

ACTUARIAL SYSTEMS CORPORATION CALIFORNIA CONSUMER PRIVACY NOTICE

FOR CALIFORNIA RESIDENTS ONLY

NOTICE STATEMENT

This Privacy Notice (“Notice”) provides you with necessary information about the personal information this Company collects, how this information may be used by Actuarial Systems Corporation (“ASC”), your privacy rights and ASC’s obligations in accordance with the California Consumer Privacy Act of 2018 (“CCPA”) and the California Privacy Rights Act of 2020 (“CPRA”).

SCOPE

This Notice applies solely to natural persons residing in California (for purposes of this Notice, hereafter referred to as “Consumers”), and does not apply to individuals living elsewhere, businesses or other corporate entities.

RESPONSIBILITIES

Laurie Hadley, Office Manager is responsible for maintaining, reviewing and updating this Privacy Notice.

DEFINITIONS

Consumer: As defined by the CCPA and CPRA, a consumer is a natural person who is a California resident, living in California for other than a temporary or transitory purpose, or individual domiciled in California.

Personal Information: Commonly referred to as Personally Identifiable Information (“PII”), Personal Information (“PI”) may be defined under various privacy laws, but, generally, is a fact about an individual which, if combined with one or more other facts about that individual, would enable others to determine the specific person to whom the facts apply.

Sensitive Personal Information: Sensitive Personal Information (“SPI”) is a subset of PI that requires greater security protections and standards of care in handling. SPI, also known as "special categories of information," is defined as information that if lost, compromised, or disclosed could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual.

ASC: For the purposes of this Notice, we will refer to Actuarial Systems Corporation and our associated affiliates as “ASC” or “the Company,” and collectively as “we”, “our”, or “us.”

PROCEDURES

1. CONSUMER RIGHTS

1.1. RIGHT TO ACCESS

You have the right to access PI which we may collect or retain about you. If requested, we shall provide you with a copy of your PI which we collect as permitted by the CCPA/CPRA. You also have the right to receive your PI in a structured and commonly used format so that it can be transferred to another entity (“data portability”).

1.2. RIGHT TO KNOW

You have the right to request that we disclose the following about your PI, as defined by the CCPA/CPRA:

- The specific PI we may collect;
- The categories of PI we may collect;
- The categories of sources from which we may collect your PI;
- The business purpose(s) for collecting or sharing your PI;
- The categories of PI we may disclose for business purposes; and,
- The categories of third parties to whom we may share your PI.

1.3. RIGHT TO OPT-OUT / DO NOT SELL MY PERSONAL INFORMATION

ASC does not sell PI within the meaning of the CCPA/CPRA.

1.4. DO NOT SHARE OR DISCLOSE MY SENSITIVE PERSONAL INFORMATION

You have the right to limit how your SPI is disclosed or shared with third parties, as defined in the CCPA/CPRA.

1.5. RIGHT TO DELETION

In certain circumstances, you have the right to request that your PI be erased. Upon verifying the validity of a deletion request, we will delete your

PI from our records, and instruct any service providers or third parties to delete your information, when applicable.

1.6. RIGHT TO CORRECT/RIGHT TO RECTIFICATION

In certain circumstances, you have the right to request correction of any inaccurate PI. Upon verifying the validity of a verifiable consumer correction request, we will use commercially reasonable efforts to correct your PI as directed, taking into account the nature of the PI and the purposes of maintaining your PI.

1.7. RIGHTS ARE NOT ABSOLUTE

Please note that the above rights are not absolute, and ASC may be entitled to refuse requests, wholly or partly, where exceptions under applicable law apply.

2. EXERCISING YOUR RIGHTS

If you are a California resident, you can exercise any of your rights as described in this Notice and in keeping with applicable privacy laws by using the contact information provided in this Notice. The Company will not discriminate against you for exercising such rights. Except as described in this Notice or provided for under applicable privacy laws, there is no charge to exercise of your legal rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, ASC may, in its discretion:

- Charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or,
- Refuse to act upon the request and notify you of the reason for refusing the request.

3. VERIFYING CONSUMER REQUESTS

When you make a request to the Company, we will require your name, e-mail, phone number, and address. ASC will attempt to match our records based on that information. Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm their identity.

4. PERSONAL INFORMATION (“PI”) WE COLLECT

We collect PI as necessary to enable us to carry out your instructions, to manage and operate our business, and to comply with our legal and regulatory obligations.

The PI that we may collect, may include, but is not limited to, the following:

- Your name;
- Your job title and company name;
- Your mailing address;
- Your contact details (such as telephone number and email address);
- Your employment and educational background and other relevant applicant information;
- Information relating to the matter in which you are seeking our advice or representation;
- Other PI contained in correspondence and documents which you may provide to us; and/or,
- Information we obtain from our Information Technology (“IT”) and communications monitoring.

This PI is required to enable us to provide our services to you. If you do not provide the PI we ask for, it may delay or prevent us from providing services to you. You must confirm that you are authorized to provide to us the PI which we shall collect on your behalf. Where the PI relates to your directors, shareholders, beneficial owners, employees, agents, associates or family members, it is not reasonably practicable for us to provide to them the information set out in this Notice. Accordingly, where appropriate, you are responsible for providing this information to any such person.

5. SENSITIVE PERSONAL INFORMATION (“SPI”) WE COLLECT

We may also collect or process SPI as necessary to enable us to carry out your instructions, to manage and operate our business, and to comply with our legal and regulatory obligations.

You may also supply us with, or we may receive, the following SPI:

- Username and password;
- Financial, account or billing information, including tax identification number, social security number, or credit/debit card information;
- Proof of identification, including driver's license number, or state/national government-issued identification;
- Diversity or demographic information, including race or ethnicity, gender or gender identity, religious or philosophical beliefs, political affiliation, opinion or association, veteran or disability status, or sexual preference;
- Information the Firm has contractually agreed to manage under heightened confidentiality and security protocols, such as health and financial information or intellectual property; and/or,

- Information required to conduct background checks, client due diligence or conflict checks.

ASC collects SPI on the basis of one or more of the following:

- You have given explicit consent to the collection for one or more specified purposes;
- Where the collection of SPI is manifestly made public by you; and/or,
- Where the collection is necessary for the establishment, exercise or defense of legal claims.

Where the collection is necessary for reasons of substantial public interest, in accordance with applicable law, ASC may collect SPI for the following reasons:

- For the purposes of the prevention or detection of an unlawful act or for preventing fraud; and,
- For the provision of confidential advice.

6. HOW PERSONAL INFORMATION IS COLLECTED

ASC collects most PI directly from you. However, we may also collect PI from the following:

- Publicly accessible sources;
- Directly from a third party for background checks or due diligence providers;
- A third party, such as a bank, financial institution or advisor, with your consent;
- Consultants and other professionals we may engage in relation to you, with your consent;
- Our website, or through the use of Cookies (Please view our Website Privacy Notice and Cookie Notice for more information); and/or,
- Our IT systems, including:
 - Online case management, document management and time recording systems;
 - Door entry systems and reception logs; and/or,
 - CCTV and access control systems.

7. THE PURPOSE FOR WHICH PERSONAL INFORMATION IS COLLECTED

The purposes for which ASC will collect or use your PI include but are not limited to:

- To carry out our business operations and associated administration in connection with you;
- To comply with our internal business processes and policies;
- To comply with our legal, regulatory and professional obligations;

- For operational reasons, such as improving efficiency, training and quality control;
- To prevent unauthorized access and modifications to our systems;
- For updating records;
- For marketing our services to you; and/or,
- For the purpose of conducting due diligence to comply with anti-money laundering ("AML") regulations to prevent money laundering and terrorist financing, as permitted by law.

8. DISCLOSURE OF PERSONAL INFORMATION

ASC shall use a reasonable standard of care to store and protect from disclosure any PI collected using the principles of least-privileged access and by limiting access to PI and SPI to individuals on a 'need to know' basis only.

PI will be retained by the Company as set out in ASC's policies, practices, or procedures. The Firm may share your PI under the following circumstances:

- In the event that we sell or purchase any business or assets, or if all or substantially all of ASC's assets are acquired by a third party, in which we may disclose your PI to the prospective seller or buyer of such business or assets, solely for the purpose of permitting the due diligence required to decide whether to proceed with a transaction;
- If reasonably necessary to protect the vital interests of a person or ASC;
- If we are subject to disclose or share your information in order to comply with any legal or regulatory obligation; or,
- To enforce or apply our terms and conditions or to establish, exercise or defend the rights of ASC, ASC employees, clients, or others.

ASC's third-party service providers are subject to security and confidentiality obligations and are only permitted to process information for a specified, legitimate business purpose and in accordance with the Company's instructions.

ASC will only share your information with the following third parties:

- Service providers that assist with providing services, including data hosting providers, recruitment agencies, IT and software providers, marketing database providers, accountants and HR system providers, including benefits and payroll providers.

9. DATA STORAGE AND SECURITY

ASC shall use a reasonable standard of care to store and protect your PI. We use appropriate physical, technical and organizational security measures and

procedures to protect PI from unauthorized use, loss, alteration, destruction or modification. ASC shall retain your PI until the initial purpose for collecting and retaining such data has been satisfied. If you subsequently agree to a new or additional purpose, your PI may be retained for that.

10. CONTACT INFORMATION

ASC is not required to appoint a Data Protection Officer. However, we have appointed the following contact in the event you have any questions regarding this Notice, or any questions about your rights with respect to your Personal Information: Laurie Hadley, Office Manager.

11. MODIFICATIONS AND REVISIONS

ASC may modify, revise, or otherwise amend this Notice at any time and in any manner. Any new version of this Notice will be posted on the Employee Workforce Now Portal Home Page. This Notice will be reviewed annually and updated, as necessary; however, ASC recognizes that laws, rules and regulations applicable to this Notice may change more often than this Notice is updated. In every case, this Notice shall be interpreted and enforced consistent with such applicable laws, rules and regulations as may from time to time apply.