



UNCOMMONLY INDEPENDENT

Privacy policy & notice for California residents

Lockton Associates, Producers, & applicants

This Privacy Policy and Notice applies to personal information of California residents who are Lockton Associates, Producers and applicants, to the extent their information is subject to the California Consumer Privacy Act of 2018 (CCPA).

This privacy policy and notice does not apply to personal information collected or otherwise received pursuant to:

- The federal Gramm-Leach-Bliley Act and its implementing regulations;
- The California Financial Information Privacy Act; or
- Certain medical and health information covered by the Health Insurance Portability and Accountability Act (HIPAA).

Your privacy is important to Lockton. We are committed to maintaining the privacy and security of your personal information.

Personal information we collect or may otherwise receive in the course of employment Lockton collects or may otherwise receive information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household ("personal information"). In that regard, sometimes Associates and Producers share the types of information listed below with Lockton. We may have collected or otherwise received in the past 12 months and may continue to collect or otherwise receive the categories of personal information listed below.

Category of personal information

Examples of personal information that may be collected or received:

- Identifiers
- Real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, Social Security number, or other similar identifiers
- Personal information categories listed in the California Customer Records statute*
- Name, 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 or any other financial, medical, or health insurance information.

*Some personal information included in this category may overlap with other categories.



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Category of personal information

Examples of personal information that may be collected or received:

- Characteristics of protected classifications under California or federal law
- 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
- Commercial information — Records of personal property, products or services purchased, obtained or considered or other purchasing or consuming histories or tendencies
- Biometric information — Physiological, biological or behavioral characteristics, including an individual's deoxyribonucleic acid (DNA), imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, voice recordings, gait patterns or rhythms, and sleep, health or exercise information
- Internet or other electronic network activity information
- Information regarding a consumer's interaction with our Internet
- Websites, applications or advertisements.
- Geolocation data physical location and/or movements determined by means of digital information processed via the Internet.
- Sensory data audio, electronic, visual, thermal or similar information.
- Professional or employment-related information
- Current and/or past employment history including performance evaluations
- Non-public education information (as defined in the Family Educational Rights and Privacy Act)
- 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 or student disciplinary records
- Inferences drawn from other personal information
- Information used to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes

Sources of personal information

We generally receive personal information from one or more of these categories of sources:

- Directly from you
- Benefits administrators
- Service providers, including affiliates
- Our website and related applications
- Other third parties (these may include, but are not limited to, third-party administrators, healthcare providers, authorized representatives, vendors, social media sites, consumer reporting agencies, your family members and regulatory agencies)

Uses of personal information

Lockton does not sell your personal information. We may use the above categories of personal information for these commercial, business, or legally required purposes.

- To create and maintain employment or applicant records, including but not limited to
 - Associate/Producer/applicant identification.
- For payroll processing and/or benefits administration, including but not limited to:
 - Claims for family or medical leave
- To enroll Associates in benefits
- To respond to Associate, Producer or applicant inquiries, provide customer support, or for other communications with Associates, Producers and applicants
- For Associate, Producer or applicant recruitment
- For responding to requests for accommodation in the workplace
- For other internal business purposes, including but not limited to audit, risk management, security, and quality control purposes
- To obtain reinsurance
- To comply with federal, state or local laws, respond to a subpoena, or comply with an inquiry by a governmental agency or regulator
- For any other legally permissible purpose related to your employment or application for employment

Once we obtain your personal information, we do not further disclose it except as permitted or required by law. We may share your information within Lockton for the above purposes. We also may disclose your information to third parties that perform services on our behalf. If we disclose your information to third parties, we require them to protect the privacy of your information. We permit them to use and disclose your information only for the purpose(s) for which we provided it.

Third parties with whom personal information is disclosed

We disclose your personal information within the Lockton group of companies and to these categories of third parties:

- Service providers that help us conduct our business and perform services on
- Benefits administrators
- Reinsurers
- Government agencies, regulatory authorities and other third parties as required by law
- You and your authorized representative(s)

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