

CCPA Notice at Collection For California Independent Contractors

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

This Notice applies only to the personal information we collect about independent contractors (“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 independent contractor 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 (“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 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, account name, Social Security number, passport number, medical license number, airline frequent flyer number, other similar identifiers.</p>	<ul style="list-style-type: none"> • Supporting infrastructure and human resource management. • Managing your relationship with us, including onboarding; timekeeping, payroll, and expense administration; training and development; creating and maintaining on-line accounts; communicating with emergency contacts; managing injury or illness claims; performance evaluation; discipline and termination. • Managing access to our facilities, equipment, and systems. • Conducting internal audits and workplace investigations. • Investigating and enforcing compliance with our policies and procedures. • 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 access to or use of personal information, and our website or data systems.

Category of Personal Information To Be Collected	Collection and Use Purposes
	<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, education, employment history, bank account number</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> gender</p>	<p>Same purposes as for “personal identifiers” category.</p>
<p>E. Biometric Information.</p> <p><i>Examples:</i> visual photos</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"> • Helping to ensure security and integrity. • Debugging to identify and repair errors that impair existing intended functionality. • 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. • Managing access to our facilities, equipment, and systems. • Conducting internal audits and workplace investigations.

Category of Personal Information To Be Collected	Collection and Use Purposes
	<ul style="list-style-type: none"> 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.
H. Visual <i>Examples:</i> Photos.	<ul style="list-style-type: none"> Other collection and processing not for the purpose of inferring
I. Professional or employment-related information. <i>Examples:</i> Application information, background check, compensation data, .	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
Social Security number or passport number.	<ul style="list-style-type: none"> Collection and processing not for the purpose of inferring characteristics about a consumer.

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, CIO, 201-661-5551, apezzi@thehwpgroup.com