

Notice at Collection and Privacy Policy

Santé Health System adopts this Notice at Collection and Privacy Policy (“Privacy Policy”) in compliance with the California Privacy Rights Act (“CPRA”). This Privacy Policy applies to “personal information” that we collect as a “business” as defined in the CPRA. The Effective Date of this policy is January 1, 2023. Santé Health System reserves the right to change, modify and update this Privacy Policy by posting a revised version on our websites and by revising the Effective Date.

Contents of Privacy Policy:

1. The categories of personal information collected by Santé during the preceding 12 months.
2. The categories of sources from which personal information is collected.
3. The purposes for which the personal information is collected, sold or shared.
4. The personal information disclosed to third parties.
5. Retention of personal information.
6. Your privacy rights and how to use them.
7. Changes to this Privacy Policy.

This Privacy Policy applies to the personal information of (a) employees, (b) independent contractors and other individuals who perform work for Santé (collectively “Non-Employees”), (c) employees’ and Non-Employees’ dependents, emergency contacts, and beneficiaries (“Related Contacts”) and (d) job applicants (all collectively, “Company Individuals”). All Company Individuals are referred to as “Employees”.

Except where the Privacy Policy specifically refers only to a specific category of Employees, this Privacy Policy refers to all categories of Employees collectively.

“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 Company Individual or household.

Santé does not collect or process sensitive personal information or characteristics of protected classifications for the purpose of inferring characteristics about a Company Individual.

1. PERSONAL INFORMATION COLLECTED

1.1 Employees

- **Identifiers:** real name, alias, telephone number, postal address, e-mail address, signature, bank account name and number for direct deposits, date of birth, Social Security Number, driver’s license number, passport number or other government-issued identifier.
- **Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80)** Name, signature, Social Security Number, postal address, telephone number, passport number, driver’s license or state identification card number, bank account name and number for direct deposit or credit card information, for example for expense reimbursement.
- **Professional or Employment-Related Information:** educational institutions attended, degrees and certifications, licenses, work experience and previous employers, union membership, professional memberships and affiliations, seniority, employment start and ending dates, and job title.
- **Sensitive identifiers:** Social Security, driver's license, state identification card, or passport number.

- **Characteristics of protected classifications under California or Federal law for employees:** race, age, national origin, disability, sex, gender, marital status, primary language, and veteran status as necessary to comply with legal obligations and to support diversity and inclusion programs; disability, medical condition, and pregnancy, childbirth, breastfeeding, and related medical conditions, as necessary to comply with Federal and California law related to leaves of absence and accommodation, including for religious accommodation; and marital and familial status as necessary to provide benefits to employees and for tax purposes.
- **Health information**, for example: information about an on-the-job injury collected for workers' compensation purposes, medical information lawfully collected for purposes of medical leaves of absence, and State and Federal reporting purposes.
- **Compensation and benefits information for employees:** salary, bonus and commission, hours and overtime, leave information, bank details (for payroll and reimbursement purposes only), benefits in which you may be enrolled, and identifying information for dependents and beneficiaries.
- **Other financial required disclosures:** information regarding child and spousal support, 401k contributions and retirement vesting, demographic and financial information for pensions and retirement plans, wage information, earnings, taxes.
- **Commercial Information**, for example: business travel and expense records.
- **Internet Activity Information**, for example: internet browsing and search history while using Santé's network, log in/out and activity on Santé's electronic resources, interactions with Santé's Internet website, applications, or advertisements, and publicly available social media activity.
- **Sensory or Surveillance Data**, for example: voicemails, recordings of meetings or video-conferences, and footage from video surveillance cameras.
- **Geolocation data**, for example: global positioning system tracking on Company vehicles.
- **Personal communications:** the contents of mail, email, or text messages on accounts or services not owned, or subscribed-to, by Santé only for purposes of legitimate Company investigations and, to the extent required by law, with your authorization.
- **Login credentials**, for example: login credentials to an online account owned or subscribed to by Santé or as necessary to review personal communications as described in the preceding bullet point.

1.2 Non-Employees

Santé may collect the categories of personal information listed in Section 1.1, above, *excluding* the following categories: (a) compensation and benefits information for employees; (b) characteristics of protected classifications under California or federal law for employees; and (c) health Information. In addition, Santé collects amounts paid to Non-Employees for services rendered.

1.3 Related Contacts

Santé collects contact information about emergency contacts. Santé may collect the following categories of personal information about spouses or domestic partners, dependents, and beneficiaries: (a) Identifiers; (b) commercial information if, for example, Santé arranges travel for a dependent to attend a Santé event; (c) Internet Activity Information if the individual uses Santé electronic resources and websites; (d) sensory or surveillance data if the individual enters Santé facilities; (e) § 1798.80 personal information, such as insurance policy numbers if the individual is covered by Santé insurance as a beneficiary; (f) protected categories of Personal Information only as required by law, for example, childbirth to administer parental leave, marital status to pay taxes, and familial status to administer benefits; (g) health information, for example, if needed to administer a leave of absence for you to care for a Related Contact; (h) date of newborn delivery to administer parental, Family and Medical Leave Act, or California Family Rights Act leave; (i) login credentials to a Santé benefits portal or site; and (j) sensitive identifiers, for example, Social Security numbers for beneficiary designations; personal communications if communicating with a workforce member.

1.4 Job Applicants

As only allowed under the law, Santé may collect the categories of personal information listed in Section 1.1, which includes Identifiers, Personal Information as identified in Cal. Civ. Code § 1798.80, Professional or Employment-Related Information, Internet Activity Information, Characteristics of protected classifications under State or Federal law as legally allowed, needed or required by law, Sensitive Identifiers, background information, such as complete background check, credit, drug/alcohol and/or other checks when permitted by law, and information received during these checks, internet or other electronic network activity information as permitted by law, and inferences drawn from any of this information to assess qualifications for a certain position.

2. THE CATEGORIES OF SOURCES FROM WHICH SANTÉ COLLECTS PERSONAL INFORMATION

You,; your spouse or dependent; internally generated; vendors and service providers, for example, job references, staffing agencies, background check companies or drug testing facilities; public internet sources such as social media and other public online sources; public records, surveillance or recording technologies installed by Santé; government or administrative agencies; claim administrators and investigators.

3. THE PURPOSES FOR WHICH WE USE YOUR PERSONAL INFORMATION

Depending upon the categories identified in Section 1 above which apply to either an employee, non-employee, related contact or job applicant, along with the disclosures above, Santé may use Personal Information for the following purposes, including any other purposes authorized by the California Privacy Protection Agency, California or Federal law:

- To operate, manage, and maintain our business.
- For hiring, retention, and employment purposes, including background and credit checks, drug testing, criminal record checks, sex offender registry;
- To otherwise accomplish our business purposes and objectives, including, for example:
 - Emergency services.
 - Quality and safety assurance measures.
 - Conducting risk and security controls and monitoring.
 - Protecting confidential and trade secret information.
 - Performing accounting, audit, and other internal functions, such as internal investigations.
 - To fulfill recordkeeping and reporting responsibilities.
 - To manage personnel and workforce matters.
 - To administer compensation, bonuses, other forms of compensation.
 - To manage vacation, sick leave, and other leaves of absence.
 - To the extent necessary to comply with Santé's legal obligations.
 - For workers' compensation and occupational health and safety purposes.
 - To track hours and attendance.
 - Complying with the law, legal process, and internal policies such as maintaining records, claims processing, responding to legal requests, exercising and defending claims.
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- To monitor use of Santé information systems and other electronic resources or information systems.
- To report suspected criminal conduct to law enforcement and cooperate in investigations.
- For communications with prospective, current, and former customers.
- To enable Santé to comply with client contractual obligations.
- To manage business expenses and reimbursements.

- To manage and operate information technology and communications systems, risk management and insurance functions, budgeting, financial management and reporting, and strategic planning.
- In connection with a corporate transaction, sale, or assignment of assets, merger, divestiture, or other changes of control or financial status of Santé or any of its subsidiaries or affiliates.
- To manage licenses, permits, and authorizations applicable to Santé’s business operations.

In addition to the above, Santé collects information about race, age, national origin, disability, sex, and veteran status and as necessary to comply with legal obligations, including the reporting requirements of the Federal Equal Employment Opportunity Act and California’s Fair Employment and Housing Act. Santé also uses personal information for purposes including:

- With respect to disability, medical condition, familial status, marital status, and pregnancy, childbirth, breastfeeding, and related medical conditions: as necessary to comply with Federal and California law related to leaves of absence and accommodation;
- With respect to military and veteran status: as necessary to comply with leave requirements under applicable law and for tax purposes;
- With respect to age: incidentally to the use of birth date for birthday celebrations and identity verification;
- With respect to religion and pregnancy, childbirth, breastfeeding, and related medical conditions: as necessary for accommodations under applicable law;
- With respect to protected classifications, such as national origin: to the extent this information is contained in documents that you provide in I-9 documentation; and
- With respect to marital status and familial status: as necessary to provide benefits and for tax purposes.

4. HOW WE SHARE THE ABOVE PERSONAL INFORMATION WITH THIRD PARTIES

As part of a legitimate business purpose, in the preceding 12 months Santé is, and has been required to disclose some or all of the categories of personal information described in Section 1 above to types of third parties listed below. When disclosure is required, Santé discloses your personal information only to the extent necessary to achieve the purpose of the disclosure and only if permitted under the CPRA.

- **Service providers:** Santé engages in certain trusted third parties to perform functions and provide services for our business needs, contractual and legal obligations. This includes services such as billing, customer relationship, database storage and management, auditors, administrative service providers, law firms, benefits, payroll, medical services, safety, security, accounting, tax and transportation. Santé discloses your personal information only subject to written contracts in compliance with the CPRA.
- **Compliance with Laws and Law Enforcement:** Santé cooperates with government and law enforcement officials or private parties to enforce and comply with the law. To the extent permitted under applicable law, we may disclose information about you to government or law enforcement officials or private parties we believe necessary or appropriate to investigate, respond to, and defend against claims, for legal process, to protect the property and rights of Santé or a third party, to protect Santé against liability, for the safety of the public or any person, to prevent or stop any illegal, unethical, fraudulent, abusive, or legally actionable activity.
- **Required Disclosures:** We may be required to disclose personal information (a) in a court proceeding, (b) in response to a court order, subpoena, civil discovery request, other legal process, or (c) as otherwise required by law.
- **Professional Advisors:** Professional advisors such as our lawyers, accountants, bankers and other outside professional advisors in the course of the services they provide to us.
- **Government or administrative agencies:** These may include, for example: Internal Revenue Service to pay taxes; Employment Development Department; OSHA/Cal OSHA; Department of Fair Employment and Housing; California Department of Industrial Relations.

- **Corporate Transactions:** Parties to transactions and potential transactions for the sale, transfer or licensing of a portion or all of the business or assets, including your personal information, such as a corporate divestiture, merger consolidation, acquisition, reorganization or sale of assets.

Santé does not disclose personal information for cross-context behavioral advertising and does not sell personal information for monetary gain.

5. RETENTION OF PERSONAL INFORMATION

Santé keeps your personal information only for as long as necessary for the purposes set forth in this policy and in accordance with our record retention schedule. Santé will store your personal data as necessary to comply with legal obligations and legitimate business reasons.

6. YOUR PRIVACY RIGHTS

6.1 Your California Privacy Rights

Subject to applicable law, Employees have the following rights:

- **Access to Specific Information:** Along with having a right to know the categories, sources, purpose and use of personal information as described above, two times in a 12-month period, you also have the right to submit a verifiable request for copies of specific pieces of your personal information collected in the preceding 12 months or at your option since January 1, 2022. There may be information that we are not permitted by law to provide to you.
- **Right to Delete:** Subject to certain exceptions, you have the right to submit a verifiable request for the deletion of personal information Santé has collected from you. Santé is not required to delete personal information that was collected from a source other than you. The Company is not required to delete personal information needed to comply with its legal obligations, to exercise its legal rights, is needed to fulfill contractual obligations, or is necessary to satisfy compliance requirements and litigation demands.
- **Right to Correct:** You have the right to submit a verifiable request that Santé rectify inaccurate information about you. When evaluating the accuracy of the personal information at issue, Santé will consider the totality of circumstances relating to the contested personal information and use commercially reasonable efforts to determine if corrections are necessary.
- **Right to Limit Processing of Sensitive Personal Information:** You have the right to tell us not to process sensitive personal information except for the purpose for which it was originally collected. Sensitive personal information includes the following categories of information described above: § 1798.80: personal information, characteristics of protected classifications, sensitive identifiers, health information, biometrics, religion, sex life, sexual orientation, personal communications, financial account information, and log in credentials. We describe the purposes for which we collect this information above, and we do not process this information for other purposes.

6.2 Exercising Access, Inaccurate Information and Deletion Rights

To exercise the access, correct inaccurate information and/or deletion rights described above, submit a request to us by either:

Toll-Free Number: 1-833-759-8284

E-Mail: HR@santehealth.net

The request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. We reserve the right to confirm your California residency. Government identification may be required. If you wish to designate an authorized agent to make a request on your behalf, we will need to verify both your and your agent's identities, which may require submission of government identification. Your agent must also provide other proof of authority acceptable to us in our sole discretion. Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We 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. In certain cases, law may permit us to deny your request. Santé will acknowledge receipt of your request to know, delete and to correct information within 10 days of receipt and will respond within 45 days. You will also be notified if we need an additional 45 days to respond.

6.3 Santé's Non-Discrimination and Non-Retaliation Policy

Santé will not discriminate or retaliate against you for exercising your rights under the CPRA.

7. CHANGES TO THIS PRIVACY POLICY

Santé reserves the right to change this Privacy Policy at any time. If the Privacy Policy is materially changed, Santé will post the changes and update the Privacy Policy's Effective Date above. You are responsible for periodically visiting Santé's website and reviewing the Privacy Policy for any changes.

FOR MORE INFORMATION

For questions about Santé's Privacy Policy, please contact us at HR@santehealth.net.