

# NOTICE TO CALIFORNIA APPLICANTS/EMPLOYEES/CONTRACTORS

Effective Date January 1, 2023

## Bright Health Group

Please take notice that the Bright Health Group the “Company” collects certain information about you.

### **Where We Get Your Information From**

The Company collects information about you from the following sources: 1) you; 2) prior employers, references, recruiters, job-related social media platforms; 3) third-party sources of demographic information; 4) third-party companies, such as background check companies, drug testing facilities; and 5) claim administrators and investigators. Depending on the Company’s interactions with you, we may or may not collect all the information identified about you.

### **The Personal and Sensitive Personal Information That We Are Collecting**

We are collecting the following information:

- Identifiers, such as name, government-issued identifier (e.g., Social Security number), and unique identifiers (e.g., employee ID);
- Personal information, such as real name, signature, SSN, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, passport number, federal identification authorizing work in the United States, access and/or passcodes, insurance policy number, education, employment, employment history, bank account number, other financial information, medical information, or health insurance information;
- Characteristics of protected classifications under California or federal law, such as age, marital status, gender, sex, race, color, disability, citizenship, primary language, immigration status, military/veteran status, disability, request for leave, and medical conditions;
- Commercial information, such as transaction information and purchase history (e.g., in connection with travel or other reimbursements [or purchases from Company]);
- Internet or network activity information, such as browsing history and interactions with our online systems and websites and any personal information that you provide while accessing the Company’s computer systems, such as personal credit card information and passwords;
- Geolocation data, such as device location from usage of the Company’s devices;
- Biometric information related to access to the Company’s secured access points;
- Audio, electronic, visual, and similar information;
- Professional or employment-related information, such as work history and prior employer;
- Non-public education information;

- Inferences drawn from any of the Personal and Sensitive Personal Information listed above to create a profile or summary about, for example, an individual's preferences and characteristics.

### **How Your Personal and Sensitive Personal Information is Used**

We may use Personal and Sensitive Personal Information:

- To operate, manage, and maintain our business;
- For hiring, retention, and employment purposes;
- To otherwise accomplish our business purposes and objectives, including, for example:
  - Emergency services;
  - Conducting research, analytics, and data analysis;
  - Maintaining our facilities and infrastructure;
  - Quality and safety assurance measures;
  - Conducting risk and security controls and monitoring;
  - Protecting confidential and trade secret information;
  - Detecting and preventing fraud;
  - Performing identity verification;
  - Performing accounting, audit, and other internal functions, such as internal investigations;
  - Complying with the law, legal process, and internal policies;
    - Maintaining records;
    - Claims processing;
    - Responding to legal requests for information and subpoenas; and
    - Exercising and defending legal claims.
- Any other purposes authorized by the California Privacy Protection Agency, California or Federal law.

We may or may not have used Personal and Sensitive Personal Information about you for each of the above purposes.

### **How We May Disclose Your Personal Information**

Company generally maintains information related to its personnel as confidential; however, from time to time, Company may have a legitimate business need to disclose personnel information for one of the purposes listed above to one or more of the categories of recipients listed below. In that event, Company discloses your personal information and/or sensitive personal information only to the minimum extent necessary to achieve the purpose of the disclosure and only if the disclosure is permitted by the California Privacy Rights Act ("CPRA") and other applicable laws.

- Service providers and contractors: Company discloses your personal information to service providers and contractors to assist us in meeting our business needs and contractual and legal obligations. The company discloses your personal information to service providers and contractors only subject to written contracts in compliance with the CPRA and any other applicable law. Service providers and contractors include auditors,

administrative service providers, law firms, travel agencies, benefits providers, and any other entity providing services to the Company.

- **Affiliated companies:** Other companies within the Bright Health Group family of companies.
- **Clients and customers:** This may include, for example, disclosing a sales representative's contact information with clients and customers.
- **Business partners:** For example, Company might disclose your business contact information to a co-developer of a new product or service with which you will be working.
- **Government or administrative agencies:** These may include, for example:
  - Internal Revenue Service to pay taxes;
  - Employment Development Department as required for state payroll taxes and to respond to unemployment or state disability insurance claims;
  - OSHA/CalOSHA as required to report work-related death or serious injury or illness; o Department of Fair Employment and Housing as required to respond to employment charges; and
  - California Department of Industrial Relations as required to resolve workers' compensation claims.
- **Public:** Company may disclose your personal information to the public as part of a press release, for example, to announce promotions or awards. If you do not want your personal information in press releases, please contact the HR Department Company which does not disclose sensitive personal information to the public.
- **Required Disclosures:** We may be required to disclose personal information (a) in a court proceeding, (b) in response to a court order, subpoena, civil discovery request, other legal process, or (c) as otherwise required by law.
- **Legal Compliance and Protections:** We may disclose personal information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of Company, our users, or others.

### **Selling of Personal Information**

The Company Does not sell your personal information.

### **Your California Privacy Rights**

Subject to applicable law, Employees have the following rights:

**Right to Know:** You have the right to submit a verifiable request for copies of specific pieces of your personal information collected in the preceding 12 months or at your option since January 1, 2022. Please note that the CPRA's right to obtain copies does not grant a right to the whole of any document that contains personal information, but only to copies of "specific pieces" of personal information. There may be some specific information about you that we are not permitted by law to provide to you because of legal restrictions or because the information is used for security purposes, such as information collected in an internal investigation. You may make these requests up to twice in a 12-month period. Moreover, Employees have a right to know categories of information collected, the sources of personal information, our purpose for

collecting and using personal information, and categories of external recipients to which personal information is disclosed, but not the individual sources or recipients. This information is provided above. Company does not always track individualized sources or recipients.

**Right to Delete:** You have the right to submit a verifiable request for the deletion of personal information that you have provided to the Company. Certain information that we hold about you may not be deleted. We are not permitted to delete information that we need in order to operate our business, administer our employees, protect our legal obligations and rights, or to provide security for our employees, our systems and our company.

**Right to Correct:** You have the right to submit a verifiable request for the correction of inaccurate personal information maintained by the Company, considering the nature of the personal information and the purposes of processing the personal information.

**Right to Opt Out of Sale and Sharing:** You have the right to opt out of the sale of your personal information and the disclosure of your personal information for cross-context advertising. As noted above, the Company does not sell personal information or disclose personal information for cross-context advertising.

**Right to Limit Processing of Sensitive Personal Information:** You have the right to tell us not to process sensitive personal information except for the purpose for which it was originally collected. Sensitive personal information includes the following categories of information: health information, biometrics, religion, sex life, sexual orientation, personal communications, financial account information, and log in credentials. We describe the purposes for which we collect this information above, and we do not process this information for other purposes.

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

The company will respond to requests to know, delete, and correct in accordance with applicable law if it can verify the identity of the individual submitting the request. You can exercise these rights in the following ways:

- Call Our Compliance Hotline - 800-978-3514
- Email [privacy@brighthouseinc.com](mailto:privacy@brighthouseinc.com)

### **Company's Non-Discrimination and Non-Retaliation Policy**

The company will not unlawfully discriminate or retaliate against you for exercising your rights under the California Privacy Rights Act.

### **Data Retention.**

The Company retains the information it receives about you for a period of – Six years, unless a shorter or longer period is required by California or Federal law.

### **Changes To This Privacy Policy**

If we change this Privacy Policy, we will post those changes on this page and update the Privacy Policy Effective Date above. If we materially change this Privacy Policy in a way that affects how we use or disclose your personal information, we will provide prominent notice of such changes and the effective date of the changes before making them.

**For More Information**

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