

## **Notice at Collection for Employees 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 Employees Residing In California (“**Notice**”) to inform you about:

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

For purposes of this Notice,

- “**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 its employees, who reside in California, in their capacity as the Company’s employees.

### **Assistance for Disabled Employees**

Alternative formats of this Notice are available to individuals with a disability. Please contact [hr@athensadmin.com](mailto:hr@athensadmin.com) for assistance.

### **1. Identifiers And Professional Or Employment-Related Information**

- 1.1 **Personal Information Collected:** The Company collects identifiers and professional or employment-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, passport number, credit card number, and debit card number.

**Professional or Employment-Related Information:** compensation, bonuses, equity grants, pensions, benefits, attendance, evaluations, performance reviews, discipline, personnel files, expenses, education, corporate credit card details, membership in professional organizations, professional certifications, work eligibility in order to comply with legal requirements, and current and past employment history.

- 1.2 **Purposes of Use:**

<b>Managing Personnel:</b>	
<ul style="list-style-type: none"> <li>• To manage personnel and employment matters</li> <li>• To set up a personnel file</li> <li>• To administer compensation, bonuses, equity grants, other forms of compensation, and benefits (as permitted by law)</li> <li>• To manage vacation, sick leave, and other leaves of absence</li> <li>• To provide training</li> <li>• To evaluate job performance and consider employees for other internal positions</li> <li>• To develop a talent pool and plan for succession</li> <li>• Career development activities</li> <li>• For diversity and inclusion programs</li> <li>• To conduct employee surveys</li> <li>• To engage in crisis management</li> <li>• To fulfill recordkeeping and reporting responsibilities</li> </ul>	<ul style="list-style-type: none"> <li>• To maintain an internal employee directory and for purposes of identification</li> <li>• To facilitate communication, interaction and collaboration among employees</li> <li>• To arrange team-building and other morale-related activities</li> <li>• To manage employee-related emergencies, including health emergencies</li> <li>• To promote the Company as a place to work</li> <li>• To arrange and manage Company-sponsored events and public service activities</li> <li>• Workforce reporting and data analytics/trend analysis</li> <li>• To design employee retention programs</li> </ul>
<b>Monitoring, Security, And Compliance:</b>	
<ul style="list-style-type: none"> <li>• To monitor use of Company information systems and other electronic resources</li> <li>• To conduct internal audits</li> <li>• To conduct internal investigations</li> </ul>	<ul style="list-style-type: none"> <li>• To administer the Company's whistleblower hotline</li> <li>• To protect the safety and security of the Company's facilities</li> <li>• To report suspected criminal conduct to law enforcement and cooperate in investigations</li> </ul>
<b>Conducting Our Business:</b>	
<ul style="list-style-type: none"> <li>• For communications with prospective, current, and former customers</li> <li>• To make business travel arrangements</li> <li>• To engage in project management</li> </ul>	<ul style="list-style-type: none"> <li>• To manage business expenses and reimbursements</li> <li>• To promote the business</li> <li>• To provide a directory and contact information for prospective and</li> </ul>

	current customers and business partners
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**2. Personal Information Categories From Cal. Civ. Code § 1798.80(e)**

The Company collects categories 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 and internal identification purposes, and (b) to identify employees to co-workers, prospective and current customers, and other third parties.
- Medical information: (a) to the extent necessary to comply with the Company’s legal obligations, such as to accommodate disabilities; (b) to conduct a direct threat analysis in accordance with the Americans with Disabilities Act and state law; (c) for workers’ compensation purposes; (d) for occupational health surveillance; (e) for occupational health and safety compliance and record-keeping; (f) to conduct fitness-for-duty examinations; (g) to administer leaves of absence and sick time; and (h) to respond to an employee’s medical emergency. Note: This Notice does not cover medical information governed by the Health Insurance Portability and Accountability Act or the Health Information Technology for Economic and Clinical Health Act.
- 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.

#### **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 employees' use of the Internet or other similar network activity, including the following: browsing history, search history, log in/out and activity on the Company's electronic resources, and information regarding an employee's interaction with an Internet web site, application, or advertisement, and publicly available social media activity.
- 5.2 **Purposes of Use:** to monitor use of the Company's information systems and/or other electronic resources or information systems, to conduct internal audits, to conduct internal investigations, to protect the safety and security of the Company's facilities, and to impose discipline.

#### **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 employee's physical location, for example, through a radio frequency identification (RFID) chip in a security badge.

- 6.2 **Purposes of Use:** to assist with routing, to confirm that an employee has arrived and left an off-site work location when scheduled, for customer service purposes, to provide training, to manage employee-related emergencies, to monitor the safety of an employee, to monitor compliance with Company policies, internal investigations, and to determine whether to discipline employees.

## **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 may collect 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 internal roles and promotions, to determine eligibility for training courses, and to assist with professional licensing.

## **9. Profile Data**

- 9.1 **Personal Information Collected:** The Company collects profile data, including the following: an individual's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
- 9.2 **Purposes of Use:** determining communication styles, professional development, and teambuilding.

## **10. Preferences**

- 10.1 **Personal Information Collected:** The Company collects employee preferences 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 employee 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 employees' 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.