

# PRIVACY NOTICE FOR CALIFORNIA JOB APPLICANTS AND TEAM MEMBERS

Effective January 1, 2023

## IMPORTANT PRIVACY NOTICE REGARDING YOUR NONPUBLIC PERSONAL INFORMATION

*In the United States, Trupanion employs team members through Trupanion Managers USA, Inc. ("Trupanion") which is a wholly owned subsidiary of Trupanion, Inc.*

As part of the recruitment process, Trupanion collects and processes personal data relating to those who apply for careers with Trupanion ("Job Applicants"). For its employees (also known as Trupanion "Team Members"), Trupanion collects and processes personal data relating to its Team Members to manage the employment relationship. Trupanion is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

### **What information does Trupanion collect?**

Trupanion collects a range of personal information about you.

For Job Applicants, this includes:

- Your name, address and contact details, including email address and telephone number; and
- Details of your qualifications, skills, experience and employment history.

For Team Members, this includes:

- Your name, address and contact details, including email address and telephone number;
- The terms and conditions of your employment;
- Details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with Trupanion; and
- Details of your schedule (dates of work, working hours and hours worked) and attendance at work.

Trupanion also collects sensitive personal information.

For Job Applicants, this includes:

- Information about your current salary, including benefit entitlements;
- Whether or not you have a disability for which Trupanion needs to make reasonable accommodations during the recruitment process;
- Information about your entitlement to work in the US;
- Information learned through your pre-employment background check if applicable;
- Information about medical or health conditions, including whether or not you have a disability for which Trupanion needs to make reasonable accommodations; and
- Equal Employment Opportunity Commission reporting information, including information about your ethnic origin, sexual orientation, and veteran status.

For Team Members, this includes:

- Details of periods of leave taken by you, including holiday, sickness absence, family leave, disability leave, and the reasons for the leave;
- Information about your entitlement to work in the US;
- Details of any disciplinary or grievance procedures in which you have been involved;
- Information about your compensation, including entitlement to benefits such as insurance;
- Details of your bank account and social security number;
- Information about your marital status, next of kin, dependents, and emergency contacts;
- Information about your nationality and entitlement to work in the US;
- Information learned through your pre-employment background check if applicable;
- Information about medical or health conditions, including whether or not you have a disability for which Trupanion needs to make reasonable accommodations;
- Equal Employment Opportunity Commission reporting information, including information about your ethnic origin, sexual orientation, and veteran status.

Trupanion collects this information in a variety of ways. For example, for Job Applicants, data might be contained in application forms, CVs, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests. For Team Members, data may be contained in documentation maintained by People Operations, performance agreements, entries in Workday (Trupanion's Human Resources Information System), and payroll records.

Trupanion will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. For Job Applicants, Trupanion will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

Data will be stored in a range of different places. For Job Applicants, this includes on your application record and on other IT systems (including email). For Team Members, this includes your personnel file, in Workday, in other IT systems and third parties.

### **Why does Trupanion process personal data?**

For Job Applicants, Trupanion needs to process data to take steps at your request prior to offering you employment. It also needs to process your data to employ you. Trupanion also requires this data for current Team Members to be able to continue their employment, process payroll, administer accommodations or leave, and manage performance.

In some cases, Trupanion needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful Job Applicant's eligibility to work in the US before employment starts. In addition, for Team Members, it is required to deduct tax, to comply with health and safety law and to enable employees to take periods of leave to which they are entitled.

Trupanion has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from Job Applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. Even if an application is not successful, a different opportunity may arise for which we may contact the applicant to assess whether they might be interested in the subsequent opportunity. We may also need to process data from Job Applicants to respond to and defend against legal claims.

Trupanion also has a legitimate interest in processing personal data during a Team Member's employment, and for maintaining those records. Maintaining this data allows us to manage performance, pay wages, administer benefits, and provide accommodations or disability leave.

We may also need to process data from Team Members to respond to and defend against legal claims.

Where Trupanion relies on legitimate interests as a reason for processing data, it has considered whether those interests are overridden by the rights and freedoms of Job Applicants and/or Team Members, and has concluded that they are not.

Trupanion processes health information if it needs to make reasonable accommodations to the recruitment process for candidates who have a disability. Trupanion also processes health information if it needs to make reasonable accommodations for Team Members to perform their work functions. This is to carry out its obligations and exercise specific rights in relation to employment.

Where we process other special categories of data, such as information about ethnic origin, sexual orientation, health, religion or belief, age, gender or marital status, this is done for the purposes of reporting to the Equal Employment Opportunity Commission ("EEOC"). All data provided for EEOC is maintained in a de-identified manner. Team Members and Job Applicants are entirely free to decide whether or not to provide such data and there are no consequences for failing to do so.

Trupanion is obliged to seek information about criminal convictions and offenses for certain roles. We do so because it is necessary for roles that require state and federal background checks to establish whether an individual has committed an unlawful act or been involved in dishonesty or other improper conduct.

For Job Applicants, we will not use your data for any purpose other than the recruitment exercise for which you have applied. For Team Members, we will not use your data other than for the purposes of your employment, those such reasons outlined in detail above.

### **Who has access to data?**

For Job Applicants, your information will be shared internally within Trupanion for the purposes of the recruitment process. This includes, but not limited to members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles. We will not share your data with third parties, unless they are part of the recruitment process or your application for employment is successful and it makes you an offer of employment. Trupanion may then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

For Team Members, your information may be shared internally, including with members of People Operations and payroll, your manager, managers in the business area in which you work, Trupanion, Inc., and IT staff if access to the data is necessary for performance of their roles.

Trupanion may share your data with third parties below in order to:

- Obtain pre-employment references from other employers
- Obtain employment background checks from third-party providers
- Obtain necessary criminal records checks from state and federal authorities
- Meet certain client contractual obligations

Trupanion may also share your data with third parties that process data on its behalf in connection with the provision of benefits, insurance providers, and provision of occupational health services.

Trupanion will process your data in North America, the UK, and the European Economic Area.

### **How does Trupanion protect data?**

Trupanion takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused, or disclosed, and is not accessed except by our employees in the proper performance of their duties.

### **For how long does Trupanion keep data?**

For Job Applicants, if your application for employment is unsuccessful, Trupanion will hold your data on file for up to two years after the end of the relevant recruitment process. At the end of that period your data is deleted or destroyed.

For Team Members, Trupanion will hold your personal data for the duration of your employment. The periods for which your data is held after the end of employment is four years from the day of your leaving.

### **Your rights**

As a data subject, you have a number of rights. You have the following rights:

- To access and obtain a copy of your data on request;
- To require Trupanion to change incorrect or incomplete data;
- To require Trupanion to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- To opt out of the sharing of your information;
- To limit the use and disclosure of your sensitive personal information; and
- To not be retaliated against for exercising these rights.

If you would like to exercise any of these rights, please contact us at [PeopleOps@Trupanion.com](mailto:PeopleOps@Trupanion.com).

If you believe that Trupanion has not complied with your data protection rights, please contact us in the first instance to help resolve your issues.

### **What if you do not provide personal data?**

For Job Applicants, you are under no statutory or contractual obligation to provide data to Trupanion during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all. If your application is successful, it will be a condition of any job offer that you provide evidence of your right to work in the US. You are under no obligation to provide information for EEOC reporting purposes and there are no consequences for your application if you choose not to provide such information.

**For Team Members, you have some obligations as part of your employment to provide Trupanion with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters. You may also have to provide Trupanion with data in order to exercise your rights with regards to sick and parental leave. Certain information, such as contact details, your right to work in the US, and direct deposit information, have to be provided to enable Trupanion to employ you. If you do not provide other information, this will hinder Trupanion's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.**