

**MUNICH RE GROUP COMPANIES “AT-COLLECTION” PRIVACY NOTICE FOR CALIFORNIA RESIDENTS IN COMPLIANCE WITH THE CALIFORNIA CONSUMER PRIVACY ACT OF 2018 (“CCPA”), AS AMENDED BY THE CALIFORNIA PRIVACY RIGHTS ACT OF 2020 (“CPRA”)**

This **EMPLOYEE PRIVACY NOTICE FOR CALIFORNIA RESIDENTS** (“Notice”) supplements and/or is in addition to current policies relating to privacy of employee, consultant, and/or employment applicant information collected by all U.S. based Munich Re Group Companies (“the Company,” “we,” “us,” and “our”).

This Notice applies solely to employees, job applicants, owners of, directors of, officers of, and independent contractors of the Company, those individuals’ emergency contacts, and persons related to those individuals in connection with the administration of employee benefits who reside in the state of California (“Workforce Member”). The Company provides this Notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) as amended by the California Privacy Rights Act of 2020 (collectively, both referred to as “CPRA”). Any terms defined in the CPRA have the same meaning when used in this Notice.

This Notice is intended to satisfy the CPRA requirement to notify Workforce Members, at or before the point of collection, about the categories of Personal Information we may collect about you and how we use that information, whether online or offline. This notice is supplemented by the Additional Privacy Statement for California Residents section of our Online Privacy Statement, which contains more detailed information, including information about your rights. You can access our Online Privacy Statement at: <https://www.munichre.com/us-non-life/en.html>.

Under the CPRA, and for the purposes of this privacy notice, “Personal Information” is any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household, including the categories identified in the table below to the extent they identify, relate to, describe, are reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular consumer or household. Please refer to the Additional Privacy Statement for California Residents section of our Online Privacy Statement for additional information about the scope of the CPRA.

Not all Personal Information of California residents is covered by the CPRA. Personal Information does not include:

- Publicly information lawfully made available from government records.
- De-identified or aggregated Workforce Member information.
- Information excluded from the CPRA's scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

**Categories of Personal Information Collected, Disclosed, Sources and Whether Sold or Shared**

The type of information we collect from you depends on how you interact with us. The table below lists the categories of Personal Information that we have collected from California residents and have disclosed to others for a business purpose in the preceding twelve (12) months, the categories of sources of Personal Information from which the Personal Information is collected, and whether we sell or share

each collected category of Personal Information. Some Personal Information included in the categories below may overlap with other categories.

We collect Personal Information from the following categories of sources and their representatives: Workforce Members; business partners, vendors, contractors and service providers; our affiliates; third party administrators; investigators; and third-party data providers.

We may disclose for a business or commercial purpose each of the categories of Personal Information described in the table below to the following categories of parties: vendors and service providers; regulators; auditors; counsel; consultants; advisors; representatives; our affiliates and subsidiaries; business partners; advertising networks; banks; operating systems or platforms; law enforcement; government entities and courts.

For more information about the business and commercial purposes for which we may collect or disclose such information, please review the “**How We Use Your Personal Information,**” and “**The Information We Share and Who We Share It With**” sections in our Online Privacy Statement: <https://www.munichre.com/us-non-life/en.html>.

Categories Collected & Disclosed in the last 12 months	Personal Information Examples	Collected	Categories of Sources	Disclosed for Business or Commercial Purpose	Sell or Share
Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers. Some identifiers included in this category may overlap with other categories.	Yes	From you directly  From you directly and automatically if you provide prior affirmative, opt-in consent for unique personal or online identifier, IP address or cookie data  From our service providers	Yes	No – do not sell  No – do not share. We disclose online identifiers such as a unique personal identifier, device ID, IP address or cookie data for cross-contextual behavioral advertising only if you provide prior affirmative, opt-in consent.

<p>Personal Records information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))</p>	<p>A 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, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some Personal Information included in this category may overlap with other categories.</p>	<p>Yes</p>	<p>From you directly From our service providers</p>	<p>Yes</p>	<p>No – do not sell No – do not share</p>
<p>Characteristics of Protected Classifications under California or federal law</p>	<p>Age (40 years or older), race, color, ancestry, national origin, citizenship, religion, marital status, pregnancy, medical condition, physical or mental disability, sex, sexual orientation, and veteran or military status. Some protected classification characteristics included in this category may overlap with other categories.</p>	<p>Yes</p>	<p>From you directly From our service providers</p>	<p>Yes</p>	<p>No – do not sell No – do not share</p>
<p>Commercial Information</p>	<p>Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>No</p>	<p>Not applicable</p>	<p>Not applicable</p>	<p>Not applicable</p>
<p>Biometric Information</p>	<p>An individual's physiological, biological or behavioral characteristics, including DNA information that can be used to establish individual identity. includes imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings from which an identifier template such as a faceprint, voiceprint can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data containing identifying information.</p>	<p>Yes</p>	<p>From you directly From our service providers</p>	<p>Yes</p>	<p>No – do not sell No – do not share</p>

Internet or network activity information	Internet or other electronic network activity information, including, but not limited to, browsing history, search history, information regarding a consumer's interaction with internet websites, applications, or advertisements.	Yes	From you directly and from other sources if you provide prior affirmative, opt-in consent	Yes	No - do not sell  No – do not share. We disclose online identifiers such as a unique personal identifier, device ID, IP address or cookie data for cross-contextual behavioral advertising only if you provide prior affirmative, opt-in consent.
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes and student disciplinary records.	Yes	From you directly  From our service providers	Yes	No – do not sell  No – do not share
Geolocation Data	Physical location or movements.	Yes	From you directly and automatically  From our service providers	Yes	No – do not sell  No – do not share

Audio, Electronic, Visual, Thermal, Olfactory or similar information	Call recordings, video and photographs.	Yes	From you directly and automatically From our service providers	Yes	No – do not sell No – do not share
Professional or employment-related information	Employment history, qualifications, licensing, performance evaluations and disciplinary record.	Yes	From you directly From our service providers	Yes	No – do not sell No – do not share
Inferences drawn from other Personal Information	Inferences drawn from any of the Personal Information described in this section about an individual to create a profile including inferences reflecting the individual's preferences, characteristics, behavior and abilities.	Yes	From you automatically and from other sources	Yes	No – do not sell No – do not share
Sensitive Personal Information	Social security number, driver's license number, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation (a geographic area that is equal to or less than the area of a circle with a radius of 1,850 feet); racial or ethnic origin, religious or philosophical beliefs, or union membership; contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication; genetic data; processing of biometric information for the purpose of uniquely identifying a consumer; Personal Information collected and analyzed concerning a consumer's health; Personal Information collected and	Yes	From you directly From our service providers	Yes	No – do not sell No – do not share

	analyzed concerning a consumer's sex life or sexual orientation.				
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**Business and Commercial Purposes for Which Personal Information is Collected and Used**

The categories of Personal Information, including sensitive Personal Information, described above are collected, used and disclosed for the following business and commercial purposes:

- To recruit employees.
- To schedule and conduct interviews.
- To review, verify, and assess information that you provide in connection with your application, and to otherwise evaluate your qualifications, suitability, and relevant characteristics.
- To hire and onboard you as a new employee including background screening and right to work checks.
- To administer benefits, such as medical, dental, vision, commuter, and retirement benefits, including recording and processing eligibility of dependents, absence and leave monitoring, insurance and accident management and provision of online total reward information and statements.
- To pay and reimburse for expenses, including salary administration, payroll management, payment of expenses, and to administer other compensation-related payments.
- To conduct performance-related reviews, including performance appraisals, career planning, skills monitoring, job moves, promotions and staff re-structuring.
- To monitor work-related licenses and credentials, including provisioning software licenses for use during an employee's work-related responsibilities, ensuring compliance, training, examination and other requirements are met with applicable regulatory bodies.
- To provide human resources management services, including providing employee data maintenance and support services, administration of separation of employment, approvals and authorization procedures, administration and handling of employee claims, and travel administration.
- To administer international assignments, including relocation services, documenting assignment terms and conditions, obtaining relevant immigration documents, fulfilling home/host country tax administration and filing obligations, and addressing health requirements
- To maintain your contact information, including altering your details across relevant entities within the Company (for example personal, other employment and transferring roles).
- To assist you in case of emergency, including maintenance of contact details for you, and your dependents in case of personal or business emergency.
- To monitor and ensure compliance with eligibility to work in the U.S.
- To conduct healthcare-related services, including conducting employment-related medical screenings for return-to-work processes and medical case management needs; determining medical suitability for particular tasks; identifying health needs of employees to plan and provide appropriate services, including operation of sickness policies and procedures; and providing guidance on fitness for travel and fitness for expatriation
- To conduct staff surveys, provide senior management information about other employees, and conduct training.
- To provide you with information, relating to products, benefits, or services that you request from the Company.

- to improve, enhance, and maintain the quality of services we provide and the usefulness of our websites, mobile applications and online services;
- to customize your experience and to analyze use of our websites, mobile applications and online services;
- To provide you with email alerts, and other notices concerning the Company.
- To provide training or organize events;
- To refer you to our third-party partners as part of a referral program;
- To comply with applicable laws, including state and federal law requiring employers to maintain certain employee records.
- To investigate privacy, security or employment related incidents and to prevent and detect fraud;
- To secure our offices, premises and physical assets, including through the use of electronic access systems.
- To conduct financial, tax and accounting audits, and audits and assessments of the Company's business operations or security and financial controls.
- To process claims and other legal actions.
- To evaluate or conduct a merger, acquisition, restructuring, reorganization, divestiture, dissolution or other sale or transfer of some or all of our assets as a going concern or as part of bankruptcy, liquidation or similar proceeding;
- To respond to law enforcement requests, court order or regulations, subpoenas, search warrants, other legal process, or to perform other reporting obligations, as required by applicable law.
- As described to you when collecting your Personal Information or as otherwise set forth in the CPRA.

We will not collect additional categories of Personal Information or use the Personal Information it collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **Retention of Personal Information**

We retain the Personal Information we collect only as reasonably necessary for the purposes described in this Notice or otherwise disclosed to you at the time of collection. We will retain certain Personal Information for as long as it is necessary pursuant to our records retention guidelines. Our records retention guidelines are based on our legal or business needs including but not limited to the following criteria: legal and regulatory obligations and requirements; contractual requirements owed to third parties; operational, fiscal, administrative or historical value to business operations; the duration of our business relationship with you, your employer or another related entity; the possibility of future complaints; whether the record is part of an insurance or reinsurance transaction or claim file; audits; investigations or litigation or the likelihood of these; the possibility of future insurance or reinsurance claim activity; whether the documentation is needed for processing of financial records; statutes of limitations; health and safety requirements; tax requirements; personnel requirements; corporate governance requirements; and record-keeping requirements.

**Right to Opt-Out of Sale or Sharing of Personal Information:** If a business “sells” or “shares” Personal Information as those terms are defined under the CPRA, you have the right to opt-out of the sale or sharing of your Personal Information. As explained below, we do not and will not sell or share your Personal Information.

We do not “sell” your Personal Information under the CPRA because we do not disclose Personal Information to a third party for monetary or other valuable consideration. We only use Statistical / Range

Measurement cookies, and disclose information to our website data analytics service provider Adobe that is not traceable to your IP address or linked to your other Personal Information, to perform statistical analyses of use of our website if you direct us to intentionally do so by providing your prior, affirmative authorization.

We also will only disclose your online identifiers such as cookie data for cross-contextual behavioral advertising purposes regarding our products and services if you direct us to intentionally use Marketing cookies by providing your prior, affirmative authorization, which is not “sharing” under the CPRA.

By default, the Statistics / Range Measurement and Marketing cookies on our website are disabled. To learn more, please click on the “Cookie Settings” link at the bottom of our website: <https://www.munichre.com/us-non-life/en.html>, where you will find instructions, an explanation of how we use Statistics / Range Measurement and Marketing cookies, and you can change the default settings for each cookie if you wish to enable them.

If you have enabled the Statistics / Range Measurement cookie and / or Marketing cookie, you can use the “Cookie Settings” link at the bottom of our website at any time to disable the cookie(s) again.

We do not have actual knowledge that we sell or share Personal Information of minors under 16 years of age, and we will not do so in the future without affirmative authorization of the individual if between 13 to 16 years of age, or the parent or guardian of an individual less than 13 years of age.

## **Your Rights and How to Contact Us**

California consumers have certain other rights regarding their Personal Information under the CPRA, subject to certain exceptions. For more information about your rights under the CPRA, how to exercise those rights, or if you have any questions or comments about this Notice, please do not hesitate to contact us at:

Phone: 888-951-1008

Email: [hrsc@munichreamerica.com](mailto:hrsc@munichreamerica.com)

Postal Address:

Human Resources Service Center

555 College Road East

Princeton, NJ 08534



