

## **THE HARTFORD**

### **EMPLOYEE CALIFORNIA PRIVACY POLICY AND NOTICE AT TIME OF COLLECTION**

*Last Updated December 2024*

The Hartford values your trust and is committed to the responsible management, use and protection of personal information. This is the California Consumer Privacy Act, as amended by the California Privacy Rights Act, (“CCPA”) Privacy Policy and Notice at Time of Collection (“CCPA Notice”) of The Hartford Financial Services Group, Inc. and its affiliates listed [here](#) (collectively, “The Hartford”). This CCPA Notice is applicable to the personal information (to the extent the personal information is subject to the CCPA) collected by The Hartford from or about California residents (defined by the CCPA as “consumers”) who are (a) employees (hereinafter “Employee”) or (b) job applicants, former employees, independent contractors, or non-employee directors of The Hartford (who, while not employees, are included in the defined term “Employee” solely for the purpose of ease of reference).

This CCPA Notice informs Employees, at or before the time of collection of their personal information, of the categories of personal information The Hartford collects from them and the purposes for which the categories of personal information will be used. This CCPA Notice also provides Employees with a comprehensive description of The Hartford’s online and offline practices regarding the collection, use, and disclosure of personal information.

This CCPA Notice does not apply to Employee’s personal information exempted from the CCPA, such as personal information collected pursuant to (i) the federal Gramm-Leach-Bliley Act and its implementing regulations or the California Financial Information Privacy Act; or (ii) certain medical and health information covered by HIPAA. Further, this Privacy Notice does not apply to consumers who are not our Employees; such consumers should refer to The Hartford’s [CCPA Privacy Policy and Notice at the Time of Collection](#) with respect to the privacy of non-Employee data.

This CCPA Notice supplements, and does not replace, other applicable policies, practices and privacy notices that may relate to the employment relationship consumers have with The Hartford , such as the Electronic Communications Policy and our [Online Privacy Policy](#).

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## **Personal Information We Collect, Use, Disclose, or Sell**

We collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Employee or household (“personal information”). We may collect, and within the last twelve (12) months we may have collected, the following categories of personal information from the sources identified below for the business and commercial purposes indicated and shared such categories of personal information with the specified categories of third parties.

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**Personal Information We Collect**

We may collect the following types of personal information, as categorized by the CCPA:

CCPA Category of Personal Information	Examples of Personal Information We Collect
Identifiers	Examples include but are not limited to: a real name, alias, postal address, unique personal identifier, social security number, driver’s license number, telephone number, passport number, or other similar identifiers, financial information including bank account number, credit card number, debit card number, or other financial account information.
Categories of Personal Information Identified in the California Customer Records Statute (Cal. Civ. Code 1798.80(e))	Examples include but are not limited to: 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 information including history, financial information including bank account number, credit card number, debit card number, or other financial information, medical information, or health insurance information.
Characteristics of protected classifications under California or federal law	Examples include but are not limited to: race, ethnicity, age, citizenship, marital status, medical condition, physical or mental disability, gender, pregnancy or childbirth and related medical conditions, veteran or military status.
Commercial information	Examples include but are not limited to: records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
Biometric information	Examples include but are not limited to: voice recordings of telephone calls with The Hartford; photographic images; sleep, health, or exercise information, to the extent “biometric information” as defined by the CCPA.
Internet or other electronic network activity information	Examples include but are not limited to: information relating to your use of our information and communications systems, including browsing history, search history, information regarding your interaction with an Internet Web site or online job boards, personal information processed on our IT

	<p>systems including contained in emails, through message applications or contained in documents sent by you. For more information about our online data collection practices, please review the Electronic Communications Policy and our <a href="#">Online Privacy Policy</a>.</p>
Geolocation data	<p>Examples include but are not limited to: physical location and/or movements, for example as recorded when employees are inputting timekeeping information via mobile app.</p>
Audio, electronic, visual, thermal, olfactory, or similar information	<p>Examples include but are not limited to: photographs, or recordings of telephone calls, voicemail recordings, or Teams or other similar meeting recordings.</p>
Professional or employment-related information	<p>Examples include but are not limited to: current and past employer name, positions held, physical demands of positions held, and salary information; recruitment information, qualifications, references, information contained in your resume/CV/cover letter or as part of application process; employment data such as dates of service, promotions, leaves, date of death; location of employment and workplace, job titles, work history, work hours, licensure and certification records, professional memberships; termination records, correspondence between us and you; your membership in public service, including military; Personal or work relationship information related to data falling under Code of Business and Ethics subjects: including but not limited to "Outside Interests" or "Insider Trading"; and performance record, compensation history, disciplinary and grievance information (including related legal matters).</p>
Non-public education information (as defined in the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g, 34 C.F.R. Part 99))	<p>Examples include but are not limited to: education records and transcripts.</p>
Inferences drawn from other personal information	<p>Examples include but are not limited to: information used to create a profile about a consumer based on information collected above, reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes; engagement, skill, and business acumen.</p>

Sensitive Personal Information	Examples include but are not limited to: health information, demographic information, precise geolocation information, company electronic communications, racial and ethnic origin, sexual orientation, and government identifiers such as a social security number or driver's license number
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### **Sources of Personal Information**

We may collect personal information from the following sources: directly from you, for example when you fill out an application or onboarding documents, or file a claim for benefits, or voluntarily participate in survey and research projects conducted by us or our businesses, or from former employers, placement firms or referees, or from your transactions with us. We also collect personal information from third parties as permitted by law, including but not limited to our service providers, background check providers, Employment Eligibility Verification Services (U.S. Citizenship and Immigration Services), Department of Labor, certification or licensure governing bodies, military verification services, consumer reporting agencies, schools or universities with your permission, and your healthcare provider, if applicable.

### **Cookies and Similar Technologies**

In addition, we may automatically collect certain information such as unique device identifiers and cookies when you use our online services, such as our website, online portals, or mobile applications, including when you use our mobile timekeeping application. For more information about our online data collection practices please see the Electronic Communications Policy and our [Online Privacy Policy](#).

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### **Business or Commercial Purposes for Which Personal Information is Collected, Disclosed or Shared**

The following are examples of the reasons for which we, or a contracted third party, may use your personal information:

- For the purpose of administering and maintaining Employee records;
- Making a decision about your recruitment or appointment;
- Determining the terms on which you work for us, including administering the contract/agreement/deed we have entered into with you;
- Checking you are legally entitled to work;
- For the administration of and communications about your benefits;
- Paying you and deducting any applicable tax, social or national insurance contributions;
- Managing absence or leave; Complying with employment and other laws and regulations, and health and safety obligations;

- Providing information to relevant external authorities for tax, social security and other purposes as legally required;
- Conducting performance reviews, managing performance, determining performance requirements, and making salary and compensation decisions;
- Equal opportunities monitoring and complying with obligations under laws and regulations applicable to The Hartford;
- Assessing qualifications for a particular job or task, including decisions about promotions;
- To prevent fraud;
- To monitor use of our property, and information and communication systems to ensure compliance with our workplace, information protection, and document management policies and that use of the property and systems supports The Hartford's business activity;
- To ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution;
- Compliance with security and other mandatory policies and building access;
- Contacting you in the event of a business disruption or continuity event;
- Satisfying (or assisting you in satisfying) education, training, and development requirements;
- Conducting surveys to assess your experience with The Hartford, including but not limited to its processes or policies;
- In connection with internal and external training and promotional presentations and publications;
- Setting up and maintaining accounts and subscriptions with third parties that provide information and research services or communication services (such as Teams, WebEx, or other conference calling technologies);
- Making decisions about your continued engagement or employment with The Hartford;
- Gathering evidence for possible grievance or disciplinary hearings;
- Making arrangements for the termination of the employment relationship;
- Dealing with legal or regulatory disputes or investigations involving you, our work, or other partners, employees, workers, and contractors, including accidents at work, potential and actual negligence claims and professional discipline matters;
- Business management and planning, including accounting, auditing, and insuring;
- Planning or reviewing options in relation to the operation or management of The Hartford.
- Keeping registers required by law or regulation;

- To conduct data analytics studies to review and better understand employee retention and attrition rates;
- Providing requested references for future employers;
- Providing proof of employment;
- Providing information in the context of a possible sale or restructuring of the business, including but not limited to due diligence purposes;
- To administer claims for benefits including sickness absence or family related leaves, to comply with employment and other laws, to carry out obligations or exercise special rights in the field of employment and social security law;
- Communicating with you, for example to respond to inquiries;
- Informing you of job opportunities and evaluating your suitability for a job;
- Enhancing the safety and security of the services and preventing fraud, or protecting our customers' or your rights, property, safety, or security;
- Enforcing applicable terms and conditions and other applicable policies;
- Drawing inferences using personal information obtained from you and from the other sources referenced above, and using inference information to understand and predict employee retention and attrition, and engagement;
- Sharing your personal information within The Hartford for the reasons stated above, as part of our regular business and reporting activities, in the context of a business reorganization or group restructuring exercise, for system maintenance support, for hosting of data and for other legitimate business reasons, including data analysis, business development, forecasting, strategy assessment, resource planning, general business operations, mergers and acquisitions, strategic sourcing, real estate, restructuring and related organizational purposes;
- Conducting business surveys and research projects, as described at the time that you choose to participate in such surveys and research projects; and
- For other purposes as permitted by law.

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### **Categories of Third Parties with Whom Personal Information is Shared or Disclosed**

Examples of third parties with whom we may share or disclose your personal information for a business purpose include but are not limited to affiliates or other parties in connection with the employment relationship and our business operations, as permitted or required by applicable law.

For example, we work with service providers that provide services to us and partner with other parties to develop, operate, deliver, maintain, improve, enhance, and protect our services and in connection with other offerings and operations of The Hartford. Those parties can include but are not limited to:

- Affiliate companies
- Website hosting or information technology consulting service providers
- Data analysis service providers
- Legal service providers
- Accounting service providers
- Administrative service providers
- Security service providers
- Application service providers
- Other service providers for the following types of activities carried out by them:
  - human capital management administration;
  - benefits provision and administration (including payroll, timekeeping, compensation, tax, insurance, and discount voucher schemes);
  - occupational health or medical assessments regarding your fitness to work and health and safety (e.g., workstation assessments);
  - insurance or benefits claims and notifications;
  - provision and administration of recruitment assessments, training, and professional development;
  - library and research services such as subscriptions and memberships;
  - building security access and maintenance;
  - travel services providers;
  - telecommunications and messaging services such as our business continuity emergency notification system;
  - consultants such as talent management and law firms;
  - hard copy archiving; and
  - IT services including systems providers for meetings, communications (including telephone, messaging, and email), productivity applications, document management, and security.

### **Additional Details about Our Collection and Uses of Your Personal Information**

We may also disclose your personal information for other purposes permitted by law and to

- Comply with applicable laws and valid legal processes

- Respond to governmental inquiries or requests, including tax authorities, regulators, or supervisory authorities, the police, or a court of competent jurisdiction
- Protect the rights, privacy, safety, or property of <https://www.thehartford.com> visitors, users of our services, customers, and the public
- Permit us to pursue available remedies or limit the damages that we may sustain
- Administer the contract, working relationship and any associated benefits with or for you; for the purposes of auditing, insuring and in the course of seeking advice with regards to our business operations and claims handling; or where we have another legitimate interest in doing so
- Enforce our Terms of Service

In the event there is a change or contemplated change in the corporate structure of The Hartford, such as a merger, consolidation, sale, liquidation or transfer of substantial assets, The Hartford may disclose your personal information and may, in its sole discretion, transfer, sell or assign personal information collected on and through our services, including your personal information, to one or more affiliated or nonaffiliated third parties.

The Hartford does not sell Employee personal information triggering opt out requirements under the CCPA.

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We do not sell your personal information or share it for purposes of cross-context behavioral advertising. The Hartford's Employee related websites are not directed to minors under 16 years of age. Therefore, we do not knowingly share or sell the personal information of minors under 16 years of age.

We do not use or disclose sensitive personal information for purposes other than the following:

- To perform the activities relating to the employment relationship reasonably expected by an Employee;
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, and or confidentiality of stored or transmitted personal information, provided that the use of the Employee's personal information is reasonably necessary and proportionate for this purpose;
- To resist malicious, deceptive, fraudulent, or illegal actions directed at The Hartford and to prosecute those responsible for those actions, provided that the use of the Employee's personal information is reasonably necessary and proportionate for this purpose;
- To ensure the physical safety of natural persons, provided that the use of the consumer's personal information is reasonably necessary and proportionate for this purpose;
- For short-term, transient use, including, but not limited to, non-personalized advertising shown as part of an Employee's current interaction with The Hartford, provided that the personal information is not disclosed to another third party and is not used to build a profile about the Employee or otherwise alter the Employee's experience outside the current interaction with The Hartford;

- To perform services on behalf of The Hartford, provided that the use of the Employee's personal information is reasonably necessary and proportionate for this purpose. For example, we may use the information for maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of The Hartford;
- To verify or maintain the quality or safety of a product, service, or device that is owned, manufactured, manufactured for, or controlled by The Hartford, and to improve, upgrade, or enhance the service or device that is owned, manufactured by, manufactured for, or controlled by The Hartford, provided that the use of the Employee's personal information is reasonably necessary and proportionate for this purpose; and
- For purposes that do not infer characteristics about the Employee.

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### **Criteria Used for the Retention of Your Personal Information**

Records, including Personal Information, are retained based on an internal Records Management Policy and Record Retention Schedule which has retention periods set in accordance with various applicable legal obligations including local, state, and federal requirements. Personal Information will not be retained beyond a reasonably foreseen need to hold the information for legal or business purposes consistent with the Policy and Schedule. Occasionally, legal obligations will require the company to maintain certain Records past their established retention periods until the legal hold has been removed.

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### **CCPA Privacy Rights**

The CCPA creates a number of consumer privacy rights for certain California residents, to the extent their personal information is covered by the CCPA. The CCPA does not apply to personal information collected pursuant to (i) the federal Gramm-Leach-Bliley Act and its implementing regulations or the California Financial Information Privacy Act; or (ii) certain medical and health information covered by HIPAA.

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### **Submitting Employee Requests Relating to Your Personal Information**

For details about how to submit a CCPA request, you can contact the Consumer Rights and Privacy Compliance Unit by telephone at 800-555-4102, email at, or submit the online form on our [website](#). You can also contact HR Service directly at 877-472-8967.

Only you, or someone legally authorized to act on your behalf, may make a verifiable Employee request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

When you submit a verifiable Employee request, we will take steps to verify your request by using your single sign on credentials or asking you for information and matching it to the information within our HR systems to ensure it is the same. In some cases, we may request additional information in order to verify your request or where necessary to process your request. If we are unable to adequately verify a request, we will notify you. Authorized agents will be required to provide signed permission demonstrating that they have been authorized by the Employee to act on their behalf, or we may require that the relevant Employee directly verify their own identity and the authority of the authorized agent.

We will only use personal information provided in a verifiable Employee request to verify the requestor's identity or authority to make the request.

In accordance with the CCPA, we may not respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

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### **Right to Know**

You have the right to request that we disclose to you certain descriptions and categories of the personal information we collect, use, disclose, share, or sell about you. For example, you may request the following:

- (1) The categories of personal information we have collected about you,
- (2) The categories of sources from which the personal information is collected,
- (3) The business or commercial purpose for collecting, selling, or sharing personal information,
- (4) The categories of third parties to whom we disclose the personal information, and
- (5) The specific pieces of personal information we have collected about you.

You may make up to two disclosure requests in any 12-month period.

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### **Right to Request Deletion**

You have the right to request that we delete your personal information. Please be aware, however, that California law allows us to retain your personal information under certain conditions, even if you have asked us to delete it, such as, for example, when retaining your personal information is necessary for us to maintain the employment relationship or provide your benefits.

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### **Right to Request Correction**

You have the right to request that we correct your personal information if the information we have is inaccurate. Please note that you may be able to directly update personal information in certain HR online accounts, such as Workday or via your benefits account (e.g., Fidelity).

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### **Right to Opt-Out of Sharing of Personal Information**

You have the right to opt-out of the sharing of your personal information for the purposes of cross-context behavioral advertising.

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### **Right to Non-Discrimination for Exercise of Consumer Privacy Rights**

The CCPA prohibits discrimination against individuals who have chosen to exercise any of the privacy rights described above. We will not discriminate or retaliate against you because you have chosen to exercise any of your privacy rights provided by the CCPA.

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### **Changes to this CCPA Notice**

We reserve the right to amend this CCPA Notice at any time in order to address future developments of The Hartford, our services, the CCPA or implementing regulations, or changes in law or industry practices. We will post the revised CCPA Notice on this page, and otherwise comply with any requirements of the CCPA regarding changes to this CCPA Notice. You can determine when this CCPA Notice was revised by referring to the “Last Updated” legend on the top of this page. Any changes will become effective upon the posting of the revised CCPA Notice on our intranet.

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### **Contact for More Information**

If you have any questions or comments about this CCPA Notice, or The Hartford’s privacy policies or practices, please contact us by telephone at 1-800-555-4102, write to us at The Hartford – Consumer Rights and Privacy Compliance Unit, 1 Hartford Plaza, Hartford, CT 06155, or via email at

[ConsumerPrivacyInquiriesMailbox@thehartford.com](mailto:ConsumerPrivacyInquiriesMailbox@thehartford.com).

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## **List of Affiliates**

This CCPA Notice is being provided on behalf of The Hartford Financial Services Group, Inc., and its affiliates (including the following as of December 2024), to the extent required by the CCPA and implementing regulations:

1stAGChoice, Inc.; Access CoverageCorp, Inc.; Access CoverageCorp Technologies, Inc.; Business Management Group, Inc.; Cervus Claim Solutions, LLC; First State Insurance Company; FTC Resolution Company LLC; Hart Re Group L.L.C.; Hartford Accident and Indemnity Company; Hartford Administrative Services Company; Hartford Asia Limited; Hartford Casualty General Agency, Inc.; Hartford Casualty Insurance Company; Hartford Corporate Underwriters Limited; Hartford Fire General Agency, Inc.; Hartford Fire Insurance Company; Hartford Funds Distributors, LLC; Hartford Funds Management Company, LLC; Hartford Funds Management Group, Inc.; Hartford Holdings, Inc.; Hartford Insurance Company of Illinois; Hartford Insurance Company of the Midwest; Hartford Insurance Company of the Southeast; Hartford Insurance, Ltd.; Hartford Integrated Technologies, Inc.; Hartford Investment Management Company; Hartford Life and Accident Insurance Company; Hartford Lloyd's Corporation; Hartford Lloyd's Insurance Company; Hartford Management, Ltd.; Hartford Management (UK) Limited; Hartford Productivity Services LLC; Hartford Singapore Pte. Ltd.; Hartford of the Southeast General Agency, Inc.; Hartford of Texas General Agency, Inc.; Hartford Residual Market, L.C.C.; Hartford Specialty Insurance Services of Texas, LLC; Hartford STAG Ventures LLC; Hartford Underwriters General Agency, Inc.; Hartford Underwriters Insurance Company; Hartford Underwriting Agency Limited; Heritage Holdings, Inc.; Heritage Reinsurance Company, Ltd.; HLA LLC; Horizon Management Group, LLC; HRA Brokerage Services, Inc.; Lattice Strategies LLC; Maxum Casualty Insurance Company; Maxum Indemnity Company; Maxum Specialty Services Corporation; Millennium Underwriting Limited; MPC Resolution Company LLC; Navigators Holdings (UK) Limited; Navigators Insurance Company; Navigators Management Company, Inc.; Navigators Specialty Insurance Company; Navigators Underwriting Limited; New England Insurance Company; New England Reinsurance Corporation; New Ocean Insurance Co., Ltd.; NIC Investments (Chile) SpA (Chile); Nutmeg Insurance Agency, Inc.; Nutmeg Insurance Company; Pacific Insurance Company, Limited; Property and Casualty Insurance Company of Hartford; Sentinel Insurance Company, Ltd.; The Navigators Group, Inc.; Trumbull Flood Management, L.L.C.; Trumbull Insurance Company; Twin City Fire Insurance Company; Y-Risk, LLC.

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