

CCPA Notice at Collection For California Employees

Health & Wellness Partners (“we,” “us,” or “our”) collects and uses your “personal information” (as defined below) for human resources, employment, benefits administration, health and safety, 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 employment relationship with us.

This Notice applies only to the personal information we collect about employees (“you” or “your”), and their emergency contacts and plan beneficiaries, 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 employee or their emergency contact or plan beneficiary (“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 (“CMIA”) 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 or plan beneficiaries 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, alias, postal address, email address, Social Security number, driver’s license number, passport number, airline frequent flyer number, other similar identifiers.</p>	<ul style="list-style-type: none"> • Supporting employment, infrastructure, and human resource management. • Managing your employment relationship with us, including onboarding; timekeeping, payroll, and expense administration; benefits administration; training and development; creating and maintaining on-line accounts; communicating with emergency contacts; managing workers’ compensation claims; performance evaluation; discipline and termination. • Managing employee access to our facilities, equipment, and systems. • Conducting internal audits and workplace investigations. • Investigating and enforcing compliance with our policies and procedures. • Engaging in corporate transactions requiring review of employee records. • Maintaining insurance policies and coverage. • Performing workplace analytics, data analytics, and benchmarking. • Verifying and validating your identity or otherwise preventing, investigating, or providing notice of fraud, unlawful or criminal activity, or unauthorized

Category of Personal Information To Be Collected	Collection and Use Purposes
	<p>access to or use of personal information, and our website or data systems.</p> <ul style="list-style-type: none"> • 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><i>Examples:</i> 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.</p>	<p>Same purposes as for “personal identifiers” category.</p>
<p>C. Protected classification characteristics under California or Federal law.</p> <p><i>Examples:</i> 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),</p>	<p>Same purposes as for “personal identifiers” category.</p>
<p>D. Biometric Information.</p> <p><i>Examples:</i> exercise data.</p>	<ul style="list-style-type: none"> • Other collection and processing not for the purpose of inferring
<p>F. Internet or similar electronic network activity information.</p> <p><i>Examples:</i> Information on interaction with a website, application</p>	<ul style="list-style-type: none"> • Internal research for technological development and demonstration. • Verifying or maintaining the quality or safety of—or improving, upgrading, or enhancing—a service or

Category of Personal Information To Be Collected	Collection and Use Purposes
	<p>device owned by, manufactured by, manufactured for, or controlled by us.</p> <ul style="list-style-type: none"> • Managing employee access to our facilities, equipment, and systems. • Conducting internal audits and workplace investigations. • Investigating and enforcing compliance with our policies and procedures. • 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>H. Visual or similar information.</p> <p><i>Examples:</i> Employee Photos.</p>	<ul style="list-style-type: none"> • Other collection and processing not for the purpose of inferring.
<p>I. Professional or employment-related information.</p> <p><i>Examples:</i> 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.</p>	<p>Same purposes as for “personal identifiers” category.</p>
<p>J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g; 34 CFR Part 99)).</p>	<p>Same purposes as for “personal identifiers” category.</p>

Category of Personal Information To Be Collected	Collection and Use Purposes
<i>Examples:</i> Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades,	

“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
Social Security number, driver’s license number, state identification card number, or passport number.	<ul style="list-style-type: none"> • Collection and processing not for the purpose of inferring characteristics about a consumer.
	<ul style="list-style-type: none"> •
Racial or ethnic origin,.	<ul style="list-style-type: none"> • Collection and processing not for the purpose of inferring characteristics about a consumer.
Personal information collected and analyzed concerning a consumer’s health.	<ul style="list-style-type: none"> • Collection and processing not for the purpose of inferring characteristics about a consumer.
	<ul style="list-style-type: none"> •

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.