

CALIFORNIA PRIVACY POLICY

Last Updated: June 30, 2023

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, including the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA). 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, through calls with our recruiters, through employment, or the application process.

If you are an employee, the Policy also applies to the beneficiaries of your employment benefits, such as the individuals who are on your health plan and the beneficiaries of your retirement accounts, as well as your emergency contacts. It is your responsibility to inform any such individuals about this Policy and ensure that you have the right to provide their Personal Information to us.

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 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, and also includes the specific items described as “sensitive personal information” set forth in the CCPA/CPRA.

Whose Personal Information Is Covered By This Policy?

This California Privacy Policy applies to the Personal Information the Company collects from and about 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.
3. **Employees:** This category includes internal employees of Accountable that work either in the corporate office or for a branch office (whether working directly at an Accountable office or remotely) and who is not a talent pool prospect or an enrolled provider.
4. **Website Visitors:** Individuals that visit Accountable’s website but do not fit within the prior three categories listed above.

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, for all four categories above.

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

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

- 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, 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, Enrolled Providers, Employees, and Website Visitors:

- **Identifiers**, including: full name, address, email address, signature, characteristics or description, 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: education, 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, device identifiers, and geolocation information when an application is signed or submitted.
- **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 Talent Pool Prospects, Enrolled Providers, and Employees):

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">• Identifiers• Professional or Employment-Related Information• Commercial Information• Inferences

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"> • Identifiers • Professional or Employment-Related Information • Legally Protected Classifications • Financial Information • Commercial Information • Inferences
To Respond To Inquiries Received Through Our “W2 Help Request” Website Feature	<ul style="list-style-type: none"> • Identifiers • Commercial Information
To Protect Against Malicious, Deceptive, Fraudulent, Or Illegal Activity by All 4 Categories of California Consumers	<ul style="list-style-type: none"> • Identifiers • Internet or Other Electronic Network Activity Information
Legal Compliance, including to respond to law enforcement requests, subpoenas from regulatory boards or legal process required by applicable law, court order, governmental regulation, or other lawful process for public safety purposes	<ul style="list-style-type: none"> • Identifiers • Professional or Employment-Related Information • Commercial Information • Internet or Other Electronic Network Activity Information • Financial Information • Legally Protected Classifications
To Process Applications For Employment, as well as to evaluate and improve our recruiting efforts	<ul style="list-style-type: none"> • Identifiers • Financial Information • Professional or Employment Related Information • Commercial Information • Inferences
To Engage in Marketing and Advertising Activities for Talent Pool Prospects, Enrolled Providers, and Website Visitors	<ul style="list-style-type: none"> • Identifiers • Professional or Employment-Related Information • Commercial Information • Inferences • Internet or Other Electronic Network Activity Information

We may also disclose the above categories of Personal Information to a third party in the context of any reorganization, financing transaction, merger, sale, joint venture, partnership, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

No Sale of Personal Information

We do not “sell” your Personal Information, including your Sensitive Personal Information, as defined under the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act. We have not engaged in such activities in the 12 months preceding the date this Policy was last updated. Without limiting the foregoing, we do not “sell” the Personal Information, including the Sensitive Personal Information, of minors under 16 years of age.

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.

Information Collected Automatically

When you visit our Site or open one of our emails, we may automatically collect information about you using tracking technology, including you Internet Protocol address (“IP Address”), a unique device or user ID, system and browser type, the referring address website, the content and pages that you access on the Site or mobile application, and the dates and times that you visit the Site. We use technology, including cookies (a piece of data that is placed on your computer when you visit a website), web beacons, and other similar technology to automatically collect certain information, as described above, that we then use for system administration, troubleshooting, and to identify you when you open our email or visit our Site through your computer or mobile device so we can enhance your online experience and make our advertising more relevant. Further, we may offer certain features that are only available through the use of this technology.

Company may use third party software to serve ads on the Site, implement email marketing campaigns, and manage other interactive marketing initiatives. Further, Company may contract with third parties to serve ads on third party websites in order to optimize advertising campaigns. This third party software may use cookies, web beacons, or similar technology to help manage and optimize your online experience with us.

You can set your browser to accept or reject cookies and to disable other tracking technology. The third party sites may also provide additional opt-out methods.

Our privacy statement does not cover the use of cookies by others including our partners,

affiliates, tracking utility company and service providers. We do not have access or control over these cookies. We also may collect information from third party websites with whom we connect, such as social media platforms.

Our Site contains embedded content (e.g., videos) and Social Media Widgets (e.g., LinkedIn, Facebook, etc.). Embedded content may place third party cookies on your device that track your online activity to enhance your experience or assess the success of their application. Social Media Widgets allow us to integrate social media functions into the Site. These widgets may place third party cookies on your device for tracking and advertising purposes. We have no direct control over the information these cookies collect, and you should refer to their website privacy policy for additional information.

Purposes for the Collection and Use of Personal Information

We may collect or use Personal Information for the purposes of operating, managing, and maintaining our business, managing our workforce and other employment purposes, and accomplishing our business purposes and objectives, including, for example, using Personal Information to:

- Plan and manage workforce activities and personnel generally, including for recruitment, onboarding, appropriate staffing, performance management, training and career development, payments and benefit administration, training, leaves and promotions;
- Conducting workforce assessments, including determining physical or mental fitness for work and evaluating work performance;
- Process payroll, manage wages and bonuses, reimburse expenses and provide healthcare, pensions, savings plans and other benefits;
- Operate, maintain, monitor and secure our facilities, equipment, systems, networks, applications and infrastructure;
- Manage attendance, time keeping, leaves of absence and paid time off;
- Facilitate communication and workforce travel;
- Undertake quality and safety assurance measures, protect the health and safety of our workforce and others, and conduct risk and security control and monitoring;
- Conduct research, analytics, and data analysis, such as to assist in succession planning and to ensure business continuity, as well as to design retention programs and diversity initiatives;
- Perform identity verification, accounting, budgeting, audit, and other internal functions, such as internal investigations, disciplinary matters and handling grievances and terminations;
- Operate and manage IT and communications systems and facilities, allocate Company assets and human resources, and undertake strategic planning and project management; and
- Comply with law, legal process, requests from governmental or regulatory authorities, internal policies and other requirements such as income tax deductions, record-keeping, work permit and immigration regulations and reporting obligations, and the exercise or defense of legal claims.

Purposes for the Collection and Use of Sensitive Personal Information

We may use Sensitive Personal Information for purposes of performing services for our business, providing services as requested by you, and ensuring the security and integrity of our business, infrastructure, and the individuals we interact with. This includes, without limitation, establishing and maintaining your employment relationship with us, ensuring the diversity of our workforce, complying with legal obligations, managing payroll, administering and providing benefits, and securing the access to, and use of, our facilities, equipment, systems, networks, applications, and infrastructure.

Retention Period

We retain Personal Information including, without limitation, Sensitive Personal Information for as long as needed or permitted for the business purpose(s) for which it was collected, subject to the retention periods set for in the Company's Data Security and Retention Policy. The criteria used to determine our retention periods include:

- The duration of your employment or your contract with us;
- The length of time we have an ongoing relationship with you or your dependents/beneficiaries and the length of time thereafter during which we may have a legitimate need to reference your Personal Information to address issues that may arise;
- Whether there is a legal obligation to which we are subject (for example, certain laws may require us to keep your records for a certain period of time); and
- Whether retention is advisable due to our legal position or requirement (such as in regard to applicable statutes of limitations, litigation holds, or regulatory investigations).

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"> • Healthcare entities that use the Company’s services, including the Company’s placement and recruitment services • 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 • Government agencies, law enforcement, and other parties as required by law, including in litigation
Financial Information	<ul style="list-style-type: none"> • Healthcare entities that use the Company’s placement service
Commercial Information	<ul style="list-style-type: none"> • 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
Internet or Other Electronic Network Activity Information (including Website Visitors)	<ul style="list-style-type: none"> • Service Providers, including the Company’s (a) website hosting provider, and (b) data analytics providers, and (c) applicant tracking system provider

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 shared about the consumer and the categories of third parties to whom the Personal Information was sold or shared, by category or categories of Personal Information for each category of third parties to whom the Personal Information was sold or shared;
- The categories of Personal Information that the business disclosed about the consumer for a business purpose and the categories of persons to whom it was disclosed for a business purpose; and,
- The business or commercial purposes for the Company's collection, sale or sharing 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 or Sharing of Personal Information

- California Consumers have a right to opt-out of the sale or sharing of the Personal Information. However, as stated above, the Company does not and will not sell Personal Information as that term is defined by the CCPA. [DO NOT SELL MY PERSONAL INFORMATION](#)

Right to Correct Inaccurate Personal Information

- California Consumers have the right to submit a verifiable request for the Company to correct inaccurate personal information the Company maintains about the consumer, taking into account the nature of the personal information and the purposes of the processing of the personal information.

Right to Limit Use and Disclosure of Sensitive Personal Information

California Consumers have the right to direct the Company to limit its use of the Consumer's sensitive personal information it has collected or processed to infer characteristics about the Consumer to necessary use to perform the services or provide the goods reasonably expected by an average consumer:

- to ensure security and integrity, to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes,
- for short-term, transient use, including, but not limited to, non-personalized advertising

shown as part of a consumer's current interaction with the business, provided that the consumer's personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with the business,

- for performing services on behalf of the business, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business,
- to undertake activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business.

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
- Email: optout@ahcstaff.com

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.

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 CPRA, 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. Our Site contains embedded content (e.g., videos) and Social Media Widgets (e.g., LinkedIn, Facebook, etc.). Embedded content may place third party cookies on your device that track your online activity to enhance your experience or assess the success of their application. Social Media Widgets allow us to integrate social media functions into the Site. These widgets may place third party cookies on your device for tracking and advertising purposes. We have no direct control over the information these cookies collect, and you should refer to their website privacy policy for additional information.

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.

Changes to this Policy

We reserve the right to make changes to this Policy at any time. In the event we make material changes to the Policy, we will provide notice through the Site. Changes will be effective immediately upon posting to the Site and will apply to your use of the Site after the “effective date” listed above. You understand and agree that your continued use of the Site after the effective date means that the collection, use, and sharing of your personal information is subject to the updated Policy. Except to the extent we receive your authorization or as permitted or required by applicable law, we will handle your data in accordance with the terms of the Policy in effect at the time of the collection.

For More Information

For questions or concerns about the Company’s privacy policies and practices, please contact us at Legal@ahcstaff.com.