



CALIFORNIA CONSUMER PRIVACY ACT EMPLOYEE PRIVACY POLICY SUPPLEMENT

The California Consumer Privacy Act of 2018 (“CCPA”) gives certain consumers that reside in the state of California (“Consumers”, “You”, or “Your”) the right to know the categories of Personal Information Sompo International, including our affiliated entities (referred to collectively as “Sompo”, “We”, “Ours”, or “Us”), collects about them, how We collect such data, the purposes for which We use it, and the third parties to which We disclose Personal Information.

This CCPA Employee Privacy Notice (“Notice”) provides the information required under the CCPA and applies to Our online and offline activities relating to the collection of Consumers’ Personal Information. This Notice supplements the [Sompo International Employee Privacy Policy](#).

I. Personal Information

As used in this Notice, “Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to a particular Consumer or household.

II. Personal Information Collected

Sompo may collect certain categories of Personal Information as defined by the CCPA (each a “Category”, collectively “Categories”). The below chart lists each Category, representative examples of each Category, and indicates whether Sompo collects such Category of Personal Information.

For a full list of all Personal Information that We may collect, please review the [Sompo International Employee Privacy Policy](#).

Category	Examples	Collected
Identifiers.	Legal name, alias, postal address, telephone or mobile contact number, email address, Internet Protocol address, and other unique personal identifiers.	YES
Personal Information as defined in the California Customer Records law (Cal. Civ. Code § 1798.80(e)).	Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, name, signature, social security number, physical address, telephone number, passport number, driver’s license or state identification card number, education, employment, employment history, bank account number or other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
Protected Classification Characteristics under California or Federal Law.	An individual’s association with one or more of the following classifications: gender, nationality, religion, sex, medical conditions, disability, age, marital status, citizenship, and military or veteran status.	YES
Commercial Information.	Records relating to an individual’s personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO

Biometric Information.	An individual's physiological, biological, or behavioral characteristics from which an identifier template can be extracted.	NO
Internet or Other Similar Network Activity.	Information related to an individual's browsing history, search history, and interaction with a website or application.	YES
Geolocation Data.	Information related to an individual's physical location or movements.	YES
Sensory Data.	Audio, electronic, visual, or similar information related to an individual.	YES
Professional or Employment Related Information.	Information related to an individual's current or past job history or performance evaluation.	YES
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 related directly to a student maintained by an educational institution or party acting on its behalf.	NO
Inferences Drawn from Other Personal Information.	Profile reflecting an individual's preferences, characteristics, behavior, attitudes, etc.	NO
<p>Personal Information does not include:</p> <ul style="list-style-type: none"> • Publicly available information from government records. • De-identified or aggregated consumer information. • Information excluded from the CCPA's scope, including: <ul style="list-style-type: none"> ○ Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPPA) 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. 		

III. Sources of Personal Information Collected About You

We may obtain the Categories of Personal Information listed above from one or more sources. Please review the [Sompo International Employee Privacy Policy](#) for a description of the sources from which We may collect Personal Information.

IV. Use of Personal Information for a Business Purpose

Personal Information may be used for different purposes if You are an applicant, candidate, employee, former employee, or other individual with whom We have a relationship. Please review the [Sompo International Employee Privacy Policy](#) for a description of the ways in which We may use or disclose Personal Information for a business purpose.

V. Categories of Personal Information Disclosed for a Business Purpose

Sompo may disclose Your Personal Information to a third party for a business purpose. When We disclose Personal Information for a business purpose, We enter a contract that prohibits the entity receiving such data from retaining, using, or disclosing the Personal Information for any purpose other than performing the services specified in the contract or as otherwise permitted by the CCPA.

In the preceding twelve (12) months, We may have disclosed the following Categories of Personal Information about You for a business purpose:

- Identifiers;
- Categories of Personal Information as defined by the California Customer Records law;
- Information relating to protected classifications under California or Federal law;
- Internet or Other Network Activity Information;
- Geolocation Information;
- Sensory Information;
- Professional or Employment Related information.

VI. Categories of Third Parties that Receive Personal Information from Sompo

Personal Information will be disclosed to different third parties depending upon the nature of Your interaction and relationship with Us. IN the course of operating Our business, it may be necessary for Us to disclose Personal Information to affiliate entities, service providers, government agencies, and other third parties. Please review the [Sompo International Employee Privacy Policy](#) for a description of the third parties to which We may disclose Personal Information.

VII. Personal Information Sales

Sompo does not sell Consumers’ Personal Information, and will not sell this information unless We modify this Notice and take the additional steps required under the CCPA, including the ability for You to Opt-Out of such data sales.

In the preceding twelve (12) months, We have not sold any Personal Information.

VIII. Consumers’ Rights Under the CCPA

As detailed below, the CCPA provides Consumers with certain rights with respect to the Personal Information collected, used, and/or disclosed by Sompo (collectively the “California Privacy Rights”):

- **Right of Access:** You have the right to request from Us:
 - The categories of Personal Information that We have collected about You;
 - The categories of sources from which the Personal Information is collected;
 - The business purpose or commercial purpose for collecting the Personal Information;
 - The categories of third parties with whom We disclose Personal Information;
 - The categories of Personal Information We have shared with third parties; and
 - A copy of the specific pieces of Personal Information that We have collected about You in the preceding 12-month time period.
- **Right to Deletion:** You have the right to request that Sompo delete the Personal Information We have collected about You. In certain situations, Sompo is not required to delete Your Personal Information, including, but not necessarily limited to, when the Personal Information

is required to complete the transaction for which it was collected, perform a contract, detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, to enable solely internal uses that are reasonably aligned with the expectations of the Consumer based on the Consumer's relationship with Us, or to comply with a legal obligation.

- **Right Not to Be Subject to Discrimination:** Should You elect to exercise the rights afforded to You under the CCPA, Sampo will not discriminate against You based solely upon Your request.

IX. Contacting Us or Exercising Your California Privacy Rights

To exercise Your California Privacy Rights, including the designation of an agent or authorized representative to act on Your behalf, or to contact Us with questions, please use one of the below methods. Please note that You may only exercise Your California Privacy Rights twice in a 12-month period, and that We may be required to collect information from You in order to verify Your identity. Sampo will respond within 45 days of receiving a California Privacy Rights request.

- **Postal Service:** address Your correspondence to:
Attn: Chief Compliance Officer
Sampo International
4 Manhattanville Road,
Purchase, NY 10577
- **Toll-Free Telephone:** 1-888-269-1961
- **Sampo International Website:** [Privacy Information Request Form](#)
- **Email:** Privacy@sampo-intl.com

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