

PRIVACY NOTICE

This notice is provided by the CopperPoint family of companies that includes Alaska National Insurance Company, CopperPoint Insurance Company, Pacific Compensation Insurance Company and their affiliated companies. It is intended specifically for our current or former employees, job applicants, owners, directors, officers, medical staff members and contractors, and their emergency contacts and dependents and spouses for purposes of administering benefits, as applicable (“Job Participants”). *This notice is not a contract for employment and does not confer or alter any at-will employment relationship between us and any employee or prospective employee.*

This notice is intended to comply with the California Consumer Privacy Act of 2018 (“CCPA”) for information we collect that’s subject to the CCPA and shall become effective on January 1, 2020. This notice does not apply to information collected pursuant to other privacy laws that is exempt under the CCPA. If you are not a Job Participant, please refer to CopperPoint’s additional privacy policies that may be obtained with the information provided at the end of this notice.

The CopperPoint family of companies values your privacy and strives to comply with various laws and regulations protecting nonpublic personal information that we collect about you, which is more fully described in Part 1, below (“Personal Information”). If you are a California resident, this notice is to inform you of our privacy policies and practices applicable to your Personal Information collected under the CCPA. Although you’re not required to reply to this notice, please read it carefully to understand your rights and what we do with your information.

Summary Statement:

The CopperPoint family of companies will not collect or disclose your Personal Information in a manner that is unlawful or contrary to this notice or discriminate against you for exercising any of your privacy rights.

General Policy Statement:

We need to collect and share Personal Information about you to run our business and to provide the benefits and services you expect from us, and to comply with our legal and regulatory obligations. In so doing, we undertake to protect the confidentiality and security of your information. This includes protecting it against unauthorized use or access through various, industry standard security features and limiting authorized access to persons and organizations based upon business need. We do not sell your Personal Information, including your financial information. And we do not share it with nonaffiliated third parties unless reasonably necessary to administer our benefits, provide you with services, perform a related function, as permitted or required by law, or as otherwise described in this notice.

We will not prepare or request an investigative consumer report about you in connection with your employment or application of employment without separately notifying you and giving you an opportunity to request a copy of the report. We will not use illegal or unethical means to collect information about you, including the use of pretext interviews. But please note that these prohibitions are not intended to hinder legitimate investigation techniques relating to fraud, harassment or other violations of laws, regulations or our policies.

Your rights regarding information we collect about you depends upon the type of information we collect and the purpose for which we collect it, as well as the jurisdiction in which you reside. This notice and our underlying policies and practices are not intended to create or bestow rights greater than or in addition to any rights you’re entitled to under laws applicable in your resident jurisdiction. Laws, technologies and business demands change over time and, therefore, this notice is subject to change with them. The version date of this notice is printed on the bottom of each page for your ease of reference. This notice may also be supplemented by various, additional privacy policies that

are sent separately or appear elsewhere, as applicable. For example, on our websites or at other points where we collect your information, either electronically or in person.

Part 1: Categories of Personal Information We Collect, Use and Disclose

We collect and disclose to third parties nonpublic information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly to a particular individual consumer or household, including you/yours, as outlined in the chart below (“Personal Information”). Personal information doesn’t include information that is (i) publicly available from government sources or (ii) deidentified or aggregated. The types of individuals we collect Personal Information on include our employees, job applicants, owners, directors, officers, medical staff members, contractors, their respective emergency contacts and others.

We have collected and/or shared – but not sold – the following categories of your Personal Information within the last twelve (12) months for the business and commercial purposes listed:

Categories and Examples of Personal Information We <u>DO</u> Collect	Purposes Used – See Part 2, Below
<p>(I) <u>Personal identifiers</u>: A real name, alias, 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 any other financial information, medical information, or health insurance information.</p> <p>Some Personal Information included in this category may overlap with other categories.</p>	<p>1 through 34, inclusive.</p>
<p>(II) <u>Personal characteristics of protected classifications under California or federal law</u>: Race, color, age (40 years and older), ancestry, national origin, citizenship, religion or creed, 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>1, 2, 4, 5, 7 through 21, inclusive, 23, 24, 27, 28, 31, 33</p>
<p>(III) <u>Commercial information</u>: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. For example, if you are authorized to utilize a personal mobile device for business purposes, we will keep a record of such device.</p>	<p>1, 5, 7, 8, 9, 10, 16, 17, 19</p>
<p>(IV) <u>Internet or other electronic network activity information</u>: Browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement. (This category does not include information that is actively entered into an online form.) For example, we monitor network activity and actively block sites that are deemed security risks or might otherwise violate company policies. We control the right to access all electronic information processed on company computers/networks in accordance with our applicable policies.</p>	<p>1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 16, 22, 24, 25, 29, 32</p>
<p>(V) <u>Sensory data</u>: Audio, electronic, visual, thermal, olfactory, or similar information. For example, your picture may be utilized on our security badges and your images may be captured on security cameras located throughout our facilities.</p>	<p>1, 2, 3, 7, 8, 9, 10, 11, 13, 14, 16, 22, 24</p>
<p>(VI) <u>Professional or employment-related information</u>: Current and/or past employment history including performance evaluations.</p>	<p>1, 7, 8, 9, 10, 11, 13, 14, 16, 17, 18, 30, 34</p>

Categories and Examples of Personal Information We <u>DO</u> Collect	Purposes Used – See Part 2, Below
(VII) <u>Non-public education information (as defined in the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g, 34 C.F.R. Part 99))</u> : Education records, files, documents, and other materials directly related to a student 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.	1, 7, 9, 10, 11, 13, 14, 16, 17, 18, 30, 33
(VIII) <u>Biometric information</u> : Physiological, biological or behavioral characteristics, including an individual’s deoxyribonucleic acid (DNA), imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise. For example, insurance regulatory agencies may require persons holding certain positions to submit their fingerprints to be held on file with the agency.	1, 7, 8, 9, 10, 12, 13, 14, 15, 16, 19, 20
(IX) <u>Geolocation data</u> : Physical location and/or movements. For example, if you utilize company-issued, electronic devices or applications equipped with location services, it may be possible for us to determine your physical location while you are in possession of and/or utilizing such equipment.	1, 3, 7, 13, 14, 23, 29
(X) <u>Inferences drawn from other Personal Information</u> : Information used to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	1, 4, 7, 13, 16, 33

PART 2: Uses of Personal Information

We do not sell your Personal Information and we will not collect it or use it contrary to this notice without further notice to you. We may use the categories of Personal Information referenced above for various purposes related to our business operations, including:

- 1) To fulfill or meet the reason you provided the information. For example, to provide you with information that you may request from us or to investigate and address your concerns, and to monitor and improve our responses;
- 2) To create, maintain, customize and secure your account with us or our business partners and service providers;
- 3) To help maintain the safety, security and integrity of our physical and technology assets and business, including utilizing security cameras and online tracking technologies;
- 4) To guide our decision-making process when tailoring our service offerings or marketing efforts;
- 5) To process your claims, requests, purchases, transactions, payments, and to prevent transaction fraud;
- 6) For testing, research and analysis, including to develop and improve our website and services;
- 7) To respond to law enforcement requests and as required by applicable laws, court order, or local, state or federal government regulations;
- 8) As necessary or appropriate to protect the rights, interests, property, or safety of you, us, our clients, or others, including responding to legitimate background requests;
- 9) As described to you when collecting your Personal Information or as otherwise set forth in the applicable privacy laws of the jurisdictions within which we operate and you reside;
- 10) To evaluate or conduct financing, 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 about you is among the assets transferred;

- 11) To verify your identity, process your registration, claim or application for any of our benefits or services, including verifying your information is accurate and valid;
- 12) To interact with insurance organizations or professional societies and licensing authorities. For example, if your position requires a license, we may contact the licensing authority to verify/confirm active license status or if you file a claim covered under our insurance policies, we may provide information to process or defend the claim;
- 13) For internal business purposes;
- 14) To defend or prosecute claims or informal complaints, including conducting internal investigations.
- 15) To contact you with regard to your use of any of our benefits or services and, in our discretion, changes to any of our benefits or services and/or any of our policies relating thereto.
- 16) For any legitimate purpose that you have expressly authorized us to use it for;
- 17) To obtain a background check, consumer report, or investigative consumer report about you, including a motor vehicle record (MVR), as appropriate;
- 18) To verify your references and other information you provide to us;
- 19) To report information to government agencies as required by applicable law, and otherwise to comply with applicable laws and government programs in which we participate;
- 20) To administer employee benefits programs, leave of absence programs and procurement and diversity programs;
- 21) To contact third parties whose information you provide to us for use in cases we deem an emergency or as otherwise permitted by applicable law;
- 22) To allow you to access our physical buildings and premises and to permit you to clock-in/-out using our timekeeping system;
- 23) To track your physical location and/or the physical location of our property in your possession or control;
- 24) To verify your compliance with our policies, procedures and workplace rules;
- 25) To enable your use of our computers, networks, phones and other technology assets;
- 26) To keep track of records related to your relationship with us;
- 27) To assess your ability to return to work following a leave of absence and to assess your request for a workplace accommodation, including assessing your ability to perform the essential functions of your position;
- 28) To administer drug-free workplace programs;
- 29) To track your efficiency and productivity;
- 30) To assess your candidacy for employment or other professional engagement with us;
- 31) To verify your identity and authorization to work in the U.S;
- 32) To evaluate your performance as an employee or in another professional engagement with us;
- 33) To provide you with educational and training opportunities, including providing your information to schools or other educational entities that are engaged to provide you with training and/or instruction;
- 34) To various professional or industry societies, organizations or educational organizations of which you or we are members. For example, if you speak at or attend such organizations' events, we may provide the organizations your information for registration or promotion purposes, including their public attendee lists.

PART 3: Your Right to Access:

While the CCPA does not afford Job Participants a right of access, other laws provide current or former employees a right to access various information on record with us, including the right to inspect and copy various documents in a personnel file like payroll records and documents bearing an employee's signature. Please contact our human resources department should you wish to inquire further.

Further Information:

Please visit our website at www.copperpoint.com/legal-and-privacy for further information about our privacy policies and practices and your rights under the CCPA and/or other privacy laws, including information on how this notice can be accessed in an alternative, ADA accessible format.

If you're a current or former Job Participant, please contact our human resources department for further information regarding your privacy or inspection rights.

If you have questions about this notice, please contact us at:

Toll-free Phone: **1-800-231-1363**

(Our office hours are 8 a.m. to 5 p.m. (MST), Monday through Friday, excluding holidays.)

Website: **www.copperpoint.com/contact-us**

Email: **ask@copperpoint.com**

Please remember that this notice is subject to change and may be supplemented by various, additional privacy policies that are sent separately or appear elsewhere, including on our websites or delivered in person.