

**California FAIR Plan Association
California Consumer Privacy Rights Act Notice to Applicants and Employees**

Pursuant to the California Consumer Privacy Act (“CCPA”) and the California Privacy Rights Act (“CPRA”), this notice provides information about the categories of personal information California FAIR Plan Association (“CFPA”) collects about applicants and employees, and their designated emergency contacts, and the purposes for which the categories of personal information shall be used.

For purposes of this notice, “personal information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household, or as otherwise defined under the CCPA or CPRA. “Personal information” does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records, nor does it include consumer information that is deidentified or aggregate consumer information. It also does not include health or medical information covered by the Health Insurance Portability and Accountability Act (“HIPAA”) or the California Confidentiality of Medical Information Act (“CMIA”), nor does it necessarily include personal information covered by other specific privacy laws, such as the Fair Credit Reporting Act (“FCRA”), the Gramm-Leach-Bliley Act (“GLBA”), the California Financial Information Privacy Act (“FIPA”), or the Driver’s Privacy Protection Act.

“Personal information,” under the CCPA or CPRA, includes but is not limited to the following:

Categories	Examples
A. Identifiers	Real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.
B. Personal Information, as defined by California Civil Code section 1798.80(e)	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, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.
C. Characteristics	Characteristics of protected classifications under California or federal law.
D. Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

E. Biometric Information	An individual’s physiological, biological, or behavioral characteristics, including an individual’s deoxyribonucleic acid (DNA), that can be used, singly or in combination with each other or with other identifying data, to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.
F. Internet or Other Electronic Network Activity Information	Browsing history, search history, and information regarding a consumer’s interaction with an internet website, application, or advertisement.
G. Geolocation Data	Data that identifies or estimates geographic location.
H. Audio, electronic, visual, thermal, olfactory, or similar information.	Audio, electronic, visual, thermal, olfactory, or similar information.
I. Professional or Employment-Related Information	Professional or employment-related information.
J. Education Information	Information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act.
K. Inferences	Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

CFPA collects the following categories of personal information about applicants and/or employees:

Categories	Examples of Specific Information That May Be Collected
A. Identifiers	Real name, alias, address, date of birth, email, account name, social security number, driver’s license or state identification number, passport number, Permanent Resident number

B. Personal Information, as defined by California Civil Code section 1798.80(e)	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, employment history, medical information, or health insurance information, and beneficiary and/or dependent information including name, address, date of birth and Social Security number.
C. Characteristics	N/A
D. Commercial Information	N/A
E. Biometric Information	N/A
F. Internet or Other Electronic Network Activity Information	N/A
G. Geolocation Data	N/A
H. Audio, electronic, visual, thermal, olfactory, or similar information.	N/A
I. Professional or Employment-Related Information	Professional or employment-related information
J. Education Information	N/A
K. Inferences	Inferences drawn from any of the information identified above to create a profile about an applicant's or employee's behavior, abilities, attitudes, and aptitude, depending on position held or applied for.

CFPA uses the above categories of personal information for the following business purpose(s):

- To make employment decisions and further the employee relationship
- To facilitate payroll, benefit, and leave of absence administration
- For security purposes
- For emergency contact purposes
- To obtain and/or maintain insurance policies and coverage
- To comply with state and federal laws and regulations
- To manage workers compensation claims and conduct workplace investigations

CFPA may disclose your personal information for the above identified business purposes. We may share your information with the following types of entities and third parties:

- **Service Providers:** CFPA may engage fulfillment companies, service providers, individuals, and agents. Such service providers perform services on our behalf. CFPA reserves the right to provide personal information to such companies to the extent it may be necessary for them to provide services to or on behalf of CFPA. Any such companies

must agree to maintain the confidentiality of any personal information we may provide to them and are contractually obligated not to disclose or use it for any other purpose. Such companies may also collect personal information directly from you in connection with providing their services, and they will have the right to provide that personal information to us. Such other companies may not use your private or personal information for purposes other than providing services through or on behalf of CFPA.

- **Law Enforcement or Other Lawful Authority:** We may from time to time be required to provide information to law enforcement or other governmental authorities pursuant to a warrant, court order, or other lawful process.

Over the last 12 months, we have shared the following types of personal information:

Category of Information	Examples of Information Shared or Disclosed	Categories of Recipients
Identifiers and Personal Information	Name, mailing address, email address, phone number, date of birth, and other identifiers.	Our service providers, and government entities (where required by law)
Sensitive Personal Information	Social Security number, driver’s license number, state identification card number, passport number	Our service providers, and government entities (where required by law)
Professional or Employment Information	Your professional and employment history details.	Our service providers, and government entities (where required by law)

CFPA will retain your Personal Information for as long as necessary to facilitate the business purposes described above, and as necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.

Contact Us

Additional information about our privacy practices and your consumer privacy rights can be found in the **CFPA** Privacy Policy, which is incorporated into this policy by reference. For more information or any questions about this notice or CFPA’s Privacy Statement, please contact CFP:

- By Email: Privacy@cfpnet.com
- By Phone: 800-339-4099
- By Mail: 725 S. Figueroa St., Ste. 3900, Los Angeles, CA 90017

- By Webform: <https://www.cfpnet.com/california-consumer-privacy-act/>