

# January 1, 2024

## California Notice at Collection for Prospective Employees

This Privacy Notice applies to prospective employees of Old Republic residing in the State of California. This Privacy Notice uses the definitions for the same terms as such terms are defined in the California Consumer Privacy Act (“CCPA”), which are incorporated herein by this reference.

### What Personal Information We Collect

In accordance with the CCPA, Personal Information is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

However, Personal Information does **not** include information outside the scope of the CCPA such as:

- Health or medical information covered by the Health Insurance Portability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA).
- Personal Information covered by the Gramm-Leach-Bliley Act (GLBA), the Fair Credit Reporting Act (FCRA), the California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994,
- Publicly available information that is available from federal, state, or local government records, and
- De-identified or aggregated consumer information.

The chart below identifies various categories of Personal Information that the Company may have collected about California prospective employees in the last twelve months from the date of this notice. The Company does not sell or share Personal Information that it collects from its prospective employees.

Category	Examples	Business Purpose for Collection
Identifiers	Real name, alias, postal address, unique personal identifier, online identifier, Internet protocol address, email address, account name, driver’s license number, passport number or other similar identifiers  Social security number is collected.	The administration of employment affairs at Old Republic requires collection of Personal Information for various purposes including but not limited to: (1) comply with state & federal employment & record retention laws, (2) effectively process & administer payroll & employee benefit plans, including leaves of absence, group health insurance, retirement, etc. (3) manage & evaluate staffing, including job performance of individual employees.
Personal information described in California Customer Records statute (Cal.	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	The administration of employment affairs at Old Republic requires collection of Personal Information for various purposes including but not limited to: (1) comply with state & federal employment & record retention laws, (2) effectively process & administer payroll &

Civ. Code § 1798.80(e))	card number, or any other financial information, medical information, or health insurance information. "Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.  Health information, citizenship and immigration status is collected.	employee benefit plans, including leaves of absence, group health insurance, retirement, etc. (3) manage & evaluate staffing, including job performance of individual employees.
Characteristics of protected classifications under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religions 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, or genetic information (including familial genetic information).  Citizenship is collected	The administration of employment affairs at Old Republic requires collection of Personal Information for various purposes including but not limited to: (1) comply with state & federal employment & record retention laws, (2) effectively process & administer payroll & employee benefit plans, including leaves of absence, group health insurance, retirement, etc. (3) manage & evaluate staffing, including job performance of individual employees.
Internet or other electronic network activity	Browsing history, search history, device identifier, information about an employee's interaction with a website, application, or advertisement.	The administration of employment affairs at Old Republic requires collection of Personal Information for various purposes including but not limited to: (1) comply with state & federal employment & record retention laws, (2) effectively process & administer payroll & employee benefit plans, including leaves of absence, group health insurance, retirement, etc. (3) manage & evaluate staffing, including job performance of individual employees. (4) comply with IT data security protocols related to systems integrity, cybercrime, hacks, & internet fraud.
Professional or employment related information	Current or past employment history, performance evaluations, disciplinary records, investigations, awards, earnings, compensation and payroll records, benefit records, employment application, resume, background checks, contracts and agreements or termination records, leave documentation, medical records or workers compensation records. Time off records, benefit elections, benefit contributions, professional certifications.	The administration of employment affairs at Old Republic requires collection of Personal Information for various purposes including but not limited to: (1) comply with state & federal employment & record retention laws, (2) effectively process & administer payroll & employee benefit plans, including leaves of absence, group health insurance, retirement, etc. (3) manage & evaluate staffing, including job performance of individual employees.

# Your Rights and Choices

The CCPA provides California employees with certain rights regarding their personal information. This chart describes those rights and certain limitations to those rights.

Right	What This Means
Notice	At or before the time of your employment, personal information is collected, you will be given or be able to access information regarding the categories of personal information to be collected and the purposes for which the categories of personal information will be used and whether that information will be sold or shared.
Access	At your verifiable request, but no more than twice in a twelve month period, we shall disclose to you: 1) the categories of personal information we have collected about you, 2) the categories of sources for the personal information we collected about you, 3) our business or commercial purpose for collecting, selling or sharing your personal information, 4) the categories of third parties to whom we disclose your personal information, 5) the specific pieces of information we have collected about you, 6) the categories of personal information disclosed about you for a business purpose and the categories of persons to whom your personal information was disclosed for a business purpose, and 7) if we sold or shared personal information, the categories of personal information sold and the categories of third parties to whom it was sold or shared.
Deletion	<p>You have the right to request that we delete any of your personal information that we collected from you, subject to certain exceptions. Once we receive and verify your request, we will delete (and direct our service providers and contractors to delete) your personal information from our records unless an exception applies. We may deny your request if retention of the information is necessary for us or our service providers or contractors to:</p> <ul style="list-style-type: none"><li data-bbox="431 1394 1308 1507">• Provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.</li><li data-bbox="431 1545 1273 1656">• Help to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate to that purpose.</li><li data-bbox="431 1694 1243 1766">• Debug to identify and repair errors that impair existing intended functionality.</li><li data-bbox="431 1803 1312 1875">• Exercise free speech, ensure the right of another to exercise their free speech rights, or exercise another right provided for by law.</li></ul>

	<ul style="list-style-type: none"> <li>• Comply with the California Electronic Communications Privacy Act (Cal. Penal Code §1546 et seq.)</li> <li>• Engage in public or peer reviewed scientific, historical, or statistical research that conforms or adheres to all other applicable ethics and privacy laws, when the information’s deletion is likely to render impossible or seriously impair the research’s completion, if you previously provided informed consent.</li> <li>• Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us and compatible with the context in which you provided the information.</li> <li>• Comply with a legal obligation.</li> <li>• Or if it is the type of personal information that falls outside the scope of the CCPA, (HIPAA, CIMA, GLBA, or publicly available information).</li> </ul>
Correct	<p>You have the right to request that we correct inaccurate personal information about you, taking into account the nature of the personal information and the purposes of the processing of the personal information. After we receive and verify your request, we will use commercially reasonable efforts to correct the inaccurate personal information as directed by you.</p>
<p>Opt-Out of Sale or Sharing</p> <p>Opt-In to Sale or Sharing</p>	<p>With some limitations, you may direct a business that sells or shares personal information to third parties not to sell or share the personal information to these third parties.</p> <p>A business may not sell or share the personal information of persons less than sixteen years of age without their affirmative consent, and in the case of those less than thirteen years of age, the consent must come from a parent.</p>
Limit Use of Sensitive Personal Information	<p>You may direct a business to limit the use of your sensitive personal information to that use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those good or services and certain other limited uses as described in the CCPA and applicable regulations.</p>
Non-Discrimination	<p>We will not discriminate against you for exercising your rights under the CCPA. Unless otherwise permitted by the CCPA we will not:</p> <ul style="list-style-type: none"> <li>• Deny you goods or service.</li> <li>• Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.</li> <li>• Provide a different level or quality of goods or services.</li> <li>• Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.</li> </ul>

## **Our Retention of Your Personal Information**

The length of time that we retain personal information largely depends upon the purpose for which the information was collected rather than the category of the information as set forth in this Notice. Personal information collected with respect to prospective employees is generally retained for periods of time that permit the company to meet its employment and benefits obligations, as well as legal and regulatory obligations.

## **To Exercise Your Rights**

### **To Opt-out of the Sale or Sharing of Your Personal Information**

The CCPA gives prospective employees the right to direct a business that sells personal information about the prospective employee to third parties not to sell the prospective employee's personal information. We do not sell and will not sell your personal information as that term is commonly understood. We also do not sell and will not sell your personal information, as that term is defined by the CCPA.

### **To Request Access to, Correction or Deletion of Your Personal Information**

To exercise your access, correction or deletion rights described above, please submit a verifiable prospective employee request to us by either: Calling us at 1-855-557-8437 or contacting us through our website <https://ccpa.oldrepublictitle.com>.

Only you or your representative that you authorize to act on your behalf (Authorized Agent) can make a verifiable prospective employee request for your personal information. The verifiable request must provide enough information that allows us to reasonably verify you are the person about whom we collected personal information. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and to confirm the personal information relates to you.

We work to respond to a verifiable prospective employee request within 45 days of its receipt. If we require additional time, we will inform you of the extension period (up to an additional 45 days), and the reason for the extension in writing. We will deliver our response by mail or electronically, depending on your preference. The response we provide will also explain any reasons why we cannot comply with a request.

You may only make a prospective employee request for access twice within a twelve-month period.

Any disclosures we provide will apply to the twelve-month period preceding the prospective employee request's receipt.

## Contact Us

If you have any questions regarding our California Notice at Collection for Prospective Employees or practices, please contact us or send your written request to:

[CCPA@oldrepublictitle.com](mailto:CCPA@oldrepublictitle.com) , 1-855-557-8437, or 3000 Bayport Drive, Suite 1000 Tampa FL 33707