

CCPA Notice at Collection For California Applicants

Health & Wellness Partners (“we,” “us,” or “our”) collects and uses your “personal information” (as defined below) for human resources, legal compliance, and business-related purposes as described in the following tables. We are committed to properly handling the personal information we collect and use in connection with your application with us.

This Notice applies only to the personal information we collect about applicants (“you” or “your”), and their emergency contacts (if any), living in California. We have adopted this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) as amended by the California Privacy Rights Act (“CPRA”), and the California Online Privacy Protection Act (“CalOPPA”). Unless otherwise indicated, any terms defined in the CCPA and implementing regulations, or CalOPPA, have the same meaning when used in this Notice.

What Personal Information Do We Collect and Use?

We collect and use information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked—directly or indirectly—with a particular applicant or their emergency contact (“personal information”). Personal information does not include:

- a) publicly available information;
- b) lawfully obtained, truthful information that is a matter of public concern;
- c) de-identified or aggregated information; or
- d) information excluded from the CCPA's scope, such as health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) and the California Confidentiality of Medical Information Act (“CM IA”) or that is clinical trial data; or information covered by sector-specific privacy laws including the Fair Credit Reporting Act (“FCRA”), the Gramm-Leach-Bliley Act (“GLBA”), the California Financial Information Privacy Act (“CalFIPA”), or the Driver's Privacy Protection Act of 1994.

To view our full California privacy notice, visit <https://www.thehwpgroup.com/california-privacy-rights/>

We may collect personal information about you or your emergency contacts in the categories described in Tables 1 and 2 below. The examples of personal information in each category are intended to be comprehensive so you can meaningfully understand the categories of personal information we may collect. We do not necessarily collect each example of personal information in a particular category. The tables also list the purposes for which we collect and use these categories of personal information.

Table 1.

Category of Personal Information To Be Collected	Collection and Use Purposes
<p>A. Personal identifiers.</p> <p><i>Examples:</i> Real name, postal address, email address</p>	<ul style="list-style-type: none"> • Supporting infrastructure and human resource management. • Recruiting and evaluating applicants. • Processing and evaluating your application and related materials you submit as an applicant. • Performing data analytics, and benchmarking. • Verifying and validating your identity or otherwise preventing, investigating, or providing notice of fraud, unlawful or criminal activity, or unauthorized access to or use of personal information, and our website or data systems. • Complying with our legal obligations, including complying with law enforcement or governmental authority requests, participating in judicial proceedings, responding to requests from third parties based on their legal rights, and investigating fraudulent activity. • Enforcing and defending our legal rights and those of our employees, affiliates, and agents.
<p>B. Personal information categories listed in the California Customer Records Statute (Cal. Civ. Code §1798.80(e)).</p>	<p>Same purposes as for “personal identifiers” category.</p>

Category of Personal Information To Be Collected	Collection and Use Purposes
<i>Examples:</i> Name, address, telephone number, education, employment history	
I. Professional or employment-related information. <i>Examples:</i> Application information, work authorization	Same purposes as for “personal identifiers” category.

“Sensitive personal information” is a type of personal information that consists of specific information categories. While we collect information that falls within the categories listed in Table 2, the CCPA does not treat this information as sensitive because we do not collect or use it to infer characteristics about a consumer.

Table 2.

L. “Sensitive Personal Information” Category	Collection and Use Purposes
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Expected Retention Periods

Except as otherwise permitted, as required by law or regulation, as needed to satisfy any legal or regulatory obligations, or as needed to resolve disputes, we will keep personal information for as long as necessary to fulfil the purposes for which we collected it. In determining an appropriate time to keep personal information, we consider applicable legal requirements, the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of the personal information, the purposes for which we process the personal information, and whether those purposes can be achieved through other means.

Selling and Sharing Personal Information

We do not sell personal information, or share it with third parties for cross-context behavioral advertising

Questions and Contact Information

If you have questions about our privacy policies and information practices, or need to access this Notice in a different format to accommodate a disability, please contact Audrey Pezzuti, Chief Information Officer, apezzuti@thehwpgroup.com, 201-661-5551.