

ASH Recruitment Privacy Statement

Effective Date: January 1, 2023

Welcome to American Specialty Health (ASH). This Human Resources (HR) Privacy Statement describes the information practices for American Specialty Health Incorporated, a Delaware corporation with a mailing address of 10221 Wateridge Circle, San Diego, CA 92121, on behalf of itself and its subsidiaries (collectively “ASH” or “we”), regarding information provided by candidates for employment with ASH and other interested parties (each, “you”, “candidate” or “user”).

If you are a CA resident, this statement includes your [California Privacy Rights](#). This Privacy Statement also serves to inform you how we collect, use, disclose, and store information about you for employment recruitment purposes. ASH values and respects your privacy.

We are committed to using your information responsibly. This Privacy Statement informs candidates for employment with us about our Human Resource (HR) information practices, including what categories of personal information and sensitive personal information we collect; how the personal information is collected; the business purpose for which we collect the personal information; the types of third parties to whom we disclose personal information; how long we keep the personal information, and the choices you have about the collection and use of your personal information.

Personal Information identifies, relates to, describes, is reasonably capable of being associated with, or could be linked, directly or indirectly, with a particular consumer or household. The type of personal information collected will include sensitive personal information, which is subject to special protections under some state laws. Such laws consider sensitive personal information to include information like government-issued numbers (e.g., Social Security, driver’s license, state identification card, or passport); information allowing access to financial accounts like credit or debit cards; geolocation within a radius less than 1850 feet; racial or ethnic origin; religious or philosophical beliefs; union membership; contents of consumer’s mail, email, text messages; genetic data; biometric information for purposes of uniquely identifying a consumer; health and mental health data; or data about a person’s sex life or sexual orientation. We use such information only to complete services related to employment-recruitment purposes or as required by law or regulations.

How we obtain information about you:

- when you provide it to us (e.g., by contacting us through our Contact Us, through our chat, when you call us, when registering or enrolling for the services)
- from your use of our website, using cookies, and
- occasionally, from our service providers and your sponsoring organization.

ASH does not sell personal information to third parties. When we use any service providers, processors, or third parties to assist us for business purposes involving the collection, use, or retention of personal information, we limit those arrangements to the uses disclosed in this privacy statement. We also

contractually require such persons to only use the personal information for the specific business purposes authorized in the contract.

We do not use personal information for Targeted Advertising (Cross-Context Behavioral Advertising).

Deidentified Information Will Not be Re-identified: Deidentified information is data where identifiers are removed or altered so the identify of an individual, a household, or device used by an individual reasonably cannot be determined from the data. Such data may also be known as pseudonymized or anonymized data. Where the information has been deidentified properly in accordance with federal or state law, the deidentified data set is not subject to privacy protections under the applicable law. To the extent ASH creates or uses such deidentified data sets, we will not attempt to alter that information so it is “reidentified,” meaning it could then be used to reasonably identify an individual, a household, or device used by an individual.

For any questions about this Privacy Statement, please contact us directly through any means noted at the end of this Privacy Statement. If information practices change, we will post the revised policy on ASHCompanies.com. See the section titled [Changes to Our Privacy Policy](#) below.

This chart is a reference guide on how ASH collects, uses, and discloses your information regarding inquiries you make to us generally. This is only a summary. You should review the full privacy statement below for more detail. If you are a California resident or an international user, the full privacy statement below contains important information related to your privacy rights.				
	Categories of Personal Information	Source of Collection	Business Purpose	Disclosure to Others
Contacting Us	<p>Identifiers: First and last name, Email address, address</p> <p>Special Identifier*: Phone number**</p> <p>Other Information:</p> <p>Inquiry Message</p> <p>*A special identifier is one that may be subject to cybersecurity and breach notification laws in various states. An example would be California Civil Code 1798.80, subdivision (e).</p> <p>**Optional Fields</p>	Provided by you.	<p>Performing Services for the Business: To perform services addressing your questions, suggestions, and complaints.</p> <p>Security: To perform auditing and detecting security incidents, if submitted electronically.</p>	<p>Service Providers and Sponsoring Organizations: To Perform Services for the Business. For example, we may disclose the information outside of ASH as necessary to resolve your inquiry or concern when resolution requires third-party action, including with our Service Providers.</p> <p>Service Providers: For Security purposes (e.g., we may disclose internet and electronic network activity and information to audit for and detect and investigate security issues).</p>

The following section of the chart is a reference guide on how ASH, through its Human Resources' department, collects, uses, and discloses your information for employment-recruitment purposes. This is only a summary. You should review the full privacy statement below for more detail. If you are a California resident or an international applicant, the full privacy statement contains important information related to your privacy rights.

In order to seek work at ASH it is necessary for ASH to receive Personal Information about you.

	Categories of Personal Information	Source of Collection	Business Purpose	Disclosure to Others
Recruitment Background Check Reports Regulatory	<p>Identifiers: First and last name; email address; postal address; username (online identifier); IP address</p> <p>Special Identifiers: Phone number; drug screening result; account password.</p> <p>Protected Class Information: Gender (optional); military service (optional); disability (optional); ethnicity (optional); date of birth; marital status.</p> <p>Professional or Employment-Related Information</p> <p>Sensitive Personal Information: government identification numbers, racial/ethnic origin (optional)</p>	<p>Provided by you and our applicant tracking service provider for employment purposes.</p> <p>Provided by background check service provider to ASH based on information you provide to the applicant tracking service provider and background check service provider.</p>	<p>To process applications, verify information, and conduct recruitment efforts.</p> <p>To verify application information and eligibility for employment.</p> <p>To meet regulatory requirements.</p> <p>To perform auditing, detecting security incidents, debugging (limited to non-sensitive personal information) programs, internal research and tech development, and quality assurance and product improvement.</p>	<p>Service Providers: Application data is collected and stored on the applicant tracking service provider's platform which is accessible by link from the Careers features on ASHCompanies.com. This information is then disclosed to ASH.</p> <p>ASH discloses education and employment information collected in the applicant tracking service provider's platform to our background check service provider if the candidate accepts a preliminary offer of employment.</p> <p>We may also use and disclose information as needed with Service Providers for security purposes.</p>
Additional Uses and Disclosures	<p>For legal purposes: including as reasonably necessary to comply with law or legal process (including a court or government order or subpoena); to detect, prevent, or otherwise address fraud, security or technical issues; to enforce this Privacy Statement; and as reasonably necessary to protect the rights, property, or safety of ASH, ASH users, and/or the public.</p> <p>During a corporate reorganization: If ASH is involved in a merger, acquisition, financing, or sale of business or assets, information collected from and about users may be transferred to one or more third parties involved in such transaction and, upon such transfer, the relevant third-party privacy policy or policies may govern further use of the information. In the event of such a change, ASH will endeavor to notify our users of the change as well as any choices our users may have regarding the change.</p> <p>Aggregate information: In addition, ASH may provide service providers, regulatory agencies, and others with aggregate statistics regarding employment-recruitment activity. The information provided will not include individually identifiable information, meaning we will not disclose your Personal Information to third parties as part of exchanges involving such aggregate information.</p>			

What kind of information do we collect about You?

Personal Information may be collected by ASH when you elect to Contact Us or apply for employment with us. These services require that you provide additional information in order to obtain the service involved. Personal Information identifies, relates to, describes, is reasonably capable of being associated with, or could be linked, directly or indirectly, with a particular consumer or household. How we obtain information about you:

- when you contact us
- when you apply for a position with ASH through our service provider website linked on the Careers page of ASHCompanies.com or you direct other employment sites such as LinkedIn and Indeed to send information to us
- from our service providers.

When you use the **Careers** feature of ASHCompanies.com, you will be linked to a website maintained by a service provider that supports ASH's recruitment and hiring process by collecting and retaining application and recruitment data for ASH. Information collected is governed by the website maintained by that service provider. Information disclosed by the service provider to us includes information required to process applications for employment with ASH. Such information generally includes the following categories of personal information identifiers (e.g., first and last name, postal address, email address, username/on-line identifier); Special Identifiers* (e.g., phone number, drug screening result); and Protected Class Information (e.g., date of birth, gender--optional, military service--optional, disability--optional, ethnicity—optional); Professional or employment --related information; and Education. Some of the data you supply for the **Careers** feature may include identifiers considered by California law to be Sensitive Personal Information. Sensitive Personal Information includes government identification numbers and racial or ethnic origin. Similarly, should you submit applications for employment with ASH, the same types of information would be collected and disclosed to us. ASH collects, uses, discloses, and retains such information to process your application for employment and to comply with legal and regulatory requirements. **A Special Identifier is one that may be subject to cybersecurity and breach notification laws in various states. An example would be California Civil Code 1798.80, subdivision (e).*

How do we use information collected about you?

We do not sell your personal information to third parties.

We do not use your personal information for targeted advertising (e.g., cross-context behavioral advertising).

We do not use sensitive personal information you supply beyond the immediate business purposes for which you have supplied it (e.g., related to an inquiry submitted to us or as part of your application for employment with us).

If you provide your name, e-mail address, postal address, and/or telephone number to us, ASH will use the information to communicate with you at your request.

Applications for Employment

Your personal data may be disclosed with ASH and used by ASH for the following application-for-employment-related purposes:

- To manage recruitment of employees, including legal eligibility for work, assess hires, and promotions;
- To monitor equal employment opportunities, in respect of diversity categories including but not limited to sex (including pregnancy, childbirth or related medical conditions and breastfeeding), gender, gender identity, gender expression, race, color, religion (including religious dress and grooming practices), creed, national origin, ancestry, physical or mental disability, legally-protected medical condition, marital status, age, sexual orientation, genetic information, military or veteran status or any other basis protected by applicable local, federal or state law. Such monitoring would only apply where it is either required or authorized by the specific legislation.

Under what circumstances does ASH disclose information collected related to employment opportunities with third parties?

ASH may disclose your Personal Information with third parties in the following circumstances:

With Service Providers: Your Personal Information may be collected by and disclosed between ASH and Service Providers (vendors that process information on behalf of ASH pursuant to a written contract) we use to administer our Human Resources program. ASH ensures that any such service providers used to administer our Human Resources program are bound to maintain confidentiality when handling your personal data on our behalf in a manner that is consistent with this policy.

For legal purposes: including as reasonably necessary to comply with law or legal process (including a court or government order or subpoena); to detect, prevent, or otherwise address fraud, security, or technical issues; to enforce this Privacy Statement for ASH recruitment-for-employment purposes and as reasonably necessary to protect the rights, property or safety of ASH, ASH users, and/or the public.

During a corporate reorganization: If ASH is involved in a merger, acquisition, financing, or sale of business or assets, information collected from and about candidates may be transferred to one or more third parties involved in such transaction and, upon such transfer, the relevant third-party privacy policy or policies may govern further use of the information. In the event of such a change, ASH will endeavor to notify impacted persons of the change as well as any choices our candidates may have regarding the change.

How can you opt-out of the collection of your information?

If you do not want ASH to receive your Personal Information, you should not provide it to us. Employment applications require ASH to receive specific information from you. Failure to provide such information may adversely impact our ability to consider you for employment.

How long does ASH retain my personal information?

When a candidate applies for a position, ASH maintains the application and supporting documentation for up to 5 years. If the candidate is hired and becomes an ASH employee, employment records are maintained for up to 10 years after termination.

Can users delete, correct, or access their information collected by ASH?

California residents see [Your California Privacy Rights](#). Except as expressly otherwise stated in this Privacy Statement, and except where applicable law provides otherwise, Personal Information collected by ASH cannot be deleted and will be retained in accordance with ASH's record retention policy and state and federal law. The functionality of the Human Resources department requires that we collect and receive certain Personal Information from you. If you do not wish to have your Personal Information collected or received by us in any capacity, you should not apply to any open positions with ASH.

Applicants and associates can access, correct, and update their Personal Information through an online system and/or by contacting the Human Resources department. ASH will use reasonable efforts to correct any reported factual inaccuracies in Personal Information.

How do we safeguard information?

In order to maintain the confidentiality of and safeguard the security of users' Personal Information, ASH enforces strict company-wide policies regarding privacy, security, and confidentiality.

ASH has an organizational commitment to protecting privacy and security. All employees who work at ASH are made aware of security policies and practices through employee orientation and annual refresher training. Personal Information is secured in isolated databases with tightly restricted access. Employees authorized to view this information are authenticated prior to gaining such access. ASH reviews web security on an ongoing basis. In addition to daily security administration and response activities, ASH undergoes an overall security review on an annual basis.

CALIFORNIA RESIDENTS: Your California Privacy Rights

Under California Civil Code Section 1798.83 (known as the "shine the light" law), California residents have a right to request an information-sharing disclosure from a business to which they have provided Personal Information, and which has disclosed the information to any third party for third-party direct marketing uses in the prior calendar year.

ASH does not knowingly share your Personal Information with third parties for their direct marketing use without your permission. California residents may send requests for information-sharing disclosure under this law by contacting us by mail at the address located in the contact section below. Please note that, under this law, we are not required to respond to your request more than once in a calendar year, nor are we required to respond to any requests that are not sent to the above-designated email address.

The California Consumer Privacy Act (CCPA) provides California residents with specific rights related to the collection, use, and disclosure of their Personal Information by us. The California Privacy Rights Act (CPRA), effective January 1, 2023, is an addendum to the CCPA. While our privacy practices have adopted many of the CCPA requirements across our program, this section discusses specific rights and elements applicable to persons who are **California residents** at the time we collected, used, or disclosed your Personal Information.

Should we receive CCPA-related requests that are manifestly unfounded or excessive, in particular because of their repetitive character, we reserve the ability to either charge a reasonable fee for taking the action requested or refuse to act on the request. If we refuse your request on this basis, we will notify you of the reason why.

Right to Know: You have the right to request that ASH disclose what Personal Information we have collected, used, disclosed, and sold, including specific pieces of personal information, for the date range indicated by you for records dated on or after January 1, 2020.

To request this information, you may fill out this [Request to Know form](#). You may submit this form by emailing us at HIPAA@ashn.com with the subject line "California Privacy Rights" or by mailing said form to our address below. You may also utilize your Right to Know by phone at (844) 646-2746.

ASH will verify your request by matching information provided by you in the Right to Know form to information housed in our internal systems. If we are unable to verify the request, we will deny the request and provide only general information about the type of personal information we process as outlined in this document. ASH may also deny requests if you submit the Right to Know form more than twice in a calendar year or if your request is not submitted online or using the email, phone number, or address designated above.

ASH will grant, deny, or respond to a request within 45 days of receipt of the Right to Know form. If an extension of time (up to a maximum of 90 days) is required, we will notify you and provide additional information about the process.

Right to Access and Portability: You have the right to receive a copy of your personal information and the specific pieces of your personal information we maintain in an easily readable electronic format. To request this information, you may fill out this [Request to Access form](#) and select options to receive a copy of the associated data.

You may submit this form by emailing us at HIPAA@ashn.com with the subject line “California Privacy Rights” or by mailing said form to our address below. You may also utilize your Right to Access and Portability by phone at (844) 646-2746.

ASH will verify your request by matching information provided by you in the Right to Know and Access form to information housed in our internal systems. If we are unable to verify the request, we will deny the request and provide only general information about the type of personal information we process as outlined in this document. ASH may also deny requests if you submit the Right to Know and Access form more than twice in a calendar year or if your request is not submitted online or using the email, phone number, or address designated above.

ASH will grant, deny, or respond to a request within 45 days of receipt of the Right to Know and Access form. If an extension of time (up to a maximum of 90 days) is required, we will notify you and provide additional information about the process.

Right to Correct: You have the right to have inaccurate personal information we maintain about your corrected. To request this information, you may fill out this [Request to Correct form](#) to specify which information requires correction.

You may submit this form by emailing us at HIPAA@ashn.com with the subject line “California Privacy Rights” or by mailing said form to our address below. You may also utilize your Right to Correct by phone at (844) 646-2746.

ASH will verify your request by matching information provided by you in the Right to Correct form to information housed in our internal systems. If we are unable to verify the request, we will deny the request. We may also deny the request, in whole or in part, if we determine the contested Personal Information is more likely than not accurate based on the totality of circumstances. We may also deny a request if it involves the same alleged inaccuracy previously denied within the past 6 months should the request not provide new or additional documentation attempting to prove the inaccuracy. We may also deny a request if we have a good-faith, reasonable and documented belief the request is fraudulent or abusive.

ASH will grant, deny, or respond to a request within 45 days of receipt of the Right to Correct form. If an extension of time (up to a maximum of 90 days) is required, we will notify you and provide additional information about the process.

Right to Delete: You have the right to request the deletion of your Personal Information collected or maintained by the ASH.

To request this information, you may fill out this [Request to Delete form](#). You may submit this form by emailing us at HIPAA@ashn.com with the subject line “California Privacy Rights” or by mailing said form to our address below. You may also utilize your Right to Know by phone at (844) 646-2746.

ASH will verify your request in a two-step verification process. First, ASH will match information provided by you in the Right to Delete form to information housed in our internal systems. We will verify your first and last name plus two other identifiers, Second, ASH will contact you to verify your identity and confirm your request, such contact may be made by phone or email.

If we are unable to verify the request, we will deny the request and provide notice of such denial. ASH may also deny requests if you submit the Right to Delete form more than twice in a calendar year or if your request is not sent to the designated email, phone number, or address.

ASH will grant, deny, or respond to a request within 45 days of receipt of the Right to Delete form. If an extension of time (up to a maximum of 90 days) is required, we will notify you and provide additional information about the process.

In response to your request, ASH may deny or grant your request. If ASH grants your request, we will notify you as to which of the following methods we have used to fulfill your request. We may do one of the following: (1) permanently delete your information from our systems; (2) deidentify your information; or (3) aggregate your information in accordance with CCPA requirements.

A denial of a deletion request may occur if ASH requires the use of your Personal Information to complete a transaction or provide services on your behalf; to detect security incidents and prosecute those responsible; to debug and repair errors that impair existing functionality; to exercise free speech or allow you to exercise free speech or any other right; to comply with the California Electronic Communications Privacy Act; to engage in public or peer-reviewed research with informed consent if deletion would seriously impair the achievement of such research; to enable solely internal uses that are reasonably aligned with the business relationship between you and ASH; or to comply with a legal obligation.

No Fee for Requests for Rights to Know/Access/Portability, Correct or Delete: ASH does not charge a fee to exercise these rights. However, should we receive CCPA-related requests that are manifestly unfounded or excessive, in particular because of their repetitive character, we reserve the ability to refuse to act on the request. If we refuse your request on this basis, we will notify you of the reason why.

Right to Non-Discrimination: You have the right to exercise your privacy rights to know and to delete without facing discrimination of service or product offerings. Your use of ASHCompanies.com will remain the same whether you exercise your Right to Know or Right to Delete under the CCPA.

Right to Authorize an Agent: You have the right to authorize an agent to communicate on your behalf. To authorize an agent, you may fill out this [CCPA Authorized Agent form](#). You may submit this form by emailing us at HIPAA@ashn.com with the subject line "California Privacy Rights" or by mailing said form to our address below. You may also utilize your Right to Know by phone at (844) 646-2746.

ASH will verify your request by matching information provided by you in the Right to Know form to information housed in our internal systems. If we are unable to verify the request, we will deny the request and provide notice of such denial.

Right to Opt-Out: ASH does not sell or knowingly share your Personal Information with third parties for non-permitted uses including direct marketing or targeted advertising (i.e., cross-context behavioral advertising). California residents may send requests for information-sharing disclosure under this law by contacting us at HIPAA@ashn.com with the subject line "California Privacy Rights" or by phone (844) 646-2746 or by mail at the address located in the contact section below. Please note that, under this law, we are not required to respond to your request more than twice in a calendar year, nor are we required to respond to any requests that are not sent to the designated email, phone number, or address.

Additionally, should we receive related requests that are manifestly unfounded or excessive, in particular because of their repetitive character, we reserve the ability to either charge a reasonable fee for taking the action requested or refuse to act on the request. If we refuse your request on this basis, we will notify you of the reason why.

Changes to Our Privacy Policy

ASH reserves the right to make changes to this Privacy Statement at any time by posting the modified policy on the home page of the ASHCompanies.com Website. Modifications shall be effective when they are posted on that Website. Such posting shall constitute notice to you.

We encourage you to check ASHCompanies.com regularly to see if we have made any modifications to this Privacy Statement.

Contacting ASH with Privacy Questions?

Questions and requests related to this Privacy Statement or the privacy rights for California residents may be submitted using the following contact information:

U.S. Mail

Privacy—HR Recruitment
P.O. Box 509117
San Diego, CA 92150-9117

By Phone

(877) 427-4766

E-mail

HIPAA@ashn.com

If you need assistance with or require this Privacy Statement in an alternative format, please contact us at (877) 427-4766.

Privacy and Security Contact Information

ASH has a designated Privacy Officer and a Chief Information Security Officer to oversee our privacy and security programs. You may direct questions about these programs to these individuals by either calling (877) 427-4766 or emailing HIPAA@ashn.com.

Non-Privacy Right-related questions should be directed to Human Resources at HRMail@ashn.com.