

Hunton Andrews Kurth LLP

HR Privacy Notice for California Residents

Effective Date: January 1, 2020

Hunton Andrews Kurth LLP and its affiliates (“Hunton AK”) respect your concerns about privacy. This HR Privacy Notice describes the types of personal information we collect about California residents who are (1) Hunton AK employees, owners, directors, officers, medical staff members and contractors (collectively, “Hunton AK Personnel”), (2) emergency contacts of Hunton AK Personnel, and (3) individuals related to Hunton AK Personnel for whom Hunton AK administers benefits (collectively with Hunton AK Personnel, “HR Covered Individuals”).

Hunton AK Personnel are responsible for providing this Privacy Notice to any HR Covered Individual whose personal information is provided to Hunton AK by Hunton AK Personnel. Certain terms used in this Notice have the meanings given to them in the California Consumer Privacy Act of 2018 and its implementing regulations (the “CCPA”).

Personal Information We Collect

Hunton AK may collect the following categories of personal information about HR Covered Individuals:

- **Identifiers:** identifiers, such as a real name, alias, postal address, unique personal identifier (e.g., a device identifier, employee number, unique pseudonym, or user alias/ID), telephone number, online identifier, internet protocol address, email address, account name, Social Security number, driver’s license number, passport number, date of birth, and other similar identifiers
- **Additional Data Subject to Cal. Civ. Code § 1798.80:** signature, physical characteristics or description, state identification card number, insurance policy number, education, bank account number, credit card number and debit card number, and other financial information, medical information, and health insurance information
- **Protected Classifications:** characteristics of protected classifications under California or federal law, such as race, color, national origin, religion, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, medical condition, ancestry, genetic information, disability, citizenship status, and military and veteran status
- **Commercial Information:** commercial information, including records of personal property, products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies
- **Online Activity:** Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with websites or applications
- **Sensory Information:** audio, electronic, visual, and similar information
- **Employment Information:** professional or employment-related information, such as compensation, benefits and payroll information (e.g., salary-related information, tax-related information, benefits elections and details regarding leaves of absence), information relating to your position (e.g., job title and job description), performance-related information (e.g., evaluations and training), talent

management information (e.g., resumé information, occupation details, education details, certifications and professional associations, historical compensation details, previous employment details, and pre-employment screening and background check information, including criminal records information), emergency contact information, and dependent information

- **Education Information:** education information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99)
- **Inferences:** inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

How We Use the Personal Information

We use personal information for the purpose of carrying out and supporting HR functions and activities, including the uses described below. In addition to general HR purposes, the Purpose column also lists relevant “business purposes” as they are described in the CCPA. The Categories of Personal Information column identifies the categories of personal information that are used for each purpose.

Purposes	Categories of Personal Information
Managing work activities and personnel generally, including recruiting; performing background checks; determining suitability for employment or promotion; determining physical and/or mental fitness for work; reviewing and evaluating performance; determining eligibility for and processing salary increases, bonuses, and other incentive-based compensation; providing references; managing attendance, absences, leaves of absences, and vacations; administering payroll services; reimbursing expenses; administering health, dental, and other benefits; training and development; making travel arrangements; securing immigration statuses; monitoring staff; creating staff directories; investigating suspected misconduct or non-performance of duties; managing disciplinary matters, grievances, and terminations; reviewing staffing decisions; and providing access to facilities	Identifiers; Additional Data Subject to Cal. Civ. Code § 1798.80; Protected Classifications; Commercial Information; Online Activity; Sensory Information; Employment Information; Education Information and Inferences
Ensuring business continuity; protecting the health and safety of our staff and others; safeguarding, monitoring, and maintaining our IT infrastructure, office equipment, facilities, and other property; detecting or preventing	Identifiers; Additional Data Subject to Cal. Civ. Code § 1798.80; Protected Classifications; Commercial Information; Online Activity; Sensory Information;

theft or fraud, or attempted theft or fraud; and facilitating communication with you and your designated contacts in an emergency	Employment Information; Education Information and Inferences
Operating and managing our IT, communications systems and facilities, and monitoring the use of these resources; performing data analytics; improving our services; allocating and managing company assets and human resources; strategic planning; project management; compiling audit trails and other reporting tools; maintaining records relating to business activities, budgeting, and financial management; managing mergers, acquisitions, sales, reorganizations or disposals and integration with business partners	Identifiers; Additional Data Subject to Cal. Civ. Code § 1798.80; Protected Classifications; Commercial Information; Online Activity; Sensory Information; Employment Information; Education Information and Inferences
Complying with legal requirements, such as tax, record-keeping and reporting obligations; conducting audits, management and resolution of health and safety matters; complying with requests from government or other public authorities; responding to legal process such as subpoenas and court orders; pursuing legal rights and remedies; defending litigation and managing internal complaints or claims; conducting investigations; and complying with internal policies and procedures	Identifiers; Additional Data Subject to Cal. Civ. Code § 1798.80; Protected Classifications; Commercial Information; Online Activity; Sensory Information; Employment Information; Education Information and Inferences
Performing services	Identifiers; Additional Data Subject to Cal. Civ. Code § 1798.80; Protected Classifications; Commercial Information; Online Activity; Sensory Information; Employment Information; Education Information and Inferences
Auditing related to a current interaction with you and concurrent transactions	Identifiers; Additional Data Subject to Cal. Civ. Code § 1798.80; Protected Classifications; Commercial Information; Online Activity; Sensory Information; Employment Information; Education Information and Inferences
Certain short-term, transient uses	Identifiers; Additional Data Subject to Cal. Civ. Code § 1798.80; Protected Classifications; Commercial Information; Online Activity; Sensory Information; Employment Information; Education Information and Inferences

<p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity</p>	<p>Identifiers; Additional Data Subject to Cal. Civ. Code § 1798.80; Protected Classifications; Commercial Information; Online Activity; Sensory Information; Employment Information; Education Information and Inferences</p>
<p>Debugging to identify and repair errors that impair existing intended functionality</p>	<p>Identifiers; Online Activity; Sensory Information; Employment Information and Inferences</p>
<p>Undertaking internal research for technological development and demonstration</p>	<p>Identifiers; Additional Data Subject to Cal. Civ. Code § 1798.80; Protected Classifications; Commercial Information; Online Activity; Sensory Information; Employment Information; Education Information and Inferences</p>
<p>Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us</p>	<p>Identifiers; Additional Data Subject to Cal. Civ. Code § 1798.80; Protected Classifications; Commercial Information; Online Activity; Sensory Information; Employment Information; Education Information and Inferences</p>

How To Contact Us

If you have any questions regarding this HR Privacy Notice for California Residents or our privacy practices, please contact us at dataprivacy@HuntonAK.com.