

PRIVACY NOTICE TO CALIFORNIA EMPLOYEES

This Privacy Notice to California Employees (this “**Policy**”) is effective as of January 1, 2023, and supplements the information contained in other applicable policies and procedures of Edgewood Partners Insurance Center and its affiliates, including our ancillary businesses (individually and collectively, “**EPIC**,” “**we**,” or “**us**”). EPIC has adopted this Policy to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act, and their implementing regulations (collectively, the “**CCPA**”).

This Policy applies solely to current and former job applicants, employees, and contractors of EPIC (each, as applicable, a “**Role**”) who are residents of the State of California (each, an “**Employee**,” “**You**,” or “**Your**”). This Policy describes the collection, use, disclosure, and destruction of Your Personal Information (as defined in Section 1 below) by EPIC in connection with Your Role. This Policy also applies to Personal Information about other individuals that You provide to EPIC in connection with EPIC’s administration of Your Role, such as Personal Information about Your emergency contacts or, if applicable, beneficiaries or participants of Your employee benefits (collectively, “**Related Individuals**”).

1. INFORMATION COMPANY COLLECTS

EPIC collects information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with an individual person, including You or a Related Individual (“**Personal Information**”). In particular, EPIC (or its service providers or agents) may collect from or about You or has collected from or about You the following categories of Personal Information within the last twelve (12) months:

Category	Examples
Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, birth date, gender, race, ethnicity, marital status, veteran status, citizenship status, 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 any other financial information, compensation information, medical information, or health insurance information. Personal Information also may include the name, address, birth date, address of any spouse/domestic partner, children and other dependents, as well as name, address, phone number, personal email and/or birth date of emergency contacts and beneficiaries under EPIC’s benefit plans. Some Personal Information included in this category may overlap with other categories.
Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Internet or other similar network activity.	Browsing history, search history, information on an applicant's, employee's and visitor's interaction with a website, application, or advertisement.
Professional or employment-related information.	Current or past job history, performance evaluations, licenses, certifications, organization memberships.
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student or professional disciplinary records.
Inferences drawn from other Personal Information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We also may collect Sensitive Personal Information. “**Sensitive Personal Information**” means Personal Information that is not publicly available and reveals one or more of the following:

- Social Security, driver's license, state identification card, or passport number;
- racial or ethnic origin; and
- the contents of mail, email, and text messages unless EPIC is the intended recipient of the communication.

Personal Information does not include:

- publicly available information from government records;
- information that we have a reasonable basis to believe is lawfully made available to the general public by You or from widely distributed media;
- information made available by a person to whom You disclosed such information without restriction;
- de-identified or aggregated information; and
- information excluded from the CCPA's scope, such as:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

EPIC obtains Personal Information from the following categories of sources:

- directly from You or Your agents. For example, from documents that You provide to EPIC related to Your application for employment or in connection with Your Role with EPIC;
- indirectly from You or Your agents. For example, through information we collect from You in the course of considering You for employment or in connection with the administration of Your Role with EPIC;
- directly and indirectly from activity on our external and internal websites, such as <https://www.epicbrokers.com/about/epic-careers/>; <https://www.linkedin.com/company/epicinsurancebrokers/jobs/>; <https://www.indeed.com/jobs?q=epic+brokers&l=&vjk=1534a7ddd2d18990>
- For example, from submissions through our websites or website usage details collected automatically; and

- from third parties that provide services to us or otherwise interact with us in connection with Your application for employment or in connection with Your Role with EPIC. For example, from licensing organizations or our payroll provider with respect to Employees, including documents required for employment or tax reporting information required by us as an employer.

2. USE OR DISCLOSURE OF PERSONAL INFORMATION

We may use or disclose the Personal Information that we collect for one or more of the following “**Business Purposes**”:

- to fulfill or meet the reason for which the information is provided. For example, if You provide us with Personal Information in order for us to consider employing You or that is required in connection with Your Role, we will use that Personal Information in connection with Role-related matters, including but not limited to hiring decisions, administering benefits, employee review and discipline, termination, and post-termination and all other matters related to Your Role;
- to provide You with information that You request from us;
- to provide You with emails and notices concerning Your Role, benefits, EPIC, or other information or news that may be of interest to You;
- to carry out our obligations and enforce our rights arising from any agreements, policies and procedures related to Your Role;
- to provide, maintain, support, and improve EPIC’s services, technologies, and websites and to present website content to You;
- as necessary or appropriate to protect the rights, property or safety of us, our clients, customers, employees and others;
- to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us is among the assets transferred; and
- as described to You when collecting Your Personal Information and as otherwise required or permitted under the CCPA.

Additionally, EPIC may use or disclose Sensitive Personal Information for one or more of the following Business Purposes:

- to fulfill or meet the reason You provided the information, including to provide or administer employment benefits or to evaluate equal employment opportunity compliance;
- to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- to respond to Your requests under the CCPA;
- for any other purpose described to You when we collect Your Sensitive Personal Information; and
- for any other acceptable and permissible purposes as set forth in the CCPA.

EPIC may disclose Personal Information to our “service providers”, to our “contractors”, and to “third parties” (each as defined by the CCPA) for Business Purposes. When we disclose Personal Information for Business Purposes, we enter into an agreement with the receiving party that describes the purpose for sharing the Personal Information, and that requires the receiving party to keep that Personal Information confidential. In the case of disclosures to our service providers, our service providers are obligated not to use the Personal Information for any purpose other than performing the services according to their agreement with us. In the case of our contractors, our contractors are

obligated not to use the Personal Information for any purpose unrelated to the Business Purpose for which we’ve engaged them.

We may disclose Your Personal Information with the following categories of entities:

Categories of Personal Information	Business Purpose	Types of Recipients
Name, address, social security number of You and your spouse/domestic partners and any dependents; birth date; medical condition; compensation information;	Provision and administration of health insurance, leave benefits and retirement plans	Health, disability and leave insurers and/or administrators, third-party providers handling EPIC’s 401(k) plans,
Name, address, social security number, compensation information	Payroll and taxes	Payroll provider, federal, state and local tax authorities
All	Compliance with subpoenas, court orders, and/or government investigations	Parties in litigation, federal and state government and quasi-governmental and regulatory agencies

3. Sales and Sharing of Personal Information

“**Sell**,” “**Selling**,” or “**Sold**” means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, Personal Information to another business or a third party for monetary or other valuable consideration.

“**Share**,” “**Sharing**,” or “**Shared**” means sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, Personal Information to a third party for Cross-context Behavioral Advertising, whether or not for monetary or other valuable consideration. “**Cross-context Behavioral Advertising**” means the targeting of advertising to an individual based on that individual’s Personal Information obtained from activity across businesses or distinctly-branded websites, applications, or services, other than the business or distinctly-branded website, application, or service with which the individual intentionally interacts.

We do not Sell or Share, and have not Sold or Shared, Your Personal Information. We will not Sell or Share Your Personal Information without providing notice to You and getting Your consent.

4. Retention and Deletion of Personal Information

We retain each category of Personal Information for as long as it is reasonably necessary for one or more Business Purposes.

However, due to the nature of the Personal Information we collect and the Business Purposes for which it is received, it is not possible to predict the length of time that we intend to retain Your Personal Information. Instead, we use the following criteria to determine whether it remains reasonably necessary to retain Personal Information:

- the initial Business Purposes for which the Personal Information was collected or a subsequent Business Purposes in accordance with the CCPA;
- whether there is a retention period required by applicable contracts with third parties, professional rules of conduct, or applicable law or regulation;
- the existence of threatened or actual litigation for which EPIC is required to preserve Personal Information; or
- generally accepted best practices in the risk management and insurance brokerage industries, and/or in the industries of the applicable affiliate(s) of EPIC receiving Personal Information.

When we determine that it is no longer reasonably necessary to retain Your Personal Information for one or more disclosed Business Purpose(s) based on the above criteria, we will delete Your Personal Information.

5. Your Rights and Choices

You may request information about our collection, use, and disclosure of Your Personal Information, whether or not it was collected electronically. For purposes of this Section 5, You includes Related Individuals.

“Verifiable Request” means that the identifying information You provide in connection with a request matches the Personal Information EPIC already maintains. Identifying information includes name, last four-digits of Social Security Number, address, and year of birth.

If You submit a Verifiable Request, we will provide You with information regarding:

- the categories of Personal Information we have collected about You; the categories of sources from which Your Personal Information was collected; our Business Purposes for collecting, Selling, or Sharing Your Personal Information; the categories of third parties with whom we disclose that Personal Information; and the specific pieces of Personal Information we collected about You; and
- what categories of Personal Information we disclosed for a Business Purpose, and to which categories of recipients we disclosed it; and
- if we Sold or Shared Your Personal Information for a Business Purpose: what categories of Personal Information we Sold or Shared, and to which categories of recipients we Sold or Shared it.

You also have the right to request a copy of Your Personal Information, and/or to request that we transmit Your Personal Information to another entity. To the extent technically feasible, we will comply with Your request and provide and/or transmit Your Personal Information in a structured, commonly used, machine-readable format.

You also have the right to request that we delete any of Your Personal Information that we collect or maintain by submitting a Verifiable Request. We may deny Your deletion request if retaining Your Personal Information is necessary for us or our “service providers” or “contractors” to:

- complete a transaction for which we collected Your Personal Information, provide goods or services that You requested, take actions reasonably anticipated within the context of Your ongoing Role with us or in connection with the Personal Information of a Related Individual;
- detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- debug products and websites to identify and repair errors that impair existing intended functionality;

- exercise free speech, ensure the right of another consumer to exercise their right of free speech, or exercise another right provided for by law;
- comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.);
- engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the achievement of such research, if You previously provided informed consent;
- enable solely internal uses that are reasonably aligned with the expectations of Employees based on Your Role with us;
- comply with a legal obligation; or
- make other internal and lawful uses of that information that are compatible with the context in which You provided it.

You further have the right to request that we correct any of Your Personal Information that is inaccurate by submitting a Verifiable Request. We will correct any inaccurate Personal Information pursuant to Your request to the extent possible using commercially reasonable efforts. We may deny Your correction request if the Personal Information is accurate. We may also delete Your Personal Information instead of correcting it to the extent such deletion would not negatively impact You.

You also have the right to request that we limit the use and disclosure of Sensitive Personal Information by submitting a Verifiable Request. If You submit such a Verifiable Request, we may continue to use or disclose Your Sensitive Personal Information to:

- complete a transaction for which we collected Your Sensitive Personal Information, provide goods or services that You requested, take actions reasonably anticipated within the context of our ongoing business relationship with You, or otherwise perform our contract with You;
- detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- use in a short-term and transient manner, including, but not limited to, to facilitate non-personalized advertising shown as part of Your current interaction with the technologies used by EPIC, but not including disclosure to third parties or use outside Your current interaction with such technologies;
- enable solely internal uses that are reasonably aligned with employee expectations based on Your relationship with us; or
- make any other uses of that information that are permitted by the CCPA and its implementing regulations.

If You choose to exercise a privacy right under the CCPA, You have the right not to receive discriminatory treatment.

You may submit a Verifiable Request for the information listed above, or exercise any of Your rights enumerated under this Notice, by calling us at 1-800-345-7242, or by completing a form on our website available [here](#). You may also submit a Verifiable Request on behalf of Your minor child.

After we receive Your Verifiable Request, we will provide to You, in writing and free of charge (unless Your request is excessive, repetitive, or manifestly unfounded), the requested information. Unless you specify a shorter period for the request and processing Your request does not require disproportionate effort, we will process Your request with respect to Personal Information we have collected from January 1, 2022 to the time of processing your request. You can choose to have this information delivered to You by postal mail or electronically. We will try to respond to Your verified request within forty-five (45) days of receipt, but if we require more time (up to another forty-five (45) days) we will

inform You of the reason and extension period in writing. Please note that we are not required to comply with Your request for information more than twice in any 12-month period. If applicable, our response will explain the reasons why we cannot comply with Your request.

EPIC does not and will not, without first obtaining Your consent, Sell or Share Personal Information.

If You choose to exercise any of the rights enumerated under this Policy, we will not:

- deny You goods or services;
- charge You different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- provide You a different level or quality of goods or services; or
- suggest that You may receive a different price or rate for goods or services or a different level or quality of goods or services.

HOWEVER, PLEASE BE AWARE THAT IT IS NECESSARY FOR EPIC TO HAVE PERSONAL INFORMATION ABOUT YOU IN ORDER FOR YOU TO BE EMPLOYED BY EPIC AND FOR US TO PROVIDE YOU WITH EMPLOYEE BENEFITS. ADDITIONALLY, IT MAY BE A FUNCTIONAL NECESSITY FOR US AND/OR OUR TECHNOLOGIES TO HAVE PERSONAL INFORMATION ABOUT YOU IN ORDER TO OPERATE, AND WE MAY NOT BE ABLE TO PROVIDE SOME OR ALL OF OUR BENEFITS OR SERVICES TO YOU IF YOU DIRECT US TO DELETE YOUR PERSONAL INFORMATION.

6. Changes to this Policy

We may amend this Policy from time to time. When we make changes to this Policy, we will notify You through by email or on an internal EPIC website.

7. Contact Information

If You have any questions or comments about this Policy, the ways in which we collect, use, disclose, or destroy Your Personal Information, or Your choices and rights regarding Your Personal Information, please do not hesitate to contact us at:

HRSupport@epicbrokers.com