

Essence Healthcare Privacy Notice for California Residents

This Privacy Policy for California Residents (“**Policy**”) supplements the information contained in the General Privacy Policy & Terms of Use found on our website and applies solely to all visitors, users, and others who reside in the State of California (“**consumers**” or “**you**”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Policy. This Policy does not apply to workforce-related personal information collected from California-based employees, job applicants, contractors, or similar individuals.

Information We Collect

Essence Healthcare collects information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“**personal information**”). Personal information does not include:

- Publicly available information 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), clinical trial data, or other qualifying research 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.

In particular, we have collected the following categories of Personal Information from consumers within the last twelve (12) months. We do not collect sensitive personal information.

Personal Information 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	A 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,	YES

(Cal. Civ. Code § 1798.80(e)).	medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	
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.	YES
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.	NO
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.	YES
H. Sensory data.	Audio recordings of phone calls and requests, voicemails you leave with our representatives	YES
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
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.	YES

Any of the above information collected for the purposes of providing healthcare coverage is considered health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA).

Sources of Information

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

- Directly from you. For example, from forms you complete through the Website.
- Indirectly from you. For example, we use Google Analytics for aggregated, anonymized website traffic analysis. In order to track your session usage, Google drops a cookie (_ga) with a randomly generated ClientID in your browser. This ID is anonymized and contains no identifiable information like email, phone number, name, etc.
- From third party sources, such as social media platforms when you interact with our social media channels or from third parties for use in our marketing, advertising, and analytics activities.

Use of Personal Information

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

- To carry out the purpose for which you provided the information. For example, if you share your name and contact information to request additional information, attend a seminar or ask a question about our plans, we will use that personal information to respond to your question or request.
- To provide you with information or services that you request from us.
- To provide you information regarding our services including updates or news that may be of interest to you.
- To provide, support, personalize, and develop our Website, products, and services.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.
- 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.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We do not sell personal information. However, we may share your personal information by disclosing it to a third party for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract. In the preceding twelve (12) months, Company has disclosed personal information for a business purpose to the categories of third parties indicated in the chart below.

Personal Information Category	Category of Third-Party Recipients
A: Identifiers.	Third party service providers and vendors; our affiliates; Internet cookie data recipients (for example Google Analytics)
B: California Customer Records personal information categories.	Third party service providers and vendors; our affiliates; Internet cookie data recipients (for example Google Analytics)
C: Protected classification characteristics under California or federal law.	Third party service providers and vendors; our affiliates; Internet cookie data recipients (for example Google Analytics)
D: Commercial information.	Third party service providers and vendors; our affiliates; Internet cookie data recipients (for example Google Analytics)
E: Biometric information.	None.
F: Internet or other similar network activity.	Internet cookie data recipients (for example Google Analytics)
G: Geolocation data.	Internet cookie data recipients (for example Google Analytics)
H: Sensory data.	Third party service providers and vendors; our affiliates
I: Professional or employment-related information.	None.

J: Non-public education information.	None.
K: Inferences drawn from other personal information.	Third party service providers and vendors; our affiliates

Deidentified Patient Information

We disclose deidentified patient information exempt from the CCPA to third parties. To de- identify the patient information, we follow the HIPAA expert determination method and/or the HIPAA safe harbor method.

Your Rights and Choices

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Right to Know and Data Portability

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the "right to know"). Once we receive your request and confirm your identity, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- The specific pieces of personal information we collected about you (also called a data portability request).

We do not provide a right to know or data portability disclosure for B2B personal information.

Right to Delete

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions (the "right to delete"). Once we receive your request and confirm your identity, we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the

context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.

2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

We do not provide these deletion rights for B2B personal information.

Right to Correct

You have the right to request that we correct your personal information that you believe is inaccurate.

Exercising Your Rights to Know, Delete or Correct

To exercise your rights described above, you will need to submit a “verifiable consumer request”. This means that you, or someone legally authorized to act on your behalf, may make a request to know, delete or correct your personal information. As a parent or legal guardian, you may make a consumer request on behalf of your minor child. To verify your identity, we ask that you provide the following information with your request:

- First and Last Name
- Email address
- Phone Number
- Full Address (Street, City, State and Zip-code)

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. You do not need to create an account with us to submit a request to know or delete. However, we do consider requests made through a password protected account sufficiently verified when the request relates to personal information associated with that specific account. If we cannot successfully verify your identity, we will inform you of that fact. We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

You may only submit a request to know twice within a 12-month period.

You may submit a verifiable consumer request to know, delete or correct by:

- Calling us at 1-800-450-0068
- By mail to:

Attn: PRIVACY OFFICE
13900 Riverport Drive
Maryland Heights, MO 63043

Response Timing and Format

We will respond to your request within forty-five (45) days of receiving your request. However, in certain circumstances, we may require additional time to process your request, as permitted by the CCPA or other applicable law. We will advise you within forty-five (45) days after receiving your request if such an extension is necessary and why it is needed. Any disclosures we provide will only cover the 12-month period preceding our receipt of your verifiable consumer request.

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 in a manner prohibited by the CCPA because you exercise your CCPA rights.

Changes to Our Privacy Policy

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, 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 changes.**

Contact Information

If you have any questions or concerns regarding this California Privacy Policy or our privacy practices, or if you have a disability and need to access this Policy in a different format, please contact us using one of the methods provided below:

By telephone to: 1-800-450-0068

By mail to: 13900 Riverport Drive, Maryland Heights, MO 63043, ATTN: Privacy Office

Effective Date

This Policy is effective 8/1/2021 and was last updated 9/15/2023.