

AXIS CAPITAL APPLICANT PRIVACY NOTICE

UNITED STATES AND CALIFORNIA RESIDENTS

This U.S. Applicant Privacy Notice (“**Applicant Notice**”) informs U.S. job applicants, including California job applicants, of AXIS Capital Holdings Limited and any of its affiliates (“**AXIS**” or the “**Company**” or “**we**” or “**us**” or “**our**”) of the Company’s practices regarding the collection, use, sale, sharing, and retention of your personal information as a job applicant (“**Applicant Personal Information**”) through our career page (the “**Site**”), including directly through a recruiter to facilitate the processing of job applications. This Applicant Notice should be read in association with all other terms that govern the Site and Company policies that may be provided to you as part of the application process. This Applicant Notice shall supplant other applicable Company Privacy Notices, if applicable. If you are a California resident, more information about our practices regarding your Applicant Personal Information may be found in Section V, pursuant to the California Consumer Privacy Act (“**CCPA**”).

I. COLLECTION, USE AND DISCLOSURE OF APPLICANT PERSONAL INFORMATION

“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 you. Personal Information does not include information that is publicly available, de-identified, or aggregated.

We may collect, use, and disclose Applicant Personal Information consistent with applicable laws. Where we disclose Applicant Personal Information to service providers or contractors, we do so for the same business purposes described below and, where appropriate, we require that such parties maintain their confidentiality and appropriate systems and processes to ensure their security and protection.

We may collect, use, and disclose the following categories of Applicant Personal Information about you. Unless otherwise noted, the disclosures herein cover our activities in the twelve months preceding the Effective Date, as well as current practices.

Categories of Applicant Personal Information	Business Purpose(s) for Collection, Use, and Disclosure
Identifiers such as your name, home address, telephone/cellphone numbers, email address, and social security number.	We use this information to open and maintain your application records; communicate with you regarding your application; confirm eligibility, qualification, and background checks; maintain business records to meet our retention policy; and comply with applicable state,

Categories of Applicant Personal Information	Business Purpose(s) for Collection, Use, and Disclosure
	federal labor, employment, equal employment opportunity, and related laws.
Personal information described in Cal. Civ. Code § 1798.80(e) such as your name, physical and electronic signature, social security number, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, and employment history.	We use this information to open and maintain your application records; communicate with you regarding your application; confirm eligibility, qualification, and background checks; maintain business records to meet our retention policy; and comply with applicable state, federal labor, employment, equal employment opportunity, and related laws.
Characteristics of protected classification under California or federal law such as your age or date of birth.	We use this to comply with U.S. Equal Employment Opportunity Commission (“EEOC”) and California Civil Rights Agency (“CCRA”) requirements, and other equal opportunity initiatives.
Internet or other electronic network activity information such as personal information you transmit or that is automatically generated by your use of a connected device.	We use this information to monitor your compliance with our internal policies and procedures, to investigate security breaches and misuse of computer equipment and systems, to protect the safety of employees and third parties, and to protect our property from theft, vandalism, and damage.
Audio, electronic, visual, thermal, olfactory, or similar information such as security camera recordings, photographs to the extent contained on documents you provide, and body temperature.	We use this information to monitor your compliance with our internal policies and procedures, to investigate security breaches and misuse of computer equipment and systems, to protect the safety of employees and third parties, and to protect our property from theft, vandalism, and damage.

Categories of Applicant Personal Information	Business Purpose(s) for Collection, Use, and Disclosure
<p>Professional or employment-related information such as education history, awards, qualifications, certificates, licenses, and any other information you choose to provide in your resumes and/or applications.</p>	<p>We use this information to open and maintain your application records; communicate with you regarding your application; confirm eligibility, qualification, and background checks; maintain business records to meet our retention policy; and comply with applicable state, federal labor, employment, equal employment opportunity, and related laws.</p>
<p>Non-public education information such as school(s) attended, grades, transcripts, records of attendance, disciplinary records, and other information relating to your education.</p>	<p>We use this information to open and maintain your application records; communicate with you regarding your application; confirm eligibility, qualification, and background checks; maintain business records to meet our retention policy; and comply with applicable state, federal labor, employment, equal employment opportunity, and related laws.</p>
<p>Sensitive Personal Information such as national identification number (i.e., social security number, driver's license); race or ethnic origin; citizenship or immigration status; sexual orientation; biometric information; and information relating to any disability or health condition that is relevant to your role, including the results of any pre-employment physical or screening examination.</p>	<p>We use this information to open and maintain your application records; communicate with you regarding your application; confirm eligibility, qualification, and background checks; maintain business records to meet our retention policy; and comply with applicable state, federal labor, employment, equal employment opportunity, and related laws.</p>

We may disclose each of the categories of Applicant Personal Information identified above to the respectively identified categories of recipients for operational or business purposes consistent with the purposes for collection or use designated, as is reasonably necessary and proportionate to achieve those purposes, or for another purpose that is compatible

with the context in which the Applicant Personal Information was collected including, but not limited to:

- Helping to ensure security and integrity of Applicant Personal Information;
- Debugging, repairing, and improving functionality;
- Short-term, transient use;
- Performing services on our behalf;
- Internal research for technological development; and
- Verifying the quality and/or safety of our devices.

In addition to the other purposes for collection, use, and disclosure of Applicant Personal Information described in this Applicant Notice, we may collect, use, and disclose Applicant Personal Information as required by law, regulation or court order; to respond to governmental and/or law enforcement requests; to identify, contact or bring legal action against someone who may be causing injury to or interfering with our or others' rights or property; to support any actual or threatened claim, defense or declaration in a case or before any jurisdictional and/or administrative authority, arbitration or mediation panel; or in connection with disciplinary actions/investigations. Likewise, we may use and disclose Applicant Personal Information to other parties in connection with the sale, assignment, merger, or reorganization.

II. CATEGORIES OF SOURCES FROM WHICH APPLICANT PERSONAL INFORMATION MAY BE COLLECTED

We may collect Applicant Personal Information on this Site, including through a recruiter, from a variety of sources to facilitate your job application, operate the Site, comply with applicable laws and other permitted purposes.

- (1) **Directly From You.** For example, we collect your name, home address, telephone/cellphone numbers, email address, and other employment-related information when you apply for a job through our Site.
- (2) **Automatically When Using Our Electronic Systems.** For example, our Site automatically collects your internet and network activity information when you apply for a job.
- (3) **Service Providers and Contractors.** For example, background check vendors, and credit agencies and bureaus.

III. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We will store your Applicant Personal Information for no longer than is necessary for the performance of our obligations or to achieve the purposes for which the Applicant Personal Information was collected, or as may be required or permitted under applicable law. We will store your applicant data for up to one year. To determine the appropriate

retention period for specific data categories, we will consider the amount, nature, and sensitivity of the data; the potential risk of harm from unauthorized use or disclosure of the data; the purposes for which we process the data and whether we can achieve those purposes through other means; and the applicable legal requirements. Unless otherwise required by applicable law, at the end of the retention period we will remove Applicant Personal Information from our systems and records or take appropriate steps to properly anonymize, deidentify, or aggregate it, where legally applicable.

IV. COOKIES AND TRACKING TECHNOLOGIES

We use cookies and other tracking technologies (such as web beacons) to collect and store information about your interactions with our Site, including information about your browsing behavior.

Cookies are small files that a website transfers to your device through a web browser that enable the Site's systems to recognize your device and to capture and remember certain information. Web beacons (also known as tracking pixels) are tiny graphics embedded invisibly on a webpage or in an email that may be used to deliver or communicate with cookies, to count users who have visited certain pages, and to understand usage patterns. In general, our website use cookies and other tracking technologies as follows:

- (1) Where necessary to run our Site;
- (2) To optimize the functionality of our Site, including by personalizing content for you, greeting you by name and remembering your preferences (e.g., your choice of language or region);
- (3) For analytics purposes—for example, to help us understand how our Site is used.

Our Site uses analytics technology, including Google Analytics, to understand how users interact with the Site, improve our web experience, and better market our products. You may exercise choices regarding the use of cookies from Google Analytics by going to <https://tools.google.com/dlpage/gaoptout> or downloading the Google Analytics Opt-out Browser Add-on.

V. NOTICE TO CALIFORNIA APPLICANTS

This section only applies to California job applicants of the Company. To exercise your privacy rights, you may fill out our [California Consumer Rights Request Form](#) or call us at **1 888 914 9661, PIN 292703**.

Any privacy rights request you submit to us is subject to an identification and residency verification process ("**Verifiable Applicant Request**"). We will not fulfill your request unless you have provided sufficient information for us to reasonably verify you are the Applicant about whom we collected Applicant Personal Information. In making a request, you will need to verify that you are the authorized user of the subject email address/account and

that you are a current resident of the State of California. Please follow the instructions on our website and promptly respond to any follow-up inquiries so that we may confirm your identity. If you request that we provide you with specific pieces of information about you, we will apply heightened verification standards.

An Authorized Agent may submit a request on behalf of an Applicant if the Applicant has provided the Authorized Agent with power of attorney in accordance with California law; alternatively, we will (1) require the Authorized Agent to present verifiable written authorization from the Applicant that the Authorized Agent has the Applicant's permission to submit the request; and (2) independently verify the Applicant's own identity with us.

Categories of Recipients to Whom Applicant Personal Information May Be Disclosed For Business Purpose

To carry out the purposes described above, we may disclose your Applicant Personal Information to the following recipients: data analytics providers, security providers, background check vendors, human resources and information technology vendors, outside legal counsel, and state or federal governmental agencies.

California Privacy Rights

If you are a resident of California, you have the right to submit certain requests under the California Consumer Privacy Act ("**CCPA**") relating to your Applicant Personal Information as described below.

Right to Opt-Out of Share and Sale of Applicant Personal Information

We will not share or sell your Applicant Personal Information. For this reason, we do not treat Applicant Personal Information collected by us as subject to a Do Not Share or Sell request and, therefore, we do not offer a way for you to submit such a request.

Right to Limit Use and Disclosure of Sensitive Personal Information

We do not use or disclose sensitive Applicant Personal Information for purposes to which the right to limit use and disclosure applies under the CCPA. For this reason, we do not offer a way for you to submit such a request.

Right to Know. You have the right to send us a request, no more than twice in a twelve-month period, for any of the following:

- (1) The categories of Applicant Personal Information we have collected about you, including:
 - a. The categories of sources from which the Applicant Personal Information was collected

- b. Our business or commercial purposes for collecting and disclosing Applicant Personal Information
- c. The categories of third parties to which we disclose Applicant Personal Information
- d. The categories of Applicant Personal Information that we disclosed for a business purpose, and for each category identified, the categories of third parties to which we disclosed that particular category of Applicant Personal Information.

(2) The specific pieces of Applicant Personal Information we have collected about you.

Right to Delete. You may request that we delete any Applicant Personal Information we have collected directly from you. After we have received your request to delete, and have verified your identity, we will delete your information except as allowed by the CCPA, and will direct any service providers and contractors which received your information from us to delete your Applicant Personal Information.

As allowed by the CCPA, we will not delete your Applicant Personal Information, even following a verifiable consumer request, if it is necessary for us or our service providers and contractors to maintain the information in order to:

1. Complete the transaction for which the personal information was collected, provide a good or service you requested, or reasonably anticipated by you within the context of a business's ongoing business relationship with you, or otherwise perform a contract between us and you.
2. Help ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes.
3. Debug to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that conforms or adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the ability to complete such research, if you have provided informed consent.
7. To enable solely internal uses that are reasonably aligned with the expectations of consumers based on your relationship with us and compatible with the context which you provided the information.

8. Comply with a legal obligation. For example, we may not be able to grant your Request to Delete your Applicant Personal Information to comply with various federal, state, and local retention laws.

We will retain a record of the deletion as required by law.

Right to Correct. If you believe that any of your Applicant Personal Information, we maintain about you is inaccurate, you have the right to request that we correct that information.

Right to Non-Discrimination for the Exercise of Your Privacy Rights. If you choose to exercise any of your privacy rights under the CCPA, we will not discriminate against you.

VI. CHANGE IN STATEMENT

We reserve the right to amend this Applicant Notice at any time in order to address future developments of Company, the Site or changes in industry or legal trends. We will post the revised Notice on the Site. Any changes will become effective upon the posting of the revised Applicant Notice on the Site. By continuing to use the Site following such changes, you will be deemed to have agreed to such changes. If you do not agree with the terms of this Applicant Notice, in whole or part, you can choose to not continue to use the Site.

HOW TO CONTACT US

Please address all inquiries, requests, and other communications regarding your personal information or this Privacy Notice to:

Contact: Data Protection Officer

Email: dpo@axiscapital.com

Address: 10000 Avalon Boulevard, Suite 200, Alpharetta, GA 30009

Phone: 1 888 914 9661, PIN 292703

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