

CALIFORNIA JOB APPLICANT PRIVACY POLICY

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Sirius America Insurance Company, its affiliates and subsidiaries, ("Sirius America", "we", "us", or "our") respects your privacy. This California Job Applicant Privacy Policy ("**Privacy Policy**") applies to the personal information of California resident job applicants ("**Applicant(s)**", "**you**", and "**your**") that we collect on our [careers webpage](#) and other of our online Sirius job postings that link to this Privacy Policy, as well as to personal information collected during the job application process. This Privacy Policy describes what personal information we collect about you, how we collect it, and why we collect and process it, and it provides details about your privacy rights in relation to your personal information.

We may modify this Privacy Policy from time to time and will indicate any such modifications by changing the date at the top of this page. If we make any material changes, we will post a prominent notice on the site and/or send you an email notification.

Please take a moment to read this Privacy Policy carefully. If you do not agree with or are not comfortable with any part of this Privacy Policy, please immediately discontinue access or use of our careers websites. This Privacy Policy is not a contract and does not create any rights. If you have questions about this Privacy Policy or how your personal information is being processed, please contact us via email at Group.Privacy@siriuspt.com.

This Privacy Policy covers the following topics which can be accessed directly by clicking on the links below.

1. **PERSONAL INFORMATION WE COLLECT**
2. **WHY WE COLLECT YOUR PERSONAL INFORMATION**
3. **SHARING YOUR PERSONAL INFORMATION**
4. **YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION**
5. **SECURITY OF YOUR PERSONAL INFORMATION**
6. **DATA RETENTION**
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1. **PERSONAL INFORMATION WE COLLECT**

Personal information has the meaning as defined under the California Consumer Privacy Act, as amended by the California Privacy Rights Act and implementing regulations (together, the "California Privacy Laws"). Personal information is typically data that identifies a unique individual or relates to an identifiable individual. This includes information you provide to us, information which is collected about you automatically, and information we obtain from third parties.

We may collect certain personal information about you when you browse our Careers site, submit a job application to one of our open positions, or when we consider you for employment. Listed below are the categories of personal information that Sirius may process about Applicants:

- **Identifiers**, such as your first and last name, alias, postal address, email address, phone number, date of birth, signature or other similar identifiers.

- **Characteristics of protected classifications under California or federal law**, such as age, race, color, national origin, citizenship, religion, 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 to the extent voluntarily disclosed by Applicants.
- **Internet or other electronic network activity information**, such as your search history, browsing history, web request, IP address, browser type, or pages viewed on our websites and services.
- **Audio and Visual information**, such as photographs and videos that may be voluntarily disclosed by you in your application, or audio and visual information collected during the interview process.
- **Professional or employment-related information**, including education history, work history, degree earned, certifications, and any other information provided in your CV, resume, and transcripts; your right to work documentation; references; any information provided during your interview or application; or background check information when permitted by applicable law, such as the results of the background check in connection with your employment with us like your criminal records and credit history.
- **Sensitive personal information**, such as such as your social security number and other government-issued IDs, financial account and log in information, precise geolocation, information about ethnic/citizenship/racial origin/sexual orientation, philosophical beliefs, or union membership, email and messages contents, and biometric Information. We collect this information to determine your eligibility to work and fulfill our obligations to relevant government authorities, to pay you or provide other benefits and process any expense claims, and for security and fraud prevention purposes, as permitted by the law. We will use this to conduct equal opportunity and diversity monitoring when permitted or required by law.

We collect much of the personal information described above directly from you through application forms, resumes, or CVs you submit to us, as well as official documentation you provide to us. We also collect certain information from third parties, such as employment agencies (such as recruiters and headhunters) and former employers when gathering references, and service providers that collect it on our behalf, such as job posting board provider. Additionally, we may collect personal information about you through background check and credit reference agencies when permitted or required by law. Finally, we may gather information from your public social media profile to complement the personal information you have provided.

2. COOKIES AND OTHER TRACKING TECHNOLOGIES

We, and third parties on our behalf, use cookies and similar tracking technologies (collectively, “**Tracking Technologies**”) to collect personal information automatically as you interact with our careers websites, to help us customize your experience and better manage content on our careers websites, including to:

- Analyze our web traffic using an analytics package
- Identify whether you already visited our careers websites
- Store information about your preferences (e.g., cookie consent)
- To recognize when you return to our careers websites

Cookies. When you visit our careers websites, we (or third-party data or ad networks we work with) may send one or more “cookies” to your computer or other devices. Cookies are alphanumeric identifiers stored on your computer through your web browser and are used by most websites to help personalize your web experience. Some cookies may facilitate additional site features for enhanced performance and functionality such as remembering preferences, analyzing usage for site optimization, allowing third parties to provide social sharing tools, and serving images or videos from third-party websites. Some features on our careers websites will not function if you do not allow cookies.

Managing Cookies. You have the right to decide whether to accept cookies. If you do not want us to deploy cookies in your browser, you may exercise your preference by modifying your web browser setting to either (1) refuse some or all cookies or (2) notify you and ask for your permission when a website tries to set a cookie. If you want to learn

the correct way to modify your browser settings, please use the “Help,” “Tools” or “Edit” menu in your browser or review the instructions provided by your browser. If you choose to disable cookies in your browser, you can still use our careers websites, although your ability to use some of the features may be affected. If you want to exercise your rights regarding personal information collected via cookies and similar tracking technologies, please see “[Your Privacy Rights](#)” section below.

Analytics. We may use third-party service providers to monitor and analyze the use of our career website, such as Google Analytics. Google Analytics is a web analytics service offered by Google LLC (“Google”) that tracks and reports website traffic. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics, available at: <https://tools.google.com/dlpage/gaoptout>.

Interest-Based Advertising. Many advertising companies that collect information for interest-based advertising are members of the Digital Advertising Alliance (DAA) or the Network Advertising Initiative (NAI), both of which maintain platforms where people can opt out of interest-based advertising from their members. To opt out of website interest-based advertising provided by each organization’s respective participating companies, visit the DAA’s opt-out portal available at <http://optout.aboutads.info/>, or visit the NAI’s opt-out portal available at <http://optout.networkadvertising.org/?c=1>.

Do Not Track. Because uniform standards for “Do Not Track” signals have not been adopted, we do not currently process or respond to “DNT” signals.

3. WHY WE COLLECT YOUR PERSONAL INFORMATION

We collect the categories of personal information listed above for human resources, employment, benefit administration, health and safety, and business-related purposes and to comply with applicable laws and regulations. We use your information to:

- evaluate you in connection with your selected job opening and/or for available positions;
- evaluate and verify your experience and qualifications in relation to specific job requirements;
- contact you regarding your application and possible employment opportunities;
- conduct lawful background screening;
- make decisions about whom to offer employment to;
- make decisions about salary and other benefits;
- carry out our human resources functions and activities;
- measure activities and main functionality of our careers websites
- to comply with our legal obligations, including:
 - carrying out checks in relation to your right to work;
 - equal opportunities monitoring;
 - determining reasonable adjustments
 - make reasonable adjustments for disabled employees;
 - to allow us to carry out our legitimate business interests, such as business planning and restructuring exercises, except where such interests are overridden by your interests in not having your personal information processed;

- to make improvements to our employment practices including improving diversity; and
- to protect your interests.

4. SHARING YOUR PERSONAL INFORMATION

We take care to allow your personal information to be accessed only by those who require access to perform their tasks and duties, and to share it only with third parties who have a legitimate purpose for accessing it. We will only share your information in the following circumstances:

- **With Sirius Associates.** Your personal information will be shared with other Sirius associates where it is necessary for them to undertake their duties with respect to your potential employment, such as to interview you.
- **With Service Providers.** We may share your personal information with our contractors, vendors, and service providers that assist us with administering the employment or working relationship with you and/or provide services to us or on our behalf. For example, service providers may include, but are not limited to, job posting board providers, recruitment agencies, data storage or hosting providers, marketing/events agencies, and credit and criminal background check companies (when this is our legal obligation or necessary for our legitimate interest).
- **With Other Third Parties.** We may share certain personal information with third parties who provide professional services (such as attorneys, auditors, accountants, and management consultants, and medical service providers), professional bodies, and regulatory authorities in the normal course of business.
- **Legal or Regulatory Requests and Investigations.** We may disclose your personal information to third parties under the following circumstances (i) to comply with relevant laws or regulations, to respond to a court order, administrative or judicial process, such as a subpoena, warrant, court order, or government audit; (ii) in response to lawful requests by public authorities (such as national security or law enforcement); and (iii) as necessary to establish, exercise or defend against potential, threatened or actual litigation (such as adverse parties in litigation). We may also need to share your personal information with tax authorities, courts, regulators, the police, and other governmental authorities where we are required or permitted to do so by law in jurisdictions in which we operate.
- **Business Transactions.** We may share your personal information with a potential buyer (and its agents and advisors) in connection with any proposed merger, acquisition, or any form of sale or transfer of some or all our assets (including in the event of a reorganization, dissolution or liquidation), in which case, personal information held by us about you will be among the assets transferred to the buyer or acquirer. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this Privacy Policy.
- **Protection of the Company or Others.** We may share your personal information where necessary to protect Sirius and its affiliates, including to investigate, prevent, or take actions regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies.
- **Disclosures with Your Consent.** We may collect, use and disclose your personal information for other purposes not listed in this privacy notice. If we do so, we will make it known to you at the time we collect, use or disclose your personal data, and, where required, obtain your consent for doing so.

5. YOUR PRIVACY RIGHTS

As a California resident, subject to certain exceptions, you may be able to assert certain rights related to your personal information as identified below. Please note that your rights with regard to your personal information are not absolute. We may deny your request: (a) when denial of the request is required or authorized by law; (b) when granting the request would have a negative impact on another's privacy; (c) to protect our rights and properties; (d) where the request is frivolous or vexatious, or for other reasons.

- **Right to Know.** You may have the right to obtain a copy, or a list of categories of the personal information that we hold about you, as well as other supplementary information, such as the purposes of processing, and the entities to whom we disclose your personal information.
- **Right to Correct.** In the event you are not able to do so yourself, such as through an application portal, you may request us to rectify, correct or update any of your personal information held by us that is inaccurate.
- **Right to Delete.** Under certain circumstances, you may have the right to request that we delete the personal information that we hold about you. This right is not absolute, and we may refuse your right to delete if it is reasonably necessary for us to provide a service requested by you; to perform a contract between us; to maintain functionality and ensure security of our systems; to enable solely expected internal uses of your personal information; to exercise a right provided by law; or to comply with a legal obligation.
- **Right to Portability.** Under certain circumstances, you may have the right to receive personal information we hold about you in a structured, commonly used, and machine-readable format so that you can provide that personal information to another entity.
- **Right to Opt Out of Sale or Sharing of Personal Information for Behavioral Advertising.** You have the right to opt-out of the sale or sharing of your personal information. We do not sell your personal information for profit, but like many websites, we use cookies, pixels, and similar technology, and we share personal information, such as your IP address or device identifiers, to certain third-party advertisers in order to improve your user experience and to optimize our recruitment activities. To the extent these are deemed to be a sale under the broad definition of “sell” contained under California Privacy Laws, to exercise your right to opt-out, please submit a request by clicking on the “Your Privacy Rights” link within the website footer.
- **Right to Limit Use of Sensitive Information.** To the extent your sensitive personal information (as that term is defined under California Privacy Laws) is used to infer characteristics about you, you have the right to direct us to stop such processing of your sensitive personal information for such purposes. We do not process any sensitive personal information to infer characteristics about Applicants.
- **Right to Object to Automated Decision-Making.** You may have the right not to be subject to a decision that is based solely on automated processing (where a decision is taken about you using an electronic system without human involvement) which significantly impacts your rights. No decision will be made by us about you solely on the basis of automated decision making which has a significant impact on you.
- **Right Against Discrimination.** You have the right not to be discriminated against for exercising any of the rights described in this section. We will not discriminate against you for exercising your privacy rights.

Exercising Your Rights

You may exercise your rights by contacting us at Group.Privacy@siriuspt.com or via another method identified in the “How to Contact Us” section below. In your request, please make clear which right you would like to exercise, and that you are a job applicant. Before fulfilling your request, we are required by law to have you to verify the personal information we already have on file to confirm your identity. If we cannot verify your identity based on the

information we have on file, we may request additional information from you, which we will only use to verify your identity, and for security or fraud-prevention purposes.

If you use an authorized agent to submit requests on your behalf, we will require you to directly verify your identity with us, or have you confirm that the authorized agent has been authorized to act on your behalf.

6. SECURITY OF YOUR PERSONAL INFORMATION

We understand the importance of your personal information. We maintain (and contractually require third parties we share your information with to maintain) appropriate physical, technical and administrative safeguards to protect the security and confidentiality of the personal information you entrust to us. These safeguards are designed to protect your personal information from loss and unauthorized access, copying, use, modification or disclosure.

However, we cannot guarantee that loss, misuse, unauthorized acquisition, or alteration of your data will not occur. Furthermore, we cannot ensure or warrant the security or confidentiality of information you transmit to us or receive from us by Internet or wireless connection, including email, phone, or SMS, since we have no way of protecting that information once it leaves and until it reaches us. If you have reason to believe that your data is no longer secure, please contact us using the contact information provided in the “How to Contact Us” section.

7. DATA RETENTION

Except as otherwise permitted or required by applicable law or regulation, we endeavor to retain your personal information only for as long as necessary to fulfil the purposes for which it was collected, as required by law or to satisfy any legal or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for personal information, we consider applicable legal requirements, the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, and the purposes for which we process your personal information.

8. HOW TO CONTACT US

If you have questions or concerns regarding this Privacy Policy, please contact us at Group.Privacy@siriuspt.com. Because email communications are not always secure, please do not include sensitive or private information in your communications to us.