Address: Safety National Casualty Corporation  
Attn: Data Privacy  
1832 Schuetz Road  
Saint Louis, MO 63146