

## **EMPLOYEE AND JOB APPLICANT PRIVACY NOTICE**

DAS Health Ventures, LLC, including its related affiliates and subsidiaries, (“DAS”, “we”, or “us”) values our relationship with our employees and potential candidates for employment and takes your privacy seriously. DAS created this Privacy Notice ("Notice") as part of our commitment to the privacy of our employees and job applicants (“you” or “your”). This Notice also provides you information on the collection, use, and disclosure of information about you in connection with your employment and application for employment with DAS. DAS may disclose personal information and other related information to our third-party service providers, vendors, agents, and contractors (collectively, “Vendors”) for various purposes relating to your employment and employment application as further detailed below.

This Notice does not form part of any contract of employment. We may update this Notice at any time, but if we do, we will provide you with an updated copy as soon as possible. We may also provide other privacy notices or disclosures on specific occasions when we are using your personal information in ways that are different from what we have described here, so that you are aware of how and why we are using such information and what your rights are with respect to such use.

This Privacy Notice was last updated **August 1, 2023**.

This Notice contains the following information:

- I. COLLECTED INFORMATION**
- II. USE OF INFORMATION**
- III. WHAT INFORMATION DAS DISCLOSES AND TO WHOM**
- IV. INFORMATION RETENTION**
- V. SECURITY**
- VI. CALIFORNIA RESIDENTS**
- VII. HOW TO CONTACT US**

## **I. COLLECTED INFORMATION:**

We collect information from you when you provide it voluntarily through the application and recruitment process and in the course of job-related activities throughout the period of your relationship with us.

In addition, we also collect information from third parties in connection with your employment and/or job application, including from the following sources:

- **Your family and significant others**
- **Your references**
- **Your agents and insurers**

During the preceding twelve (12) months, we have collected the following categories of personal information: (A) identifiers such as a real name, alias, postal address, unique personal identifier, online identifiers, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers; (B) any categories of personal information described in subdivision (e) of Cal. Civ. Code Section 1798.80 (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); (C) characteristics of protected classifications under California or federal law; (D) biometric information; (E) Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with an Internet Web site, application, or advertisement; (F) geolocation data; and (G) professional or employment-related information.

For more information about the types of your personal information we may use and how we use your personal information, see the detailed descriptions below.

## **II. USE OF INFORMATION:**

We will only use your personal information for the purposes identified below, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose described here. If we need to use your personal information for an unrelated purpose or if we change the basis on which we are processing your data, we will notify you and we will explain the legal basis which allows us to do so.

<b>The Personal Information we Process about You</b>	<b>Categories of Sources</b>	<b>Business or Commercial Purposes for Collection</b>	<b>Disclosed for a Business Purpose?</b>	<b>Third parties to whom Disclosed for Business Purpose</b>
<b>Personal identifiers.</b> Identifiers such as real name, postal addresses, unique personal identifier, online	Direct contact with employees or job applicants through phone, email, and from	For us to perform functions for your benefit or on your behalf in connection with your employment	Yes	Vendors; affiliates; employee benefits providers;

The Personal Information we Process about You	Categories of Sources	Business or Commercial Purposes for Collection	Disclosed for a Business Purpose?	Third parties to whom Disclosed for Business Purpose
<p>identifier Internal Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.</p>	<p>any vendors assisting with collecting employee or job applicant information</p>	<p>and/or your application for employment, which may include the following:</p> <ul style="list-style-type: none"> <li>• Communicating with you;</li> <li>• Facilitating transactions on your behalf;</li> <li>• Assessing compliance with your regulatory and legal requirements (e.g., taxes, travel visas) and acting on your behalf to fulfill your regulatory and legal requirements;</li> <li>• Maintaining records of past transactions and business information for our legitimate interest in documenting the scope of your employment, as well as your legitimate interest in maintaining such documentation for your business purposes; or</li> <li>• For us to comply with our legal obligations, including assessing compliance with our regulatory requirements (e.g., regulatory tax requirements).</li> </ul>		<p>government agencies</p>

The Personal Information we Process about You	Categories of Sources	Business or Commercial Purposes for Collection	Disclosed for a Business Purpose?	Third parties to whom Disclosed for Business Purpose
<b>Information about you.</b> Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including but not limited to name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance notice 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.	Direct contact with employees and/or job applicants through phone, email, and from any vendors assisting with collecting employee and/or job applicant information	For us to administer your relationship with us, including in order to provide you with benefits and services, as applicable, and comply with our legal obligations, including where it is necessary to protect your interests (or someone else's interests, or where you have already made the information public.	Yes	Vendor affiliates; employee benefits providers; government agencies;
<b>Characteristics of Classes Protected under California or Federal Law.</b> Information includes: familial status, disability, sex, national origin, religion, color, race, sexual orientation, gender identity and gender expression, marital status, veteran status, medical condition, ancestry, source of income, age, or genetic information.	This information is collected directly from you or our Vendors.	This information is necessary to administer your relationship with us, including meeting our legal obligations, and providing you with benefits and services, as applicable.	Yes	Vendors; affiliates; employee benefits providers; government agencies

The Personal Information we Process about You	Categories of Sources	Business or Commercial Purposes for Collection	Disclosed for a Business Purpose?	Third parties to whom Disclosed for Business Purpose
<b>Biometric Information.</b> This information includes retina or iris scan, fingerprint, voiceprint, or record of hand or face geometry.	Direct contact with employees who work at a facility that utilizes biometric scanning technology	If you are employed by us at a facility that utilizes biometric scanning technology, we may process this information for time keeping purposes.	Yes	Vendors; affiliates
<b>Usage Information.</b> Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement. We reserve the right to monitor your internet or other similar network activity to the extent you use our information systems or our electronic communication devices, or to the extent you use your personally-owned electronic communication devices to access our information systems. This extends to personal (non-DAS owned) email boxes accessed through DAS-owned or operated information systems or electronic communication devices.	This information is collected directly from you, typically through the use of cookies and similar technologies.	This information is processed in order to administer your relationship with us, including meeting our legal and compliance obligations and pursuing the efficient management of our business.  It is also processed in order to help detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and for compliance management.	Yes	Vendors; affiliates

The Personal Information we Process about You	Categories of Sources	Business or Commercial Purposes for Collection	Disclosed for a Business Purpose?	Third parties to whom Disclosed for Business Purpose
<b>Geolocation Information.</b> This includes time and physical location related to use of an internet website, application, device, or physical access to our office location.	This information is collected directly from you or our Vendors.	This information is used to manage our workforce.	Yes	Vendors; affiliates; government agencies
<b>Professional or Employment-related Information.</b> This includes work history, academic and professional qualifications, educational records, references, interview notes, job title, position, hire dates, compensation, performance and disciplinary records, and vacation and sick leave records.	This information is collected directly from you or our Vendors.	This information is necessary to administer your relationship with us and to pursue the efficient management of our business.	Yes	Vendors affiliates; employee benefits providers; government agencies

**Sensitive Personal Information.**

We do not use or disclose your sensitive personal information for purposes other than those necessary to carry out your employment contract, to aid in protecting and securing your personal information and our systems, to verify or maintain the quality or safety of our services and systems, or as otherwise permitted under regulations or required by law.

Category	Source	Purpose of Processing
<b>Social security number, driver's license number or other state ID number, and passport information.</b>	This information is collected directly from you or our Vendors.	A social security number is necessary to administer your relationship with us, particularly as it relates to taxation.  Passport information is necessary for us to verify your right to work.
<b>Racial or ethnic origin.</b>	This information is collected directly from you or our Vendors.	This information is used to administer your relationship with us.
<b>Biometric information.</b> This includes physiological, biological or behavioral characteristics that can be used, singly or in combination with each other or with other identifying information, to establish individual identity.	This information is collected directly from you or our Vendors.	This information is used to administer your relationship with us, particularly as it relates to timekeeping at certain facilities.
<b>Precise geolocation.</b>	This information is collected directly from you or our Vendors.	This information is used to manage our workforce.
<b>Health information.</b>	This information is collected directly from you or our Vendors.	This information is used to manage our workforce, including to ascertain whether you may have been exposed to a virus in connection with a pandemic.

### III. WHAT INFORMATION DAS DISCLOSES AND TO WHOM:

We will endeavor to ensure that all non-governmental third parties to which we transfer personal information about you agree, as part of their contract with us, to treat personal information about you in accordance with applicable privacy laws.

In connection with your employment, we may share your personal information with the following types of recipients:

- **Third parties engaged by you or who may engage you – where we share data access on your behalf and in your interests**
  - Third parties who you have engaged for services (e.g., financial institutions, mortgage companies, attorneys)
  - Governmental agencies, including taxing and immigration authorities

- **Our Vendors, who we engage to help us run our business, including:**
  - Software providers we use to manage your information (e.g., accounting software)
  - Hosting providers that provide database storage for our business
  - Payroll providers
- **Benefit providers, including health plans**

Additionally, we will share your personal information with third parties where required by law, where it is necessary in connection with your employment or where we have another legitimate interest in doing so.

In order to manage our employment relationship with you, we may transfer the personal information we collect about you to other countries, the laws of which may differ than those governing your personal information in the United States.

#### **IV. INFORMATION RETENTION:**

We will retain your personal information only for as long as is necessary for the legitimate business purposes set out in this Notice. We will retain and use your personal information to the extent necessary to comply with our legal, accounting, or reporting obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies. Additionally, we may continue to store your personal information contained in our standard back-ups.

#### **V. SECURITY:**

We have put in place appropriate security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. Other than third parties with whom we share personal information as authorized by you but with whom we do not have a contract (e.g., financial institutions, etc. where you or a member of your team has a contract with such third party), third parties we engage in our business who may have access to your personal information will only process your personal information on our instructions and they are required to only use your data as necessary to perform their contract with us.

#### **VI. CALIFORNIA RESIDENTS:**

Depending on where you live, you may have certain rights with respect to personal information that we have collected and used under certain circumstances.\*

Under the California Consumer Privacy Act of 2018 (“CCPA”), as amended by the California Privacy Rights Act of 2020 (“CPRA”), (collectively, “California Consumer Privacy Laws”), California residents have certain rights around DAS’ collection, use, and disclosure of their Personal Information. This Section only applies to California residents.

##### Personal Information

The California Consumer Privacy Laws define personal information as information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“Personal Information”).



Personal Information does not include:

- (1) De-identified or aggregated information (DAS does not attempt to re-identify any de-identified information it may collect or process);
- (2) information that is lawfully made available from federal, state, or local government records, or information that DAS has a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely distributed media; or information made available by a person to whom the consumer has disclosed the information if the consumer has not restricted the information to a specific audience; and
- (3) information excluded from the California Consumer Privacy Laws, such as health or medical information covered under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), medical information governed by the California Confidentiality of Medical Information Act, personal information disclosed pursuant to the Driver’s Privacy Protection Act of 1994 (“DPPA”), financial information covered under the Fair Credit Reporting Act (“FCRA”) or Gramm-Leach Bliley Act (“GLBA”).

Sensitive Personal Information Sensitive Personal Information (“SPI”) is Personal Information that reveals:

- Social security number, driver’s license, state identification card or passport number;
- Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account;
- Your precise geolocation;
- Your racial or ethnic origin, religious or philosophical beliefs, or union membership; and
- The contents of your mail, email, or text messages, unless the business is the intended recipient of the communication.

#### Personal Information Sale and Sharing

We do not and do not intend to “sell” personal information about you or “share” it for cross-context behavioral advertising, as defined under applicable privacy law. We also have not done so for the last 12 months.

DAS does not sell or share your Personal Information and will not do so in the future without providing you with notice and an opportunity to opt-out of such sale or sharing as required by law. Similarly, we do not offer financial incentives associated with our collection, use, or disclosure of your Personal Information. DAS does not make your Personal Information available for cross-context behavioral advertising (which is called “sharing” under the CCPA) within the meaning of California Consumer Privacy Laws. We do allow certain third-party partners to collect information about you for the purposes of digital programing measurement and analytics, and for security matters such as fraud detection and reporting. We do not, however, sell or use Personal Information about you for targeted advertising on third-party websites.

#### Categories of Information We Collect, Use, and Disclose

The chart provided in the ***Use of Information*** section above provides information about the types of Personal Information we collect, the sources of the information, the purposes for which we use the information, and the categories of third parties with whom we have shared this information in the last 12 months for a business purpose.

#### Your California Consumer Privacy Law Rights

You may have certain rights with respect to Personal Information that we have collected and used under certain circumstances, including the below. However, these rights are not absolute, we may decline your request as permitted by law.

***Information.*** You can request that we provide you the following information regarding our use of your Personal Information:

- The categories of your Personal Information that we have collected
- The purposes for which we have collected or used such Personal Information
- The categories of sources for the Personal Information we have collected about you
- The categories of third parties with whom we have disclosed your Personal Information
- If we have disclosed your Personal Information for a business purpose, a list identifying the Personal Information categories that each category of recipient obtained
- If we have sold or shared your Personal Information, a list identifying the Personal Information categories that each category of recipient purchased

***Access.*** You can request that we provide you a copy of your Personal Information that we have collected in the past 12 months.

***Correction.*** You can request that we correct any inaccuracies in your Personal Information. DAS will use commercially reasonable efforts to correct the identified inaccurate information upon receiving a verifiable request.

***Deletion.*** You can request that we delete your Personal Information collected in the past 12 months when we no longer need such data in connection with your employment or employment application (subject to certain exceptions that may apply under applicable law).

***Opt Out of Sale or Sharing.*** Under California Consumer Privacy Law, you have the right to opt out of the sale or the disclosure of your Personal Information for purposes of cross-context behavioral advertising (“sharing”). For clarity, however, DAS does not “sell” or “share” Personal Information for purposes of California Consumer Privacy Law.

***Limit Use of Sensitive Personal Information.*** Under California Consumer Privacy Law, You have the right to limit the use and disclosure of Your SPI information if collected or used for purposes beyond those specifically permitted by California Consumer Privacy Law. DAS does not collect or use your SPI for purposes beyond those permitted by California Consumer Privacy Law.

***Right to Non-Discrimination.*** If you choose to exercise your privacy rights under the California Consumer Privacy Laws, we will not charge you different prices or provide different quality of services unless those differences are related to your Personal Information or otherwise permitted by law.

If you are a California resident where one or more of these rights are granted to you under applicable law, and you wish to exercise any such rights listed above, please submit a request, or designate an authorized agent to make a request under the CCPA on your behalf, by contacting us at [privacy@DAShealth.com](mailto:privacy@DAShealth.com), (866) 365-0655, or complete the form available at: <https://DAShealth.com/privacy-policy-request/> (password: DAShealthPrivacy). To verify your identity when you submit a request, we will match the identifying information you provide us to the Personal Information we have about you. If you have an account with us, we will also verify your identity through our existing authentication practices for your account.

Only you, or an agent legally authorized to act on your behalf, may make a verifiable consumer request related to your Personal Information as described above (“California Consumer Request”). Please understand that we are required to verify your California Consumer Request and may require you to provide some information to enable us to carry out such verification. We will deny requests from agents that do not submit proof of legal authorization to act on your behalf. To verify that an agent has legal authority to act for you, we may require a copy of a power of attorney or require that you provide the agent with written permission and verify your own identity with us. We cannot respond to your California Consumer Request or provide you with Personal Information if we cannot verify your identity or authority to make the California Consumer Request and confirm the Personal Information relates to you.

When you, or someone legally authorized to act on your behalf, make a California Consumer Request, you can expect the following:

We will verify your identity. You will need to provide us with certain information so that we can verify that you are who you say you are. Which information is required may depend on the type and sensitivity of information subject to the California Consumer Request.

We will respond to your California Consumer Request within the legally required amount of time. If necessary, we may need additional time to respond where allowed by law, but we will reply either way within the legally required period and, if we need an extension, we will explain why.

In certain cases, a California Consumer Request may be denied. For example, if we cannot verify your identity or if providing you information could create an unreasonable risk to someone’s security (for example, we do not want very sensitive information disclosed inappropriately). If we deny your California Consumer Request, we will explain why we denied it.

Making a California Consumer Request does not require you to create an account with us. We will only use Personal Information provided in a California Consumer Request to verify the requestor's identity or authority to make the California Consumer Request.

## **VII. HOW TO CONTACT US:**

If you have any questions or concerns about our use of your personal information, please do not hesitate to contact us through any of the methods listed below.

*Phone:* (866)-365-0655

*Email:* [privacy@DAShealth.com](mailto:privacy@DAShealth.com)

*Address:*

DAS Health  
1000 N. Ashley Dr, #300  
Tampa, FL 33602  
ATTN: Corporate Counsel  
35907608.3