



## CCPA Privacy Notice for California Website Visitors

**Last Updated:** February 12, 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 website visitors and users 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.

### **I. 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 may collect, or may in the future collect, the following categories of personal information from you when you visit or use the website [www.landmarkhealth.org](http://www.landmarkhealth.org):

<b>Category</b>	<b>Examples</b>	<b>Collected</b>
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.	NO
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 (e.g., call recordings and call transcriptions), 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 fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our services or to subscribe to receive our emails, we will use that personal information to respond to your inquiry.

- To provide, support, and develop our Website and to deliver content and service offerings relevant to you.
- To analyze Website user behavior and traffic, and to perform other related analytics.
- To provide you with services, support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To maintain records and comply with applicable record-keeping policies, laws, rules, and regulations.
- To help maintain the safety, security, and integrity of our Website, databases and other technology assets, and business.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To investigate and defend ourselves against any claims or allegations.
- To protect the personal safety of users of this Website or the public.
- To defend and protect our rights, property, employees, customers, or patients.
- To implement, monitor, and manage electronic security measures on devices that are used to access networks and systems.
- To communicate with you and/or contact you about opportunities or services that may be of interest to you.
- To pursue business development opportunities.
- For recruitment activities.
- For outreach and engagement activities.
- For marketing, advertising, and other promotional activities.
- For training and customer service improvement activities.
- To perform call monitoring activities.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of Landmark Health's assets, whether as a going concern or as a part of bankruptcy, liquidation, or similar proceedings, in which personal information held by Landmark Health about consumers is among the assets transferred.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

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.

For more information on the collection and use of your personal information or about the security of your personal information, please visit the [CCPA Privacy Policy](#).

