

California Privacy Rights Notice

Your California privacy rights

This website is owned and managed by The Segal Group, Inc. which includes affiliates Segal Benz and Segal Advisors. These companies will be collectively referred to as “Segal,” “our,” or “we” throughout this policy. We respect your privacy and are committed to protecting it through our compliance with this policy.

This Privacy Policy for California Residents supplements the information contained in [Segal's Privacy Policy](#) and applies solely to all visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA), as amended, and any terms defined in the CCPA have the same meaning when used in this Policy.

This Policy does not apply to workforce-related Personal Information collected from California resident employees, job applicants, contractors, or similar individuals. Segal maintains a [separate privacy policy](#) for these purposes.

Where noted in this Policy, the CCPA temporarily exempts Personal Information reflecting a written or verbal business-to-business communication (“B2B Personal Information”) from some its requirements.

Segal’s roles under the CCPA

Segal qualifies as both a “Business” and “Service Provider” under the CCPA as a legal entity that provides employment benefits consulting services (“services”) to businesses (our “clients”) for retirement, health, and other benefit programs, services or products to which consumers and their dependents or beneficiaries receive access through the consumer’s employer.

- In our role as a Business under the CCPA, Segal directly collects and processes employee-related and B2B Personal Information, both of which are currently subject to exemptions under the CCPA regarding individuals’ rights, which may affect your rights and choices described in the Section below. Segal also collects and processes information about visitors to our website. To the extent that Segal meets the CCPA definition of a “Business,” Segal shall comply with the CCPA and its regulations with regard to any Personal Information that we collect or maintain as a business.
- In our role as a Service Provider under the CCPA, Segal collects and processes employment-related information and other Personal Information of consumers from or on behalf of our clients, who disclose this Personal Information to us pursuant to a written contract that prohibits us from retaining, using, or disclosing the Personal Information for any purpose (including sale or other commercial purpose) other than performing the services specified in the contract (the “Business Purpose”).

This Policy only applies to Personal Information that we collect and process in our role as a “Business,” but it does not apply to information collected from or about Segal job applicants, employees or contractors. Segal maintains a [separate policy for individuals such as employees, contractors](#), and job applicants for whom we directly collect employment-related Personal

Information. It does not apply to Personal Information we collect or process when we act as a service provider to process information on behalf of our clients for which we provide consulting services.

Information we collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“Personal Information”). Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information expressly excluded from the CCPA’s scope, including:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA), clinical trial data, or other qualifying research data;
 - Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

In the preceding twelve (12) months, Segal has collected the following categories of Personal Information from consumers:

- Personal identifiers;
- Internet or other similar network activity; and
- Professional or employment-related information.

Use of personal information

We may use or disclose the Personal Information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information.
- To provide, support, personalize, and develop our website, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, transactions, and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.

We will not collect additional categories of Personal Information or use the Personal Information we collect for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing personal information

We may share your Personal Information by disclosing it to a third party for a Business Purpose. We only make these Business Purpose disclosures under written contracts that describe the purposes, require the recipient to keep the Personal Information confidential, and prohibit using the disclosed information for any purpose except performing the contract.

In the preceding twelve (12) months, Segal has disclosed Personal Information for a Business Purpose to the categories of third parties indicated in the chart below.

We do not sell Personal Information in general, however, the CCPA defines selling broadly. If one of our business entities begins to share Personal Information in a manner that would qualify as a sale under the CCPA, we will update this Policy accordingly. If you think that one of our business entities currently shares information in a manner that qualifies as a sale, please contact us at Privacy@segalco.com.

Personal Information Category	Business Purpose Disclosures
Personal Identifiers	To our vendors, service providers, contractors, and subcontractors, including project management software providers, records and database management providers; marketing partners including direct marketing providers and event hosts; and backup data storage providers.
Commercial information or internet activity.	None
Professional or employment-related information.	To service providers, contractors, and subcontractors, including project management software providers, records and database management providers, and backup data storage providers.

Deidentified patient information

We disclose deidentified patient information exempt from the CCPA to third parties. To deidentify the patient information, we followed the HIPAA expert determination method and/or the HIPAA safe harbor method specified in 45 C.F.R. §164.514.

Your rights and choices

The CCPA provides “consumers” (California residents) with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

Right to know and data portability

As a California consumer you have the right to request that we disclose certain information about collection, use and sharing of your Personal Information over the past 12 months (the “Right to Know”). If Segal receives a “Right to Know” request, we have different obligations depending on whether we collected the information from you in our role as a Business or a

Service Provider. In our role as a Service Provider, we will either choose to act on behalf of the client Business that disclosed the information to us and respond directly to the request or we will inform the requestor that the request cannot be acted upon because the request has been sent to a Service Provider.

If we collected your information in our role as a Business or choose to process your request in our role as a Service Provider, in our response to a verified “Right to Know” request, we will disclose to you:

- The categories of Personal Information we collected about you.
- The categories of sources of the Personal Information we collected about you.
- Our business or commercial purpose for collecting that Personal Information.
- The categories of third parties with whom we share that Personal Information.
- If we disclosed your Personal Information for a business purpose, we will identify the Personal Information categories that each category of recipient obtained.
- The specific pieces of Personal Information we collected about you (also called a “Data Portability” request).

We do not provide a right to know or data portability disclosure for B2B Personal Information.

In addition, our response to a Request to Know will not disclose a consumer’s Social Security number, driver’s license number or other government-issued identification number, financial account number, any health insurance or medical identification number, an account password, security questions and answers, or unique biometric data generated from measurements or technical analysis of human characteristics. We will, however, inform the consumer with sufficient particularity that we have collected the specific type of information.

Right to delete

California consumers have the right to request that we delete any Personal Information of a consumer that we collected and retained, subject to certain exceptions (the “Right to Delete”). If Segal receives a request from a consumer in our role as a Service Provider, we will either choose to act on behalf of the client business that disclosed the information to us and respond directly to the request or inform the requestor that the request cannot be acted upon because the request has been sent to a Service Provider.

If we choose to process your request as a Service Provider and/or if we receive your request in our role as a Business, we will review your request to determine if there is an exception under the CCPA that allows us to retain the information and notify you of this determination.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the Personal Information, 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.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act. Cal. Penal Code § 1546 et. seq.
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

If no exception applies, we will delete or deidentify Personal Information not subject to one of these exceptions from our records and will direct our Service Providers to take similar action.

We will direct any subcontractors with whom we have shared the information to take similar action.

If we deny your request to delete, we will inform you that we will not comply with the request and describe the basis for the denial including any conflict with federal or state law, or exception to the CCPA, unless we are legally prohibited from disclosing the conflict or exception. We will delete the Personal Information that is not subject to the specific exception or applicable law and will not use the Personal Information that we retain for any other purpose than provided for by such exception or state or deferral law.

If we maintain your Personal Information in de-identified form, we are not obligated to provide or delete this information in response to a Consumer Request or to re-identify individual data in order to verify a Consumer Request.

Right to opt-out of sale

The Segal Group does not sell any Personal Information. However, the CCPA defines selling broadly. If one of our business entities begins to share Personal Information in a manner that would qualify as a sale under the CCPA, we will update this Policy accordingly. If you think that one of our business entities currently shares Personal Information in a manner that qualifies as a sale, please contact us at Privacy@segalco.com.

Non-discrimination

Subject to some exceptions, California consumers have the right not to be discriminated against based on the consumer's refusal to provide a Business with Personal Information.

Discrimination can include:

- Denying you goods or services.
- Charging (or suggesting you may receive) different prices for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Providing (or suggesting you may receive) a different level or quality of goods or services.

Exercising your right to know or delete

To exercise your Right to Know, including your right to request data portability, or Right to Delete described above, please submit a request by either:

- Calling us at 866.626.4690
- Emailing us at Privacy@segalco.com.

Your request must contain sufficient detail to allow us to properly understand, evaluate, and respond to it (see below);

Only you, or someone legally authorized to act on your behalf (an "Authorized Agent"), may make a Request to Know or Request to Delete related to your Personal Information.

You should ensure that your request contains sufficient information for us to match it to information that we previously collected about you, and that allows us to reasonably verify you are the person about whom we collected Personal Information. If we maintain a password-protected account with you, we may be able to verify the requestor's identity through the existing authentication practices for that account. In some instances, we may ask for a signed declaration under penalty of perjury that you are the consumer whose Personal Information is the subject of the request. For requests seeking specific pieces of information, highly sensitive information or deletion of information, we may require additional proof of identification.

If you would like, you may designate an Authorized Agent to make a request on your behalf. However, requests from Authorized Agents must include proof of authorization from you. If you designate an Authorized Agent to make a request under the CCPA, in order to verify that that person has authority to act for you, we may require:

- A copy of a power of attorney or other written permission from you to have the agent act on your behalf.
- You to verify your own identity with us directly.

If we are not able to verify the identity of the individual making the request within 45 days of receiving it, we may deny the request.

We will only use Personal Information provided in the request for the purpose of verifying the requestor's identity or authority to make such request. We will delete this information as soon as practicable after we meet those obligations unless it is necessary for record keeping purposes.

You or your authorized agent may only submit a request to know twice within a 12-month period.

Response timing and format

We will confirm receipt of your request within ten (10) business days. The confirmation will generally be made in the same manner as the request (i.e., if you made the request by phone, we will call you; if you made the request by email we will email you.) If you do not receive confirmation within the 10-day timeframe, please contact Privacy@segalco.com. We will make every effort to substantively respond to a consumer request within forty-five (45) days of receiving it. If we require more time to respond, we will inform you of the reason and the extension period (up to another 45 days) in writing.

If you have a password-protected account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any response that we provide will only cover the 12-month period prior to our receipt of your request. The response we provide will also explain any reason(s) that we cannot comply with a request, if applicable. If we partially deny the request, we will disclose the other information sought by the requestor. For requests to transmit your Personal Information to another entity, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

Children under age 16

Segal's website and services are not intended for children under 16 years of age. We do not knowingly collect Personal Information from children under 16. If you are under 16, do not use or provide any information on this website. If we learn we have collected or received Personal Information through our website from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at Privacy@segalco.com or call us at 866.626.4690.

California residents younger than 16 may have additional rights regarding the collection and use of their Personal Information. Segal does not sell any Personal Information, including information from or about minor children. However, the CCPA defines selling broadly. If one of our business entities begins to share Personal Information in a manner that would qualify as a sale under the CCPA, we will update this Policy accordingly. If you think that one of our business entities currently shares Personal Information, including information about minors, in a manner that qualifies as a sale, please contact us at Privacy@segalco.com.

Changes to our privacy policy

We reserve the right to amend this CCPA privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will post the updated notice on the Website and update the notice's effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

For more information

If you have any questions or concerns about Segal's Privacy Policies, this notice, or the ways in which Segal collects and uses your information described here, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 866.626.4690

Email: Privacy@segalco.com

Postal Address:

The Segal Group, Inc.
Attn: General Counsel
333 West 34th Street, 3rd Floor
New York, NY 10001

If you need to access this Policy in an alternative format due to having a disability, please contact Privacy@segalco.com and 866.626.4690.