



Kelly Benefits

kellybenefits.com California Consumer Privacy Notice

Effective Date: January 1, 2020

Last Updated: October 24, 2022

SCOPE

Kelly Benefits is required under California law to provide specific disclosures to residents of those states about how we treat personal information that we collect, including through our website(s) and online platforms where this Policy is posted. **This Privacy Notice (the “Notice”) is intended to supplement the disclosures we make in our Privacy Policy, and several sections of the Notice refer back to our Privacy Policy.**

CALIFORNIA CONSUMER PRIVACY ACT (CCPA)

The California Consumer Privacy Act of 2018 (“CCPA”) is defined by the California law as information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with California consumers or households. Additionally, the CCPA requires Kelly Benefits to make specific disclosures about how we collect, use and share the personal information of California residents who are subject to the CCPA. The CCPA also grants such California residents certain rights related to their personal information. **This section describes our personal information practices and contains these required disclosures and instructions for California residents who wish to exercise their rights under CCPA.**

Please note that, to the extent permitted under CCPA, this California Privacy Notice does not apply to the personal information of California residents that we collect:

- From our workforce members or prospects for employment-related purposes; or
- In the course of certain business-to-business transactions.

We are required under CCPA to tell you which categories of “personal information” we collect, and which of these categories we disclose for business purposes as this term is defined under the CCPA.

California Privacy Notice

Under the California Civil Code Section 1798.83-1798.84, California residents are entitled to ask companies with whom they have an established business relationship to provide certain information about the companies’ sharing of Personal Information with third parties for direct

marketing purposes. Pursuant to the CCPA, Kelly Benefits, and any affiliate of Kelly Benefits are providing the following Privacy Statement to explain how Kelly Benefits uses and discloses personal information that we collect from individuals who are residents of California, including but not limited to, users who visit our websites or consumers who receive services directly from Kelly Benefits or a Kelly Benefits affiliate. This Privacy Statement does not apply to personal information pertaining to Kelly Benefits business contacts or employee of Kelly Benefits. The CCPA defines Personal Information, also known as Personal Data, as categories of ¹information that identify, relate to, describe or are reasonably capable of being associated with, or could reasonably be linked, directly or indirectly to a particular individual or household.

Categories of Personal Data Collected & Disclosed

Under the CCPA, California residents have the right to request the Personal Data that may be collected and disclose the following categories of Personal Data:

1. Identifiers, such as name, contact information, online identifiers and Social Security numbers and other government-issued ID numbers;
2. Personal information, as defined in the California consumer records law, such as name, contact information, insurance policy number, education, employment, employment history financial information, medical information and health information¹;
3. Characteristics of protected classifications under California and federal law², such as sex, age, race, religion, national origin, disability, medical conditions and information, citizenship, immigration status or marital status;
4. The business or commercial purpose for collecting or selling personal information;
5. Commercial Information, such as transaction information, purchase history and financial details;
6. Biometric information, such as facial recognition and fingerprints;
7. Internet or network activity information, such as browsing history and interactions with our website, applications or systems;
8. Professional or employment-related information and data necessary for benefits and related administrative services;
9. Educational information subject to the federal Family Educational Rights and Privacy Act;
10. Inferences drawn from any of the Personal Information listed above to create a profile or summary above, for example, an individual's preferences, abilities, aptitudes and characteristics;
11. The categories of third parties with whom the business shares personal information; and
12. The specific pieces of personal information it has collected about that consumer.

Purposes For the Collection of Personal Data

Kelly Benefits uses your Personal Data for the following purposes:

¹ This includes 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.

² This includes sex (including pregnancy, childbirth, and related medical conditions), age (40 and over), race, color, religion or creed, ancestry, national origin, disability, medical conditions, genetic information, AIDS/HIV status, marital status, sexual orientation, gender identity and expression, citizenship, primary language, immigration status, military/veteran status, political affiliation/activities, domestic violence victim status, and request for leave.

- (a) Business purposes for Processing Personal Data. Pertaining to Kelly Benefits clients and business partners. Personal Data pertaining to clients with whom Kelly Benefits has a business relationship may be processed as needed:
- i. To provide information, product, or service requested by the individual, and as would be reasonably expected by the individual given the context in which the Personal Data was collected, and the information provided in the applicable privacy statement given (such as for personalization, remembering preferences, or respecting individual rights);
 - ii. For due diligence, including verifying the identity of the individual, as well as the eligibility of the individual to receive information, products, or services (such as verifying age, employment, or account status);
 - iii. To send transactional communications (such as requests information, responses to requests for information, and updates);
 - iv. To manage the individual's account, such as for customer service, finance and dispute resolution purposes;
 - v. For risk management and mitigation, including for audit and insurance functions, and as needed to license and protect intellectual property and other assets;
 - vi. For security management, including monitoring individuals with access to the website, applications, systems or facilities, investigation of threats, and as needed for any data security breach notification; and
 - vii. To anonymize or de-identify the Personal Data.
- (b) Business-necessary processing activities. Kelly Benefits may process data as needed (i) to protect the privacy and security of the Personal Data it maintains, such as in connection with advanced security initiatives and threat detection; (ii) for treasury operations and money movement activities; (iii) for compliance functions, (iv) for business structuring and activities, (v) for business activities, management reporting and analysis.
- (c) Development and improvement of products and/or services. Kelly Benefits may process Personal Data to develop and improve its services, and for research, development, analytics, and business intelligence.
- (d) Secondary Purposes. Additionally, Kelly Benefits uses your Personal Data for secondary purposes such as: (i) internal audits and investigations, (ii) implementation or verification of business controls, (iii) statistical research, (iv) dispute resolution, (v) legal or business counseling, (vi) compliance with laws and company policies, and/or (vii) insurance purposes.

Sources of Personal Data

Kelly Benefits collects this Personal Data actively (i.e. direct input from individual) or passively

(i.e. website cookies) from you. Additionally, we may also collect Personal Data from our clients, business partners and/or vendors, where applicable.

Disclosure of Personal Data

Kelly Benefits discloses Personal Data for the following reasons:

Service Providers/Business Partners. Kelly Benefits may share your Personal Data with our clients and business partners for certain business purposes. This information is provided in order for them to provide Kelly Benefits with services such as for the purpose of auditing and fraud investigations. These clients and business partners have access to your Personal Data only for the purpose of performing services on our behalf and are expressly obligated not to disclose or use your Personal Data for any other purpose.

Related Entities. Kelly Benefits may share Personal Data between and among Kelly Benefits, its subsidiaries, and affiliated companies for purpose of management and analysis, and other business purposes.

When Required by Law. Kelly Benefits may be required to disclose your Personal Data to third-parties including law enforcement agencies when required to protect and defend our legal rights, protect the safety and security of users of our Services, prevent fraud, respond to legal process, or a request for cooperation by a government entity, as required by law.

Corporate Transactions. In the event of sale, transfer, merger, reorganization, or similar event at Kelly Benefits may transfer your Personal Data to one or more third parties as part of that transaction with the business entities or people involved in the deal negotiation or transfer.

With Your Consent. Kelly Benefits may share Personal Data about you with other third-party companies if you give us permission or direct us to share the information. Kelly Benefits will share Personal Data with authorized agents that you authorize Kelly Benefits to communicate to.

California Consumer Rights

If you are a California resident and are engaged in a business relationship directly with Kelly Benefits as a consumer, client, or business partner for the provision of Kelly Benefits services, you may request the following information:

- (1) Right to Access. This means that you can request that we disclose the categories of personal information we collected about you. The categories of sources from which such personal information is collected; the categories of personal information we have “sold” or disclosed for a business purpose; the categories of third-parties to whom the personal information was disclosed. You may request that we disclose to you the categories of, and specific pieces of Personal Data that we collected about you for the twelve (12) month period preceding your request, including:
 - a. The Categories of Personal Data we collected about you;
 - b. The Categories of sources from which we collected such Personal Data;
 - c. The purpose for collecting Personal Data about you; and
 - d. The Categories of third-parties with access to your Personal Data, if any.

The right to access will also include specific pieces of Personal Data we collected about you. Personal Data that includes social security number or other government-issued identification number, financial account number, and health insurance or medical identification number, an account password, or security question and answers, or unique biometric data generated from measures or technical analysis of human characteristics will not be provided, to protect the security of this type of data.

- (2) *Right to Request Deletion of your Personal Data.* This means that you can request that we delete personal information about you which we have collected from you. You may request that we delete Personal Data that we have collected or maintain about you, subject to certain exceptions under the CCPA (i.e. if we are required by law to retain the information).
- (3) *Right to Opt-Out of Sale of Personal Data.* We do not sell nor share Personal Data to third-parties for purposes without consent. Kelly Benefits does not knowingly sell personal data of minors under 16 years of age.
- (4) *Right to Non-Discrimination.* We will not discriminate against any consumer who has chosen to exercise their rights under the CCPA (i.e. deny you services or provide you a different level of service).

How to Submit a California Rights Request

If this privacy statement applies to you, you may make a request for the disclosures described above or make a request to delete Personal Data we may collect. If you are a California resident and would like to make such a request, please submit your request in writing via U.S. Mail to: Kelly & Associates Insurance Group, Inc., Attn: Privacy Officer, 1 Kelly Way, Sparks, Maryland 21152; or via email to privacyofficer@kellybenefits.com.

Upon receipt of your request we will provide directions on identifying verification requirements which may include your name, email address and/or information Kelly Benefits maintains on you, where appropriate. Your request will not be processed until your identity has been verified. Once your identity has been confirmed, your request will be processed in accordance with the CCPA.

Authorized Agents Submitting a Rights Request on Behalf of a Client or Business Partner

You may choose to designate an authorized agent to make a request under the CCPA on your behalf. No information will be disclosed until the authorized agent's authority has been reviewed and verified. Once a request has been submitted by an authorized agent, we may require additional information (i.e. written authorization from a Kelly Benefits client or business partner) to confirm the authorized agent's authority.

Additional Information About California Rights

If you reside in California, you also have the right to ask us one time each year if we have shared personal information with third parties for their purposes. California residents who wish to exercise their rights under this section can email us at privacyofficer@kellybenefits.com. Please indicate you are a California resident making a "Shine the Light" request, and include your name, telephone number and the email address you used to access our site.

Changes to this CCPA Notice

We may change or update this CCPA Notice from time to time. When we do, we will post the revised CCPA Notice on our website with a new “Last Updated” date.

HOW TO CONTACT US

Please contact us for more information or if you have questions or comments about our privacy practices at privacyofficer@kellybenefits.com. You may also reach us by mail at the address below. If you send us a letter, please provide your name, address, email address, and detailed information about your question, comment, or complaint.

Kelly Benefits can be contacted regarding the Site by mail at:

Kelly & Associates Insurance Group, Inc.
Attn: Privacy Officer
1 Kelly Way
Sparks, Maryland 21152

Additionally, you may contact us by telephone at 410-527-3400, or by email at privacyofficer@kellybenefits.com. Please do NOT include any sensitive information in your email to us (this would include your social security number, financial information, or personal conditions).