

California Job Applicant Privacy Notice

Effective Date: January 1, 2023

Last Updated on: August 10, 2023

This Job Applicant Privacy Notice (“Job Applicant Notice”) describes how Health Gorilla, Inc. (“Health Gorilla” “we,” “us,” or “our”) collects personal information (“PI”) of California job applicants in the human resources (“HR”) context. This Job Applicant Notice is designed to meet obligations under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (together, the “CCPA”) and serves as our notice at collection. Capitalized terms used but not defined in this Job Applicant Notice shall have the meanings given to them under the CCPA. In the event of a conflict between any other Health Gorilla policy, statement, or notice and this Job Applicant Notice, this Job Applicant Notice will prevail as to California job applicants, unless stated otherwise.

Non-Applicability: This Job Applicant Notice does not apply to our consumer facing website(s), which are addressed in our general privacy policy and notice available <https://www.healthgorilla.com/home/privacy-policy>, except when you submit a job application to us. It also does not apply to our current or former employees or independent contractors, which are addressed in our Employee Privacy Policy available from our human resources department.

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Notice of Data Practices

The description of our data practices covers the twelve months prior to the Effective Date and will be reviewed/updated at least annually. However, our data practices may vary in between annual updates. If such practices are material, we will provide supplemental pre-collection notice of our then-current practices, which may include references to other privacy policies or notices. Otherwise, this notice applies.

Sources of Personal Information and Use

We may collect your PI directly from you, such as when you apply for a position or become employed or engaged by Health Gorilla. We may collect (e.g., contact details, identification, educational and employment history) over the telephone, through documents such as consents to perform employment screening, applications for

employment, in our notes or records we create about you, from third parties (e.g., references and recruiters), or from public sources of data.

Generally, we use job applicant PI for HR Business Purposes and as otherwise required for the operation of our business. For example, we use job applicant PI for the following purposes:

- Recruitment
- Communication with job applicants
- Processing job applications
- Employment eligibility and background screenings
- Accommodation requests
- HR systems and security
- Auditing, investigations, and compliance
- Maintaining job applicant records
- Facilitating diversity and inclusion programs

We may also use job applicant PI for “Additional Business Purposes” in a context that is not a Sale or Share under the CCPA, such as:

Disclosing PI to our Service Providers, Contractors, or Processors that perform services for us (“Vendors”);

For additional purposes explained at the time of collection (such as stated in an applicable privacy policy or notice);

Disclosing it to you or others at your request or through your action (e.g., payroll processors or benefit providers);

To the government or private parties for legal compliance or to protect or enforce legal rights or obligations or to prevent harm;

As required or permitted by applicable law;

To assignees as part of an acquisition, merger, asset sale, or other transaction where another party assumes control over all or part of our business (“Corporate Transaction”).

Subject to CCPA obligations and restrictions, our Vendors may also use your PI for Business Purposes and Additional Business Purposes and may engage their own vendors to enable them to perform services for us.

PI by Category – Collection, Disclosure and Retention

We may collect the personal information and sensitive personal information categories listed in the table below.

Personal Information Category	Examples of PI Collected and Retained	Categories of Recipients
Identifiers	Real name, alias, postal address, unique personal identifies, online identifier, Internet Protocol address, and e-mail address	Sale/Share: None Disclosure for Business Purposes: HR system and software vendors General IT, software, and other business vendors (e.g., job listing vendors; CV mail) and/or Other parties in connection with our legal obligations within the limits of Additional Business Purposes.
Personal Records listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	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, medical information, or health insurance information. (Some PI including in this category may overlap with other categories.)	Sale/Share: None Disclosure for Business Purposes: HR system and software vendors General IT, software, and other business vendors (e.g., job listing vendors; CV mail) and/or Other parties in connection with our legal obligations within the limits of Additional Business Purposes.
Personal Characteristics or Traits under California or federal law.	In some circumstances, we may collect PI that is protected under California or U.S. law, such as age, sex, gender, gender identity, gender expression, nationality,	Sale/Share: None Disclosure for Business Purposes: HR system and software vendors

	race, ethnicity, veteran status, or disability	<p>General IT, software, and other business vendors (e.g., job listing vendors; CV mail)</p> <p>Other parties in connection with our legal obligations within the limits of Additional Business Purposes.</p>
Professional or employment-related information	Professional, educational, or employment-related information (e.g., job title, office location, telephone number, dates of employment, qualification details, (including professional credentials and certifications), background checks, and company email addresses	<p>Sale/Share: None</p> <p>Disclosure for Business Purposes:</p> <p>HR system and software vendors</p> <p>General IT, software, and other business vendors (e.g., job listing vendors; CV mail) and/or</p> <p>Other parties in connection with our legal obligations within the limits of Additional Business Purposes.</p>
Internet Usage Information	When you use our online systems or otherwise interact with us online, we may collect browsing history, search history and other information regarding your interaction with our systems or other sites, applications, or content.	<p>Sale/Share: None</p> <p>Disclosure for Business Purposes:</p> <p>HR system and software vendors</p> <p>General IT, software, and other business vendors (e.g., job listing vendors; CV mail) and/or</p> <p>Other parties in connection with our legal obligations within the limits of Additional Business Purposes.</p>
Sensory data	We may collect audio, electronic, visual, or similar information such as video recordings of response to interview questions.	<p>Sale/Share: None</p> <p>Disclosure for Business Purposes:</p> <p>HR system and software vendors</p> <p>General IT, software, and other business vendors (e.g., job listing vendors; CV mail) and/or</p> <p>Other parties in connection with our legal obligations within the limits of Additional Business Purposes.</p>
Non-public education	Education records directed mainly by an educational institution or	Sale/Share: None

information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	party acting on its behalf, such as transcripts and educational institutions attended, background checks, and completion of degrees and certificates.	Disclosure for Business Purposes: HR system and software vendors General IT, software, and other business vendors (e.g., job listing vendors; CV mail) and/or Other parties in connection with our legal obligations within the limits of Additional Business Purposes.
Inferences drawn from other personal information	We may draw inferences from other information we collect about you or from you.	Sale/Share: None Disclosure for Business Purposes: General IT, software, and other business vendors (e.g., job listing vendors; CV mail) and/or Other parties in connection with our legal obligations within the limits of Additional Business Purposes.
Sensitive Personal Information	Government-Issued Identifiers including (social security, driver's license, state identification card, or passport number) Personal characteristics (racial or ethnic origin) Health Information (PI collected and analyzed concerning an individual's health) (for accommodation requests). Sexual Orientation (PI collected and analyzed concerning an individual's sexual orientation)	Sale/Share: None Disclosure for Business Purposes: General IT, software, and other business vendors (e.g., job listing vendors; CV mail) and/or Other parties in connection with our legal obligations within the limits of Additional Business Purposes.

There may be additional information we collect that meets the definition of PI under the CCPA but is not reflected by a category above in which case we will treat it as PI as required but will not include it when we describe our practices by category. We will not sell the PI or sensitive PI we collect.

As permitted by applicable law, we do not treat de-identified data or aggregated consumer data as PI and we reserve the right to convert, or permit others to convert your PI into de-identified data or aggregate consumer information and may elect not to

treat publicly available information as PI. We will not attempt to re-identify data that we maintain as de-identified.

Retention of PI

Because there are numerous types of PI in each category and various uses for each PI type, actual retention periods vary. We retain specific PI elements based on how long we have a legitimate purpose for the retention, including as mandated by applicable laws.

Questions/Contact Us

If you have any questions about this Notice or need to access it in an alternative format due to having a disability, please contact **peopleteam@healthgorilla.com or (844) 446-7455**.

Postal Address:

Health Gorilla
Attn: People Team
800 W. El Camino Real #100
Mountain View, CA 94040

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