



California Employee Privacy Notice

Last Updated: 01/31/2024

1. INTRODUCTION

This California Employee Privacy Notice (“Employee Notice”) applies to personal information that we collect about new hires, current employees, current independent contractors, and former employees that are California residents (collectively, “Employees”) of United Heritage Financial Group and United Heritage Life Insurance Company (collectively “United Heritage,” “we,” “us,” “our”).

2. COLLECTION, USE, AND DISCLOSURE OF EMPLOYEE PERSONAL INFORMATION

Sources of Employee Personal Information. We may collect Employee personal information directly from Employees, from within our family of companies, automatically from United Heritage IT systems, through devices you choose to connect to United Heritage networks, from other Employees such as your manager, or from Human Resources.

Categories of Employee Personal Information Collected, Purposes, and Disclosure. We may collect the following categories of Employee personal information, for the following purposes, and disclose such Employee personal information to service providers for the following business purposes:

Category of Personal Information	Categories of Sources from which Collected	Purposes for Collection / Use / Disclosure
Identifiers 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	<ul style="list-style-type: none"> • Directly from you • Automatically when you use our electronic systems such as our employee portal • Created by us (e.g., your employee ID) • From service providers that help us to run our business 	<ul style="list-style-type: none"> • To communicate with you such as when regarding your employment and benefits • To onboard and enroll you as an employee • To provide compensation and benefits, such as if you are eligible for certain employment sponsorships • To comply with applicable laws and regulations included those related to sending you W-2s and other tax information • To manage the security of our premises and systems • To detect and prevent fraud against you and/or us
Personal Records , 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	<ul style="list-style-type: none"> • Directly from you • From service providers that help us to run our business • From third parties (e.g., past employers through references checks, government bodies) 	<ul style="list-style-type: none"> • To communicate with you such as when your signature is required for a legal document • To onboard and enroll you as an employee, such as when conducting background checks • To provide compensation and benefits, such as based on your employment history • To comply with applicable laws and regulations including our responsibility that you are eligible for employment within the United States • To manage the security of our premises and systems • To detect and prevent fraud against you and/or us • To process certain services such as your payments for food services through us

Category of Personal Information	Categories of Sources from which Collected	Purposes for Collection / Use / Disclosure
<p>Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies</p>	<ul style="list-style-type: none"> • Directly from you • From service providers that help us to run our business 	<ul style="list-style-type: none"> • To provide benefits or process reimbursements when applicable, such as job-related travel expenses
<p>Characteristics of protected classifications under California or federal law, including age and date of birth, marital status, race, ancestry, ethnic origin, sex, gender, sexual orientation, gender identity, religion or creed, military or veteran status, medical condition, disability, marital status</p>	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • To comply with applicable laws and regulations such as the EEO-1 that we are required to provide to the government each year • To assess availability and access to certain benefits such as parental leave, disability accommodations, or religious accommodations • To assess availability to and access by employees on a voluntary basis for company-provided affinity and support groups
<p>Internet or other electronic network activity information, including browsing history, search history, and information regarding your interactions with our websites, applications, or employee portals</p>	<ul style="list-style-type: none"> • Automatically when you use our electronic systems such as our employee portal • From service providers that help us to run our business • From third parties such as Internet Service Providers 	<ul style="list-style-type: none"> • To manage corporate information technology such as the employee portal • To manage job-appropriate use of company devices or devices used for job functions • To manage the security of our premises and systems • To make it easier for you to log into our employee portals, websites, or apps • To improve our website, set default options, and provide you with a better technical experience • To detect and prevent fraud against you and/or us
<p>Audio, electronic, visual, or similar information, including closed-circuit images, photographs and video of you (for ID badges, marketing materials, etc.), and audio recordings as may relate to your job functions (such as if you provide customer service through the phone)</p>	<ul style="list-style-type: none"> • Directly from you • While you are on company property or using certain company devices (e.g., if you answer or place phone calls on a recorded line) 	<ul style="list-style-type: none"> • To manage the security of our premises and systems • To manage job duties, evaluate performance, and operate our business
<p>Inferences drawn from the other categories of personal information used to create a profile reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes</p>	<ul style="list-style-type: none"> • From the same sources as the categories of personal information used to conduct an inference 	<ul style="list-style-type: none"> • To manage job duties, evaluate performance, including assessing promotions, and operate our business, such as for employment reviews addressing work performance and capability • To manage corporate information technology such as understanding how the employee portal is used in order to improve the technology to make work functions efficient on company-provided devices and portals • To detect and prevent fraud against you and/or us

<p>Professional or employment-related information, including:</p> <p>Recruitment information (such as skills, qualifications, references, recommendations, and other information included in a resume, application form, or cover letter);</p> <p>Background information commonly used for onboarding and security screenings;</p> <p>Criminal records information including results of background checks obtained through government agencies;</p> <p>Employee profile information (employee status, organization information, performance and talent information, employment background, functional experience, leadership experience, honors or awards, timesheets, education, training, professional certifications, evaluations, developmental planning, career interests and development information, and other talent management and team-based assessments);</p> <p>Languages spoken;</p> <p>Compensation, payroll, and benefits information;</p> <p>Withholdings, and tax information (such as information collected on IRS Form W-4 and California Tax Form DE 4);</p> <p>Citizenship, immigration, visa status, and work authorization information (including information from related documents, such as your passport, driver's license, or other identification, proof of residence, and proof of authorization to work in the United States, and documents you provide with your US Citizenship and Immigration Services Form I-9);</p> <p>Medical, parental, family, vacation, and other leave and associated records, including details of the types of and reasons for leave being taken, duration of leave, and leave-related correspondence;</p> <p>Information about your health, sickness, and absences (including information regarding your physical and/or mental health, any participation in health and wellness programs, drug and alcohol screening information, medical provider information—for example, if you apply for workers' compensation—and information about any conditions that may require accommodations within the workplace);</p> <p>Information about births, adoptions, deaths, child medical support orders, loss of eligibility for medical coverage, and other life events that may trigger an opportunity to modify your benefits elections;</p>	<ul style="list-style-type: none"> • Directly from you • From service providers that help us to run our business • From third parties (e.g., government agencies) 	<ul style="list-style-type: none"> • To assess your eligibility for promotion, such as consideration of education and certifications • To administer the employment relationship such as processing payroll • To manage job duties, evaluate performance, and operate our business, such as approving vacation time • To provide compensation and benefits such as overtime and workplace health-related accommodations • To comply with applicable laws and regulations such as addressing worker's injury compensation where required by law • To manage the security of our premises and systems • To detect and prevent fraud against you and/or us
<p>Emergency contacts/next of kin information, details about your spouse/partner, dependents and beneficiaries (such as their names, titles, relationship to you, addresses, telephone numbers, and email addresses);</p> <p>Any termination of employment documentation, including resignation letters, dismissal letters, minutes of meetings, settlement agreements and related correspondence;</p> <p>Vehicle information (such as year, make, model, color, and license plate), used for parking assignments</p>		

Categories of Sensitive Personal Information Collected, Purposes, and Disclosure. In addition to the personal information described above, we may collect, use, and disclose to service providers personal information that is considered sensitive under California law in the following ways:

Category of Sensitive Personal Information	Categories of Sources from which Collected	Purposes for Collection / Use / Disclosure
Social security, driver's license, state identification card, or passport number	<ul style="list-style-type: none"> • Directly from you • From service providers that help us to run our business 	<ul style="list-style-type: none"> • To communicate with you such as when regarding your employment and benefits • To onboard and enroll you as an employee • To provide compensation and benefits, such as if you are eligible for certain employment sponsorships • To comply with applicable laws and regulations • To manage the security of our premises and systems • To detect and prevent fraud against you and/or us
Account log-in in combination with any required security or access code, password, or credentials allowing access to an account	<ul style="list-style-type: none"> • Directly from you • Automatically when you use our electronic systems such as the employee portal 	<ul style="list-style-type: none"> • To manage corporate information technology such as your registration and log in to employee portals • To manage the security of our premises and systems
Personal information that reveals an Employee's racial or ethnic origin, religious or philosophical beliefs, or union membership	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • To comply with applicable laws and regulations such as the EEO-1 that we are required to provide to the government each year • To assess availability and access to certain benefits such as religious accommodations • To assess availability to and access by employees on a voluntary basis for company-provided affinity and support groups
Contents of mail, email, and text messages except those for which we are the intended recipient	<ul style="list-style-type: none"> • Directly from you • From service providers that help us to run our business such as e-mail providers 	<ul style="list-style-type: none"> • To manage job duties, evaluate performance, and operate our business such as assessing appropriate use of company-provided email accounts and adherence to company policies • To manage corporate information technology such as company-provided email accounts
Personal information collected and analyzed concerning an Employee's health	<ul style="list-style-type: none"> • Directly from you • From service providers that help us to run our business • From third parties (e.g., government agencies or health providers) 	<ul style="list-style-type: none"> • To administer the employment relationship such as health accommodations • To manage job duties, evaluate performance, and operate our business, such as approving sick leave • To provide compensation and benefits such as workplace health-related accommodations • To comply with applicable laws and regulations such as addressing worker's injury compensation where required by law • To detect and prevent fraud against you and/or us
Personal information collected and analyzed concerning an Employee's sex life or sexual orientation	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • To comply with applicable laws and regulations • To assess availability and access to certain benefits such as insurance benefits accommodations (e.g., IVF coverage benefits) • To assess availability to and access by employees on a voluntary basis for company-provided affinity and support groups

Categories Of Recipients To Whom We Disclose Employee Personal Information. We do not sell or share for behavioral advertising Employee personal information, but we may disclose your personal information to the following categories of parties for the following purposes:

- **Family of companies.** We may internally disclose personal information as well as within our family of companies so that we and other family companies can respond to requests or inquiries or tell you about a product or service. For example, we may disclose your information to a United Heritage affiliate if you apply for a position with that affiliate.
- **Business transfers.** We may disclose personal information in the event we sell or transfer all or a portion of our business assets (e.g., further to a merger, reorganization, liquidation, bankruptcy, or any other business transaction), including negotiations of such transactions.

- **In response to legal process.** We may disclose personal information for legal compliance, law enforcement, and public safety purposes. For example, to law enforcement, government or regulatory bodies, lawful authorities, or other authorized third parties in order to comply with laws, regulations, court orders, or other legal obligations.
- **To protect us and others.** We may disclose the information we collect from you where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Use, or as evidence in litigation in which we are involved.
- **To professional advisers.** We may disclose the information we collect from you to seek advice from lawyers, auditors, and other professional advisers.

3. **RETENTION OF EMPLOYEE PERSONAL INFORMATION**

We generally retain Employee personal information for at least seven years, up to ten years, after you leave your employment. Otherwise, we may retain personal information for as long as is necessary 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 required 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 information by applicable laws or regulations.

Where information is used for more than one purpose, we will retain it until the purpose with the latest period expires. For more information about our retention policies, please contact us using the contact details below.

4. **CALIFORNIA PRIVACY RIGHTS**

If you are a California resident, 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 using the information provided in Section 5, Contact Us, below.

If you make a privacy request, we may take steps to verify your identity before responding to your request. You may designate an authorized agent to make a request on your behalf. You may make such a designation by providing the agent with written permission to act on your behalf. As permitted by law, we may take steps to verify your own identity in response to a request even if you choose to use an agent.

Please note that our response times to your requests may vary depending on the specific request and the type of information sought. We respond to all verifiable requests for information as soon as we reasonably can and no later than legally required. In the event we are not able to process all or part of your request, we will provide an explanation as to why.

Right to Request More Information. You may request more information about:

- the categories of personal information we have collected about you;
- the categories of sources from which the personal information is collected;
- our business or commercial purpose for collecting or disclosing your personal information;
- the categories of third parties with whom we disclosed your personal information;
- the specific pieces of information we have collected about you;
- the categories of personal information about you that we disclosed for a business purpose and the categories of persons to which it was disclosed.

Right to Correct Inaccurate Information. If you believe that any of the personal information we maintain about you is inaccurate, you may submit a request for us to correct that information. Upon receipt of a verifiable request to correct inaccurate personal information, we will use commercially reasonable efforts to correct the information as you direct.

Right to Request Deletion of Your Personal Information. California Employees have the right to request that we delete personal information collected or maintained by us. Following receipt of a verifiable request to delete, we will let you know what personal information we can delete from our records. We will also notify our service providers to which we transferred your information about your request to delete.

Right to Non-Discrimination for the Exercise of Your Privacy Rights. If you choose to exercise any of the privacy rights described above, consistent with California law, we will not retaliate against an Employee for exercising their privacy rights.

5. **CONTACT US**

If you have any questions about this Employee Notice, please contact us at regulatory@unitedheritage.com or at (800) 657-6351.