

**Your California Privacy Policy (Employee,
Beneficiary, Job Applicant and Independent
Contractor)
Effective September 2024**

This California Privacy Policy applies to our California employees (including current and former employees), beneficiaries of employee benefit plans, job applicants and independent contractors (collectively “California Residents”). It describes the personal information we collect and how we use it in connection with your relationship with Liberty Mutual Group Inc., or any of its affiliates and subsidiaries (“**Liberty Mutual**”, or “**Company**”). It also describes the additional rights you may have under the California Consumer Privacy Act.

I. What Information Did Liberty Mutual Collect?

In the preceding twelve (12) months, Liberty Mutual collected the following categories of personal information listed below. The data Liberty Mutual collects varies based on your relationship to us. For example, we will collect different information for a beneficiary on our employee benefits plans than we collect for a job applicant.

Category	Examples
Identification Data	Name, work address, telephone numbers, employee n number, Social Security Number, identification information provided on I-9 forms, photograph email addresses, precise geolocation, and similar data about you
Further Identification Data	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
Job 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
Salary 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
Protected Classifications 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
IT 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
Marketing and Communication Data	Email content, business letter content, business documents, chat content, business call data (including call recordings) and similar data about you
Performance and Disciplinary 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
Background Check Data	Data included in employment background checks, including credit records, driving records, criminal history, education verification, employment verification, and licensing verification
Sensitive Data	As defined under the California Privacy Rights Act
Inferences drawn from other personal information	Includes information gleaned from resume, job interviews and any pre-employment screening or testing that may be conducted
Geolocation Data	Includes physical location from where you applied and whether you applied via a mobile device; includes security badge data for employees
Professional or employment related Data	Includes current and/or past job history and your resume, performance evaluations (in the case of internal candidates), as well as information related to whether you are legally authorized to work in the United States and whether you have ever applied to or been employed by Liberty or any of its subsidiaries and affiliates previously

II. How Did Liberty Mutual Collect This Information?

In the preceding twelve (12) months, Liberty Mutual obtained personal information about California Residents from the following categories of sources:

- **Information you provide to us directly**, including for example information provided in your job application, during employment, after employment or to obtain benefits as a beneficiary;
- **Information we collect or receive from third parties**, such as during the background check process and from benefits providers;
- **Publicly available sources**; and/or
- **Our subsidiaries and affiliates.**

III. How did Liberty Mutual Use Your Data?

In the preceding twelve (12) months, Liberty Mutual used the following categories of data for the purposes listed below and may have disclosed this information to certain categories of third parties.

Employee Data

Business Purpose	Categories of Employee Data involved	Disclosed to these Categories of Third Parties
<p>Compensation-related Purposes</p> <ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> Liberty Affiliates Service Providers Benefits Providers Public Entities Advisors including law firms, accountants, auditors and tax advisors Persons, organizations, affiliates or service providers conducting research or analytics As permitted by law
<p>Benefit-related Purposes</p> <ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> Liberty Affiliates Service Providers Benefits Providers Public Entities Advisors including law firms, accountants, auditors and tax advisors Persons, organizations, affiliates or service providers conducting research or analytics As permitted by law
<p>Workforce Management-related Purposes</p> <ul style="list-style-type: none"> Administering the workforce, including managing work activities, providing performance evaluations and promotions, producing and maintaining corporate organization charts, staffing, secondments, team management, administering global mobility programs, managing business travel and employee reimbursements, carrying out workforce analysis, 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 	<ul style="list-style-type: none"> Identification Data Job Data Salary Data Communication Data Protected Characteristics Data Performance and Disciplinary Data 	<ul style="list-style-type: none"> Liberty Affiliates Service Providers Benefits Providers Public Entities Advisors including law firms, accountants, auditors and tax advisors Persons, organizations, affiliates or service providers conducting research or analytics As permitted by law

<p>Regulatory-related Purposes</p> <ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> Liberty Affiliates Service Providers Benefits Providers Public Entities Advisors including law firms, accountants, auditors and tax advisors As permitted by law
<p>Internal Compliance-related Purposes</p> <ul style="list-style-type: none"> Ensuring compliance with applicable Company policies and procedures, including the compliance helpline, physical/IT/network security, 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 	<ul style="list-style-type: none"> Liberty Affiliates Service Providers Public Entities Advisors including law firms, accountants, auditors and tax advisors As permitted by law
<p>IT Purposes</p> <ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> Liberty Affiliates Service Providers Advisors including law firms, accountants, auditors and tax advisors As permitted by law
<p>Communication-related Purposes</p> <ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> Liberty Affiliates Service Providers Benefits Providers Public Entities Advisors including law firms, accountants, auditors and tax advisors Persons, organizations, affiliates or service providers conducting research or analytics As permitted by law
<p>Emergency Contact-related Purposes</p> <ul style="list-style-type: none"> Communicating with your designated contacts in case of emergency 	<ul style="list-style-type: none"> Further Identification Data 	<ul style="list-style-type: none"> Liberty Affiliates Service Providers Benefits Providers As permitted by law
<p>Authority-related Purposes</p> <ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> Liberty Affiliates Service Providers Benefits Providers Public Entities Advisors including law firms, accountants, auditors and tax advisors As permitted by law

Job Applicant Data

Business Purpose	Personal Data Categories	Disclosed to these Categories of Third Parties
<p>Determining your eligibility for the role</p> <ul style="list-style-type: none"> For example, we collect your educational and employment qualifications 	<ul style="list-style-type: none"> Identification Data Further Identification Data IT Data Professional or employment related information Inferences drawn from other personal information Geolocation Data Marketing and Communications Data 	<ul style="list-style-type: none"> Liberty Affiliates Service Providers As permitted by law
<p>Processing your employment application</p> <ul style="list-style-type: none"> For example, we will conduct a background check if we offer you a job. We perform credit checks on applicants for certain positions. Similarly, we may ask for your driver’s license number to obtain a Motor Vehicle Report if the job requires you to drive. In addition, we will collect your e-mail address and contact information so that we can communicate with you about job opportunities, respond to your questions and welcome you to Liberty Mutual 	<ul style="list-style-type: none"> Identification Data Further Identification Data IT Data Professional or employment related information Inferences drawn from other personal information Salary Data Marketing and Communications Data Background Check Data Geolocation Data 	<ul style="list-style-type: none"> Liberty Affiliates Service Providers Public Entities Advisors including law firms, accountants, auditors and tax advisors As permitted by law
<p>Recruiting, Personnel Planning and Management purposes</p> <ul style="list-style-type: none"> For example, ensuring our job openings are located in areas where talent is interested in those opportunities Ensuring that we are aligning candidates with roles that match their interests Conducting analytics 	<ul style="list-style-type: none"> Identification Data Further Identification Data IT Data Professional or employment related information Inferences drawn from personal information Geolocation Data 	<ul style="list-style-type: none"> Liberty Affiliates Service Providers Persons, organizations, affiliates or service providers conducting research or analytics As permitted by law
<p>Regulatory and Legal Requirements</p> <ul style="list-style-type: none"> For example, ensuring we comply with Equal Employment Opportunity laws and other regulations or laws; Evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Liberty Mutual’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding in which personal information held by Liberty Mutual is among the assets transferred; Internal staffing analyses; Exercise and defend our legal rights and positions; Respond to law enforcement requests as 	<ul style="list-style-type: none"> Identification Data Further Identification Data Protected Classification Characteristics Professional or employment related information Marketing and Communications Data IT Data Inferences drawn from other personal information 	<ul style="list-style-type: none"> Liberty Affiliates Service Providers Benefits Providers Public Entities Advisors including law firms, accountants, auditors and tax advisors Persons, organizations, affiliates or service providers conducting research or analytics As permitted by law

<p>required by applicable law, court order, or governmental regulations;</p> <ul style="list-style-type: none"> • Provide improved quality, training, and security; • As otherwise permitted by law 		
<p>IT and network security purposes</p> <ul style="list-style-type: none"> • For example, to detect and respond to any security incidents 	<ul style="list-style-type: none"> • Identification Data • Further Identification Data • IT Data • Geolocation Data • Professional or employment related information • Marketing and Communications Data 	<ul style="list-style-type: none"> • Liberty Affiliates • Service Providers • Public Entities • Advisors including law firms, accountants, auditors and tax advisors • As permitted by law
<p>Administrative purposes</p> <ul style="list-style-type: none"> • Including cost and budgeting purposes, aggregate management reporting, internal training, and as generally required to conduct the business of Liberty Mutual, its subsidiaries and affiliates 	<ul style="list-style-type: none"> • Identification Data • Further Identification Data • IT Data • Geolocation Data • Professional and employment related information • Marketing and Communications Data 	<ul style="list-style-type: none"> • Liberty Affiliates • Service Providers • Benefits Providers • Public Entities • Advisors including law firms, accountants, auditors and tax advisors • Persons, organizations, affiliates or service providers conducting research or analytics • As permitted by law

Independent Contractor Data

Business Purpose	Personal Data Categories	Disclosed to these Categories of Third Parties
<p>Communicating with you, including, for example, welcoming you to Liberty Mutual and explaining your role.</p> <ul style="list-style-type: none"> • For example, we collect your name, telephone number and perhaps your email address. We collect your physical work location in the event there is a natural disaster for work relocation purposes 	<ul style="list-style-type: none"> • Identification Data • Further Identification Data 	<ul style="list-style-type: none"> • Liberty Affiliates • Service Providers • Public Entities • Advisors including law firms, accountants, auditors and tax advisors • As permitted by law
<p>Regulatory and Legal Requirements</p> <ul style="list-style-type: none"> • Internal staffing analyses; • Exercise and defend our legal rights and positions; • Evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Liberty Mutual’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding in which personal information held by Liberty Mutual is among the assets transferred; 	<ul style="list-style-type: none"> • Identification Data • Further Identification Data • IT Data 	<ul style="list-style-type: none"> • Liberty Affiliates • Service Providers • Public Entities • Advisors including law firms, accountants, auditors and tax advisors • Persons, organizations, affiliates or service providers conducting research or analytics • As permitted by law

<ul style="list-style-type: none"> Respond to law enforcement requests as required by applicable law, court order, or governmental regulations; Provide improved quality, training, and security; As otherwise permitted or required by law 		
<p>IT and network security purposes</p> <ul style="list-style-type: none"> For example, to detect and respond to any security incidents 	<ul style="list-style-type: none"> Identification Data Further Identification Data IT Data 	<ul style="list-style-type: none"> Liberty Affiliates Service Providers Public Entities Advisors including law firms, accountants, auditors and tax advisors As permitted by law
<p>Compensation-related purposes</p> <ul style="list-style-type: none"> For example, to issue payment for your services either to you directly or to the supplier, vendor, staffing company that employs you 	<ul style="list-style-type: none"> Identification Data Further Identification Data Salary Data 	<ul style="list-style-type: none"> Liberty Affiliates Service Providers Public Entities Advisors including law firms, accountants, auditors and tax advisors Persons, organizations, affiliates or service providers conducting research or analytics As permitted by law
<p>Finance and Audit-related Purposes</p> <ul style="list-style-type: none"> Corporate financial responsibilities and compliance, including internal/external audits and cost/budgeting analysis and control; For tax and/or accounting purposes 	<ul style="list-style-type: none"> Identification Data Further Identification Data Salary Data 	<ul style="list-style-type: none"> Liberty Affiliates Service Providers Public Entities Advisors including law firms, accountants, auditors and tax advisors Persons, organizations, affiliates or service providers conducting research or analytics As permitted by law
<p>Administrative purposes</p> <ul style="list-style-type: none"> Including cost and budgeting purposes, training, and as generally required to conduct the business of Liberty Mutual, its subsidiaries and affiliates 	<ul style="list-style-type: none"> Identification Data Further Identification Data IT Data 	<ul style="list-style-type: none"> Liberty Affiliates Service Providers Public Entities Advisors including law firms, accountants, auditors and tax advisors Persons, organizations, affiliates or service providers conducting research or analytics As permitted by law

IV. Categories of Information Sold or Shared

In the last 12 months, Liberty Mutual did not sell your personal data, as the term is defined under the California Consumer Privacy Act as amended. If you visit libertymutual.com or other Liberty Mutual websites, we may share (as defined under CCPA) some personal information (e.g. IP address, device ID) for cross-context behavioral advertising.

V. Your Right To Access, Delete and Correct Your Information

The California Consumer Privacy Act of 2018, as amended, provides California Residents with specific rights to access, delete or correct personal information. These rights are subject to certain exceptions. Our response to your exercise of rights may be limited as permitted under law.

A. Access or Deletion

You may have the right to request that Liberty Mutual disclose certain information to you about our collection and use of your personal information, including a copy of the personal information we have collected. You have the right to know what personal information we collected about you, including the categories of information, the categories of sources from which the information is collected, the business purpose for use or sharing of the information, the categories of third parties to whom we disclosed information, and the specific pieces of information we have collected about you.

You also may have the right to request that Liberty Mutual delete personal information that Liberty Mutual collected from you, subject to certain exceptions. Once Liberty Mutual receives and verifies your request, we will delete your personal information from our systems, unless an exception applies. If applicable, we will also notify third parties, service providers and contractors with whom we may have shared your data of your request for deletion.

To the extent Liberty has your Social Security Number, Driver's License Number or any other government-issued identification information for you, we do not provide access to this information pursuant to best security practices, CPRA, and any related regulations.

B. Correction

You have the right to request that Liberty Mutual correct inaccurate personal information, taking into account the nature of and purpose for the processing of your information. Upon verifying the validity of a verifiable employee correction request, we will use commercially reasonable efforts to correct the inaccurate personal information as requested.

Liberty Mutual may reject a request for correction if we are unable to verify your identity or if we determine that the contested personal information is more likely than not accurate based on the totality of the circumstances. If necessary, we may request that you provide documentation that the personal information is inaccurate.

C. How To Make an Access, Deletion, or Correction Request

To exercise the access, deletion, or correction rights described above, a verifiable request may be made to Liberty Mutual by either:

- Online: Libertymutualgroup.com/privacy-policy/employee-data-request
- Calling: 800-344-0197
- Mail: Liberty Mutual Insurance Company
175 Berkeley St.

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Boston, MA 02116
Attn: Privacy Office.

Limited personal information will be required for identity verification purposes. The specific elements may vary depending on the nature of your relationship with Liberty Mutual, but will typically include name, address, phone number, date of birth, last four of your social security number, and a description of your relationship with Liberty Mutual. You may only make a verifiable request for access or deletion twice within a twelve (12) month period. The verifiable employee request must provide sufficient information that allows Liberty Mutual to reasonably verify that you are the person about whom Liberty Mutual collected personal information or an authorized representative of such person; and describe your request with sufficient detail that allows Liberty Mutual to properly understand, evaluate, and respond to it. If Liberty Mutual is unable to verify you based on the information you have provided and the information contained in our systems, Liberty Mutual will advise you that we cannot complete your request based on inability to verify you.

Only you, or someone legally authorized to act on your behalf, may make a verifiable request related to your personal information.

A California Resident may use an authorized agent to submit a right to access, a request to delete, or a request to correct. Liberty Mutual may require the authorized agent to provide proof that the California Resident gave the agent signed permission to submit the request. In addition, the California Resident may be required to verify their own identity with Liberty Mutual and we may ask you to directly confirm that you provided the authorized agent permission to submit the request.

We may deny a request from an agent that does not submit proof that they have been authorized by the California Resident to act on their behalf. Such requirements, however, will not apply where a California Resident has provided the authorized agent with power of attorney pursuant to Cal. Prob. Code Sections 4121 to 4130. For any questions regarding an authorized agent request, please contact the Liberty Mutual Privacy Office as described in the contact section below.

D. Response Timing

Liberty Mutual endeavors to respond to a verifiable employee request within forty-five (45) days of its receipt. If more time is needed, Liberty Mutual will inform you of the reason and extension period in writing. If Liberty Mutual is unable to fulfill your request, you will be provided with the reason that the request cannot be completed.

We may deliver the personal information to you electronically, or by mail at your option. If electronically, then we will deliver the information in a portable and, to the extent technically feasible, in a readily useable format that allows you to transmit the information from one entity to another without hindrance.

VI. Opt-Out Rights

A. Rights to opt in and out of information selling/sharing

Liberty Mutual does not sell the personal information of California Residents.

Liberty Mutual shares your personal information when you visit a Liberty Mutual website. The California privacy law defines sharing as “communicating orally, in writing, or by electronic or other means, a consumer’s personal information . . . to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration.” For example, this occurs when you visit a Liberty Mutual website. Cookies or pixels are deployed that then allow us to show you targeted advertisements when you visit other websites or social media platforms.

California Residents may opt-out of sharing personal data for cross-context behavioral advertising. If you opt-out, this means for example that after you visit libertymutual.com you will not see a targeted, personalized ad on a different
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website or social media platform. Liberty Mutual will accept any of the three options listed below as a valid request to opt-out of sharing.

- (1) Use the Global Privacy Control (“GPC”). This is an opt-out at the browser and device level. For example, if you turn on GPC on your laptop, you have opt-ed out for data collected while on your laptop but not if you visit our website on your phone. You need to turn on GPC for each device. Click [here](#) to learn how to turn on GPC. If you turn on GPC, your opt-out of sharing is accepted automatically.
- (2) Click on the Do Not Sell Or Share My Personal Information Link that displays at the bottom of our website. This is an opt-out at the browser and device level. If you visit our website from your laptop and click on the link, we know when you are on that device that you have opted-out. When you visit the device on your phone, you will need to click on the link again to opt-out from that device.

OR

- (3) If you provided Liberty Mutual with your email address during the online quoting process, you can opt-out of sharing by completing a form. Click on lmi.co/caprivacychoices to opt-out.

Liberty Mutual will not require you to create an account to exercise your opt-out rights. We may ask you for additional information necessary to complete the opt-out request. We may deny an opt-out request if we have a good-faith, reasonable, and documented belief the request is fraudulent. Upon receipt of your request, Liberty Mutual will not share your personal information with third parties for cross-context advertising within fifteen (15) business days of receiving your request. An authorized agent may submit an opt-out request on your behalf if the agent provides a copy of your signed permission to submit a request on your behalf.

B. Right to Limit the Use of Sensitive Information

California Residents have the right to request Liberty Mutual limit the use and disclosure of their sensitive information to that which is necessary to perform the services reasonably expected by an average consumer who requests these services, with some identified exceptions. For example, Liberty Mutual is allowed to use sensitive data (even if you opt-out):

- To perform the services or provide the goods requested by you;
- If it is not used to infer characteristics about you;
- To detect security incidents;
- To resist malicious, fraudulent, deceptive or illegal actions directed at Liberty Mutual;
- To ensure the physical safety of a person;
- For short-term and transient use;
- To perform services on behalf of Liberty Mutual; or
- To verify or maintain the quality of services provided.

To submit a request to limit, click on lmi.co/caprivacychoices. Upon receiving your request to limit, Liberty Mutual may ask you for additional necessary information to complete your request. A request to limit may be denied if we have a good-faith and reasonable belief that the request is fraudulent. Liberty Mutual will process your request within fifteen (15) business days of receiving your request. You may use an authorized agent to submit a request on your behalf if the authorized agent provides a copy of an employee’s signed permission authorizing the agent to submit a request on their behalf.

No discrimination

You have the right not to be discriminated against for exercising any of your CCPA rights. For example, exercising

your lawful rights under CCPA alone will not result in:

- Adverse employment action, denial of your job application, or an end to your contractor term;
- Charge you different prices or rates for goods or services;
- Provide you a different level or quality of goods or services; and
- Suggest that you may receive a different price or rate for goods or services, or a different level or quality of goods or services.

How to Contact Us:

You can submit requests, seek additional information, or obtain a copy of our Privacy Notice in an alternative format by either:

Calling: 800-344-0197

Email: Privacy@libertymutual.com

Online: [Libertymutualgroup.com/privacy-policy/employee-data-request](https://libertymutualgroup.com/privacy-policy/employee-data-request)
lmi.co/caprivacychoices

Mail: Liberty Mutual Insurance Company
175 Berkeley St.
Boston, MA 02116
Attn: Privacy Office

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 Policy. Changes to the policy will be posted at <https://us.myliberty.lmig.com/work-life/employee-handbook-company-policies/state-specific-provisions>.