

**Graham Holdings Company  
California Worker Privacy Statement  
January 1, 2020**

Graham Holdings Company and its affiliates (“the Company”) respects the privacy of your personal information and takes our related compliance and regulatory obligations seriously. This California Privacy Statement (“Statement”) describes the categories and uses of the Personal Information (as defined below) of Company employees, independent contractors and job applicants who reside in California (collectively “California Workers”) as required by the California Consumer Privacy Act (“CCPA”). The term “California Workers” includes California independent contractors and job applicants in addition to employees solely for the purpose of this Statement.

The Company receives Personal Information from and about you during the course of interviewing, hiring and employing or engaging you. We also may collect Personal Information about your related family members, dependents and beneficiaries in connection with benefits processing or obtaining emergency contacts. “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 individual or household.

**Categories of Personal Information Collected**

Category	Examples
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, or other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status.
D. Internet or other similar network activity.	Email sent or received on the Company network or on your Company computer, browsing history, search history, and information on your interaction with a website, application, or advertisement while operating on the Company network.

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California Worker Privacy Statement  
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E. Geolocation data	Internet protocol address, which may indicate general location.
F. Sensory data.	Audio, electronic, visual, or similar information.
G. Professional or employment-related information.	Job title, business site, supervisor, work schedule and status, compensation information, benefit information, training and development information, employment duration, current or past job history or performance evaluations, certification information, special competencies or work accomplishments and other relevant information.
H. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, predispositions, behavior, attitudes, and aptitudes.

**Purposes for Processing Your Personal Information**

The processing of your Personal Information enables the Company to perform its role as an employer and/or for the purposes of engaging you, including fulfilling its legal obligations under applicable laws and as necessary in connection with the Company's performance of its employment and/or other worker obligations. Without this information, it would not be possible for the Company to manage the workforce and meet applicable legal obligations. The Company processes certain Personal Information for its business interests, including, but not limited to, the following:

1. applicant recruiting and employee on-boarding;
2. payroll administration and independent contractor payment processing;
3. pension administration;
4. health administration/health insurance/benefits;
5. life insurance/benefits;
6. expense reimbursement and management;
7. contacting others in the event of an emergency;
8. making information available on the intranet and to facilitate communication between and among the Company workforce;
9. administration and management of your access to information technology systems;
10. time entry and leave management;

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11. training, appraisal, and development, such as personality and aptitude tests (e.g. DiSC and Strengths Finder), performance records and disciplinary records;
12. employee and staff surveys;
13. equal opportunities monitoring;
14. any Company benefit administration, including equity-related plans and benefits;
15. for marketing and/or public relations purposes and in connection with the performance of your duties (e.g., the Company may send your contact information to customers and potential customers as part of the marketing and sales process so they can contact you); and
16. to comply with applicable laws and legal obligations, including without limitation:
  - a. to maintain the ethics hotline;
  - b. to respond to governmental inquiries or requests from public authorities;
  - c. to comply with valid legal process or discovery obligations;
  - d. to protect the rights, privacy, safety or property of the Company, its workers or the public if such a disclosure is proportionate in the individual case;
  - e. to permit the Company to pursue available remedies or limit the damages that the Company may sustain;
  - f. to respond to an emergency; and/or
  - g. to comply with applicable regulations, policies and procedures.