

Effective Date: 1/1/2023

## **The Dentists Insurance Company Applicant Privacy Notice**

The Dentists Insurance Company and its affiliates (collectively, “TDIC”, “we”, or “us”) are committed to protecting the privacy and security of your personal information. This applicant privacy notice (“Privacy Notice”) describes how we collect and use personal information about you during and after your employment-seeking engagements or interactions with us (collectively, your “employment”). It applies to all current and former job seekers and/or applicants (collectively “applicants”).

This Privacy Notice does not form part of any contract of employment or other contract to provide services.

It is important that you read and retain this Privacy Notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights may be.

We do not sell your personal information.

### **Personal Information We Collect About You**

“Personal Information” means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with an individual. It does not include data that cannot be associated with you (“deidentified information”).

### **Applicants**

As an applicant, we collect Personal Information through the application and recruitment process, directly from candidates, and from employment agencies, screening services, and/or other background-check providers. We may collect additional information from third parties including former employers, credit reference agencies, or other sources that supply employment verification services.

We may collect, store, and use the following categories of Personal Information about you:

- **Personal identifiers**, such as name, title, addresses, telephone numbers, email addresses, social security number, passport number, and driver’s license number.
- **Professional or employment-related information**, such as professional and employment-related background information through the recruitment process (including copies of right to work documentation, references and other information included in a resumé, CV, or cover letter or as part of your

application to work at [Company]). In addition, we collect information regarding job titles, salary history, work history, training records, and professional memberships.

- **Education information**, such as your employment records include information you provided during the employment process about the educational institutions you have attended or your level of education. We also collect and maintain information about any professional licenses you hold, certifications you received, or additional education or training you have undertaken prior to your employment.
- **Inferences drawn to create a profile**, such as an assessment of your interests, strengths, capabilities, potential, preferences, and/or other characteristics. Participation in such assessments is voluntary, and the outcomes of the assessments will be used only to assist you in your career development.
- **Sensitive Personal Information**, includes:
  - **Employment eligibility information**, including social security number, driver's license number, passport number, nationality/visa status, or related information to verify your employment eligibility and to provide travel arrangements.
  - **Diverse workforce efforts information**, including race, ethnicity, disability, veteran's status, or sexual orientation. Participation in such efforts are voluntary, and the outcomes of the efforts will be used for internal development at [Company].
  - **Health information**, including biological testing and screening for controlled substances and if applicable, information such as medical condition, disability status, and other health issues required for work environment or working practices accommodations if applicable.

## **How We Use Personal Information About You**

Situations in which we use your Personal Information include:

- **Decisions related to your employment**, including making decisions about your recruitment; determining whether to offer you a position and on what terms, job duties, salary, and compensation.
  - To track our diversity efforts.
  - To verify your employment eligibility and to provide travel arrangements for you.

- **Compliance with legal obligations**, including verifying that you are legally permitted to work in the United States.

We may use any and all of the information collected for any of the purposes described in this Privacy Notice, unless limitations are listed.

### **Disclosure of Your Personal Information**

We may disclose the Personal Information that we collect or you provide with the following categories of third parties for our business purposes (as described above):

- **Recruitment vendors** that assist with the application process, including assessing candidate qualifications and providing the platform through which candidates submit their candidacy.
- **Government agencies**, to comply with mandatory reporting.
- **External parties** when required by law or to protect TDIC or other persons, as described in this Privacy Notice.
- **Temporary staffing agencies** that provide contingent workers for assignment at TDIC.

### **Sources of Your Personal Information**

We collect Personal Information about applicants through the application and recruitment process, directly from candidates, and from employment agencies, screening services, and/or other background-check providers. We may collect additional information from third parties including former employers, credit reference agencies, or other sources that supply employment verification services.

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

We will keep your Personal Information for as long as is needed to carry out the purposes we've described, or as otherwise required by law. The criteria used to determine the applicable retention period for your Personal Information includes the length of time we have an ongoing relationship with you as an applicant and whether there is a legal obligation to which we are subject that requires us to retain your Personal Information.

Where we have no continuing purpose to process your Personal Information, we will either delete or anonymize it or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal

Information and isolate it from any further processing until deletion is possible.

### **Special Information for California Residents**

The California Privacy Rights Act (“CPRA”) may provide California residents, referred to in the law as “consumers,” with rights to receive certain disclosures regarding the collection, use and sharing of Personal Information, as well as rights to access, delete, correct, and control Personal Information. The CPRA defines “personal information” to mean “information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular” California resident. Certain Personal Information we collect may be exempt from the CPRA because it is considered public information (because it is made available by a government entity) or covered by a federal privacy law, such as the Gramm–Leach–Bliley Act, the Health Insurance Portability and Accountability Act, or the Fair Credit Reporting Act.

To the extent that we collect Personal Information about you that is subject to the CPRA, your rights are described in the below disclosures.

#### **Right to Information Regarding the Categories of Personal Information Collected, Sold, and Otherwise Shared**

You have the right to receive information regarding the categories of Personal Information we collect, sell, disclose, or otherwise share. You also have the right to receive information regarding the sources of Personal Information we collect, the purposes for which we collected it and the third parties and service providers with whom we shared it. That information is provided in this Privacy Notice. We collect and have collected within the last 12 months, the categories of Personal Information described in the Personal Information We Collect About You section above.

#### **Right to Access Personal Information**

You have the right to request access to specific pieces of Personal Information collected about you. To protect our applicant’ Personal Information, we are required to verify your identity before we can act on your request. We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If you would like more information about your employment-seeking history with TDIC, contact the Human Resources Department directly.

#### **Right to Request Deletion of Personal Information**

You have the right to request in certain circumstances that we delete any Personal Information that we or third-parties on our behalf have collected directly from you. To protect our employees’ Personal Information, we are required to verify your identity before we can act on your request and maintain a record of your request. We may have a reason under the law why we do not have to comply with your request, or why we may

comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response. If you would like more information about your employment-seeking history with TDIC, contact the Human Resources department directly.

### **Right to Correct Personal Information**

You have the right to request in certain circumstances that we correct any inaccurate Personal Information that we have collected directly from you. To protect our applicants' Personal Information, we are required to verify your identity before we can act on your request.

### **Authorized Agent**

You can designate an authorized agent to submit requests on your behalf. However, we will require written proof of the agent's permission to do so and we will need to verify your identity directly.

## **Appeal**

You have a right to appeal decisions concerning your ability to exercise your consumer rights. Please contact the Legal Department to request a second review concerning decisions on your request.

## **Right to Information Regarding Participation in Data Sharing for Financial Incentives**

We may run promotions from time to time whereby we incentivize an applicant to share certain pieces of Personal Information with us. Participation in any of these incentives is voluntary, and you may opt out of the data sharing at any time.

## **Right to Opt Out of Sale or Sharing of Personal Information**

You have the right to opt out of any sale of Personal Information (as that term is defined by the CPRA) or any sharing of Personal Information for the purposes of cross contextual advertising. However, we currently do not sell or share your Personal Information. Please note the right to opt out does not apply to our disclosure of Personal Information to service providers, who are parties we engage to perform a function on our behalf and are legally and contractually obligated to use the Personal Information only for that function.

## **How to Submit a Request**

You may submit a request to exercise your rights as follows:

- By contacting us through our website: [insuranceinfo@tdicins.com](mailto:insuranceinfo@tdicins.com)
- By calling us at 800.733.0633.

We will verify your identity based on the information we have on file. In the event that you are requesting access to sensitive categories of Personal Information, we may require an additional step to verify your identify (including providing us a copy of a government-issued ID). We will only use the information collected during the verification process to verify your identity and will not retain the information longer than required for this purpose.

If you designate an authorized agent to make a request on your behalf, please ensure the authorized agent identifies him/herself as an authorized agent. We may require written proof of the agent's permission to make a request on your behalf, and we may need to verify your identity directly.

## **Data Security**

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. We use physical, administrative, and technical safeguards to secure Personal Information.

Unfortunately, the storage and processing of information via internet-connected computers can never be completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information stored or processed by us.

### **Changes to this Privacy Notice**

We reserve the right to update this Privacy Notice at any time. If we make material changes to this policy that will affect you, we will post an updated copy of this Privacy Notice as soon as reasonably practical.

### **Contact Us**

If you have any questions about this Privacy Notice, please contact us at [insuranceinfo@tdicins.com](mailto:insuranceinfo@tdicins.com).