

# CALIFORNIA PRIVACY POLICY

Last Updated: January 1, 2020

Accountable Healthcare Staffing, Inc. (“Company,” “we,” “our,” or “us”) takes your privacy seriously. We want you to know how we collect, use, share, and protect your Personal Information and about the rights of California residents under California law. This Policy applies to the information that the Company collects from California residents both online (through our website) and offline, including, but not limited to, at conferences, and through calls with our recruiters.

## **This Privacy Policy addresses the following topics**

- The Scope of this Privacy Policy
- The Company’s Collection, Use and Disclosure of Personal Information
- Your California Privacy Rights
- How to Exercise Your Rights
- How We Will Verify Your Requests
- Requests by Authorized Agents
- The Company’s Non-Discrimination Policy
- Your Right to Information About Disclosures of Personal Information for Direct Marketing Purposes
- Your “Do Not Track” Browser Setting
- Third-Party Links and Services
- Minors Under 13 Years of Age
- For More Information
- Changes to This California Privacy Policy

## **Assistance For The Disabled**

Alternative formats of this Privacy Statement are available to individuals with a disability. Please contact us at [Legal@ahcstaff.com](mailto:Legal@ahcstaff.com) for assistance.

## **The Scope Of This Privacy Policy**

### What Is Personal Information?

“Personal Information”. “Personal Information” means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household.

### Whose Personal Information Is Covered By This Policy?

This California Privacy Policy applies to the Personal Information provided to the Company by residents of the State of California (“California Consumers”). For the purposes of this Policy, the Company has grouped the California Consumers whose Personal Information it collects into the following groups:

1. **Talent Pool Prospects:** This group includes: (a) individuals who submit their Personal Information to the Company through the “Quick Apply” or “Arrange an Interview” features on our website; (b) individuals who apply for a position with a healthcare entity (not a Corporate Job, *i.e.*, not a job with Accountable) using the “Apply To This Job” feature on our website; (c) individuals whose Personal Information was submitted to the Company through the “Refer a Friend” feature on the website; (d) individuals who communicate with one of our recruiters; and (e) individuals whose Personal Information is collected at a conference.
2. **Enrolled Providers:** This category includes individuals that the Company places with healthcare facilities.

#### What Personal Information Does This Privacy Policy Cover?

This Privacy Policy applies to all Personal Information of California Consumers that we collect both online and offline, from Talent Pool Prospects and Enrolled Providers.

#### Whose Personal Information Is **Not** Covered By This Privacy Policy?

For purposes of this Privacy Policy, “Consumer” does not include:

- California residents who are (a) the Company’s own employees, directors, officers, or independent contractors, or applicants for Corporate Jobs (collectively, “HR Individuals”) in their capacity as HR Individuals; (b) the emergency contacts of HR Individuals in their capacity as emergency contacts; or (c) the spouse or dependents of HR Individuals who receive Company benefits by virtue of their relationship to an HR Individual in their capacity as a spouse or dependent.
  - ***For example, this Policy does not apply to the Company’s own recruiters or to applicants for any position with the Company.***
- California residents who are employees or other agents of a business engaged in a transaction with the Company in their capacities as employees or agents of that business.
  - ***For example, this Policy does not apply to HR professionals at a hospital for which the Company places Enrolled Providers.***

#### What Else Should I Know About The Company’s Handling Of California Consumers’ Personal Information?

Please read carefully the Company’s *Privacy Policy & Terms of Use* available at [https://www.ahcstaff.com/doc/accountable\\_tos.pdf](https://www.ahcstaff.com/doc/accountable_tos.pdf), as it contains important information about your use of our services, including this website. If you have any questions, please contact us by using the contact information below.

## The Company's Collection, Use And Disclosure Of Personal Information

This section of the Privacy Policy describes, for the 12 months preceding the date last updated, above, (a) the categories of Personal Information we have collected about you, (b) the sources of that Personal Information, (c) the business and commercial purposes for use, and (d) the categories of third party recipients of your Personal Information. Unless we inform you otherwise, this section also serves as our "notice at collection" by informing you of your Personal Information to be collected in the future and the purposes for its use.

### Categories Of Personal Information Collected:

In the last 12 months, the Company collected the following categories of Personal Information about California Consumers, including Talent Pool Prospects and Enrolled Providers:

- **Identifiers**, including: full name, address, email address, telephone number; Social Security number or last four digits of a Social Security number, login credentials for your Accountable website account.
- **Financial Information**, including: bank account number and routing number.
- **Professional or Employment-Related Information**, including: employment history and professional license information.
- **Commercial Information**, including: placement history; information provided by the California Consumer about others using the "Refer a Friend" feature on the website; and preferences, including whether the California Consumer wanted to receive e-mail notifications concerning potential opportunities.
- **Internet Or Other Electronic Network Activity Information**, including: pages visited on the Company's website and links clicked, IP address.
- **Legally Protected Classifications**, including race, gender, marital status, age, military veteran status.
- **Inferences**, drawn from the categories of Personal Information listed above to create a profile reflecting a California Consumer's preferences.

### Purposes For Using Personal Information Collected

In the last 12 months, the Company used the categories of Personal Information listed above for the following purposes (unless specifically stated otherwise below, the listed purposes apply to both Talent Pool Prospects and to Enrolled Providers):

Purpose For Which Information Is Used	Categories of Personal Information
To Evaluate Talent Pool Prospects, Inform Talent Pool Prospects Of Placement Opportunities, And Facilitate The Placement Or Recruitment Of Talent Pool Prospects	<ul style="list-style-type: none"><li>• Identifiers</li><li>• Professional or Employment-Related Information</li><li>• Commercial Information</li><li>• Inferences</li></ul>

Purpose For Which Information Is Used	Categories of Personal Information
To Place Enrolled Providers In Positions At Healthcare Entities That Are Our Customers	<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Professional or Employment-Related Information</li> <li>• Legally Protected Classifications</li> <li>• Financial Information</li> <li>• Commercial Information</li> <li>• Inferences</li> </ul>
To Respond To Inquiries Received Through Our “W2 Help Request” Website Feature	<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Commercial Information</li> </ul>
To Protect Against Malicious, Deceptive, Fraudulent, Or Illegal Activity	<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Internet or Other Electronic Network Activity Information</li> </ul>
Legal Compliance	<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Professional or Employment-Related Information</li> <li>• Commercial Information</li> <li>• Internet or Other Electronic Network Activity Information</li> <li>• Financial Information</li> </ul>

Sources Of Personal Information Collected

In the last 12 months, the Company collected the following categories of Personal Information about both Talent Pool Prospects and Enrolled Providers from each of the sources listed below:

- **Directly From California Consumers:** (a) Identifiers, (b) Commercial Information, (c) Financial Information, (d) Professional or Employment-Related Information, (e) Legally Protected Classifications, (f) Inferences drawn from the aforementioned categories of Personal Information provided by the consumers.
- **From Individuals Who Refer a Prospect:** Identifiers.
- **Data Collection Technologies, such as cookies, pixels and web beacons (used by the Company’s data analytics providers):** Internet Or Other Electronic Network Activity Information.

Disclosure Of Personal Information To Third Parties

In the last 12 months, the Company disclosed the following categories of Personal Information about both Talent Pool Prospects and Enrolled Providers to the following categories of third parties for a business or commercial purpose:

Category of Personal Information	Category of Third Party
Identifiers Professional or Employment-Related Information Inferences	<ul style="list-style-type: none"> <li>• Healthcare entities that use the Company's services, including the Company's placement and recruitment services</li> <li>• Service Providers, including the Company's (a) website hosting provider, (b) data analytics providers, (c) business texting service, (d) applicant tracking system provider, and (e) customer relationship management database provider</li> <li>• Government agencies, law enforcement, and other parties as required by law, including in litigation</li> </ul>
Financial Information	<ul style="list-style-type: none"> <li>• Healthcare entities that use the Company's placement service</li> </ul>
Commercial Information	<ul style="list-style-type: none"> <li>• Service Providers, including the Company's (a) website hosting provider, (b) data analytics providers, (c) business texting service, (d) applicant tracking system provider, and (e) customer relationship management database provider</li> </ul>
Internet or Other Electronic Network Activity Information	<ul style="list-style-type: none"> <li>• Service Providers, including the Company's (a) website hosting provider, and (b) data analytics providers, and (c) applicant tracking system provider</li> </ul>

No Sale Of Personal Information

The Company does not and will not sell California Consumers' Personal Information.

**Your California Privacy Rights**

Right to Know

California Consumers have the right to submit a verifiable request to know:

- The categories and specific pieces of Personal Information that the Company has collected about them;
- The categories of sources from which the Company collected the Personal Information;
- The categories of Personal Information that the Company sold or disclosed to a third party (other than a service provider) for a business purpose and the categories of recipients of that information; and
- The business or commercial purposes for the Company's collection, disclosure, or sale of the Personal Information.

#### Right To Delete

- California Consumers have the right to submit a verifiable request for deletion of their Personal Information that the Company has collected from the Consumer.

#### Right to Opt Out of Sale of Personal Information

- California Consumers have a right to opt-out of the sale of the Personal Information. However, as stated above, the Company does not and will not sell Personal Information.

### **How to Exercise Your Rights**

The Company will respond to requests in accordance with applicable law if it can verify the identity of the individual submitting the request. California Consumers can exercise their rights in the following ways:

- Complete the online request form available here: [CCPA Request Form](#)
- Contact by telephone: 855.523.2070

### **Requests By Authorized Agents**

You may designate an authorized agent to exercise your right to know or your right to delete by submitting to us a completed "Authorized Agent Designation" form. You can obtain the designation form by contacting us at [Legal@ahcstaff.com](mailto:Legal@ahcstaff.com).

If an authorized agent submits a request to know or a request to delete on your behalf, the authorized agent must submit with the request either (a) a power of attorney that is valid under California law, or (b) a document signed by you that authorizes the authorized agent to submit the request on your behalf. In addition, we may ask you to follow the applicable process described above for verifying your identity.

### **How We Will Verify Your Requests**

The processes that we follow to verify that the person making a request to know or a request to delete is the person about whom we have collected personal information are described below. The relevant process depends on how and why the request is submitted.

### Requests Through Your Password-Protected Account

If you created a password-protected account with us before the date of your request, we will rely on the fact that your request has been submitted through your account as verification of your identity. We will require that you re-authenticate yourself before we disclose your personal information in response to a request to know and before we delete your personal information in response to a request to delete.

You are responsible for protecting the security of your log-in credentials for your account. Please do not share your log-in credentials with anyone. If we suspect fraudulent or malicious activity on or from your account, we will not respond to a request to know or a request to delete until we have been able to confirm, through further verification procedures, that you made the request.

### Requests Other Than Through A Password-Protected Account

If you submit a request by any means other than through a password-protected account that you created before the date of your request, the verification process that we follow will depend on the nature of your request as described below:

- Requests To Know Categories Of Personal Information: We will match at least two data points that you provide with your request to know, or in response to our request for verification information, against information about you we already have in our records and that we have determined to be reliable for purposes of verifying your identity. Examples of relevant data points include your mobile phone number, your zip code, or information about products or services that you have purchased from us.
- Requests To Know Specific Pieces Of Personal Information: We will match at least three data points that you provide with your request to know, or in response to our request for verification information, against information that we already have about you in our records and that we have determined to be reliable for purposes of verifying your identity.
- Requests To Delete Personal Information: Our process for verifying your identity will depend on the sensitivity (as determined by the Company) of the personal information that you ask us to delete. For less sensitive personal information, we will require a match of two data points as described in Point No. 1, above. For more sensitive personal information, we will require a match of three data points as described in Point No. 2, above.

We have implemented the following additional procedures when verifying the identity of requestors:

1. If we cannot verify your identity based on the processes described above, we may ask you for additional verification information. If we do so, we will permanently delete the verification information that you provide promptly after we have completed the verification process. We will not use that information for any purpose other than verification.
2. If we cannot verify your identity to a sufficient level of certainty to respond to your request, we will let you know promptly and explain why we cannot verify your identity.

### **The Company's Non-Discrimination Policy**

California Consumers have the right not to be subject to discriminatory treatment by Company for exercising their privacy rights under the California Consumer Privacy Act, and the Company will not discriminate on that basis. However, the Company may charge a California Consumer a different price or rate or provide a different level or quality of goods or services if the difference is reasonably related to the value provided to the California Consumer by the Consumer's Personal Information. If the Company does so, it will provide Consumers with any legally required notice.

### **Your 'Do Not Track' Browser Setting**

The Company's website collects personally identifiable information about your online activities over time. We support the Do Not Track (DNT) browser setting. DNT is a preference you can set in your browser's settings to let the websites you visit, including the Site, know that you do not want the sites collecting your personally identifiable information.

### **Third-Party Links And Services**

We provide links to third party websites operated by organizations not affiliated with Company. We do not disclose your Personal Information to organizations operating such linked third-party websites. We do not review or endorse, and are not responsible for, the privacy practices of these organizations. We encourage you to read the privacy policy of each and every website that you visit. This Privacy Policy applies solely to information collected by Company through our services.

### **Minors Under 16 Years of Age**

We respect the privacy of children. Our services are not designed to attract an audience younger than sixteen (16), and we do not knowingly collect Personal Information from children under sixteen (16). If you are under the age of sixteen (16), you are not permitted to use our services and should not send any information about yourself to us through our services. Please contact us using the contact details below if you believe we may have



collected information from your child under the age of sixteen (16), and we will work to delete it.

**For More Information**

For questions or concerns about the Company's privacy policies and practices, please contact us at [Legal@ahcstaff.com](mailto:Legal@ahcstaff.com).

4843-6051-2943.3 105832.1001