

Privacy Notice and Notice at Collection for Job Applicant Data

This Privacy Notice and Notice at Collection (“Privacy Notice” or “Notice”) explains what personal information New WPCO Holdings, LLC., and all its subsidiaries and entities for which they perform management services, (collectively “Wellpath,” “we,” “us,” or “our”) collect and use about job applicants and candidates for employment (“you”), why we collect it, and how we use and share it. This Notice also describes the rights that California residents may have under the California Consumer Privacy Act of 2018, as amended from time to time, and its implementing regulations (collectively, the “CCPA”).

Job applicants with disabilities may access this Notice in an alternative format by contacting hrbpquestions@wellpath.us. Certain terms used in this Privacy Notice have the meanings given to them in the CCPA.

1. What Personal Information Do We Process?

Depending on your interactions with us, we may collect (and may have collected during the 12-month period prior to the effective date of this Privacy Notice) the following categories of personal information about job applicants:

1. **Identifiers and Contact Information**, such as your name, alias, postal address, telephone number, email address, Social Security number, driver’s license or other government ID, passport number, and online identifiers (e.g., IP address, login credentials used in connection with our careers portal).
2. **Categories of Personal Information Described in Cal. Civ. Code § 1798.80(e)**, such as signature, insurance policy number, physical characteristics or description, and medical information (for example, information you choose to provide in connection with workplace accommodation requests).
3. **Demographic and Protected Classifications**, such as gender, sex, race, age (40+), ethnic origin, religion, marital status, sexual orientation, disability status, medical conditions, citizenship, nationality, and veteran or military status (to the extent you provide this information voluntarily or as permitted/required by law).
4. **Professional, Employment, and Education Information**, such as details in your résumé, cover letter, references, job application materials, desired position, available start date, desired compensation and availability, immigration or work authorization status, relationship with the company or its current/former employees, work history (including job titles, duties, dates of employment, skills, and experience), health, safety and environmental training, certifications, licenses, assessment results, language proficiencies, professional memberships, honors or awards, internships, and education records.
5. **Electronic and Technical Information**, such as login credentials for our applicant systems, browsing activity on our careers website, device and connectivity information used to access our online platforms, and technical information related to remote video interviews (e.g., IP address, device type, browser, or meeting log data). This may include transcripts or summaries generated by video interview platforms.
6. **Geolocation Data**, such as the time and approximate location associated with the IP address accessing our online applicant systems.
7. **Sensory or Surveillance Information**, such as video footage from security cameras when visiting our offices, recordings or transcripts of virtual interviews (including transcriptions generated by platforms such as Microsoft Teams or similar services), or health and safety screening information (e.g., temperature checks, if applicable).
8. **Inferences and Profiles** – such as information derived from other personal information to assess qualifications, preferences, aptitudes, or likely interests relevant to recruitment.
9. **Voluntary Information You Provide**, such as hobbies, interests, career goals, or other personal details you choose to share that go beyond application requirements.

We do not collect or process “sensitive personal information” (as defined under the CCPA) for the purpose of inferring characteristics about you.

By providing us with personal information, you agree that you are authorized to provide us with such information. **Where the information you are providing pertains to someone else (such as a job applicant reference), you acknowledge that you are required to inform them of the contents of this Privacy Notice.**

2. How Do We Collect Your Personal Information?

During the 12-month period prior to the effective date of this Privacy Notice, we may have collected or received personal information:

- **Directly from you**, for example, when you submit an application, résumé, cover letter, or other materials; participate in interviews or assessments; or communicate with us about opportunities;

- **From third party sources**, such as information provided by professional references, recruitment agencies, background check providers, or otherwise publicly available information (such as professional networking sites, publicly available databases, or job boards);
- **Automatically and indirectly from you**, such as through logging and analytics tools, cookies, pixel tags, and other technologies on our careers website and applicant tracking systems, or through technical information generated during remote video interviews; and
- **From third parties**, such as job applicant references and our service providers and business partners involved in our employment, benefits, and retention processes.

3. For What Purposes Do We Process Your Personal Information?

We may use (and may have used during the 12-month period prior to the effective date of this Notice) job applicants' personal information for the purposes of carrying out and supporting recruitment and hiring activities, including the uses described below.

- **Recruitment and Hiring**, such as receiving, reviewing, and processing applications; assessing qualifications and fit for a position; scheduling and conducting interviews (including remote/virtual interviews); administering skills, aptitude, or personality assessments; and making hiring decisions.
- **Background Checks and Eligibility to Work**, such as conducting reference checks, verifying employment or education history, confirming work authorization or immigration status, and performing background checks as permitted by law.
- **Communication**, such as corresponding with you about your application, scheduling interviews, providing status updates, and maintaining a talent pool for future opportunities.
- **Equal Opportunity and Fair Hiring Practices**, such as collecting and reporting demographic data where permitted or required by law to ensure nondiscrimination, monitor representation, and support fair and inclusive recruitment processes.
- **Immigration and Work Authorization**, such as verifying eligibility to work and complying with immigration and visa requirements.
- **Compensation Benchmarking**, such as considering salary expectations and comparing them with internal ranges to inform hiring decisions.
- **Health, Safety, and Security**, such as ensuring a safe interview process, complying with health and safety protocols, securing physical offices and IT systems, and preventing fraud or unauthorized access to our applicant platforms.
- **Business Planning and Management**, such as evaluating recruitment strategies, tracking candidate sourcing channels, forecasting workforce needs, and conducting analytics to improve our recruiting process.
- **Legal and Compliance**, such as complying with immigration, labor, and employment laws; responding to lawful requests from regulators or law enforcement; defending against legal claims; and complying with recordkeeping and reporting obligations.
- **Interview Documentation**, such as recording, transcribing, or summarizing interviews (whether virtual or in person) to evaluate candidates and maintain a record of the recruitment process.
- **Talent Pools and Job Alerts**, such as maintaining applicant databases, creating candidate pipelines, or providing job alerts or similar notifications if you choose to sign up.
- **Quality, Improvement, and Innovation**, such as monitoring the performance of applicant systems, identifying errors, and improving candidate experience and hiring technology. This may include collecting candidate feedback on the application or interview process.

4. Disclosures of Personal Information for a Business Purpose

We do not:

- **Sell your personal information;**
- **Share or disclose your personal information for cross-context behavioral advertising;**
- **Use your sensitive personal information for purposes other than those allowed by the CCPA as set out in Cal. Code Regs. tit. 11 § 7027(m); or**
- **Sell or share the personal information of individuals under 16 years of age as those terms are defined under the CCPA.**

We generally disclose, and in the preceding 12 months we may have disclosed, the categories of personal information listed above to the following categories of entities for business purposes:

- **Service providers supporting our recruitment process**, including:
 - **Applicant tracking system (ATS) and recruiting platforms** (to receive, process, and manage applications);
 - **Background check and identity verification providers** (to verify employment history, education, or eligibility to work);
 - **Video interview, transcription, and assessment platforms** (e.g., Microsoft Teams, automated scheduling tools, skills testing providers);
 - **Recruitment partners** such as external recruiters, search firms, and job boards engaged to identify or evaluate candidates;
 - **IT hosting and support providers** (for secure storage of applicant data); and
 - **Professional advisors** such as outside legal counsel, auditors, or consultants assisting with recruiting, compliance, or dispute resolution.
- **Regulatory and legal authorities**, such as government agencies, courts, or law enforcement, in response to subpoenas, lawful requests, immigration/work authorization requirements, or other legal obligations.
- **Corporate transaction participants**, such as potential buyers, investors, or other counterparties (and their advisors) in connection with a proposed merger, acquisition, reorganization, or sale of some or all of our business or assets.

5. Retention & Deletion Period

We retain applicant personal information for as long as necessary to carry out the processing activities described in this Privacy Notice and as required or permitted by applicable law. In general, we retain applicant records for **a minimum of five years** after the conclusion of the recruitment process (longer if required by law, including obligations under equal employment opportunity and federal contractor recordkeeping rules). If you are hired, your application materials and related records will be incorporated into your personnel file and retained for the duration of your employment **plus seven years**, unless a longer retention period is required by applicable law or company policy.

We may retain personal information for longer periods in specific circumstances, including:

- Where legal, regulatory, or immigration/work authorization obligations require us to keep records;
- Where records must be retained for equal opportunity reporting, audit, or compliance purposes;
- Where applicant information is relevant to potential or ongoing legal claims or disputes; or
- We may retain your information for consideration for future opportunities, unless you request to be omitted from future consideration.

If interviews are recorded, transcribed, or summarized, these materials may be retained in our recruitment management system for as long as necessary to evaluate your candidacy and to comply with recordkeeping obligations. Candidate feedback surveys, if collected, are anonymized as soon as practicable.

We determine our retention and deletion periods according to the following characteristics:

- The scope, nature, and sensitivity of the personal information;
- The risk of harm from unauthorized use or disclosure;
- The purposes for which the information was collected and how long it is needed for those purposes;
- The period during which the information may remain accurate and relevant;
- Applicable legal, accounting, reporting, or regulatory requirements; and
- The potential need to retain records for legal claims or compliance audits.

When applicant information is no longer needed for the purposes described above, it will be securely deleted or anonymized in accordance with our records retention policies.

6. Notice of Electronic Monitoring on Company-Provided Devices and Systems

Wellpath may use electronic monitoring software on company-provided devices and systems. This monitoring may include, but is not limited to:

- Tracking whether employees are logged in to company systems;
- Monitoring whether employees are actively using your device, including through detection of mouse clicks, keyboard activity, and application usage;
- Recording the applications, websites, and programs accessed on company devices;
- Tracking the amount of time spent logged in, active, or idle; and

- Generating reports regarding employee work activity for supervisory review.

This monitoring occurs on company-owned devices and during work hours. Information collected through electronic monitoring may be used for workforce management, security, compliance, performance evaluation, and other legitimate business purposes. Wellpath does not use monitoring in an employee's residence, personal vehicle, or on personal property, except where such monitoring is required for the employee's job duties. Employees may decline any request to install monitoring or data-collection applications on their personal electronic devices for the purposes of employer surveillance.

7. Rights for California Residents

The CCPA provides California residents with specific rights regarding their personal information. This section describes those rights and explains how to exercise them. **This section applies only to residents of California.**

- **Know and Access:** California residents have the right to request, twice in a 12-month period, that we disclose the personal information we have collected about them, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about them.
- **Correction:** California residents have the right to request that we correct the personal information we maintain about them, if that information is inaccurate.
- **Deletion:** California residents have the right to request that we delete certain personal information we have collected about them, subject to certain exceptions.
- **Portability:** California residents have the right of portability, or the right to have us transfer their personal information to other persons or entities upon their request.
- **Non-Discrimination:** California residents have the right to not be discriminated against for exercising their privacy rights.

California residents can exercise their privacy rights by submitting a request to us at hrbpquestions@wellpath.us.

We will verify the identity of California residents before fulfilling requests to access, correct, or delete personal information. Authorized agents may submit requests on behalf of California residents if they provide proof of authorization, and we may also require the individual to verify their identity directly. We will respond to requests as required by applicable law. We may deny a request if we cannot verify identity or if the law otherwise permits.

8. Changes to this Notice

We may update this Notice to reflect the changes in our privacy practices at any time and without prior notice to you. When we do so, we will update the Effective Date above. We encourage you to periodically review this Notice for the latest information on our privacy practices.

9. Contact

If you have any questions or concerns regarding this Privacy Notice or our collection of your personal information, please contact us via email at hrbpquestions@wellpath.us.