Notice at Collection for Contractors Residing In California

Athens Insurance Service, Inc; Athens Managed Care, Inc; Athens Program Insurance Service LLC, DBA Athens Administrators (the "Company") is providing you with this Notice at Collection for Contractors Residing in California ("Notice") to inform you about:

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

For purposes of this Notice,

- **"Contractor"** means a natural person who (a) resides in California, and (b) who provides any service to a business pursuant to a written contract.
- "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 Contractors, who reside in California, in their capacity as Contractors.

Assistance for Disabled Contractors

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 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 Work-Related Information: contractual agreement, invoices reflecting time worked, contract deliverables, contract payments, tax-related information, insurance information, licensing and certifications.

1.2 Purposes of Use:

Managing Personnel:

- To evaluate Contractors' qualifications for engagements
- To negotiate and execute the agreement with the Contractor
- To administer the relationship with the Contractor
- To make contract payments
- To evaluate Contractors' deliverables or performance of the contract

- For recordkeeping purposes
- To maintain an internal directory and for purposes of identification
- To determine a Contractor's licensure for an engagement
- To determine a Contractor's certifications for an engagement

Monitoring, Security, and Compliance:

- To monitor use of Company information systems
- To conduct internal audits
- To conduct internal investigations
- To safeguard the Company's proprietary information
- To protect the safety and security of the Company's facilities
- To administer the Company's whistleblower hotline
- To report suspected criminal conduct to law enforcement and cooperate in investigations

Conducting Our Business:

- For communications with prospective, current, and former customers and/or the Contractor
- 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:

- <u>Photograph and physical description</u>: for security and internal identification purposes; and
- Medical information: to respond to a medical emergency.

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, the federal Office of Contracting Compliance Programs (applicable to government contractors), and California's Fair Employment and Housing Act, and for purposes of diversity analytics.

The Company also uses this Personal Information for purposes including: (a) with respect to disability and/or medical condition, as necessary, to comply with Federal and California law related to accommodation; and (b) with respect to age, incidentally to the use of birth date for identity verification.

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

4. <u>Commercial Information</u>

- 4.1 **Personal Information Collected:** The Company collects commercial information including the following: products or services purchased, obtained, or considered.
- 4.2 **Purposes of Use:** to comply with contractual reimbursement obligations.

5. Internet Or Other Similar Network Activity

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.

Purposes of Use: to monitor use of the Company's information systems and 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 a Contractor'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, for customer service purposes, to protect the safety of Contractors, to protect confidentiality and privacy, internal investigations, to monitor compliance with Company policies, and to manage emergencies.

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 contractors.

8. Profile Data

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

9. Preferences

- 9.1 **Personal Information Collected:** The Company collects Contractor preferences information, including preferred meals and desired working hours.
- 9.2 **Purposes of Use:** for event planning and to plan and arrange work.

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

The Company also may use Contractors' 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 operations.	permits	and	authoriz	ations	applicable	to the	Company's	business