

California Consumer Privacy Act Disclosure to Stretto Employees and Applicants
Last Updated: January 11, 2023

The below disclosure only pertains to California employees and applicants:

Stretto, Inc. (“Stretto”) collects, receives, and maintains the following categories of personal information of current and former employees and applicants for the following business purposes:

Category of Personal Information Collected	How We Use Your Personal Information
<p>Identifiers such as name, alias, postal or mailing address, email address, telephone number, SSN, driver’s license or state identification card number, passport number, or other similar identifiers.</p>	<p>To comply with state and federal law and regulations requiring employers to maintain certain records (such as immigration compliance records, personnel files, wage and hour records, payroll records, and tax records); to effectively process payroll; to maintain commercial insurance policies and coverages including for workers’ compensation; to manage workers’ compensation claims; to administer and maintain group health insurance benefits, 401K and/or retirement plans; or to obtain and verify background checks on job applicants and employees.</p>
<p>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) such as 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, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p>	<p>To comply with state and federal law and regulations requiring employers to maintain certain records (such as immigration compliance records, personnel files, wage and hour records, payroll records, and tax records); to effectively process payroll; to maintain commercial insurance policies and coverages including for workers’ compensation; to manage workers’ compensation claims; to administer and maintain group health insurance benefits, 401K and/or retirement plans; or to obtain and verify background checks on job applicants and employees.</p>
<p>Protected classification characteristics under California or federal law such as age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	<p>To administer employee benefits (e.g., leaves of absences) or accommodations; to investigate and resolve employee complaints pertaining to the protected categories; or for EEO reporting.</p>

Category of Personal Information Collected	How We Use Your Personal Information
<p>Internet or other similar network activity such as browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.</p>	<p>For employment related matters only.</p>
<p>Geolocation data such as physical location or movements.</p>	<p>To provide you with the services you request.</p>
<p>Professional or employment-related information such as current or past job history or performance evaluations and log in credentials for company-owned applications.</p>	<p>For employment related matters only.</p>
<p>Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)) such as education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.</p>	<p>To evaluate your employment application or perform background checks.</p>
<p>Inferences drawn from other personal information such as a profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	<p>For employment related matters only.</p>
<p>Sensitive personal information such as a social security or driver's license number, precise geolocation, email or mail content, financial account information or genetic data.</p>	<p>To comply with state and federal law and regulations requiring employers to maintain certain records (such as immigration compliance records, personnel files, wage and hour records, payroll records, and tax records); to effectively process payroll; to maintain commercial insurance policies and coverages including for workers' compensation; to manage workers' compensation claims; to administer and maintain group health insurance benefits, 401K and/or retirement plans; or to obtain and verify background checks on job applicants and employees.</p>

Stretto does ***NOT*** collect any of the following personal information from current or former employees:

- (i) Commercial information**, such as records of personal property, products or services purchased, obtained or considered or other purchasing or consuming histories or tendencies;
- (ii) Biometric information**, such as genetic, physiological, behavioral and biological characteristics or activity patterns used to extract a template or other identifier or identifying information such as fingerprints, faceprints, gait, keystroke or other physical patterns; or
- (iii) Sensory data** such as audio, electronic visual, thermal, olfactory or similar information.

Disclosure of Personal Information to Third Parties

Stretto does not sell or otherwise disclose your personal information to any third parties for any monetary consideration. We may disclose your personal information to the following categories of recipients: (1) Stretto affiliates; (2) external service providers and vendors of employment-related services such as Anthem and ADP; (3) local governmental, regulatory, and supervisory authorities, and/or judicial agencies, as permitted or required under applicable law; (4) potential investors and their advisors, auditors and legal counsel in connection with a corporate restructuring, sale, merger, or other changes of control; and (5) to third parties in circumstances in which we are required to do so by law, regulation, or legal process.

Protection of Personal Information & Your Rights

As a California resident you have the following rights under the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA) in relation to personal information we have collected about you, to the extent required by the CCPA and CPRA and subject to verification:

Right to Know/Access: You have the right to request certain information about our collection and use of personal information about you as described below:

- The specific pieces of your personal information collected.
- The categories of your personal information collected.
- The categories of sources from whom your personal information is collected.
- The purpose for collecting your personal information.
- The categories of third parties with whom we have shared your personal information.

Right to Delete: You have the right to request that we delete certain personal information we have about you.

Right to Correct: You have the right to request that we correct inaccurate personal information regarding the information you provide us.

Right to Opt Out of Sale or Sharing: You have the right to direct us not to sell or share your personal information with third parties.

Right to Restrict the Use of Sensitive Personal Information: You have the right to limit our use or disclosure of your sensitive personal information.

Right of No Retaliation: You have the right to be free from unlawful discrimination or retaliation for exercising any of the rights above.

Making a Request

To make a request in relation to the above rights, please contact us using the contact information below. To fulfill your request, we will need to verify your identity. Only you or someone legally authorized to act on your behalf may make a request related to your personal information. To designate an authorized agent to act on your behalf, please submit your request by U.S. Mail as described below and include a signed authorization permitting a named agent to request information on your behalf.

Request by U. S. Mail, Email or FAX: Please fill out the [CCPA Request Form](#) completely. Sign and date the form. Send the form and a legible copy of a state-issued photo ID showing your current name and address to Stretto by Email to Legal@stretto.com OR by FAX to 1-866-307-1003 OR by U. S. Mail to STRETTO, ATTN: CCPA Request, 410 Exchange, Ste. 100, Irvine, CA 92602.

Updates and Questions

We may update this notice from time to time, in which case the revised notice will be posted to our web site or provided to you in writing, by email or mail. If you have any questions or concerns about this disclosure, please email Legal@stretto.com or call 1.866.218.1003 between the hours of 8:00 a.m. and 8:00 p.m. ET, Monday – Friday.