

JOB APPLICANT PRIVACY AND SECURITY POLICY – FOR APPLICANTS IN THE U.S.

EFFECTIVE MAY 1, 2024

HCC Insurance Holdings, Inc. and its subsidiaries (under the trading name of Tokio Marine HCC) (“TMHCC” or the “Company”) are committed to protecting the privacy and security of personal information of all individuals. This Privacy and Security Policy (“Policy”) applies to individuals who apply to work for the Company, including any current employees who may apply for new positions with the Company (“Applicant”). This Policy describes the personal information we collect and how we use it when you apply for a job with us.

Please note that if you apply for a job outside of the country in which you reside, your personal information will be collected and processed in accordance with applicable laws. The Company complies with all data privacy and laws in the jurisdictions in which it recruits and hires employees, including the California Privacy Rights Act.

This Policy does not address your interactions with TMHCC outside the context of applying for employment with the Company such as browsing TMHCC’s website or checking out TMHCC’s insurance products or services online as a prospective or actual customer. For information on how we collect and use information related to those types of interactions, please see our [Online Privacy Policy](#).

What personal information do we collect?

Subject to applicable law, we collect only the personal information that is reasonably necessary and proportionate to achieve our recruiting and hiring business purposes for Applicants. We may collect the following information:

- **Identification data** such as your name, gender, photograph, date of birth
- **Contact details** such as home and business address, telephone/email addresses, emergency contact details
- **Employment details** such as job title/position, office location, employment contract, performance and disciplinary records, grievance procedures, professional memberships
- **Background information** such as academic/professional qualifications, education, CV/résumé, criminal records or credit check data (where permissible and in accordance with applicable law)
- **Government or national identifiers** such as government issued ID/passport, immigration/visa status, social security or national insurance numbers
- **Information on your spouse/partner and/or dependents** such as your marital status, identification and contact data about them and information relevant to any benefits extended to such people
- **Financial information** such as bank details, tax information, withholdings, salary, benefits, expenses, company allowances, stock and equity grants
- **Profession or employment-related information** such as references, pre-employment test results, including psychometric or personality tests, post-offer medical information, including drug results, immigration and work eligibility

- **IT information** such as information required to provide access to company IT systems and networks (and information collected by / through those systems) such as IP addresses, log files and login information

We may also process Sensitive Personal Information relating to you (and your spouse/partner and/or dependents). Sensitive Personal Information includes any information that reveals your racial or ethnic origin, religious, political or philosophical beliefs, sexual orientation, trade union membership, criminal convictions, genetic data, biometric data for the purposes of unique identification, and information about your health. In the United States, Sensitive Personal Information also includes government identifiers (including social security, driver's license, state identification card, or passport number), citizenship or immigration status, and precise geolocation data. As a general rule, we try not to collect or process any Sensitive Personal Information about you, unless authorized by law or where necessary to comply with applicable laws or to provide benefits. We do not sell Sensitive Personal Information collected under this Policy.

How is personal information collected?

We collect personal information about Applicants from a variety of sources, which may include:

- Directly from you
- Any information you authorize us to collect from third parties such as background or credit check agencies (subject to applicable law)
- Previous and current employers or references
- Service providers such as recruiters or hiring agencies
- Online, publicly available sources including social network and recruiting sites such as LinkedIn. For avoidance of doubt, TMHCC will at no time ask or request to gain access to your social media account.

How is personal information used?

We use your personal information for a limited number of business purposes, which may include any of the following, subject to applicable law:

- Processing and review of your job application, including any cover letter, resume, and/or references
- Determining your eligibility for employment and assessing your skills, qualifications, and interests in a particular position
- Contacting you if we need more information, including scheduling or conducting an interview
- Verifying your information and carrying out employment, background, credit, and reference checks, subject to applicable law
- Assessing and determining an appropriate compensation package
- Maintaining records related to our hiring processes and monitoring for diversity and equal opportunities
- Complying with legal, compliance, and regulatory requirements such as compliance with any applicable non-discrimination laws

- Protecting the interests of TMHCC, other job applicants, our employees, or the public
- Detecting and protecting against security incidents or violations of TMHCC’s policies or the law

In certain cases, we may process your personal information with the assistance of automated employment decisionmaking tools. When such tools are used, TMHCC takes steps to ensure compliance with applicable law. For that reason, when we make an automated decision about you, we will inform you. You may have the right to contest the decision, to express your point of view, and/or to require a human review of the decision.

We may also combine the information we collect (“aggregate”) or remove pieces of information (“de-identify”) to limit or prevent identification of any particular individual to help with goals like research and improvement of our recruitment processes.

Who is your personal information shared with?

We do not sell (or “share” as defined by California law) your personal information. We may share your personal information with the following parties but only on a need-to-know basis and subject to applicable law:

- Other companies within the TMHCC group to the extent necessary to administer the recruitment, hiring, or employment process
- Third party service providers to the extent necessary for the recruitment and/or hiring process such as a recruitment agency, background screening agency, or any professional advisor
- Any other third party or government agency when we have a legal basis to do so such as with the consent or authorization of the Applicant or to comply with or respond to a valid legal process or law enforcement request

How long is personal information retained for?

We will keep your personal information on our records for as long as we have an ongoing legitimate business need to do so in accordance with our legal obligations, our records retention policies, or as otherwise permitted by law. We will delete your data once the legal obligation expires or after the period of time specified in our records retention policies. The period of retention is subject to our review and alteration.

If you are hired, your application information becomes part of your employment record, and we may use it in connection with your employment consistent with our Employee Privacy Policy. If you are not hired or decline an offer of employment, with your consent, we keep your application to allow you to obtain information about the recruitment process and to consider you for other job openings.

Your privacy choices

Depending upon where you reside, you may have any or all of the following rights in connection with your personal information:

- Know the categories and/or specific pieces of personal information collected about you, including how we process and share that certain information generally;
- Access a copy of the personal information we retain about you;
- Request deletion of your personal information;
- Direct us to correct your personal information if you are unable to correct that personal information through our career sourcing platform;
- Restrict how we use certain personal information or your sensitive personal information for certain purposes;
- Object to or limit the processing of your personal information;
- Request that we transfer your personal information to another entity; and
- Request that we not reach decisions affecting you using automated processing or profiling.

We will verify your identity in connection with any of the above requests and take steps to ensure that only you or your authorized representative can exercise rights with respect to your information. There may be situations where we are unable to grant your request, such as if we cannot verify your identity or if we need to retain the information to fulfill a transaction.

You have the right to not be discriminated against for your privacy choices. However, please be aware that if you exercise your right to object or your rights of restriction or deletion, or if you choose to decline to share certain information with us, we may not be able to assess your suitability for (continued) employment.

If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information that was lawfully collected on grounds other than consent.

Although we do not sell your personal information, we allow certain companies to place tracking technologies such as pixels or cookies on our sites, including our career page. Those companies receive information about your interaction with our sites that is associated with your browser or device, which information may be used to improve our site and user experience. Except for this kind of sharing, we do not sell any of your information.

To exercise any rights you may have in connection with your personal information, (i) please click [here](#) to submit an online request, (ii) email us at privacypolicy@tmhcc.com, or (iii) call us toll free at 888-688-0775 and select option 2.

Security

TMHCC is committed to keeping your personal information safe. However, no administrative, physical or technical security measure is 100% effective. We have reasonable security measures in place designed to protect against the unauthorized access, loss, misuse and alteration of personal information under our control. For example, our security and technology policies are periodically reviewed and enhanced as necessary and only authorized personnel have access to user

information. We use Secured Socket Layer (SSL) to encrypt financial information you input before it is sent to us. The servers we use to store personal information are kept in a secure environment.

Changes to this Policy

We may update this Policy from time to time in response to changing legal, technical, or business developments. When we update our Policy, we will take reasonable measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Policy changes if and where this is required by applicable privacy laws if we use your information in a manner not reasonably expected by you.

You can see when this Policy was last updated by checking the “effective date” displayed at the top of this Policy.

Any changes will be effective only after the effective date of the change and will not affect any dispute arising prior to the effective date of the change.

Questions

If you have any questions about this Policy and are applying for employment with the Company within the U.S., please contact us using the following contact details:

Phone: 888-688-0775

Email: privacypolicy@tmhcc.com

If you are a resident outside of the U.S., please refer to our [Global Privacy Policy](#) for contact details.