

**Notice at Collection
for Board Members Residing In California**

Athens Insurance Service, Inc; Athens Managed Care, Inc.; Athens Program Insurance Service, LLC collectively DBA Athens Administrators (the “**Company**”) is providing you with this Notice At Collection For Board Members Residing In California (“**Notice**”) to inform you about:

1. The categories of Personal Information that the Company collects about Board Members who reside in California; and
2. The purposes for which the Company uses that Personal Information.

For purposes of this Notice,

- “**Board Member**” means a natural person, who resides in California, designated in the Company’s articles of incorporation as a Board Member or elected by the incorporators and natural persons designated, elected, or appointed by any other name or title to act as a Board Member, and a Board Members successors.
- “**Personal Information**” means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a natural person that the Company collects about Board Members, who reside in California, in their capacity as Board Members.

Assistance for Disabled Board Members

Alternative formats of this Notice are available to individuals with a disability. Please contact hr@athensadmin.com for assistance.

1. Identifiers And Professional Or Work-Related Information

- 1.1 Personal Information Collected:** The Company collects identifiers and professional or work-related information, including some and/or all of the following:

Identifiers: real name, nickname or alias, postal address, telephone number, e-mail address, Social Security number, signature, online identifier, Internet Protocol address, bank account name and number for direct deposits, driver’s license number or state identification card number, and passport number, credit card number, and debit card number.

Professional or Work-Related Information: compensation, equity grants, benefits, attendance, expenses, education, corporate credit card details, membership in professional organizations, professional certifications, tenure, board voting records, and current and past employment history.

1.2 Purposes of Use:

Managing The Board Member's Service:	
<ul style="list-style-type: none">• To evaluate a Board Member's qualifications for the Board Member role• To administer the Board Member relationship• To administer compensation, equity grants, other forms of compensation, and benefits• To arrange meetings and other Company-events	<ul style="list-style-type: none">• For recordkeeping purposes• To maintain an internal directory and for purposes of identification• To arrange team-building and other morale-related activities• To manage Board Member-related emergencies, including health emergencies
Monitoring, Security, And Compliance:	
<ul style="list-style-type: none">• To monitor use of Company information systems• To conduct internal audits• To conduct internal investigations• To protect the safety and security of the Company's facilities	<ul style="list-style-type: none">• To administer the Company's whistleblower hotline• To report suspected criminal conduct to law enforcement and cooperate in investigations
Conducting Our Business:	
<ul style="list-style-type: none">• For communications with the Board Member• To make business travel arrangements• To promote the business	<ul style="list-style-type: none">• To manage business expenses and reimbursements• To provide a directory and contact information for prospective and current customers and business partners

2. Personal Information Categories From Cal. Civ. Code §1798.80(e)

The Company collects types of Personal Information listed in Cal. Civ. Code §1798.80(e) (other than those already listed in “Identifiers,” above) as follows for the corresponding purposes listed below:

- Photograph and physical description: (a) for security or other internal identification purposes, and (b) to identify Board Members to employees, co-workers, prospective and current customers, and other third parties.
- Medical information: to respond to a medical emergency; and
- Benefits information: to administer corporate benefits.

3. Characteristics Of Protected Classifications Under California Or Federal Law

The Company collects information about race, age, national origin, disability, sex, and veteran status as necessary to comply with legal obligations, including the reporting requirements of the federal Equal Employment Opportunity Act and California’s Fair Employment and Housing Act. The Company also collects information about disability status to the extent an employee may need special assistance during emergencies from the Company or from first responders.

The Company also collects the following characteristics (in addition to those listed above) for its diversity and inclusion programs (including analytics): (a) religion, (b) sex, (c) gender, (d) pregnancy, (e) childbirth, (f) breastfeeding, or related medical conditions, (g) sexual orientation, (h) disability, (i) gender identity, (j) gender expression, (k) marital status, (l) age, (m) familial status, or (n) ancestry.

The Company also uses this Personal Information for purposes including: with respect to disability, medical condition, familial status, marital status, and pregnancy, childbirth, breastfeeding, and related medical conditions, as necessary to comply with Federal and California law related to leaves of absence and accommodation; with respect to military and veteran status, as necessary to comply with leave requirements under applicable law and for tax purposes; with respect to age, incidentally to the use of birth date for birthday celebrations and identity verification; with respect to religion and pregnancy, childbirth, breastfeeding, and related medical conditions, as necessary for accommodations under applicable law; with respect to protected classifications, such as national origin, to the extent this information is contained in documents that you provide in I-9 documentation; and with respect to marital status and familial status, for Company events and as necessary to provide benefits and for tax purposes.

The Company collects this category of Personal Information on a purely voluntary basis, except where required by law, and uses the information only in compliance with applicable laws and regulations.

The Company collects information about sex, race, national origin, ancestry, and veteran status as necessary to comply with legal obligations. The Company also collects information about the above for purposes of diversity analysis. The Company also collects information about the above for purposes of public relations relating to board composition.

4. Commercial Information

4.1 Personal Information Collected: The Company collects commercial information including the following: products or services purchased or obtained.

4.2 Purposes of Use: reimbursement of business expenses, auditing, data security, preventing illicit activity, providing services, research and development, error prevention, quality assurance and improvement, product and service training, and order fulfillment.

5. Internet Or Other Similar Network Activity

5.1 Personal Information Collected: The Company collects information about Board Members' use of the Internet or other similar network activity, including the following: browsing history, search history, log in/out and activity on Company electronic resources, and information regarding a Board Member's interaction with an Internet web site, application, and publicly available social media activity.

5.2 Purposes of Use: to monitor use of Company information systems and/or other electronic resources or information systems, to conduct internal audits, to conduct internal investigations, and to protect the safety and security of the Company's facilities.

6. Geolocation Data

6.1 Personal Information Collected: The Company may collect geolocation data including some or all of the following: (a) information that can be used to determine a mobile device's physical location; (b) information that can be used to determine a vehicle's physical location; and (c) information that can be used to determine an Board Member's physical location, for example, through a radio frequency identification (RFID) chip in a security badge.

6.2 Purposes of Use: to protect the safety of Board Members, to assist with routing, for customer service purposes, to provide training, to manage emergencies, to monitor compliance with Company policies, internal investigations, and to determine whether to discipline Board Members.

7. Sensory Or Surveillance Data

7.1 Personal Information Collected: The Company may collect sensory or surveillance data, including the following: voice-mails, recordings of customer service telephone calls, and footage from video surveillance cameras.

7.2 Purposes of Use: for purposes of communications, to protect the safety and security of the Company's facilities and personnel through video surveillance, to monitor compliance with Company policies, to provide training, for quality assurance, and to determine whether to discipline employees.

8. Non-Public Education Information

8.1 Personal Information Collected: The Company collects education information, including some or all of the following: academic transcripts, educational discipline records, and academic counseling records.

8.2 Purposes of Use: to determine suitability for appointment as a Board Member.

9. Profile Data

9.1 Personal Information Collected: The Company collects profile data, including the following: individual's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

9.2 Purposes of Use: to determine suitability for appointment as a Board Member, to determine communication styles, professional development, and teambuilding.

10. Preferences

10.1 Personal Information Collected: The Company collects Board Member preference information, including preferred meals, seating and other travel preferences, desired working hours, work space preferences, and preferred work supplies.

10.2 Purposes of Use: for travel and event planning, for Board Member satisfaction, and to plan and arrange work supplies and workspaces.

Purposes Potentially Applicable To Any of the Categories of Personal Information Listed Above

The Company also may use Board Members' Personal Information to facilitate administrative functions and information technology operations and for legal reasons and corporate transactions. These functions include, but are not limited to the following:

- To manage and operate information technology and communications systems, risk management and insurance functions, budgeting, financial management and reporting, strategic planning;

- To manage litigation involving the Company, and other legal disputes and inquiries and to meet legal and regulatory requirements;
- In connection with a corporate transaction, sale, or assignment of assets, merger, divestiture, or other changes of control or financial status of the Company or any of its subsidiaries or affiliates; and
- To manage licenses, permits and authorizations applicable to the Company's business operations.