

CALIFORNIA EMPLOYEE PRIVACY NOTICE

Revision Date

Last modified: [12/27/2019]

Introduction

USLI and its subsidiaries, affiliates, and related entities (collectively, "USLI," "we," or "us") are committed to protecting the privacy and security of your personal information. In accordance with that commitment and the California Consumer Privacy Act (CCPA), this California Employee Privacy Notice ("Privacy Notice") describes the categories and purposes of personal information USLI collects during and after your job application and employment. This Privacy Notice applies only to USLI's former and current job applicants and former and current employees who are physically located (for other than a temporary or transitory purpose) and/or domiciled in California.

For purposes of this Privacy Notice, "personal information" means any information that identifies or could reasonably be linked, directly or indirectly, with a particular individual or household. Personal information does not include publicly available information, deidentified data, or aggregate consumer information.

Please carefully read this entire Privacy Notice to understand our policies and practices regarding your personal information.

Personal Information Collected

To carry out our activities and obligations as an employer, we may collect, store, and use the following personal information:

| Personal Information Category | Examples |
|---|--|
| Identifiers | A real name, alias, postal address, unique personal identifier, 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, address, telephone number, passport number, driver's license or state identification card number, education, employment, employment history, bank account number, other financial information, medical information, or health insurance information. |
| Protected classification characteristics under California or federal law | Age (40 years or older), race, color, national origin, 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, or veteran or military status. |
| Biometric information | Data related to health, exercise, and other physical characteristics for fitness programs. |
| Internet or other similar network activity | Browsing history and search history. |
| Geolocation data | Physical location or movements as transmitted via "key fobs" used for building access. |
| Sensory data | Audio, electronic, visual, thermal, olfactory, or similar information only as needed to accommodate a condition protected by the Americans with Disabilities Act (ADA). |
| Professional or employment-related information | Current or past job history or performance evaluations. |
| 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 transcripts, class schedules, student identification codes, or student financial information. |
| Inferences drawn from other personal information. | Personal information creating a profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes as provided by the Caliper Profile assessment. |

Please note some personal information included in one category may overlap with other categories.

Purposes of Collected Personal Information

USLI collects your personal information only to comply with legal obligations that apply to us as your employer and to facilitate our employment relationship with you. Specifically, USLI may collect your personal information for any of the following legitimate business purposes:

- Pre-employment background check and drug screening
- Onboarding and new hire orientation
- USLI College Help Program and Qualified Educational Assistance Plan
- Employee administration, including payroll and benefits administration
- Business management and planning, including internal administration with our affiliated entities
- Accounting and auditing
- Processing employee work-related claims, such as insurance and worker's compensation claims
- Education, training, and development
- Conducting performance reviews and determining performance requirements
- Assessing qualifications for a particular job or task
- Gathering evidence for disciplinary action or termination
- Detecting security incidents and protecting against malicious, deceptive, fraudulent, or illegal activity
- Complying with applicable state and federal laws and regulations
- Any other way we may describe when you provide the information
- Any other purpose for which you provide it and/or consent

Accuracy of Personal Information

It is important that the personal information we hold about you is accurate and current. Please promptly notify us if any of your personal information collected by USLI changes during your employment.

Changes to This Privacy Notice

The date the Privacy Notice was last revised is identified at the top of the page. We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice once we make any updates.

If we choose to collect any of the aforementioned personal information for any purpose other than those listed above, we will provide you with notice and, where required by law, seek your consent. We may collect your personal information without your knowledge only where required by applicable law or regulation.

Incorporation of Other Privacy Notices

All other notices related to the data privacy of USLI's past and present job applicants and employees ("Other Privacy Notices") are incorporated herein. Other Privacy Notices include, but are not limited to, the following:

- The General Privacy Notice, set forth on USLI's website (www.usli.com)
- IT Team Electronic Technology Policy, provided during new hire orientation
- The limitation on privacy when using USLI's information systems, set forth on page six of USLI's Benefits Overview (6/18) booklet
- Acceptable Internet and Email Usage, set forth under the Information Technology Overview (12/18) of the New Hire Orientation booklet
- HIPPA Privacy Notice, set forth on pages 28 to 33 of USLI's Benefits Overview (6/18) booklet

Contact Us

For questions or comments regarding this Privacy Notice or our privacy practices, please write us at:

Attn: Legal and Compliance, Cybersecurity and Data Privacy
USLI
1190 Devon Park Drive
Wayne, PA 19087

You may also email us at cybercompliance@usli.com.