

# Privacy Notice For California Residents

**Last updated: August 8, 2023**

This Notice describes the online and offline practices of Heath & Wellness Partners (“we,” “us,” or “our”) for collecting, using, and disclosing personal information about California consumers. It applies only to natural persons (including our customers, employees, job applicants, and independent contractors) living in California (“consumers,” “you,” or “your”). 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.

To view our Notices At Collection for California consumers, visit:

- California employees: <https://www.thehwpgroup.com/california-privacy-rights/employee.pdf>
- California job applicants: <https://www.thehwpgroup.com/california-privacy-rights/applicants.pdf>
- California independent contractors: <https://www.thehwpgroup.com/california-privacy-rights/independentcontractors.pdf>

## Personal Information We Collect

We collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked—directly or indirectly—with a particular consumer or household (“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 that is 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.

We have collected the following categories of personal information about consumers in the last twelve (12) months:

**Table 1.**

Category	Examples	Collected
A. Personal identifiers.	Real name, alias, postal address, email address, account name, Social Security number, driver's license number, passport number, medical license number, airline frequent flyer number, other similar identifiers.	Yes.
B. Personal information categories listed in the California Customer Records Statute (Cal. Civ. Code §1798.80(e)).	Name, signature, Social Security number, address, telephone number, passport number, driver's license number, insurance policy number, education, employment history, bank account number, credit card number, financial information, medical information, or health insurance information.	Yes.
C. Protected classification characteristics under California or Federal law.	Age (>40), race, ancestry, national origin, citizenship, religion, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, pregnancy, childbirth and related medical conditions),.	Yes
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	No.
E. Biometric Information.	Exercise data.	Yes
F. Internet or similar electronic network activity information.	Information on interaction with a website, application	Yes

Category	Examples	Collected
G. Geolocation data.	Data derived from a device and used (or intended to be used) to locate a consumer within a geographic area.	No.
H. Audio, electronic, visual, thermal, olfactory, or similar information.	photos	Yes
I. Professional or employment-related information.	Employment application information, background check, work authorization, performance and disciplinary records, salary, bonus, commission, and other similar compensation data, benefit plan enrollment, participation, and claims information, leave of absence information including religious, military and family obligations, health data concerning employee and their family members.	Yes.
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g; 34 CFR Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades	Yes
K. Inferences drawn from any personal information we have collected in Categories A-J and L, to create a profile about a consumer (reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes), or to predict a salient consumer characteristic or propensity.	Characteristic or propensity (such as “married,” “homeowner,” “on-line shopper,” “likely voter”) derived from personal information that we have collected in Categories A-J and L.	No.

“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.**

<b>L. "Sensitive Personal Information" Categories</b>	<b>Collected</b>
Social Security number, driver's license number, state identification card number, or passport number.	Yes
Account log-in, financial account, debit card, or credit card number <u>along with</u> any required security or access code, password, or credentials allowing access to an account.	No
Precise geolocation.	No.
Racial or ethnic origin,	Yes
Contents of a consumer's mail, email, and text messages, unless we are the intended recipient of the communication.	No.
Genetic data.	No
Biometric information processed for the purpose of uniquely identifying a consumer.	No.
Personal information collected and analyzed concerning a consumer's health.	Yes
Personal information collected and analyzed concerning a consumer's sex life or sexual orientation.	No

## Sources Of Personal Information

We obtain the categories of personal information listed in Tables 1 and 2 from the following categories of sources:

- You or others acting on your behalf, both directly/intentionally, and indirectly/automatically.
- Operating systems and platforms.

## Why We Collect Personal Information

We collect personal information about consumers for the following business or commercial purposes:

**Table 3.**

<b>Business Purposes</b>	<b>Commercial Purposes</b>
<ul style="list-style-type: none"><li>• Helping to ensure security and integrity.</li><li>• Debugging to identify and repair errors that impair existing intended functionality.</li><li>• Internal research for technological development and demonstration.</li><li>• Verifying or maintaining the quality or safety of—or improving, upgrading, or enhancing—a service or device owned by, manufactured by, manufactured for, or controlled by us.</li></ul>	<ul style="list-style-type: none"><li>• Supporting employment, infrastructure, and human resource management.</li><li>• Recruiting applicants.</li><li>• Processing and evaluating applications and related materials submitted by applicants.</li><li>• Performing data analytics.</li><li>• 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.</li><li>• Enforcing and defending our legal rights and those of our employees, affiliates, and agents.</li><li>• Preventing, detecting, and investigating security incidents that compromise the availability, authenticity, integrity, or confidentiality of personal information.</li><li>• Resisting malicious, deceptive, fraudulent, or illegal actions directed at us and prosecuting those responsible.</li><li>• Collection and processing not for the purpose of inferring characteristics about a consumer.</li></ul>

## **Selling and Sharing Personal Information**

We have not sold personal information, or shared it with third parties for cross-context behavioral advertising, in the past twelve (12) months.

## **Disclosing Personal Information For A Business Purpose**

To the past twelve (12) months, we have disclosed the following categories of personal information (corresponding with Tables 1 and 2) to third parties for a business purpose:

- Helping to ensure security and integrity.
- Debugging to identify and repair errors that impair existing intended functionality.
- Short-term, transient use, including non-personalized advertising shown as part of your current interaction with us.
- Internal research for technological development and demonstration.

Verifying or maintaining the quality or safety of—or improving, upgrading, or enhancing—a service or device owned by, manufactured by, manufactured for, or controlled by us. The categories of third parties to whom we disclosed these categories of personal information for a business purpose are:

- None

## Using and Disclosing “Sensitive Personal Information”

We only use or disclose information described in Table 2 for one or more of the purposes specified in 11 CCR § 7027(m):

- Preventing, detecting, and investigating security incidents that compromise the availability, authenticity, integrity, or confidentiality of personal information.
- Resisting malicious, deceptive, fraudulent, or illegal actions directed at us and prosecuting those responsible.
- Ensuring the physical safety of natural persons.
- Performing services on our behalf.
- Verifying or maintaining the quality or safety of—or improving, upgrading, or enhancing—a service or device owned by, manufactured by, manufactured for, or controlled by us.
- Other collection and processing not for the purpose of inferring characteristics about a consumer.

We do not collect or process this information to infer characteristics about consumers.

## Your Rights Regarding Your Personal Information

The CCPA provides you with specific rights regarding your personal information:

- 1) **Right to Know.** You have the right to ask us to disclose to you the following information about personal information we collect from you:
  - Categories of personal information collected;
  - Categories of sources of personal information collected;
  - Business or commercial purposes for collecting personal information (we do not sell or share personal information);
  - Categories of personal information we disclosed about you for a business purpose, and for each, the categories of third parties to whom we disclosed each category; and
  - The specific pieces of personal information we have collected about you in the twelve (12) months before we received your request. You may ask us to provide this information beyond the 12-month period (as long as we collected the personal information on or after January 1, 2022), and we will do so unless it would be impossible or involve disproportionate effort—if so, we will explain why.
  
- 2) **Right to Delete.** You have the right to ask us to delete any of your personal information that we collected from you.
  
- 3) **Right to Correct.** You have the right to ask us to correct inaccurate personal information that we maintain about you.

## Exercising Your CCPA Rights

If you would like to exercise your right to know, to delete, or to correct, you may do so by calling (877) 406-6909 or visit <https://www.thehwpgroup.com/california-privacy-rights/>. A request must contain enough information to allow us to understand, evaluate, and respond to it. A request must also be “verifiable,” meaning:

- The request must be made by you (on your own behalf or on behalf of your minor child), by a person registered with the California Secretary of State and authorized to act on your behalf, or by a person with your power of attorney or acting as your conservator; and
- We must be able to verify—using commercially reasonable methods—that the person making the request is in fact you, your authorized agent, your power of attorney holder, or your conservator.

Where feasible, we will verify by matching information provided by the requestor to personal information about you (or your minor child) that we already maintain, or we will use a third-party verification service that complies with the CCPA. For requests to correct, we will try to verify based on personal information that is not the subject of the request to correct. If we cannot verify your identity using personal information that we already maintain, we may ask for more information, but we will only use the additional information for verification purposes, security, or fraud prevention. We will delete any additional personal information requested for verification as soon as practical after processing the request, except as needed to comply with record-keeping requirements.

We will not require you or your authorized agent to pay a fee (including a non-reimbursed notary fee) to verify a request to know, to delete, or to correct.

We will respond to requests to know, to delete, and to correct as follows:

- Within ten (10) business days of receiving the request, we will confirm that we received it and let the requestor know how we will process it (including general information about our verification process, and when you can expect a response).
- We will respond to a request within forty-five (45) calendar days of receiving it, regardless of the time needed to verify—but if we cannot verify the request within the 45-day period, we can tell you this and deny the request.
- If needed, we can take up to forty-five (45) more calendar days (for a total of ninety (90) calendar days) to respond to a request. If we need that extra time, we will notify the requestor within the original 45-day period and explain why we need it.

## **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights.

## **How We Respond To “Do Not Track” Signals**

We do not respond to web browser “Do Not Track” signals or other mechanisms that automatically communicate a consumer’s choice not to be tracked.

## **Analytics Services Provided By Others**



We use Google Analytics, a web-based analytics service provided by Google, Inc. ("Google"). For more information on how Google uses data when you use this website, please follow this [link](#) or visit <https://policies.google.com/technologies/partner-sites>. You may be able to opt-out of some or all of Google Analytics features by downloading the Google Analytics opt-out browser add-on, available at [here](#) or at <https://tools.google.com/dlpage/gaoptout>.

## **Material Changes To This Notice**

We may make material changes to this Notice. Notification of material changes will be posted on this page. You should review this Notice from time-to-time to keep up to date on our most current policies and practices.

## **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](mailto:apezzuti@thehwpgroup.com), 201-661-5551.