

PRIVACY NOTICE FOR EMPLOYEES AND JOB APPLICANTS

This Privacy Notice for Employees and Job Applicants (“**Notice**”) explains what types of personal information ICW Group may collect about its employees, job applicants, officers, directors and contractors in the ordinary course of business, and how that personal information may be used. In this Notice, the terms “**we**,” “**us**,” and “**our**” refer to ICW Group and its affiliates and subsidiaries. “**You**” and “**your**” refers to each past and present employee of, and each individual applying for employment with, any ICW Group company.

The categories of personal information we may collect are listed below. Examples are illustrative and may or may not represent specific types of information collected about a particular employee or applicant. Information collected under one category may overlap with other categories.

Identifiers: Information that can be used to directly identify you.

Examples: Your real name, alias, postal address, unique personal identifier, Internet Protocol (“IP”) address, email address, account name, social security number, driver’s license number, passport number, immigration forms, or other similar identifiers.

How do we use it?

- Manage and document your employment or application for employment with us, and employment-related requirements, actions, matters and activities;
- Maintain your employee information in company directories;
- Maintain emergency contact and beneficiary details;
- Administer benefits, such as medical, dental, optical, commuter, and retirement benefits, including recording and processing eligibility of dependents, absence and leave monitoring, and insurance;
- Protect the safety and security of our workforce, guests, property, and assets including monitoring activities in our facilities and activity using our computers, devices, systems, networks, services, communications and other assets and resources;
- Monitor eligibility to work in the U.S.;
- Detect, investigate and prevent policy violations, security incidents, fraud and other unwanted activity;
- Investigate and respond to claims or complaints;
- Comply with and support the enforcement of applicable laws, regulations, policies and procedures; and
- Use in ways we have told you about for our business activities, or for other purposes as permitted by law.

Record Information: Information that we maintain in our recruitment, employment, contractor, and other similar records.

Examples: Your signature, social security number, physical characteristics or description, telephone number, insurance policy number, bank account number, credit card number, debit card number, or any other financial information, medical information, which may include neural data, or health insurance information.

How do we use it?

- Manage and document your employment or application for employment with us, and employment-related requirements, actions, matters and activities;
- Maintain your employee information in company directories;
- Maintain emergency contact and beneficiary details;
- Administer benefits, such as medical, dental, optical, commuter, and retirement benefits, including recording and processing eligibility of dependents, absence and leave monitoring, and insurance;
- Protect the safety and security of our workforce, guests, property, and assets including monitoring activities in our facilities and activity using our computers, devices, systems, networks, services, communications and other assets and resources;
- Monitor eligibility to work in the U.S.;
- Detect, investigate and prevent policy violations, security incidents, fraud and other unwanted activity;
- Investigate and respond to claims or complaints;
- Comply with and support the enforcement of applicable laws, regulations, policies and procedures; and
- Use in ways we have told you about for our business activities, or for other purposes as permitted by law.

Legally Protected Characteristics: Information considered a “protected classification” under California law, or other state or federal law.

Examples: Your race, age (40 years or older), color, ancestry, national origin, marital status, medical condition, pregnancy or childbirth, sexual orientation, veteran or military status, gender, physical or mental disability, and religion, to the extent disclosed by the employee.

How do we use it?

- Manage and document your employment or application for employment with us, and employment-related requirements, actions, matters and activities;
- Maintain emergency contact and beneficiary details;
- Administer benefits, such as medical, dental, optical, commuter, and retirement benefits, including recording and processing eligibility of dependents, absence and leave monitoring, and insurance;
- Monitor eligibility to work in the U.S.;
- Comply with and support the enforcement of applicable laws, regulations, policies and procedures; and
- Use in ways we have told you about for our business activities, or for other purposes as permitted by law.

Biometric Information: Information about your physiological, biological, or behavioral characteristics that can be used to identify you.

Examples: An image of your iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings.

How do we use it?

- Manage and document your employment or application for employment with us, and employment-related requirements, actions, matters and activities;
- Monitor eligibility to work in the U.S.;
- Comply with and support the enforcement of applicable laws, regulations, policies and procedures;
- Obtain access to certain physical structures and facilities;
- As needed for licensing or compliance with applicable laws or regulations;
- Ensure a safe and efficient working environment; and
- Use in ways we have told you about for our business activities, or for other purposes as permitted by law.

Internet or Network Activity: Information about your activities on the internet or other electronic network activity information using devices, applications, assets or resources that are managed by ICW Group.

Examples: Your browsing history, search history, and information regarding your interaction with an Internet Web site, application, or advertisement while using a device or application managed by ICW Group.

How do we use it?

- Manage and document your employment or application for employment with us, and employment-related requirements, actions, matters and activities;
- Maintain your employee information in company directories;
- Protect the safety, security and efficiency of our workforce, guests, property, and assets including monitoring activities in our facilities and activity using our computers, devices, systems, networks, services, communications and other assets and resources;
- Detect, investigate and prevent policy violations, security incidents, fraud and other unwanted activity;
- Investigate and respond to claims or complaints;
- Comply with and support the enforcement of applicable laws, regulations, policies and procedures; and
- Use in ways we have told you about for our business activities, or for other purposes as permitted by law.

Geolocation Data: Information that can be used to identify the physical location of devices, assets or resources that are managed by ICW Group.

Examples: Location information derived from your device's GPS coordinates, Cell ID, MAC addresses, Wi-Fi, Bluetooth technology.

How do we use it?

- Manage and document your employment or application for employment with us, and employment-related requirements, actions, matters and activities;
- Maintain emergency contact details;
- Protect the safety and security of our workforce, guests, property, and assets including monitoring activities in our facilities and activity using our computers, devices, systems, networks, services, communications and other assets and resources;
- Detect, investigate and prevent policy violations, security incidents, fraud and other unwanted activity;
- Investigate and respond to claims or complaints;
- Comply with and support the enforcement of applicable laws, regulations, policies and procedures; and
- Use in ways we have told you about for our business activities, or for other purposes as permitted by law.

Environmental Information: Information that is typically detected by the senses.

Examples: Audio, electronic, visual, thermal, or olfactory information.

How do we use it?

- Manage and document your employment or application for employment with us, and employment-related requirements, actions, matters and activities;
- Maintain your employee information in company directories;
- Maintain emergency contact and beneficiary details;
- Protect the safety, efficiency and security of our workforce, guests, property, and assets including monitoring activities in our facilities and activity using our computers, devices, systems, networks, services, communications and other assets and resources;
- Detect, investigate and prevent policy violations, security incidents, fraud and other unwanted activity;
- Comply with and support the enforcement of applicable laws, regulations, policies and procedures; and
- Use in ways we have told you about for our business activities, or for other purposes as permitted by law.

Professional or Employment Information: Information about your professional and employment status and background.

Examples: Job related data, maintained as part of the employment relationship that could be contained in a job application or resume; an employment contract; a contractor agreement; a performance review; a disciplinary record; photos; information from employee expenses; browsing and search history; payroll and benefits related data; internal and external contact information; or information captured from video, audio, systems, or other forms of monitoring or surveillance.

How do we use it?

- Manage and document your employment or application for employment with us, and employment-related requirements, actions, matters and activities;
- Maintain your employee information in company directories;
- Maintain emergency contact and beneficiary details;
- Monitor eligibility to work in the U.S.;
- Comply with and support the enforcement of applicable laws, regulations, policies and procedures; and
- Use in ways we have told you about for our business activities, or for other purposes as permitted by law.

Non-public Education Information (Family Educational Rights and Privacy Act (FERPA)).

Examples: Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades or transcripts.

How do we use it?

- Manage and document your employment or application for employment with us, and employment-related requirements, actions, matters and activities;
- Monitor eligibility to work in the U.S.;
- Conduct performance-related reviews, including performance appraisals, career planning, skills monitoring, job moves, promotions and staff re-structuring; and
- Use in ways we have told you about for our business activities, or for other purposes as permitted by law.

Inferences Drawn from Other Personal Information

Examples: Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

How do we use it?

- Manage and document your employment or application for employment with us, and employment-related requirements, actions, matters and activities;
- Maintain emergency contact and beneficiary details;
- Protect the safety and security of our workforce, guests, property, and assets including monitoring activities in our facilities and activity using our computers, devices, systems, networks, services, communications and other assets and resources;
- Detect, investigate and prevent policy violations, security incidents, fraud and other unwanted activity; and
- Use in ways we have told you about for our business activities, or for other purposes as permitted by law.

The California Consumer Privacy Act (CCPA) gives California residents the right to know the categories of personal information their employer collects about them and the purpose for the collection. For a complete statement of ICW Group's California Privacy Policy and CCPA Notice at Collection, click here: <https://www.icwgroup.com/california-privacy-policy-and-practices/>

Individuals residing in other states may have similar or other rights under the laws of those states. Neither this Notice nor any other ICW Group notice or policy statement is intended to limit or restrict the legal rights of any employee or applicant under California law or the laws of any other applicable state.

We may collect Personal Information from you in a variety of different situations, including, but not limited to on our website, your mobile device, through email, in physical locations, through the mail, over the telephone, and/or by personal observation. We may also collect information from governmental agencies, service providers, and vendors such as for background checks. As defined in the CCPA, "Personal Information" is information that identifies, relates to, or could reasonably be linked directly or indirectly with a particular California resident. Personal Information does not include deidentified or aggregated consumer information.

How ICW Group Shares Your Personal Information

When disclosing your personal information to a third party for a business purpose, ICW Group enters into a contract with the third party describing the purpose of such disclosure and requiring that such personal information be kept confidential and not used for any purpose except to perform the services under the contract or respond to regulatory or law enforcement requests.

In the preceding twelve (12) months, ICW Group has disclosed the following categories of personal information for a business purpose:

- Identifiers
- Customer records
- Employment-related records
- Records containing personal information
- Records containing legally protected classification characteristics
- Biometric Information
- Internet or other similar network activity
- Geolocation Data
- Environmental Information
- Professional or employment-related information
- Educational information
- Inferences drawn from other personal information

We disclose your personal information to the following categories of third parties:

- Service providers, such as for HR-related services, benefits and wellness service providers, payroll services
- Governmental agencies
- Affiliates for regulatory reasons
- Insurance agents or brokers
- Other insurers to respond to your application for insurance
- Reinsurance companies or claims administrators
- Insurance regulators or law enforcement officials
- Lienholders, assignees, lessors, or other persons having a beneficial or legal interest
- Others to prevent fraud, respond to a subpoena or search warrant
- Companies that provide motor vehicle reports, credit reports or claims history
- Auto repair shops, medical providers, contractors, service providers, and other third parties who require such information to support our business

In the preceding twelve (12) months, ICW Group has not sold the personal information of any past or present employee or job applicant, and we have no intention of selling such information at this time or in the foreseeable future.

Changes to this CCPA Employee Privacy Notice

We reserve the right to amend this Privacy Notice for Employees and Job Applicants at our discretion and at any time. Your continued use of our website or interaction with us through other methods following the posting of changes and/or our directing you to the updated employee privacy notice constitutes your acknowledgment of such changes.

- This Privacy Notice was last updated on August 8, 2025.

Contact Us

If you have questions regarding this Privacy Notice for Employees and Job Applicants or our data privacy practices, you may contact us at:

ICW Group
Attention: Law Department
15025 Innovation Drive
San Diego, CA 92128-3455

Or by calling (866) 442-9477.

Consumer Privacy Practices by Individual's State of Residence

California Privacy Policy; Notice at Collection: <https://www.icwgroup.com/california-privacy-policy-and-practices/>

[icwgroup.com](https://www.icwgroup.com)

ICW Group is the marketing name for ICW Group Holdings, Inc. For a list of all ICW Group Holdings, Inc. subsidiaries, please visit our website www.icwgroup.com. Not all products and coverages are available in all states.