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## General Information

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### California Consumer Privacy Act of 2018 Workforce Collection Notice

**Purpose:** To comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Policy.

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## Policy

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**Policy:** Summary of policy

- A. This Workforce Collection Notice for California Residents supplements the information contained in WelbeHealth's [HIPAA Notice of Privacy Practices](#) and applies solely to all visitors to our careers website. (www.welbehealth.com/careers) and who reside in the State of California ("job applicants" or "you").
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## Procedures

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### I. Information We Collect

- A. WelbeHealth collects 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 job applicant, household, or device ("personal information").
- B. Personal information does not include:
  - i. Publicly available information from government records.
  - ii. Deidentified or aggregated job applicant information.
- C. Information excluded from the CCPA's scope, like:
  - i. 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.
  - ii. 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.
- D. In particular, WelbeHealth has collected the following categories of personal information from job applicants within the last 12 months:

Category	Examples
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.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, 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, genetic information (including familial genetic information).
Internet or other similar network activity.	Browsing history, search history, information on a job applicant's interaction with a website, application, or advertisement.
Geolocation data.	Physical location or movements.

- E. WelbeHealth obtains the categories of personal information listed above from the following categories of sources:
- Directly from you. For example, from forms you complete.
  - Indirectly from you. For example, from observing your actions on our website.

## II. Use of Personal Information

- A. WelbeHealth may use or disclose the personal information WelbeHealth collects for one or more of the following purposes:
- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information when applying for a position, WelbeHealth will use that personal information to contact you about your application.

- ii. To process your application.
  - iii. To create, maintain, customize, and secure your account with WelbeHealth.
  - iv. To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve WelbeHealth's responses.
  - v. To help maintain the safety, security, and integrity of our website, products and services, databases and other technology assets, and business.
  - vi. For testing, research, analysis, and product development, including to develop and improve WelbeHealth's Website, products, and services.
  - vii. To periodically contact you about WelbeHealth news, new job opportunities, events and/or other services provided by WelbeHealth, or any other information that may be of interest.
  - viii. To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
  - ix. For internal administrative and auditing purposes.
  - x. For compliance with legal and regulatory requirements and corporate governance obligations.
  - xi. As described to you when collecting your personal information or as otherwise set forth in the CCPA.
  - xii. To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about WelbeHealth Website users is among the assets transferred.
- B. WelbeHealth will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **III. Sharing Personal Information**

- A. WelbeHealth may share your personal information by disclosing it to a third party for a business purpose.
- i. WelbeHealth only makes 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.
  - ii. In the preceding 12 months, WelbeHealth has not disclosed personal information for a business purpose.
- B. WelbeHealth does not sell personal information.

### **IV. Your Rights and Choices**

- A. The CCPA provides California residents with specific rights regarding their personal information.
- B. Right to Know and Data Portability
- i. You have the right to request that WelbeHealth discloses certain information to you about our collection and use of your personal

information over the past 12 months (the "right to know"). Once WelbeHealth receives your request and confirm your identity (see Exercising Your Rights to Know or Delete), WelbeHealth will disclose to you:

- a. The categories of personal information WelbeHealth collected about you.
- b. The categories of sources for the personal information WelbeHealth collected about you.
- c. WelbeHealth's business or commercial purpose for collecting that personal information.
- d. The categories of third parties with whom WelbeHealth shared that personal information.
- e. If WelbeHealth disclosed your personal information for a business purpose:
  - i. Disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- ii. The specific pieces of personal information WelbeHealth collected about you (also called a data portability request).

C. Right to Delete

- i. You have the right to request that WelbeHealth delete any of your personal information that WelbeHealth collected from you and retained, subject to certain exceptions (the "right to delete"). Once WelbeHealth receives your request and confirm your identity (see Exercising Your Rights to Know or Delete), WelbeHealth will review your request to see if an exception allowing us to retain the information applies. WelbeHealth may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:
  - a. Complete the transaction for which WelbeHealth 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, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
  - b. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
  - c. Debug products to identify and repair errors that impair existing intended functionality.
  - d. Exercise free speech, ensure the right of another job applicant to exercise their free speech rights, or exercise another right provided for by law.
  - e. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
  - f. 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.
  - g. Enable solely internal uses that are reasonably aligned with job applicant expectations based on your relationship with WelbeHealth.
  - h. Comply with a legal obligation.
  - i. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.
  - ii. WelbeHealth 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.
- D. Exercising Your Rights to Know or Delete
- i. To exercise your rights to know or delete described above, please submit a request by either:
    - a. Calling WelbeHealth at (888) 530-4415 [TTY: (800) 735-2922.
    - b. Emailing WelbeHealth at [personalinfo@welbehealth.com](mailto:personalinfo@welbehealth.com).
    - c. Visiting Greenhouse
      - 1. [www.greenhouse.com](http://www.greenhouse.com)
      - 2. Follow password protected account instructions.
  - ii. Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information.
  - iii. You may only submit a request to know twice within a 12-month period. Your request to know or delete must:
    - a. Provide sufficient information that allows WelbeHealth to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include:
      - 1. Account Log-in
    - b. Describe your request with sufficient detail that allows WelbeHealth to properly understand, evaluate, and respond to it.
  - iv. WelbeHealth cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.
  - v. You do not need to create an account with WelbeHealth to submit a request to know or delete. However, WelbeHealth does consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.
  - vi. WelbeHealth will only use personal information provided in the request to verify the requestor's identity or authority to make it.
- E. Response Timing and Format
- i. WelbeHealth will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please email [personalinfo@welbehealth.com](mailto:personalinfo@welbehealth.com).
  - ii. WelbeHealth endeavor to substantively respond to a verifiable consumer request within 45 days of its receipt. If WelbeHealth requires

more time (up to another 45 days), WelbeHealth will inform you of the reason and extension period in writing.

- iii. If you have an account with WelbeHealth, WelbeHealth will deliver a written response to that account. If you do not have an account with WelbeHealth, WelbeHealth will deliver a written response by mail or electronically, at your option.
- iv. Any disclosures WelbeHealth provides will only cover the 12-month period preceding our receipt of your request.
  - a. The response WelbeHealth provides will also explain the reasons WelbeHealth cannot comply with a request, if applicable.
  - b. For data portability requests, WelbeHealth 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, specifically electronic written communication.
- v. WelbeHealth does not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If WelbeHealth determines that the request warrants a fee, WelbeHealth will tell you why WelbeHealth made that decision and provide you with a cost estimate before completing your request.

#### **V. Non-Discrimination**

- A. WelbeHealth will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, WelbeHealth will not:
  - i. Deny you goods or services.
  - ii. Provide you a different level or quality of goods or services.
  - iii. Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.
- B. However, WelbeHealth may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive WelbeHealth offers will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

#### **VI. Changes to Our Privacy Policy**

- A. WelbeHealth reserves the right to amend this privacy policy at our discretion and at any time. When WelbeHealth makes changes to this privacy policy, WelbeHealth will post the updated notice on the Website and update the notice's effective date.
- B. Your continued use of WelbeHealth's Website following the posting of changes constitutes your acceptance of such changes.

## VII. Contact Information

- A. If you have any questions or comments about this notice, the ways in which WelbeHealth collects and uses your information described here [and in the Privacy Policy], your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact WelbeHealth at:
- i. Phone: (888) 530-4415 [TTY: (800) 735-2922]
  - ii. Website: [www.welbehealth.com](http://www.welbehealth.com)
  - iii. Email: [personalinfo@welbehealth.com](mailto:personalinfo@welbehealth.com)
  - iv. Postal Address:  
WelbeHealth, LLC.  
Attn: Privacy Officer  
340 S. Lemon Avenue  
Suite 4051  
Walnut, CA 91789
- B. If you need to access this Policy in an alternative format due to having a disability, please contact [personalinfo@welbehealth.com](mailto:personalinfo@welbehealth.com) and/or (888) 530-4415 [TTY: (800) 735-2922].

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## References

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## Glossary

Term	Definition
California Confidentiality of Medical Information Act (CMIA)	California law that protects the confidentiality of individually identifiable medical information obtained by health care providers, health insurers, and their contractors.
California Consumer Privacy Act of 2018 (CCPA)	The CCPA regulations provide guidance to businesses on how to inform consumers of their rights under the CCPA, how to manage consumer requests, how to verify the identity of consumers making requests, and how to apply the law as it relates to minors. In doing so, the regulations make it easier for consumers to exercise their CCPA rights.
California Financial Information Privacy Act (FIPA)	Contains disclosure regulations and prohibits financial institutions from selling or sharing nonpublic personal information with nonaffiliated third parties without the consumer's explicit prior consent.



Driver's Privacy Protection Act of 1994	Amends the Federal criminal code to prohibit disclosure of personal information derived from an individual's motor vehicle records to anyone other than that individual.
Fair Credit Reporting Act (FCRA)	Protects information collected by consumer reporting agencies such as credit bureaus, medical information companies and tenant screening services.
Gramm-Leach-Bliley Act (GLBA)	Requires financial institutions – companies that offer consumers financial products or services like loans, financial or investment advice, or insurance – to explain their information-sharing practices to their customers and to safeguard sensitive data.
Health Insurance Portability and Accountability Act of 1996 (HIPAA)	A federal law that required the creation of national standards to protect sensitive patient health information from being disclosed without the patient's consent or knowledge.
Personal Information	Information that can be used to identify, locate, or contact an individual, alone or when combined with other personal or identifying information

#### Regulation/Statute

Regulation/Statute #	Title
<a href="#">11 CCR ADC § 7000</a>	California Consumer Privacy Act of 2018
<a href="#">Cal. Penal Code § 1546.1</a>	California Electronic Communications Privacy Act
<a href="#">Cal. Civ. Code § 1798.80(e)</a>	California Customer Records

#### Attachments

Attachment #	Title
<a href="#">Notice of Privacy Practices</a>	WelbeHealth's HIPAA Notice of Privacy Practices