



CCPA Privacy Notice for California Job Applicants, Employees, Interns, Directors, Officers, and Contractors

Last Updated: February 5, 2021

Landmark Health, LLC and its for-profit members, subsidiaries, and affiliates, including Landmark medical professional entities (collectively referred to herein as “Landmark Health”, “we”, “our” or “us”) hereby provide this notice to all job applicants, employees, interns, directors, officers, and contractors residing in California (“you”) in order to comply with the California Consumer Privacy Act of 2018 (CCPA). Any terms defined in the CCPA have the same meaning when used in this notice.

Information We Collect

We collect 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 consumer or household (“**personal information**”). In particular, Landmark Health collects, or may in the future collect, the following categories of personal information from you in your role (or former role) as a job applicant, employee, intern, director, officer or contractor:

Category	Examples	Collected
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.	YES
B. 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.	YES
C. 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).	YES

D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	YES
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To process payroll or to pay invoices.
- To track time and attendance.
- To communicate with you.

- To obtain, maintain, and provide insurance policies and coverages and manage claims (including but not limited to worker's compensation, general and commercial liability, professional liability and other types of commercial insurance policies/coverages).
- To credential a provider with a health plan and related credentialing activities.
- To perform, obtain and/or verify background checks, drug screenings, licenses, sanction checks, references, prior job history and any requirements that are a condition of employment/continued employment.
- To maintain emergency contact, spouse, dependent, and beneficiary information for you.
- For any benefits-related purposes, including to administer and maintain benefits and benefit programs such as group health insurance and retirement services, as well as to offer discounts and other perks or programs to employees.
- To collect your signature and related authentication details in connection with any documents you electronically or physically sign and provide to Landmark Health. This information may be used to maintain the integrity of our processes, enforce rights, prevent fraud, and validate your identity.
- To evaluate compensation and other job-related data, including but not limited to anonymizing and/or aggregating data to perform workforce analytics, data analytics, and benchmarking.
- To evaluate and manage employees' performance of their job duties, including reviews, promotions, discipline and/or termination.
- To promote Landmark Health and its business activities, which may include advertising, promotion, marketing, or internal corporate communications.
- To conduct workplace investigations.
- To manage employees' leaves of absence, reasonable accommodation requests, and similar activities.
- To manage and track required trainings.
- To identify conflicts of interest.
- To manage, track and/or reimburse business or other relevant expenses.
- To evaluate your eligibility to receive equity or purchase employee investment shares, and for equity-related administration purposes.
- To apply for, maintain or renew permits, licenses, certifications, insurance, and similar items on your behalf.
- To evaluate job applicants and candidates for employment, or to evaluate directors, officers or contractors for the role for which they are being considered or services they will provide.
- To facilitate student internships through an educational affiliation arrangement.

- To comply with corporate requirements, policies, procedures, or standards.
- To add or remove officers, directors, shareholders, members or owners of any Landmark Health entity.
- To execute and/or notarize documents.
- To provide, validate, or communicate services offered by Landmark Health service providers and third parties directly to you.
- For recruitment activities, which may include notifying you about Landmark Health events and job opportunities.
- To perform surveillance and call monitoring.
- To implement, monitor, and manage electronic security measures, provide identity verification and authentication, fraud and other potential criminal activity detection and prevention, performance monitoring, and as part of typical employment-related activities.
- To grant and monitor access to Landmark Health facilities.
- To create identification badges or tags.
- To comply with contractual obligations.
- To comply with health plan and other customer requests.
- To keep records of employee personal information as required by law and in accordance with our record retention policies.
- To fulfill our legal obligations under applicable laws, court orders, regulations and other legal processes; to respond to law enforcement requests.
- To investigate and defend ourselves against any claims or allegations; to defend or protect the rights, property, and safety of us, you, or another party.
- To engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions.
- For any and all other employment and job-related purposes or, for contractors who are not Landmark Health employees, for all purposes related to your performance of services for Landmark Health.
- As described to you when collecting your personal information.
- To fulfill or meet the reason you provided the information.
- To conduct and maintain records of temperature screenings and other health screenings, symptoms, test results or diagnoses as necessary to ensure health, safety, and wellness among staff and patients; identify individuals who are displaying COVID-19 symptoms; communicate with individuals who have tested for or are suspected of having COVID-19; communicate with individuals who have potentially been exposed to COVID-19; help support contact tracing efforts in connection with COVID-19; and share with government authorities and law enforcement (e.g. public

health authorities) as may be required by applicable laws, regulations, court orders or other legal processes relating to COVID-19.

Landmark Health 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. Landmark Health reserves the right to amend this Privacy Notice at any time.