

California Employee Personal Information Notice

This California Employee Personal Information Notice applies to our current and former California employees. It describes the personal information we collect and how we use it in connection with your employment with Liberty Mutual Group Inc., or any of its affiliates and subsidiaries (“**Liberty Mutual**”, or “**Company**”).

I. Categories of Personal Data

Liberty Mutual may collect the following personal information in connection with the work you perform for the Company:

- Your name, work address, telephone numbers, employee number, Social Security Number, identification information provided on I-9 forms, photograph and email addresses and similar data about you (“**Identification Data**”);
- Your home address, private email address, personal contact details, citizenship, visa permit and residency data, date of birth, country of birth, emergency contact details, next of kin details, resume and job application form data, references, bank account(s), information on prior employers, family members, family status and similar data about you (“**Further Identification Data**”);
- Job title and code, career history, professional memberships, work location, division, department, position level, employment records, time records, swipe card data, attendance and leave records, assigned tasks and projects, manager's name, business travel data, training data to include attendance of training, information related to talent management, start date and similar data about you (“**Job Data**”);
- Your actual earnings information including your base salary, bonus and commission earnings, any overtime earnings, if applicable, actual insurance benefits (including information about you and your dependents Liberty Mutual provides to the insurer or benefits vendor), tax information, and information relating to your company pension and 401K, any company loans, company credit cards, (if applicable) attachments of salary, charitable contributions you elect to make from your earnings, and similar data about you (“**Salary Data**”);
- Protected classification characteristics described in California Civil Code §1798.80(e), including age, race, color, national origin, citizenship, religion or creed, marital status, medical information, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status (“**Protected Classifications Data**”);
- Computer usage information related to your use of company equipment, computer systems, communications systems, mobile phones and other resources, including your username, IP addresses from company devices or other devices you use to access Liberty Mutual websites, time and date of access, location of your device, URLs of the websites you visit, emails exchanged through your Liberty Mutual e-mail account, contacts, calendars, Internet usage generally and similar data about you (“**IT Data**”);
- Email content, business letter content, business documents, chat content, business call data (including call recordings) and similar data about you (“**Communication Data**”);
- Performance reviews, evaluations and ratings, records of investigations regarding violations of law and/or company policy or other internal investigations, records of disciplinary action, and time and attendance data and similar data about you (“**Performance and Disciplinary Data**”);

- Data included in employment background checks, including credit records, driving records, criminal history, education verification, employment verification, and licensing verification (“**Background Check Data**”);
- **Sensitive Data** as defined under the California Privacy Rights Act when used to infer characteristics of an individual.

II. What Data Does Liberty Mutual Use for Each Purpose?

Liberty Mutual does not sell employee personal data, as that term is defined under the California Consumer Privacy Act as amended. If you visit Liberty Mutual websites, we may share (as defined under CCPA) some personal information (e.g., IP address, device ID) for cross-context behavioral advertising.

Purpose for Collection	Explanation of Use	Categories of Employee Data involved
Compensation-related Purposes	Administering and providing compensation, including administering and providing wage and salary payments and overtime, commissions, bonuses and other applicable incentive payments	<ul style="list-style-type: none"> • Identification Data • Further Identification Data • Job Data • Salary Data • Performance and Disciplinary Data
Benefit-related Purposes	Administering and providing applicable benefits and other work-related allowances, including reporting of benefit entitlements and use	<ul style="list-style-type: none"> • Identification Data • Further Identification Data • Job Data • Salary Data • Protected Characteristics Data • Performance and Disciplinary Data
Workforce Management-related Purposes	Administering the workforce, including managing work activities, providing performance evaluations and promotions, producing and maintaining corporate organization charts, succession planning, staffing, secondments, team management, analyzing employee engagement and retention, diversity, equity and inclusion initiatives, administering global mobility programs, managing business travel and employee reimbursements, carrying out workforce analysis, monitoring attendance, auditing of employee functions, conducting talent management and career development, leave management/approvals, providing information to our employment verification vendor, administering recognition programs, deploying internal trainings and surveys, managing proper termination of employment relationship, and managing workplace conditions to reduce the risk of transmission of COVID-19 or other infectious diseases	<ul style="list-style-type: none"> • Identification Data • Job Data • Salary Data • Communication Data • Protected Characteristics Data • Sensitive Data • Performance and Disciplinary Data

Regulatory-related Purposes	Complying with applicable laws, regulatory and employment-related requirements and administration of those requirements	<ul style="list-style-type: none"> • Identification Data • Further Identification Data • Job Data • Salary Data • Performance and Disciplinary Data • Protected Characteristics Data • Background Check Data
Internal Compliance-related Purposes	Ensuring compliance with applicable Company policies and procedures, including the compliance helpline, physical/IT/network security, attendance, and internal investigations	<ul style="list-style-type: none"> • Identification Data • Job Data • Salary Data • IT Data • Communication Data • Performance and Disciplinary Data • Background Check Data
IT Purposes	Providing access to company computer systems and networks, monitoring use, ensuring network and system security, monitoring and ensuring confidentiality of company data	<ul style="list-style-type: none"> • Identification Data • IT Data
Communication-related Purposes	Communicating with you and/or other employees, facilitating global collaboration and teamwork, to provide for a global directory and/or to communicate with third parties (such as existing or potential business partners, suppliers, customers or government officials)	<ul style="list-style-type: none"> • Identification Data • Job Data • Communication Data
Emergency Contact-related Purposes	Communicating with your designated contacts in case of emergency	<ul style="list-style-type: none"> • Further Identification Data
Authority-related Purposes	Responding to and complying with requests and legal demands from regulators or other authorities in or outside of your home country	<ul style="list-style-type: none"> • Identification Data • Further Identification Data • Job Data • Salary Data • Protected Characteristics Data • IT Data • Communication Data • Performance and Disciplinary Data
Security and Fraud Prevention-related Purposes	Security and fraud prevention activities such as prevention of fraud, prevention of misuse of IT systems or company resources, prevention of money laundering, furthering physical security, furthering IT and network security, or internal investigations	<ul style="list-style-type: none"> • Identification Data • Further Identification Data • Job Data • IT Data • Communication Data • Performance and Disciplinary Data
Finance and Audit-related Purposes	Corporate financial responsibilities and compliance, including internal/external audits and cost/budgeting analysis and control	<ul style="list-style-type: none"> • Identification Data • Further Identification Data • Job Data • Salary Data • IT Data • Communication Data • Performance and Disciplinary Data

Cross Context Behavioral Advertising	If you visit Libertymutual.com or other Liberty Mutual websites, using cookies we may display Liberty Mutual ads on other websites or social medial engines that you visit.	• IT Data
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III. Retention of Personal Data

We retain your information in accordance with our legal obligations, our records retention policies, or as otherwise permitted by law. We will delete your data once the legal obligation expires or after the period of time specified in our records retention policies. The period of retention is subject to our review and alteration.

IV. No Expectation of Privacy

You have no reasonable expectation of privacy while in a Liberty Mutual workspace or common public area (for example, the lobby) or with respect to any information stored on or transmitted by Company Information Systems and Electronic Resources. Please review the Access to and Protection of Corporate Systems and Data policy at [Corporate Technology Resources \(lmig.com\)](http://lmig.com) for more information. See also the Workstation Access and Other Corporate Resources policy at [Access to Workstation and Corporate Resources \(lmig.com\)](http://lmig.com). You may have additional rights under other California laws. For more information about these rights, please go to lmi.co/caprivacynotices and click on the link California Privacy Policy (Employee, Beneficiary, Job Applicant and Independent Contractor).

V. Changes to this Notice

Liberty Mutual reserves the right to amend this Notice at any time. The “Last Updated” date at the bottom of this Notice indicates when Liberty Mutual last revised this Notice. Any changes will become effective when Liberty Mutual posts the revised Privacy Notice. Changes to the policy will be posted at <https://us.myliberty.lmig.com/work-life/employee-handbook-company-policies/state-specific-provisions> in the California section or lmi.co/caprivacynotices.

VI. How to Contact Us

If you have any questions or comments about this Notice or are requesting the Notice in an alternative format, please do not hesitate to contact us at:

Calling: 800-344-0197
 Email: Privacy@libertymutual.com
 Mail: Liberty Mutual Insurance Company
 175 Berkeley St., 6th Floor
 Boston, MA 02116
 Attn: Privacy Office