

## **California Consumer Privacy Act (“CCPA”): California Consumer Privacy Notice**

*Effective Date: January 1, 2023*

*Last Updated On: April 1, 2023*

This page describes how Estrella Insurance and its subsidiaries and affiliates (collectively, “Estrella Insurance,” “we,” “us,” or “our,” “Company”) handles Personal Data that is subject to the California Consumer Privacy Act (“CCPA”) for the following types of California residents:

- **Individual Consumers, Business Contacts and Website Visitors**, such as an individual or business (including an employee of our vendor or business customer) who interacts with us through our websites, social media accounts, online advertisements, and mobile applications (collectively, our “Digital Properties”), through communications (such as mail, email, and phone), at in-person events, and through other online and offline methods – click [HERE](#) to view our CCPA Individual Consumer, Business Contacts and Website Visitors Privacy Notice
- **Job Applicants** who have applied for a job with Estrella Insurance – click [HERE](#) to view our CCPA Job Applicant Privacy Notice

As used in these Privacy Notices, “Personal Data” means any information that identifies, describes, or can reasonably be associated with a particular individual.

**Importantly, the Privacy Notices posted on this page do not apply to Personal Data that is exempt from the CCPA, such as data subject to the Fair Credit Reporting Act (“FCRA”), the federal Gramm-Leach-Bliley Act (“GLBA”), or the California Financial Information Privacy Act (collectively, “Exempt Financial Information”). Exempt Financial Information is subject to our [Website Privacy Statement](#). These Privacy Notices also do not apply to other, non-financial Personal Data that is exempt from the CCPA, such as data subject to the Health Insurance Portability and Accountability Act (HIPAA) or the California Confidentiality of Medical Information Act.**

## **CALIFORNIA CONSUMER PRIVACY NOTICE: INDIVIDUALS, BUSINESSES, AND WEBSITE VISITORS**

This Privacy Notice (“Notice”) describes how Estrella Insurance processes Personal Data that we collect through our websites, social media accounts, online advertisements, and mobile applications (collectively, our “Digital Properties”) and through other online and offline interactions.

Whenever you interact with us on behalf of another individual or entity, such as by providing or accessing Personal Data about another individual, you need to obtain their consent (or have the legal authority without consent) to share any Personal Data you provide to us.

**Changes:** We may update this Notice from time to time. Any updated Notice will be effective when posted. Please check this Notice periodically for updates. If required by law, we will contact you directly to provide you with an updated Notice.

### **1. Sources of Personal Data**

We collect Personal Data about you from the following sources:

- A. **Directly from you.** We may collect Personal Data you provide to us directly, such as when you contact us through our Digital Properties, interact with us in person at tradeshows, sign up for offers or other services, register for an account with us, or otherwise communicate with us.
- B. **Data collected automatically and through tracking technologies.** We may automatically collect information or inferences about you, such as through cookies and other tracking technologies, when you interact with our Digital Properties. This may include information about how you use and interact with our Digital Properties or otherwise interact with us, information about your device, and internet usage information.
- C. **From third parties.** We may collect Personal Data from third parties, such as service and content providers, our affiliated companies and subsidiaries, business partners, data brokers, social media companies or other parties who interact with us, including through referrals.
- D. **From publicly available sources.** We may collect Personal Data about you from publicly available sources, such as public profiles and websites.

We may combine and use information and make inferences from information that we receive from the various sources described in this Privacy Notice, including third party sources. We may also use or disclose the combined information and inferences for the purposes identified below.

### **2. Types of Personal Data We Collect**

We may collect the following types of Personal Data about you:

- A. **Identifiers**, such as your name, email address, physical address, telephone number, business contact information, account number, and device identifiers (e.g., cookie IDs and IP address).
- B. **Records about you**, such as signatures; payment and delivery details; the content, timing and method of communications you have with us, such as online chats, calls, and emails; and personal opinions or insights included in any feedback relating to your interactions with us or reviews you submit about our products and services.
- C. **Commercial information**, such as information related to your transactions, products or services purchased, obtained or considered; subscription information; evidence of personal assets and guarantees for potential franchisees;; your marketing preferences;; and legal information relating to your transactions, such as fraud checks or flags raised about your transactions, payment card refusals, complaints and information related to their resolution.
- D. **Internet or other electronic network activity information**, such as your browsing history, search history, preferences (including marketing preferences), and other information regarding your interactions with and use of the Digital Properties. For more information about cookies and other device data, please see Section 5 – Cookies and Other Tracking Technologies.
- E. **Non-precise geolocation data**, such as your location as derived from your IP address.
- F. **Audio, electronic, visual, or other sensory information**, such as photographs, security camera footage, and audio recordings of your communications with our customer service centers.
- G. **Professional or employment-related information**, such as job title, organization, professional licenses, credentials or affiliations, personality assessments and background check information for potential franchisees; and other professional information.
- H. **Education information**.
- I. **Inferences** drawn from any of the information we collect to assess the level of interest in our products and services based on frequency of visits and contact, evaluate the industries showing interest in our products and services based on IP address (where we can infer your approximate location to improve our communications to you), and determine your preferred frequency for receiving offers.
- J. **Sensitive Personal Information**, such as Social Security number, driver's license number, or passport number; account log-in information; and racial or ethnic origin if you choose to provide it.

### **3. How We Use Personal Data**

We may use Personal Data for the following purposes:

- A. **To provide you or your company with products and services**, such as registering, verifying, and maintaining your account with us; providing and delivering you the products and services you or the company you represent requests and providing customer service; processing or fulfilling orders and transactions, including executing franchise relationships; processing payments; paying referral fees; communicating with you about our products and services; hosting informational webinars; verifying eligibility for certain programs or benefits; soliciting feedback and responding to requests, complaints, and inquiries; and providing similar services or otherwise facilitating your relationship with us.
- B. **For our internal business purposes**, such as operating our Digital Properties and customizing the content; maintaining internal business records; document management and similar activities; enforcing our policies and rules; management reporting; auditing; IT administration of our network, Digital Properties, and other technologies; and IT security management and tasks.
- C. **For our internal research and product improvement purposes**, such as verifying or maintaining the quality of our products or services; improving our products or services; designing new products and services; evaluating the effectiveness of our advertising or marketing efforts; and debugging and repairing errors with our systems, networks, and equipment.
- D. **For legal, safety or security reasons**, such as complying with legal and reporting requirements; investigating and responding to claims against the Company and its customers; protecting our, your, our customers', and other third parties' safety, property or rights; detecting, preventing, and responding to security incidents; and protecting against malicious, deceptive, fraudulent, or illegal activity.
- E. **In connection with a corporate transaction**, such as if we acquire, or sell or transfer all or a portion of our business or assets, including through a sale in connection with bankruptcy and other forms of corporate change.
- F. **For marketing and targeted advertising**, such as marketing our products or services or those of our affiliates, business partners, or other third parties (for purposes of this paragraph alone, "we" or "our" includes our affiliates, business partners, or other third parties we may be working with to provide marketing). For example, we may use Personal Data we collect to personalize advertising to you on this website or others, to analyze interactions with our email communications or website areas viewed, to develop product, brand or services audiences (including by identifying you across devices/sites) to better target our advertising to you, or to send you newsletters, surveys, questionnaires, promotions, or information about events or webinars. You can unsubscribe from our email marketing via the link in the email or by contacting us using the information in the *Contact Information* section below.

We only use Sensitive Personal Information for the following purposes: (i) performing services or providing goods reasonably expected by an average consumer; (ii) detecting security incidents; (iii) resisting malicious, deceptive, or illegal actions; (iv) ensuring the physical safety

of individuals; (v) for short-term, transient use, including non-personalized advertising; (vi) performing or providing internal business services; (vii) verifying or maintaining the quality or safety of a service or device; or (viii) for purposes that do not infer characteristics about you.

We may use anonymized, de-identified, or aggregated information for any purpose permitted by law.

#### **4. How We Disclose Personal Data**

We may disclose Personal Data to third parties, including the categories of recipients described below.

Although we have not "sold" Personal Data for money in the past 12 months, we engage in routine practices with our Digital Properties involving third parties that could be considered a "sale" or "sharing" as defined under California law. We do not knowingly sell or share any Personal Data of minors under the age of 16.

<i><b>Categories of Personal Data We Collect</b></i>	<i><b>Categories of Third Parties with Whom We Disclose Personal Data for a Business Purpose</b></i>	<i><b>Categories of Third Parties to Whom Personal Data is Sold or Shared</b></i>
<b>Identifiers</b> (Section 2.A)	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• Vendors necessary to complete transactions you request</li> <li>• Law enforcement, government, agencies, and other recipients for legal, security, or safety purposes</li> <li>• In connection with a corporate transaction</li> <li>• Entities to which you have consented to the disclosure</li> </ul>	<ul style="list-style-type: none"> <li>• Business partners</li> </ul>
<b>Records about you</b> (Section 2.B)	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• Vendors necessary to complete transactions you request</li> <li>• Law enforcement, government, agencies, and other recipients for legal, security, or safety purposes</li> <li>• In connection with a corporate transaction</li> <li>• Entities to which you have consented to the disclosure</li> </ul>	<ul style="list-style-type: none"> <li>• Business partners</li> </ul>

<b>Commercial information</b> (Section 2.C)	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• Vendors necessary to complete transactions you request</li> <li>• Law enforcement, government, agencies, and other recipients for legal, security, or safety purposes</li> <li>• In connection with a corporate transaction</li> <li>• Entities to which you have consented to the disclosure</li> </ul>	<ul style="list-style-type: none"> <li>• Business partners</li> </ul>
<b>Internet or other electronic network activity</b> (Section 2.D)	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• Vendors necessary to complete transactions you request</li> <li>• Law enforcement, government, agencies, and other recipients for legal, security, or safety purposes</li> <li>• In connection with a corporate transaction</li> <li>• Business partners</li> <li>• Entities to which you have consented to the disclosure</li> </ul>	<ul style="list-style-type: none"> <li>• Business partners</li> </ul>
<b>Geolocation data</b> (Section 2.E)	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• Vendors necessary to complete transactions you request</li> <li>• Law enforcement, government, agencies, and other recipients for legal, security, or safety purposes</li> <li>• In connection with a corporate transaction</li> <li>• Business partners</li> <li>• Entities to which you have consented to the disclosure</li> </ul>	<ul style="list-style-type: none"> <li>• Business partners</li> </ul>
<b>Audio, electronic, visual, or other sensory information</b> (Section 2.F)	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• Vendors necessary to complete transactions you request</li> </ul>	<ul style="list-style-type: none"> <li>• Not sold or shared</li> </ul>

	<ul style="list-style-type: none"> <li>• Law enforcement, government, agencies, and other recipients for legal, security, or safety purposes</li> <li>• In connection with a corporate transaction</li> <li>• Entities to which you have consented to the disclosure</li> </ul>	
<b>Professional or employment-related information</b> (Section 2.G)	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• Vendors necessary to complete transactions you request</li> <li>• Law enforcement, government, agencies, and other recipients for legal, security, or safety purposes</li> <li>• In connection with a corporate transaction</li> <li>• Entities to which you have consented to the disclosure</li> </ul>	<ul style="list-style-type: none"> <li>• Business partners</li> </ul>
<b>Education information</b> (Section 2.H)	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• Vendors necessary to complete transactions you request</li> <li>• Law enforcement, government, agencies, and other recipients for legal, security, or safety purposes</li> <li>• In connection with a corporate transaction</li> <li>• Entities to which you have consented to the disclosure</li> </ul>	<ul style="list-style-type: none"> <li>• Business partners</li> </ul>
<b>Inferences</b> (Section 2.I)	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• Vendors necessary to complete transactions you request</li> <li>• Law enforcement, government, agencies, and other recipients for legal, security, or safety purposes</li> <li>• In connection with a corporate transaction</li> <li>• Entities to which you have consented to the disclosure</li> </ul>	<ul style="list-style-type: none"> <li>• Business partners</li> </ul>

<b>Sensitive Personal Information</b> (Section 2.J)	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• Vendors necessary to complete transactions you request</li> <li>• Law enforcement, government, agencies, and other recipients for legal, security, or safety purposes</li> <li>• In connection with a corporate transaction</li> <li>• Entities to which you have consented to the disclosure</li> </ul>	<ul style="list-style-type: none"> <li>• Not sold or shared</li> </ul>
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The categories of recipients in the chart above are used to mean:

- A. **Affiliates and subsidiaries**, including parent entities, corporate affiliates, subsidiaries, business units, and other companies that share common ownership.
- B. **Service providers** that work on our behalf to provide the products and services you request or support our relationship with you, such as IT providers, internet service providers, web hosting providers, data analytics providers, and companies that provide business support services, financial administration, or event organization.
- C. **Professional consultants**, such as accountants, lawyers, financial advisors, and audit firms.
- D. **Vendors necessary to complete transactions**, such as payment processors.
- E. **Law enforcement, government agencies, and other recipients for legal, security, or safety purposes**, such as when we share information to comply with law or legal requirements, to enforce or apply our Terms of Use and other agreements or policies; and to protect ours, our customers', or third parties' safety, property, or rights.
- F. **Other entities in connection with a corporate transaction**, such as if we, or some or all of our assets, are acquired by another entity, including through a sale in connection with bankruptcy or other forms of corporate change.
- G. **Business partners** that may use Personal Data for their own purposes, such as:
  - Advertisers, ad platforms and networks, and social media platforms;
  - Third parties whose cookie and tracking tools we use as described in Section 5; and
  - Partners who work with us on promotional or sponsorship opportunities.

Where recipients use your Personal Data for their own purposes independently from us, we are not responsible for their privacy practices or personal data processing policies. You should consult the privacy notices of those third-party services for details on their practices.



## **H. Entities to which you have consented to the disclosure.**

### **5. Cookies and Other Tracking Technologies**

Our Digital Properties (and authorized third parties) use cookies and other tracking technologies to collect information about you, your device, and how you interact with our Digital Properties. This section contains additional information about:

- The types of tracking technologies we use and the purposes for which we use them
- The types of information we collect using these technologies
- How we disclose or make information available to others
- Choices you may have regarding these technologies

#### **A. Types of cookies and tracking technologies we use**

Our Digital Properties and the third parties that we authorize may use the following tracking technologies:

- Cookies, which are a type of technology that installs a small amount of information on a user's computer or other device when they visit a website. Some cookies exist only during a single session, and some are persistent over multiple sessions over time.
- Pixels, web beacons, and tags, which are types of code or transparent graphics that contain a unique identifier. In addition to the uses described in Section 5.2 below, these technologies provide analytical information about the user experience and help us customize our marketing activities. In contrast to cookies, which are stored on a user's computer hard drive, pixels, web beacons, and tags are embedded invisibly on web pages.
- Session replay tools, which record your interactions with our Digital Properties, such as how you move throughout our Digital Properties and engage with our webforms. In addition to the uses described in Section 5.2 below, this information helps us improve our Digital Properties and identify and fix technical issues visitors may be having with our Digital Properties.
- Embedded scripts and SDKs, which allow us to build and integrate custom apps and experiences, some of which may be developed by a third party.

#### **B. Purposes for Using These Technologies**

We and authorized third parties use these technologies for purposes including:

- **Personalization**, such as remembering user preferences, login details and browsing behavior; tracking your activity across online properties and platforms over time to better understand your preferences and interests; and personalizing online content;
- **Improving performance**, such as maintaining and improving the performance of our Digital Properties;
- **Analytics**, such as analyzing how our Digital Properties are used. For example, we use Google Analytics to help us improve our Digital Properties, performance and user

experiences. Google Analytics may use cookies and other tracking technologies to perform their services. To learn how Google Analytics collects and processes data, please visit: “How Google uses data when you use our partners’ sites or apps” located at [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners); and

- **Advertising**, such as providing you with offers that may be of interest to you; conducting targeted advertising to you on our Digital Properties and those of third parties; and measuring the effectiveness of our communications with you and advertising campaigns, including identifying how and when you engage with our communications.

### **C. Personal Data Collected**

These tracking technologies collect data about you and your device, such as your IP address, cookie ID, device ID, AdID, operating system, browser used, browser history, search history, and information about how you interact with our Digital Properties (such as pages on our Digital Properties that you have viewed).

### **D. Disclosures of Personal Data**

We may disclose information to third parties or allow third parties to directly collect information using these technologies on our Digital Properties, such as social media companies, advertising networks, companies that provide analytics including ad tracking and reporting, security providers, and others that help us operate our business and Digital Properties.

### **E. Your Choices**

Some of the third parties we work with participate with the Digital Advertising Alliance ("DAA") and Network Advertising Initiative ("NAI"). The DAA and NAI provide mechanisms for you to opt out of interest-based advertising performed by participating members at <http://www.aboutads.info/choices/> and <https://optout.networkadvertising.org/>.

You can also refuse or delete cookies using your browser settings. If you refuse or delete cookies, some of our Digital Properties’ functionality may be impaired. Please refer to your browser’s Help instructions to learn more about how to manage cookies and the use of other tracking technologies. If you change computers, devices, or browsers; use multiple computers, devices, or browsers; or delete your cookies, you may need to repeat this process for each computer, device, or browser. Opting out of interest-based advertising will not opt you out of all advertising, but rather only interest-based advertising from us or our agents or representatives. Some browsers have incorporated Do Not Track (“DNT”) preferences. We do not currently honor such signals.

## **6. Data Retention**

Your Personal Data will be retained as long as necessary to fulfill the purposes we have outlined above unless we are required to do otherwise by applicable law. This includes retaining your Personal Data to maintain our relationship with you or your company; to improve our business over time; to ensure the ongoing legality, safety and security of our services and relationships;

and for other legitimate business purposes in accordance with our internal retention procedures. If you are an employee of our vendor, once you or your company has terminated your relationship with us, we may retain your Personal Data in our systems and records in order to ensure adequate fulfillment of surviving provisions in terminated contracts or for other legitimate business purposes, such as to enable easier future user onboarding, in order to demonstrate our business practices and contractual obligations, or to provide you with information about our products and services in case of interest.

## **7. Data Subject Rights**

California residents may have certain rights, subject to legal limitations, regarding the collection, use, and sharing of personal information under the CCPA, such as:

- **Right to Know.** You may request information about the categories of Personal Data we have collected about you; the categories of sources from which we collected the Personal Data; the purposes for collecting, selling, or sharing the Personal Data; and to whom we have disclosed your Personal Data and why. You may also request the specific pieces of Personal Data we have collected about you
- **Right to Delete.** You may request that we delete Personal Data that we have collected from you.
- **Right to Correct.** You may request that we correct inaccurate Personal Data that we maintain about you.
- **Right to Opt Out of Sale/Sharing.** You may request to opt out from the sale or sharing of your Personal Data.

You may exercise the Right to Know, Right to Delete, or Right to Correct via our webform available at [privacychoices.confie.com](https://privacychoices.confie.com) or by calling us at 877-214-0149.

You may exercise the Right to Opt-Out of Sale/Sharing via the **Consent Management Platform** (“CMP”). When you disable Sale/Sharing, the CMP will place a token signaling that you have opted out of such online activities. Please note:

- The token applies only to the Digital Property you are accessing and the browser and device you are using at the time you submit your CMP request. You will also need to disable “Sale/Sharing” in the CMP from each browser you use, and on each Digital Property you access.
- If you delete the token, you will need to disable “Sale/Sharing” in the CMP from that browser again.
- If you have blocked such technologies, we will be unable to fully comply with your request.

To the extent required by law, we will honor opt-out preference signals sent in a format commonly used and recognized by businesses, such as an HTTP header field or JavaScript object. We will process opt-out preference signals at the browser level.

Non-Discrimination: We will not discriminate against you in any manner prohibited by law for exercising your privacy rights.

Verification: In order to process rights requests, we may need to obtain information to locate you in our records or verify your identity depending on the nature of the request. In most cases we will collect some or all of the following data elements: first and last name, email address, and telephone number. In some cases, we may request different or additional information, including a signed declaration that you are who you say you are, and will inform you if we need such information.

Authorized Agents: Authorized agents may exercise rights on behalf of you by submitting a request via our webform available at [privacychoices.confie.com](https://privacychoices.confie.com) or by calling us at 877-214-0149 and indicating that they are submitting the request as an agent. We may require the agent to demonstrate authority to act on behalf of you by providing signed permission from you. We may also require you to verify your own identity directly with us or to directly confirm with us that you provided the authorized agent permission to submit the request.

## **8. Contact Information**

If you have questions regarding this Privacy Notice, please contact us at 877-214-0149.

## **CALIFORNIA CONSUMER PRIVACY NOTICE: JOB APPLICANTS**

This Privacy Notice (“Notice”) describes how Estrella Insurance processes Personal Data about California residents who have applied for a job with Estrella Insurance. This Disclosure does not apply to Personal Data collected about other types of individuals or Personal Data collected from you in different contexts. For example, if you interact with our commercial websites or visit our careers page, the California Consumer Privacy Notice: **Individuals and Website Visitors** will apply. If you join or are a current or former member our workforce, the California Personnel Privacy Notice will apply.

Whenever you interact with us on behalf of another individual or entity, such as by providing or accessing Personal Data about another individual, you need to obtain their consent (or have the legal authority without consent) to share any Personal Data you provide to us.

**Changes:** We may update this Notice from time to time. Any updated Notice will be effective when posted. Please check this Notice periodically for updates. If required by law, we will contact you directly to provide you with an updated Notice.

This Notice does not form part of any contract of employment or other contract to provide services and does not give you any contractual rights.

### **1. Sources of Personal Data**

We collect Personal Data about you from the following sources:

- A. **Directly from you.** We may collect Personal Data you provide to us directly, such as when you complete a paper or online application (including on a dedicated online talent management platform), communicate with us in connection with your application, provide references, or participate in an interview or any aptitude test or assessment (including online). We may also collect your Personal Data when you decide to complete questionnaires, such as a satisfaction survey or a diversity and inclusion questionnaire.
- B. **Data collected automatically.** We may automatically collect information or inferences from or about you or your device.
- C. **From third parties.** We may collect Personal Data from third parties, such as companies or individuals who direct or refer you to us (including third-party staffing or recruiting firms or individuals who suggest or identify you, as well as from publicly available sources and third-party professional social networking websites). Where permitted or otherwise authorized by law, we may also collect information received from third parties in connection with references or background checks.

We may combine and use information and make inferences from information that we receive from the various sources described in this Privacy Notice, including third party sources. We also use or disclose the combined information and inferences for the purposes identified below.

### **2. Types of Personal Data We Collect**

We may collect the following types of Personal Data about you such as:

- A. **Identifiers**, such as your name, email address, physical address, telephone number, and other contact information.
- B. **Records About You**, such as
  - 1. Signatures; and
  - 2. Your physical characteristics or a description of you;
- C. **Protected class and demographic information**, such as your age (including birthdates), military or veteran status, and your gender.
- D. **Commercial information**, such as salary and wage information and history.
- E. **Internet or other electronic network activity information**, such as your browsing history, search history and application status.
- F. **Non-precise geolocation data**, such as your location as derived from your IP address.
- G. **Audio, electronic, visual, or other sensory information**, such as photographs or security camera footage in public areas of Estrella Insurance's facilities (including reception, the work floor, conference rooms, parking, and other general areas) if you participate in on-site activities, such as a job fair, job interview or aptitude test, as well as photographs, audio, or footage collected in the course of video interviews or through an online applicant platform, or other recordings.
- H. **Professional or employment-related information**, such as resume or curriculum vitae information, certifications, qualifications, membership in professional bodies, employment history, job preferences (including your willingness to relocate or travel), documentation required under immigration and employment laws (such as citizenship, visa data, details of residency, and work permit information), and such other information you provide. We may also collect and process information about you generated during or after interviews and related activities, such as tests or satisfaction surveys. This information may come directly from you or from our employees or contractors. In addition, we may collect information about criminal convictions and offenses, such as information from legal proceedings, disciplinary information or sanctions from previous jobs, and information from background checks, drug-screening and employment eligibility checks.
- I. **Education Information**, such as education history, professional qualifications, academic certificates and licenses, languages spoken, and other relevant skills.
- J. **Inferences** drawn from any of the information we collect, such as likelihood of your profile being a good fit with our internal team and long-term prospects with Estrella Insurance.

K. **Sensitive Personal Data**, including the following, where permissible or required under applicable laws and regulations:

1. Social Security number, driver's license, state identification card, or passport number.
2. Account log-in information.
3. Racial or ethnic origin, religious or philosophical beliefs, or union membership.
4. Information about your health, such as disability status and information about such disability, drug-test results, vaccination status, and food intolerances (if, for instance, we invite you for a meal or we book a flight for your job interview).
5. Information about your sexual orientation.

### **3. How We Use Personal Data**

We may use Personal Data for the following purposes:

- A. **In connection with your application**, such as assessing your application, interview, and test results for suitability for the position for which you have applied or other open positions; communicating with you concerning job openings or your application; conducting pre-employment verification and screening; offering you the job position, in our discretion; notifying you of job opportunities (including from affiliates in our group, where we have shared your job application with them); and dealing with any inquiry, challenge, or request for feedback received in relation to our recruitment and hiring decisions.
- B. **For our internal business purposes**, such as managing and improving our recruitment process (for example, enhancing our scouting and talent identification processes); enforcing our policies and rules; and operating our diversity and inclusion initiatives.
- C. **For legal, safety or security reasons**, such as complying with legal requirements, processes, or orders; complying with reporting and similar requirements; complying with government inspections and other requests from government or other public authorities; pursuing legal rights and remedies; investigating and responding to claims against Estrella Insurance and its customers and employees; monitoring and managing equal opportunity programs; screening and conducting background checks (as required or permitted by law); protecting our, your, our customers', and other individuals' safety, property or rights; addressing security and health and safety issues (including managing spread of communicable diseases) and malicious, deceptive, fraudulent, or illegal activity; ascertaining your eligibility for work; and receiving legal advice or approval.
- D. **In connection with a corporate transaction**, such as if we acquire, or some or all of our assets are acquired by, another entity, including through a sale in connection with bankruptcy and other forms of corporate change.

- E. **For promotional purposes**, such as to notify you about new job openings in accordance with your preferences.

We only use Sensitive Personal Information for the following purposes: (i) performing services or providing goods reasonably expected by an average consumer; (ii) detecting security incidents; (iii) resisting malicious, deceptive, or illegal actions; (iv) ensuring the physical safety of individuals; (v) for short-term, transient use, including non-personalized advertising; (vi) performing or providing internal business services; (vii) verifying or maintaining the quality or safety of a service or device; or (viii) for purposes that do not infer characteristics about you.

We may use anonymized, de-identified, or aggregated information for any purpose.

#### **4. How and to Whom We Disclose Personal Data**

We may disclose Personal Data to third parties, including the categories of recipients described below. We do not “sell” or “share” job applicant Personal Data (as those terms are defined in the CCPA).

<i><b>Categories of Personal Data We Collect</b></i>	<i><b>Categories of Third Parties with Whom We Disclose Personal Data for a Business Purpose</b></i>
<b>Identifiers</b> (Section 2.A)	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• Vendors necessary to complete transactions you request</li> <li>• Business partners</li> <li>• Law enforcement, government, agencies, and other recipients for legal, security, or safety purposes</li> <li>• In connection with a corporate transaction</li> <li>• Business partners</li> <li>• Entities to which you have consented to the disclosure</li> </ul>
<b>Personal information subject to the California Customer Records Act</b> (Section 2.B)	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• Vendors necessary to complete transactions you request</li> <li>• Business partners</li> <li>• Law enforcement, government, agencies, and other recipients for legal, security, or safety purposes</li> <li>• In connection with a corporate transaction</li> <li>• Entities to which you have consented to the disclosure</li> </ul>
<b>Characteristics of protected classifications under California or federal law</b> (Section 2.C)	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• Vendors necessary to complete transactions you request</li> <li>• Law enforcement, government, agencies, and other recipients for legal, security, or safety purposes</li> </ul>



	<ul style="list-style-type: none"> <li>• In connection with a corporate transaction</li> <li>• Entities to which you have consented to the disclosure</li> </ul>
<b>Commercial information</b> (Section 2.D)	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• Vendors necessary to complete transactions you request</li> <li>• Business partners</li> <li>• Law enforcement, government, agencies, and other recipients for legal, security, or safety purposes</li> <li>• In connection with a corporate transaction</li> <li>• Entities to which you have consented to the disclosure</li> </ul>
<b>Internet or other electronic network activity</b> (Section 2.E)	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• Vendors necessary to complete transactions you request</li> <li>• Law enforcement, government, agencies, and other recipients for legal, security, or safety purposes</li> <li>• In connection with a corporate transaction</li> <li>• Entities to which you have consented to the disclosure</li> </ul>
<b>Geolocation data</b> (Section 2.F)	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• Vendors necessary to complete transactions you request</li> <li>• Business partners</li> <li>• Law enforcement, government, agencies, and other recipients for legal, security, or safety purposes</li> <li>• In connection with a corporate transaction</li> <li>• Entities to which you have consented to the disclosure</li> </ul>
<b>Audio, electronic, visual, olfactory, or similar information</b> (Section 2.G)	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• Law enforcement, government, agencies, and other recipients for legal, security, or safety purposes</li> <li>• In connection with a corporate transaction</li> <li>• Entities to which you have consented to the disclosure</li> </ul>
<b>Professional or employment-related information</b> (Section 2.H)	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• Business partners</li> <li>• Law enforcement, government, agencies, and other recipients for legal, security, or safety purposes</li> <li>• In connection with a corporate transaction</li> <li>• Entities to which you have consented to the disclosure</li> </ul>

<b>Education information</b> (Section 2.I)	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• Business partners</li> <li>• Law enforcement, government, agencies, and other recipients for legal, security, or safety purposes</li> <li>• In connection with a corporate transaction</li> <li>• Entities to which you have consented to the disclosure</li> </ul>
<b>Inferences</b> (Section 2.J)	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• Vendors necessary to complete transactions you request</li> <li>• Law enforcement, government, agencies, and other recipients for legal, security, or safety purposes</li> <li>• In connection with a corporate transaction</li> <li>• Entities to which you have consented to the disclosure</li> </ul>
<b>Sensitive personal information</b> (Section 2.K)	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• Law enforcement, government, agencies, and other recipients for legal, security, or safety purposes</li> <li>• In connection with a corporate transaction</li> <li>• Entities to which you have consented to the disclosure</li> </ul>

The categories of recipients in the chart above are used to mean:

- A. **Affiliates and subsidiaries**, including parent entities, corporate affiliates, subsidiaries, business units, and other companies that share common ownership with us.
- B. **Service providers** that work on our behalf to provide products and services, such as IT support providers, software service providers, background check vendors, and drug-screening providers.
- C. **Professional consultants**, such as recruiters, accountants, lawyers, financial advisors, and audit firms.
- D. **Vendors necessary to complete transactions you request**, such as shipping companies and logistics providers.
- E. **Business partners**, such as certain travel services and recruitment firms.
- F. **Law enforcement, government agencies, and other recipients for legal, security, or safety purposes**, such as when we share information to comply with law or legal requirements, to enforce or apply our policies, and to protect ours, our customers', or third parties' safety, property or rights.

G. **To other entities in connection with a corporate transaction**, such as if we, or some or all of our assets, are acquired by another entity, including through a sale in connection with bankruptcy or other forms of corporate change.

H. **Entities to which you have consented to the disclosure**, where consent is required by law.

## **5. Data Retention**

Your Personal Data will be retained as long as necessary to fulfill the purposes we have outlined above unless we are required to do otherwise by applicable law. This includes retaining your Personal Data to maintain our employment relationship with you; to improve our business over time; to ensure the ongoing legality, safety and security of our services and relationships; and for other legitimate business purposes otherwise in accordance with our internal retention procedures.

## **6. Data Subject Rights**

California residents may have certain rights, subject to legal limitations, concerning the collection, use, and disclosure of Personal Data under the CCPA, such as:

- **Right to Know.** You have the right to request information about the categories of Personal Data we have collected about you, the categories of sources from which we collected the Personal Data, the purposes for collecting, selling, or sharing the Personal Data, and to whom we have disclosed Personal Data and why. You may also request the specific pieces of Personal Data we have collected about you.
- **Right to Delete.** You have the right to request that we delete Personal Data that we have collected from you.
- **Right to Correct.** You have the right to request that we correct inaccurate Personal Data that we maintain about you.

California residents may exercise the Right to Know, the Right to Delete, and the Right to Correct via our webform available at [privacychoices.confie.com](https://privacychoices.confie.com) or by calling us at 877-214-0149.

We will not discriminate against you for exercising your privacy rights.

**Verification:** In order to process requests, we will need to obtain information to locate you in our records or verify your identity depending on the nature of the request. In most cases, we will collect some or all of the following data elements: first and last name, email address, and telephone number. In some cases, we may request different or additional information, including a signed declaration that you are who you say you are, and will inform you if we need such information.

**Authorized Agents:** Authorized agents may exercise rights on behalf of California residents by submitting a request via our webform available at [privacychoices.confie.com](https://privacychoices.confie.com) or by calling us at 877-214-0149 and indicating that they are submitting the request as an agent. We will require the

agent to demonstrate authority to act on behalf of the resident by providing signed permission from the resident. We may also require the resident to verify their own identity directly with us or to directly confirm with us that they provided the authorized agent permission to submit the request.

## **7. Contact Information**

If you have questions regarding this Privacy Notice, please contact us at 877-214-0149.