

## Privacy Notice for California Residents

### 1/1/2020

This **Privacy Notice for California Residents** applies to individuals who live in the State of California and whose data is subject to the California Consumer Privacy Act of 2018 (CCPA). Below describes what information Carelon collects that is subject to the CCPA, your rights under the CCPA, and how you can enforce those rights under the CCPA. Any terms defined in the CCPA have the same meaning when used here.

### Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“Personal Information”).

Personal Information does not include:

- Publicly available information lawfully made available from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope, like:
  - 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 clinical trial data;
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

If certain types of information are exempt from CCPA, and therefore this policy, other Carelon privacy policies may apply such as our HIPAA Notice of Privacy Practices.

Carelon has collected the following categories of Personal Information from its consumers within the last twelve (12) months:

Category	Examples	Collected?
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<p>Information that is protected against security breaches such as: name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p> <p>Some personal information included in this category may overlap with other categories may not be subject to all the rights under the CCPA.</p>	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	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.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	YES
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES

Category	Examples	Collected?
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

We generally do not collect additional categories of personal information or use the personal information we collected for significantly different or meaningfully unrelated purposes without providing you notice.

### Where We Obtain Personal Information

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you or your devices. For example, from forms you complete on our website.
- Indirectly from you. For example, from observing your actions on our website or interactions with our advertisers.
- Other users of our services.
- Affiliates.
- Advertising networks.
- Internet service providers.
- Government entities.
- Operating systems and platforms.
- Social networks.
- Resellers including consumer data brokers.
- Business partners. For example, pharmacy benefit managers or providers.
- Publicly accessible sources. For example, National Provider Identifier.

### Use of Personal Information

We may use, or disclose the personal information we collect for one or more of the following business and commercial purposes:

- Fulfilling or meeting the reason you provided the information. For example, if you share personal information in order to be a credentialed provider in Carelon's provider network, we will use that personal information for the credentialing process.
- Providing you with information, products or services that you request from Carelon.
- Providing you with email alerts, event registrations and other notices concerning Carelon's services, or news that may be of interest to you.

- Sending you text messages or push notifications.
- Updating your status on social networks, sending messages on your behalf to your social networks, and providing other features and services to you.
- Facilitating the connection of third-party services or applications, such as social networks.
- Marketing purposes, such as developing and providing promotional and advertising materials that may be useful, relevant, valuable or otherwise of interest to you.
- Facilitating transactions and payments.
- De-identifying and aggregating information collected through our services and using it for any lawful purpose.
- Processing your job application.
- Responding to trust and safety issues that may arise.
- Carrying out our obligations and enforce our rights arising from any contracts or other terms entered into between you and Carelon, including billing, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency.
- Auditing related to a current interaction with you and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- Personalizing your experience on our services, such as presenting tailored content.
- Undertaking activities to verify or maintain the quality or safety of our services, and to improve, upgrade, or enhance our services.
- For testing, research, analysis, and product development, including the development of data models and algorithms, and for demonstration purposes.
- Auditing related to a current interaction with you and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Debugging to identify and repair errors that impair existing intended functionality.
- Short-term, transient use.
- Contracting with service providers to perform services on our behalf or on their behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.
- Otherwise enabling or effecting, directly or indirectly, a commercial transaction.
- For other purposes for which we provide specific notice at the time the information is collected.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

Effective January 1, 2021, for job applicants, employees, owners, directors, officers, medical staff members, or contractors of Carelon, who reside in California and from whom we collect personal information as a business under California law, we collect, use and disclose your personal information in accordance with the specific business purposes below:

- **Recruitment:** To receive, evaluate, and process job applications, verify your information and conduct background checks, as permitted by law, communicate with you about the recruitment process and your application, schedule interviews, and improve the recruitment process.

- **HR Operations:** To fulfill your employment agreement, manage employee onboarding, promotions, transfers, and secondments, manage HR related claims and litigation, provide trainings, performance reviews, and evaluations, manage business and travel expenses, and create reports for workforce planning, such as headcount and employee turnover.
- **Payroll and Benefits:** To administer pay and benefits, process business and travel expense reimbursements, calculate tax and social security withholdings, comply with wage garnishment orders, and process leaves.
- **IT and Security:** To provide IT and security support, manage IT resources and provisions of new IT applications, manage log-in credentials, monitor IT systems and networks for suspicious activity, detect intrusions, and monitor and control access to facilities to protect us, our personnel, and property.
- **Legal and Compliance:** To comply with legal obligations regarding HR analytics, including requests from government statistics services, process conflict of interest reporting, process employee work-related claims such as worker compensation or insurance claims ensure compliance with our employee policies and security requirements gather evidence for and to support any internal investigations, litigation, disciplinary action, termination, or related activities, protect, enforce, and defend the legal rights, privacy, safety, or property of us and our employees, agents, and contractors, protect against fraud and manage risk, and comply with applicable laws, regulations, legal processes, or enforceable governmental requests.
- **Acquisition or Merger:** To manage acquisitions, mergers, and reorganizations or sale of some or all of a company.
- **Other Business Purposes:** For other purposes that you would reasonably expect, or for which we provide specific notice at the time the information is collected.

## Sharing Personal Information

Carelon may disclose your personal information to a third party for a business or commercial purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, Carelon has disclosed the following categories of personal information for a business purpose:

- Category A: Identifiers
- Category B: California Customer Records
- Category C: Protected classification characteristics under California or federal law.
- Category F: Internet history
- Category I: Professional or employment-related information

In the preceding twelve (12) months, Carelon has not disclosed personal information for a commercial purpose. However, for California residents, the California Consumer Privacy Act (CCPA) defines “selling” personal information to include providing it to a third party in exchange for money or valuable services. We may in the future disclose data in any of the categories above to certain third parties for commercial purposes, in our products and services or in exchange for valuable services, such as advertising or social media engagement services, which may constitute a “sale” under the CCPA.

Pursuant to our [Privacy Notice](#), we share your information with the following categories of third parties for a commercial purpose:

- **Advertising Providers:** Advertising technology companies, such as advertising networks.
- **ISPs:** Internet service providers.
- **Analytics Providers.**
- **Government:** Government entities.
- **OS/Platform Provider:** Operating systems and platforms.
- **Social Networks.**
- **Resellers:** Consumer data brokers.
- **Affiliates.**
- **Vendors:** Vendors and service providers.
- **Integrated Third Parties:** Third parties integrated into our services.
- **Third Parties as Legally Required:** Third parties as required by law and similar disclosures.
- **Third Parties in Merger/Acquisition:** Third parties in connection with a merger, sale, or asset transfer.
- **Third Parties with Consent:** Other third parties for whom we have obtained your permission to disclose your Personal Information.

For avoidance of doubt, we do not sell health information subject to HIPAA without your express authorization. If you give us such an authorization, you may revoke it in writing at any time. Your revocation will not affect any use or disclosure permitted by your authorization while it was in effect.