



California Resident Job Applicants Privacy Notice

Last Updated: 01/31/2024

1. INTRODUCTION

This Notice applies to personal information that we collect about California residents who submit applications for employment (“Applicants”) to United Heritage Financial Group and United Heritage Life Insurance Company (collectively “United Heritage,” “we,” “us,” “our”).

This California Resident Job Applicants Privacy Notice (“Notice”) supplements our [Website Privacy Policy](#), which applies to visitors to our websites, www.unitedheritage.com, www.unitedheritagepc.com, www.unitedheritagelife.com, and www.sublimityins.com (collectively, the “Websites”), including Applicants that may submit an employment application through the website.

2. COLLECTION, USE, AND DISCLOSURE OF PERSONAL INFORMATION

Sources of Personal Information. We may collect personal information, including sensitive personal information (as further described below) about Applicants directly from Applicants, from within our family of companies, or from outside parties such as drug testing and consumer reporting agencies, such as a background or credit checks; former employer or references in order to evaluate qualifications; and referral sources, such as current employees, recruiters, and job applicant platforms.

Categories of Personal Information Collected, Purposes, and Disclosure. We may collect, depending on the nature of your interactions with us, the following categories of personal information, for the following purposes, and disclose such personal information to service providers for the following business purposes:

Category of Personal Information	Purposes for Collection / Use / Disclosure	Business Purposes for Disclosure to Service Providers
Identifiers <i>Examples: Real name, date of birth, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, and other similar identifiers</i>	<ul style="list-style-type: none"> • To perform necessary and appropriate internal functions, such as resolving complaints, records maintenance and developing or improving our website, products, and services • To process job applications • To assess qualifications for a particular job or task • To determine obligations as an employer • To complete activities related to recruiting, onboarding, and employment referrals • To gather evidence for investigations or to comply with applicable law • To detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity; conduct internal investigations; and help maintain and improve the safety, security, and integrity of our website, information systems, databases, and other technology assets • To prevent and detect fraud, verify identity, comply with a legal obligation, defend legal claims, assist with legal processes such as investigations, regulatory requests, litigation, and arbitration, and as required by applicable law, court order, or governmental regulations • To comply with health and safety obligations 	<ul style="list-style-type: none"> • Helping to ensure security and integrity • Debugging to identify and repair errors in functionality • Short-term, transient use • Performing services needed to operate our business, including maintaining or servicing accounts, providing customer service, processing requests, verifying information, and other similar services • Internal research for technological development and demonstration • Undertaking activities to verify or maintain the quality or safety of our systems and services, and to improve, upgrade, or enhance our systems and services

Category of Personal Information	Purposes for Collection / Use / Disclosure	Business Purposes for Disclosure to Service Providers
<p>Personal information described in California Civil Code § 1798.80(e) <i>Examples: Signature, telephone number, employment and employment history, and education</i></p>	<ul style="list-style-type: none"> To perform necessary and appropriate internal functions, such as resolving complaints, records maintenance and developing or improving our website, products, and services To process job applications To assess qualifications for a particular job or task To determine obligations as an employer To complete activities related to recruiting, onboarding, and employment referrals To determine performance requirements To gather evidence for investigations or to comply with applicable law To detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity; conduct internal investigations; and help maintain and improve the safety, security, and integrity of our website, information systems, databases, and other technology assets To prevent and detect fraud, verify identity, comply with a legal obligation, defend legal claims, assist with legal processes such as investigations, regulatory requests, litigation, and arbitration, and as required by applicable law, court order, or governmental regulations To comply with health and safety obligations 	<ul style="list-style-type: none"> Helping to ensure security and integrity Debugging to identify and repair errors in functionality Short-term, transient use Performing services needed to operate our business, including maintaining or servicing accounts, providing customer service, processing requests, verifying information, and other similar services Internal research for technological development and demonstration Undertaking activities to verify or maintain the quality or safety of our systems and services, and to improve, upgrade, or enhance our systems and services
<p>Characteristics of protected classifications under California or federal law <i>Examples: Age, sex, sexual orientation, gender identity, gender, disability/health, military status, national origin, citizenship, marital status, medical conditions, physical or mental disability, and pregnancy, childbirth, and/or related medical conditions</i></p>	<ul style="list-style-type: none"> To process job applications To assess qualifications for a particular job or task To determine obligations as an employer To complete activities related to recruiting, onboarding, and employment referrals For business improvement, management, and planning To determine performance requirements To gather evidence for investigations or to comply with applicable law To prevent and detect fraud, verify identity, comply with a legal obligation, defend legal claims, assist with legal processes such as investigations, regulatory requests, litigation, and arbitration, and as required by applicable law, court order, or governmental regulations To comply with health and safety obligations 	<ul style="list-style-type: none"> Helping to ensure security and integrity Short-term, transient use Internal research for technological development and demonstration Undertaking activities to verify or maintain the quality or safety of our systems and services, and to improve, upgrade, or enhance our systems and services
<p>Internet or other electronic network activity <i>Examples: Browsing history, search history, and information regarding a consumer's interaction with an internet web site</i></p>	<ul style="list-style-type: none"> To process job applications To complete activities related to recruiting, onboarding, and employment referrals For business improvement, management, and planning To detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity; conduct internal investigations; and help maintain and improve the safety, security, and integrity of our website, information systems, databases, and other technology assets To prevent and detect fraud, verify identity, comply with a legal obligation, defend legal claims, assist with legal processes such as investigations, regulatory requests, litigation, and arbitration, and as required by applicable law, court order, or governmental regulations 	<ul style="list-style-type: none"> Helping to ensure security and integrity Debugging to identify and repair errors in functionality Short-term, transient use Performing services needed to operate our business, including maintaining or servicing accounts, providing customer service, processing requests, verifying information, and other similar services Internal research for technological development and demonstration Undertaking activities to verify or maintain the quality or safety of our systems and services, and to improve, upgrade, or enhance our systems and services

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Audio, electronic, visual, thermal, or similar information <i>Examples: CCTV for Applicants visiting our physical offices and audio recordings of phone or video interviews</i>	<ul style="list-style-type: none"> To process job applications To assess qualifications for a particular job or task To complete activities related to recruiting, onboarding, and employment referrals To gather evidence for investigations or to comply with applicable law To detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity; conduct internal investigations; and help maintain and improve the safety, security, and integrity of our website, information systems, databases, and other technology assets To prevent and detect fraud, verify identity, comply with a legal obligation, defend legal claims, assist with legal processes such as investigations, regulatory requests, litigation, and arbitration, and as required by applicable law, court order, or governmental regulations To comply with health and safety obligations 	<ul style="list-style-type: none"> Helping to ensure security and integrity Debugging to identify and repair errors in functionality Short-term, transient use Performing services needed to operate our business, including maintaining or servicing accounts, providing customer service, processing requests, verifying information, and other similar services Internal research for technological development and demonstration Undertaking activities to verify or maintain the quality or safety of our systems and services, and to improve, upgrade, or enhance our systems and services
Professional or employment-related information <i>Examples: Resumes, former employers, work history, and certifications</i>	<ul style="list-style-type: none"> To process job applications To assess qualifications for a particular job or task To determine obligations as an employer To complete activities related to recruiting, onboarding, and employment referrals To determine performance requirements To gather evidence for investigations or to comply with applicable law To prevent and detect fraud, verify identity, comply with a legal obligation, defend legal claims, assist with legal processes such as investigations, regulatory requests, litigation, and arbitration, and as required by applicable law, court order, or governmental regulations 	<ul style="list-style-type: none"> Helping to ensure security and integrity Short-term, transient use Performing services needed to operate our business, including maintaining or servicing accounts, providing customer service, processing requests, verifying information, and other similar services

Categories of Sensitive Personal Information Collected, Purposes, and Disclosure. We may also collect, depending on the nature of your interactions with us, the following categories of sensitive personal information:

Category of Sensitive Personal Information	Purposes for Collection / Use / Disclosure	Business Purposes for Disclosure to Service Providers
Personal information that reveals an Applicant's social security, driver's license, state identification card, or passport number.	<ul style="list-style-type: none"> To process job applications To assess qualifications for a particular job or task To determine obligations as an employer To complete activities related to recruiting, onboarding, employment referrals, and offboarding To gather evidence for investigations or to comply with applicable law 	<ul style="list-style-type: none"> Helping to ensure security and integrity Short-term, transient use Performing services needed to operate our business, including maintaining or servicing accounts, providing customer service, processing requests, verifying information, and other similar services

Category of Sensitive Personal Information	Purposes for Collection / Use / Disclosure	Business Purposes for Disclosure to Service Providers
Personal information that reveals an Applicant's racial or ethnic origin, religious or philosophical beliefs, or union membership.	<ul style="list-style-type: none"> To determine obligations as an employer To complete activities related to recruiting, onboarding, employment referrals, and offboarding For business improvement, management, and planning To comply with health and safety obligations To gather evidence for investigations or to comply with applicable law 	<ul style="list-style-type: none"> Short-term, transient use Performing services needed to operate our business, including maintaining or servicing accounts, providing customer service, processing requests, verifying information, and other similar services Undertaking activities to verify or maintain the quality or safety of our systems and services, and to improve, upgrade, or enhance our systems and services
Personal information collected and analyzed concerning an Applicant's health.	<ul style="list-style-type: none"> To determine obligations as an employer To complete activities related to recruiting, onboarding, employment referrals, and offboarding For business improvement, management, and planning To comply with health and safety obligations To gather evidence for investigations or to comply with applicable law 	<ul style="list-style-type: none"> Helping to ensure security and integrity Short-term, transient use Performing services needed to operate our business, including maintaining or servicing accounts, providing customer service, processing requests, verifying information, and other similar services Undertaking activities to verify or maintain the quality or safety of our systems and services, and to improve, upgrade, or enhance our systems and services

Categories of Whom We Disclose Personal Information. We do not sell or share for behavioral advertising Applicant personal information. We may disclose your 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 including affiliates 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.
- **Service providers.** We may disclose personal information to vendors, service providers, contractors or agents who perform functions on our behalf for the business purposes described above. These service providers may include recruiters, human resources vendors, consultants, and vendors that provide recruiting resources.
- **Screening providers.** We may disclose information about you for pre-employment screening purposes, such as drug testing; and customer reporting agencies, including background or credit checks.
- **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 also 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 also 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, or as evidence in litigation in which we are involved.

3. PERSONAL INFORMATION RETENTION

We generally retain personal information for at least seven years, but no more than ten years, after you submit your personal information. 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.

Please note that should you become employed by us, different retention periods may apply as described in privacy notices provided to you as part of your employment.

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 consumers 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 and contractors, and any third parties to which we disclosed 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 deny you goods or services; charge different prices or rates for goods or services; or provide you a different level or quality of goods or services. Nor will we retaliate against an Applicant for exercising their privacy rights.

5. CONTACT US

You may contact us for more information or to exercise your privacy rights at:

- Toll Free Phone: 1-800-657-6351 ext. 4000
- Online: <https://www.unitedheritage.com/index.php?r=site%2Fcontact>
- Address: PO Box 7777, Meridian, Idaho 83680-7777
- Email: heritage@unitedheritage.com

6. ACCESSIBILITY

Consumers with a disability may seek more information on accessibility [here](#).