**Homesteaders California Employee Privacy Policy**

**Effective Date:** October 19, 2026

## Scope of This Policy

The California Consumer Privacy Act, as amended by the California Privacy Rights Act, and its implementing regulations (collectively, the "CCPA"), gives California residents certain rights and requires businesses to make certain disclosures regarding their collection, use, and disclosure of Personal Information. This CCPA Employee Privacy Policy (the "Employee Policy") provides such notice to California employees, independent contractors, and other individuals (collectively, "Employees") who interact with Homesteaders Life Company and any subsidiaries or affiliates (collectively, "Homesteaders," "we," "us," and "our") in an employment-related capacity.

Please note that this Employee Policy only addresses Homesteaders' collection, use, and disclosure of employment-related Personal Information and only applies to residents of California. This Employee Policy does not apply to individuals who are residents of other U.S. states or other countries and/or who do not interact with Homesteaders in an employment-related capacity. For further details about our privacy practices pertaining to non-Employee Personal Information, please see our Privacy Policy.

As an Employee, you have the right to know what categories of Personal Information Homesteaders collects, uses, discloses, sells, and shares about you. This Employee Policy provides that information and other disclosures required by California law.

## Definitions

- "Personal Information" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Employee. Personal Information includes Sensitive Personal Information, but does not include protected health information covered by the Health Insurance Portability and Accountability Act ("HIPAA"), nonpublic personal information under the Gramm-Leach-Bliley Act ("GLBA"), publicly-available information, or any other information which is exempt from the CCPA.

- "Sensitive Personal Information" includes Personal Information that reveals an Employee's (i) social security number, driver's license, state identification card, or passport number, (ii) account log-in, financial account, debit card, or credit card number in combination with any required security or access code, (iii) precise geolocation, (iv) racial or ethnic origin, citizenship or immigration status, religious or philosophical beliefs, or union membership, (v) mail, email, and text messages contents, unless Homesteaders is the intended recipient of the communication, (vi) genetic data, or (vii) neural data. Sensitive Personal Information also includes biometric information for the purpose of uniquely identifying an Employee, Personal Information concerning an Employee's health, and Personal Information concerning the Employee's sex life or sexual orientation.

- "Sell," "Sale," or "Sold" means renting, releasing, or transferring an individual's Personal Information to a Third Party for money or other valuable consideration.

- "Share," "Shared," or "Sharing" means transferring an individual's Personal Information to a Third Party for cross-context behavioral advertising or targeted advertising purposes, whether or not for money or other valuable consideration.

- "Third Party" means any non-affiliated person that is not a Vendor.
- "Vendor" means as "Service Provider" or "Contractor," as those terms are defined by the CCPA, that collects, stores, or otherwise handles data for us and is bound by contractual obligations to use your Personal Information only as directed by us.
- Other CCPA Definitions used in this Employee Policy, such as the terms "Collect," "Processing," "Consumer," and other terms defined in the CCPA and their conjugates, have the meanings afforded to them in the CCPA, whether or not such terms are capitalized herein, unless contrary to the meaning thereof.

**1. Types of Personal Information We Collect About Employees**

We, and our Vendors, collect, and have collected in the past 12 months, the following categories of Personal Information about Employees:

- Identifiers, such as name, alias, postal address, unique personal identifier, online identifiers, Internet Protocol address, email address, account name, signatures, physical characteristics or description, telephone number, or other similar identifiers.
- Contact and Financial Information, including phone number, address, email address, financial information, medical information, or health insurance information.
- Characteristics of Protected Classifications under state or federal law, such as age, gender, race, physical or mental health conditions, and marital status.
- Commercial Information, such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Biometric Information.
- Internet or Other Electronic Network Activity Information, such as browsing history and interactions with our websites or advertisements.
- Geolocation Data, such as device location that is more granular than a city or town.
- Audio, Electronic, Visual, and Similar Information, such as video or call recordings.
- Professional or employment-related information, such as work history and prior employer;
- Education information, as defined in the federal Family Educational Rights and Privacy Act, such as student records and directory information;
- Inferences drawn from any of the Personal Information listed above to create a profile or summary about, for example, an individual's preferences and characteristics; and
- Sensitive Personal Information, including:
    - Personal Information that reveals:
        Social security, driver's license, state identification card, or passport number;
        Account log-in, financial account number, debit card number, or credit card number in combination with any required security or access code, password, or credentials for allowing access to an account;
        Precise geolocation;
        Racial or ethnic origin, religious or philosophical beliefs, or union membership;
        Contents of an Employee's email and text messages, unless the business is the intended recipient thereof; or
    - Biometric data processed for the purpose of uniquely identifying an Employee;
    - Personal Information Collected and analyzed concerning an Employee's health; and

- Personal Information Collected and analyzed concerning an Employee's sex life or sexual orientation.

## 2. Purposes for Processing and Disclosing Employee Personal Information

We, and our Vendors, collect, process, and disclose the Personal Information described in this Employee Policy to:

- Manage your Employee relationship with us;
- Manage and provide compensation, payroll, tax, and benefits planning, enrollment, and administration;
- Provide you access to our systems, networks, databases, equipment, and facilities;
- Manage our workforce and its performance, including personnel planning, productivity monitoring, and evaluation;
- Manage workforce development, education, training, and certification;
- Monitor, maintain, and secure our systems, networks, databases, equipment, and facilities;
- Authenticate your identity and verify your access permissions;
- Arrange, confirm, and monitor work-related travel, events, meetings, and other activities;
- Assess your working capacity or the diagnosis, treatment, or care of a condition impacting your fitness for work, and other preventative or occupational medicine purposes (including work-related injury and illness reporting);
- Contact and communicate with you regarding your employment, job performance, compensation, and benefits, or in the event of a natural disaster or other emergency;
- Contact and communicate with your designated emergency contact(s) in the event of an emergency, illness, or absence; and
- Contact and communicate with your dependents and designated beneficiaries in the event of an emergency or in connection with your benefits.

In addition to the purposes identified above, we may use and disclose any and all Employee Personal Information that we collect as necessary or appropriate to:

- Comply with laws and regulations, including (without limitation) applicable tax, health and safety, anti-discrimination, immigration, labor and employment, and social welfare laws;
- Monitor, investigate, and enforce compliance with and potential breaches of our policies and procedures and legal and regulatory requirements;
- Comply with civil, criminal, judicial, or regulatory inquiries, investigations, subpoenas, or summons; and
- Exercise or defend the legal rights of Homesteaders and our employees, affiliates, customers, contractors, and agents.

We may also deidentify any Personal Information we collect about you. When we do so, we take reasonable measures to ensure that the information cannot be associated with an Employee, and we maintain and use the information in deidentified form. We will not attempt to reidentify the information, except that we may attempt to reidentify the information solely for the purpose of determining whether our deidentification processes satisfy applicable legal requirements. After it has been deidentified, the information is no longer Personal Information and is not subject to this Employee Policy.

We also do not process Personal Information for purposes of profiling or to engage in automated decision making in furtherance of decisions that produce legal or similarly significant effects (which means a decision that results in the provision or denial of financial or lending services, housing,

insurance, education enrollment or opportunity, criminal justice, employment opportunities, health-care services, or access to essential goods or services).

### 3. Purposes for Processing and Disclosing Employee Sensitive Personal Information

We, and our Service Providers, collect, process, and disclose the categories of Sensitive Personal Information described in this Policy only as reasonably necessary for:

- Performing the services or providing the goods reasonably expected by an average Employee who requests those goods or services (including offering benefits to Employees and their beneficiaries);
- Preventing, detecting, and investigating security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted Personal Information;
- Resisting malicious, deceptive, fraudulent, or illegal actions directed at us and prosecuting those responsible for those actions;
- Ensuring the physical safety of natural persons;
- Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of an Employee's current interaction with us, provided that we will not disclose the Employee's Personal Information to a Third Party and/or not build a profile about the Employee or otherwise alter the Employee's experience outside the current interaction with the business;
- Performing services on our behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on our behalf;
- Verifying or maintaining the quality or safety of a product, service, or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured by, manufactured for, or controlled by us;
- Collecting or processing Sensitive Personal Information where such collection or processing is not for the purpose of inferring characteristics about an Employee.

### 4. Retention of Employee Personal Information

We will retain your Personal Information for the duration of your Employee relationship with us, as applicable, and longer as may be required by applicable laws or as necessary to support our business operational purposes listed above.

### 5. Sale & Sharing of Employee Personal Information

We generally do not Sell or Share, and have not Sold or Shared in the past 12 months, the Personal Information we collect about Employees, as the terms "Sell" and "Share" are defined by the CCPA. Subject to some exceptions, a "Sale" is the disclosure of Personal Information to a third party for monetary or other valuable consideration, and a "Share" is the disclosure of Personal Information to a third party for cross-context behavioural advertising, whether or not for monetary or other valuable consideration.

However,, we do Sell and Share Personal Information we collect about consumers who visit our websites via cookies and other tracking technologies. We may Sell and Share such information to third parties, such as marketing and analytics providers, for the following purposes: to market and advertise our products and services, including to inform consumers of products or other features that we believe may be of interest, and for data analytics, including to better understand our audiences, evaluate interest in our services, and improve our services. Consumers have the right

to opt-out of the Sale and Sharing of their Personal Information and can exercise these rights through the "Your Privacy Choices" link in the "Data Subject Rights" section, below, or at the footer of every page on our website. The "Your Privacy Choices" link will open our Cookie Preference Center, and you can then click "Reject All" to opt out of Sale and Sharing of Personal Information.

We also do not knowingly Sell or Share the Personal Information of consumers under the age of 16.

**6. How We Disclose Employee Personal Information**

We disclose, and we have disclosed in the past 12 months, the categories of Personal Information listed in the "Types of Personal Information We Collect About Employees" section in the following contexts:

- *With Affiliates and Vendors***.** We disclose Personal Information we collect to our affiliates and to our Vendors who act on our behalf. For example, we use Vendors to provide us with benefits and wellness services, website services, as well as other products and services, such as web hosting, data analysis, customer service, infrastructure services, technology services, email delivery services, legal services, and other similar services. These Vendors may need Personal Information about you to perform their obligations. We impose contractual limitations on our Vendors' use of Personal Information they collect in conjunction with providing services to us.
- *As Described in a Privacy Notice or With Your Consent.* We may disclose Personal Information as described in any privacy notice we provide to you, or with your consent if we obtain it from you in a particular context.
- *In Aggregate or De-Identified Form.* We may aggregate or de-identify the Personal Information we collect, and we may disclose aggregated and/or de-identified information to our Vendors, and to third parties for our business operational purposes and for any other purposes permitted by applicable law.

We may also disclose Personal Information in the following contexts:

- *As Part of a Business Transfer.* Your Personal Information may be transferred to a successor organization if, for example, we transfer the ownership or operation of our business to another organization, if we merge with or are acquired by another organization, or if we liquidate our assets. In negotiating with a third party about entering into such an arrangement, we may need to disclose your Personal Information. In such cases, we will take reasonable measures to protect the Personal Information we disclose, and we will seek assurances that the successor organization's use of your Personal Information will still be subject to this Employee Policy and the privacy preferences you have expressed to us.
- *For Compliance with Laws and Protection of Our Rights and the Rights of Others*. We may disclose your Personal Information when we, in good faith, believe disclosure is appropriate to comply with the law, a court order, or a subpoena. We may also disclose your Personal Information to prevent or investigate a possible crime, such as fraud or identity theft; to protect the security of the Services; to enforce or apply our Terms of Use or other agreements; or to protect our own rights or property or the rights, property, or safety of our Users or others.

**7. Sources of Employee Personal Information**

We collect Personal Information directly from all Employees, including Personal Information about Employees' beneficiaries or dependents. We also collect Personal Information from joint marketing partners, public databases, providers of demographic data, publications, professional organizations, educational institutions, social media platforms, service providers and third parties that help us screen

and onboard individuals for hiring purposes, and service providers and third parties when they disclose information to us.

**8. Data Subject Rights**

As an Employee, you have the following rights regarding our collection and use of your Personal Information, subject to certain exceptions.

*Rights that Require Verification*

Employees may exercise their data subject rights or submit a request by contacting us at privacyrequest@homesteaderslife.com, by calling 888-312-9018, or by clicking webform. You may also authorize an agent to make data subject requests on your behalf. In such instances, authorized agents may use the same methods as you to submit the requests on your behalf. To verify your identity and protect your Personal Information, we may ask the requestor to provide information that will enable us to verify your identity in order to comply with your data subject request, such as by asking your agent to provide proof of signed permission from you, or asking you to confirm with us directly that you provided the agent with permission to submit the request. In some instances, we may decline to honor your request if an exception applies under applicable law. We will respond to your request consistent with applicable law.

- *Right to Know*: You have the right to know the following details about our privacy practices at or before the point of collection. We have provided such information in this Employee Policy. You may also request that we provide you with information about the following aspects of how we have handled your Personal Information specifically in the 12 months preceding your request:
    - The categories of Personal Information we have collected about you;
    - The categories of sources from which such Personal Information was collected;
    - The business or commercial purpose for collecting, Selling or Sharing Personal Information about you;
    - The categories of Personal Information about you that we disclosed and the categories of third parties to whom we disclosed such Personal Information;
    - The categories of Personal Information about you that we Sold or Shared, and the categories of third parties to whom we Sold or Shared such Personal Information;
    - The categories of Sensitive Personal Information we collect, the purposes for which it is collected or used, and whether that information is Sold or Shared; and
    - The length of time we intend to retain each category of Personal Information, or if that is not possible, the criteria used to determine that period.
- *Right to Deletion*: You may request that we delete any Personal Information about you we that we collected from you.
- *Right to Correction*: You may request that we correct any inaccurate Personal Information we maintain about you.
- *Right to Access Specific Pieces of Personal Information*: You may ask to obtain the specific pieces of Personal Information we have collected about you in a portable and, to the extent

technically feasible, readily usable format that allows you to transmit the Personal Information to another entity without hindrance. You may not exercise this right more than two times in a calendar year.

*Rights that Do Not Require Verification.* You may exercise these rights through the "Your Privacy Choices" link below or at the footer of every page on our website. The "Your Privacy Choices" link will open our Cookie Preference Center, and you can then click "Reject All" to opt out of the sale and sharing of Personal Information.

- *Right to Opt-Out of Sale and Sharing of Your Personal Information*: You have the right to opt out of the Sale and Sharing of your Personal Information. As noted above, we generally do not Sell or Share, and have not Sold or Shared in the past 12 months, the Personal Information we collect about Employees, as the terms "Sell" and "Share" are defined by the CCPA. Subject to some exceptions, a "Sale" is the disclosure of Personal Information to a third party for monetary or other valuable consideration, and a "Share" is the disclosure of Personal Information to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration.

  However, we do Sell and Share Personal Information we collect about consumers who visit our websites via cookies and other tracking technologies. Consumers have the right to opt-out of the Sale and Sharing of their Personal Information and can exercise these rights through the "Your Privacy Choices" link below or at the footer of every page on our website. The "Your Privacy Choices" link will open our Cookie Preference Center, and you can then click "Reject All" to opt out of Sale and Sharing of Personal Information.



**Your Privacy Choices**

*Opt-Out Preference Signals*

Some web browsers or devices offer settings where you may pre-set a signal to websites that you do not want to have your online activity and behavior tracked, Sold, Shared, or otherwise used for targeted advertising purposes. We recognize the opt-out preference signals that we are required to recognize for compliance with applicable law. Where required by U.S. Privacy Laws, we treat the opt-out preference signals we are required to comply with as a valid request to opt-out of Sale, Sharing, and processing for purposes of targeted advertising, as applicable, for the browser or device through which the signal is sent and any consumer profile we have associated with that browser or device, including pseudonymous profiles. Further, if we know the identity of the consumer from the opt-out preference signal, we will also treat the opt-out preference signal as a valid request to opt out of Sale and Sharing for such consumer. Consumers may use opt-out preference signals by downloading or otherwise activating them for use on supported browsers and setting them to send opt-out preference signals to websites they visit. Please note, however, that our sites are not currently configured to recognize the "Do Not Track" signal.

*Non-Discrimination.*

We will not discriminate or retaliate against you for exercising your data subject rights under this Employee Policy. For example, we will not make hiring, firing, promotional, or disciplinary decisions, or otherwise retaliate against you, as a result of you exercising your data subject rights.

**9. Steps We Take to Safeguard Your Personal Information**

We maintain reasonable administrative, physical and technological measures to protect the confidentiality and security of Personal Information you submit. Unfortunately, no website, server or database is completely secure or "hacker proof." We therefore cannot guarantee that your Personal Information will not be disclosed, misused or lost by accident or by the unauthorized acts of others. Further, we cannot control dissemination of Personal Information you post on or through our website using any social networking tools, and you should have no expectation of privacy in such Personal Information.

**10. Financial Incentives**

We do not provide financial incentives to California consumers who allow us to collect, retain, Sell, or Share their Personal Information. We will describe such programs to you if and when we offer them to you.

**11. Changes to this Employee Policy**

This Employee Policy describes Homesteaders' current policies and practices with regard to the Personal Information we collect about Employees.

As a result of changes to our practices in the Employee context, or changes in the law, we may need to update or revise this Employee Policy. Accordingly, we reserve the right to update or modify this Employee Policy at any time. When we do so, we will post the revised version of this Employee Policy on this page, and we may provide further notice to you to the extent required by applicable law. Your continued use of our website after we have posted the revised Employee Policy constitutes your agreement to be bound by the revised Employee Policy.

For your convenience, whenever this Employee Policy is changed, we will update the "effective date" at the top of this page. Be sure you check the effective date to see if this Policy has been revised since your last visit.

**12. Contact Us**

More information about our general privacy practices can be found in our Privacy Policy. If you have any questions about this Employee Policy or our privacy practices, please contact us using the information provided below:

Homesteaders Life Company, c/o Privacy Request
5700 Westown Parkway
Des Moines, Iowa 50266

You may also call us at 888-312-9018 or email us at privacyrequest@homesteaderslife.com.