

Privacy Notice for California Consumers

This **Privacy Notice for California Consumers** applies to solely to California consumers and to data that is subject to the **California Consumer Privacy Act of 2018** (“CCPA”), as amended and supplemented by the **California Privacy Rights Act of 2020** (“CPRA”). This Notice does not apply to information collected, processed or disclosed pursuant to the Health Insurance Portability and Accountability Act or the Gramm Leach-Bliley Act. Below describes what information **Carelon** (“Carelon” or “We” or “Us”) collects that is subject to the CCPA and CPRA, your rights under the CCPA and CPRA, and how you can enforce those rights under the CCPA and CPRA. Any terms defined in the CCPA and CPRA have the same meaning when used here.

Information We Collect

Carelon may collect (and may have collected during the twelve (12) month period prior to the Last Updated date of this Notice) following categories of personal information:

Category	Examples
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.
B. Personal information listed in California Civil Code § 1798.80(e).	Information that is protected against security breaches such as: name, signature, socialsecurity 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.



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).
D. 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.
E. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
F. Professional or employment-related information.	Current or past job history or performance evaluations.

For data that is exempt from the CCPA and CPRA, another Carelon privacy policy may apply, such as our [HIPAA Notice of Privacy Practices](#).

Retention of Personal Information

We will retain Personal information for the time period reasonably necessary to achieve the purposes described in [our Privacy Policy](#) and this Notice, or any other notice provided at the time of collection, taking into account applicable statutes of limitation and records retention requirements under applicable law.

Sources of Personal Information

Within the last twelve (12) months prior to the Last Updated date of this Notice, we may have obtained personal information from the following categories of sources:

- Directly from you or your devices. For example, from forms you complete on our website.
- Indirectly from you, such as when you visit our secured facilities, websites, online and mobile applications.

- Other individuals, such as authorized agents.
- Affiliates.
- Advertising networks.
- Internet service providers.
- Government entities.
- Operating systems and platforms.
- Social networks.
- Resellers including consumer data brokers.
- Business partners. For example, pharmaceutical manufacturers and reinsurers.
- Publicly accessible sources. For example, Tax Identification Numbers and National Provider Identifiers.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business 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 Anthem'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, text messages, push notifications, event registrations, and other notices concerning Anthem's services, or news that may be of interest 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, with the exception of cross-context behavioral advertising (which is addressed below, **Sale and Sharing of Personal Information**)
- 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 and CPRA.

We do not collect or process sensitive personal information for purposes of inferring characteristics about consumers.

Use of Carelon Job Applicant and Employee Personal Information

Effective January 1, 2023, 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, attendance, 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.

- **To Identify Wellness Opportunities.** To identify and target benefit and wellness programs which may benefit our employees. We will never share your personal information with third parties without your consent.
- **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 and internal policies 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.

If you have any questions, comments, or concerns about our processing activities, please contact your HR or Recruiting representative, as appropriate.

Sale and Sharing of Personal Information

We do not sell personal information in exchange for monetary consideration. We may disclose personal information by allowing certain third parties (such as online advertising services) to collect personal information via automated technologies on our websites for cross-context behavioral advertising purposes. Under CCPA/CPRA, these kinds of disclosures may be considered a “sale” when the personal information is exchanged for non-monetary consideration, or “sharing” when the personal information is disclosed for cross-context behavioral advertising purposes. You have the right to opt-out of these types of disclosures of your information.

We may sell or share (and may have sold or shared during the 12-month period prior to the Last Updated date of this Notice) the following categories of personal information about you to online advertising services:

- Identifiers
- Commercial Information
- Online Activity
- Inferences

We do not have actual knowledge that we sell or share personal information of minors under 16 years of age.

Disclosure of Personal Information

During the 12-month period prior to the Last Updated date of this Notice, Carelon may have disclosed the following categories of personal information for the business purposes listed above to the following categories of third parties:

Category of Personal Information	Categories of Third Parties
A. Identifiers.	• Affiliates and subsidiaries • Vendors who provide services on our behalf • Professional services organizations, such as auditors and law firms • Joint marketing partners • Business partners • Online advertising services and networks • Internet service providers • Data analytics providers • Operating systems and platforms • Social networks • Data brokers, such as background check services • Business partner's vendors • Surveys and Feedback
B. Personal information listed in California Civil Code § 1798.80(e).	• Affiliates and subsidiaries • Vendors who provide services on our behalf • Professional services organizations, such as auditors and law firms • Joint marketing partners • Business partners • Online advertising services and networks • Internet service providers • Data analytics providers • Operating systems and platforms • Social networks • Data brokers, such as background check services • Business partner's vendors
C. Protected classification characteristics under California or federal law.	• Affiliates and subsidiaries • Vendors who provide services on our behalf • Professional services organizations, such as auditors and law firms • Business partners • Social networks • Data brokers, such as background check services • Business partner's vendors

	• Surveys and Feedback
D. Biometric information.	• Vendors who provide services on our behalf • Professional services organizations, such as auditors and law firms
E. Professional or employment-related information.	• Affiliates and subsidiaries • Vendors who provide services on our behalf • Professional services organizations, such as auditors and law firms • Business partners • Internet service providers • Data analytics providers • Operating systems and platforms • Social networks • Data brokers, such as background check services • Business partner's vendors

In addition to the categories of third parties above, during the 12-month period prior to the Last Updated date of this Notice, we may have disclosed personal information to government entities, self-regulatory organizations and third parties in connection with corporate transactions, such as mergers, acquisitions or divestitures, that may assume or have assumed control of all or part of our business.

Your California Privacy Rights and Choices

The CCPA and CPRA provide consumers with specific rights regarding their personal information. This section describes your CCPA and CPRA rights and explains how to exercise those rights.

Right to Know: You have the right to request, twice in a 12-month period, that we disclose the categories of personal information we have collected about you, the categories of sources from which the personal information was collected, the purposes for the collection, the categories of third parties to whom we disclosed personal information, and the specific personal information we collected about you.

Right to Delete: You have the right to request that delete certain personal information that we collected from you.

Right to Correct: You have the right to request that we correct personal information that we maintain about you, if that information is inaccurate.

Right to Opt Out of Sale or Sharing: You have the right to request that we cease the “sale” or “sharing” of your personal information.

How to Submit a Request: To submit a Right to Know, Right to Delete, Right to Correct, Right to Opt Out of Sale or Sharing request, you (or your authorized representative) may submit a request to us by visiting <https://www.elevancehealth.com/privacy-form> or by contacting Carelon via the phone numbers in the “Contact Information” section below.

For questions, comments, rights requests, and other CCPA and CPRA-related inquiries you may contact Carelon via the contact information listed at the end of this notice.

Verifying Requests

To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information.

If we cannot verify your identity or authority to make the request, we will not be able to fulfill your request. The information provided for verification will only be used for that purpose.

Authorizing an Agent

To authorize an agent to make a request to know or delete on your behalf, please write to:

Carelon Privacy Office
220 Virginia Ave
Indianapolis, IN 46204

To authorize an agent to make an opt-out request on your behalf, please send a written authorization signed by you and the authorized agent to us via the Contact Information section.

Processing Fees

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA or CPRA rights. Unless permitted by the CCPA or the CPRA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

We may offer you certain financial incentives such as discounted prices, rates, or quality levels. Any permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

“Shine the Light”

California's “Shine the Light” law (Civil Code Section § 1798.83) permits users of our Website who are California consumer to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send us an electronic message through our website or write us at our address listed below.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such change.**

Contact Information

You can contact Carelon with your questions, comments, rights requests, and other CCPA and CPRA-related inquiries by:

Mail:

Carelon Privacy Office

220 Virginia Ave

Indianapolis, IN 46204

Or contacting the applicable areas below:

Carelon Research: Phone: 833-905-1643

Broker Credentialing and Licensing: Phone: 877-304-6470

Provider Services: Phone: 800-677-6669

Human Resources: Phone: 866-777-9636

Human Resources Wellness: Phone: 866-777-9636

Travel, Expense Management and Procurement: Phone: 877-811-3112

Sydney Community: Link appears on the app login page.

Ethics Department: Phone: 877-725-2702

If you believe your personal information was accessed without permission, please contact Carelon by the means listed above.

Print Privacy Notice for California Consumers

