# Privacy Policy Introduction

This Privacy Policy applies to the Physician Careers website (this "Website") of Southern California Permanente Medical Group ("SCPMG"). This Privacy Policy describes how SCPMG collects and uses the personal information you provide via the Website and other information that is collected from your use of the Website. It also describes how you can review and request updates to this information. See **Questions, complaints, and contacts** below.

### Website Privacy Statement

Our use and disclosure of an individual's personal information are limited as required by state and federal law. We do not sell or rent personal information about visitors to the Website.

# Collecting and using personal information

We collect personal information from you, if you choose to apply for a position with SCPMG or otherwise to provide it to us at scpmgphysiciancareers.com at the Career Opportunities tab. The personal information that we collect and the purposes for which we use this information are described in our CCPA notice, below.

#### <u>User Surveys</u>

We will periodically ask users to complete surveys asking about their experiences with features of the Website. These surveys ask you for demographic information such as age, gender, and education. We use survey information for evaluation and quality improvement purposes, including helping SCPMG to improve information and services offered through the Website. In addition, users giving feedback may be individually contacted for follow-up due to concerns raised during the course of such evaluation. Such information may be stored for future evaluation and quality improvement activities.

### **Disclosures**

We may disclose personal information to any person performing audit, legal, operational, or other services for us.

We will use information that does not identify individuals for these activities whenever reasonably possible. Information disclosed to vendors or contractors for operational purposes may not be re-disclosed to others by such a vendor or contractor, except as permitted by SCPMG and applicable law.

We may also disclose your personal information:

- as required by law, such as to comply with a subpoena, or similar legal process
- when we believe in good faith that disclosure is necessary to protect our rights, protect
  you or others from threats of imminent harm, investigate fraud or other activity in
  violation of the law, or respond to a government request
- to protect the security and reliability of the Website
- if SCPMG is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Website of any change in ownership or use of your personal information, as well as any choice you may have regarding your personal information
- to any other third party with your prior consent to do so

Your activity on the Website is also tracked, as described below.

### Website Visitor Data

SCPMG routinely gathers data on website activity, such as how many people visit the site, the web pages they visit, where they come from, how long they stay, etc. The data are collected on an aggregate, anonymous basis, which means that no personally identifiable information is associated with the data. This data helps us improve our content and overall usage. The information is not shared with other organizations for their independent use.

The Website does not honor a browser's signal or header request not to track the user's activity. Such user activity is tracked by the web analytics vendor over time and may also be tracked across different websites.

#### Web Logs

In addition to Website visitor data, we also use a website activity analytics service offered by a third-party vendor to maintain standard Web logs that record data about all visitors and customers who use the Website. These logs may contain the Internet domain from which you access the site (such as aol.com, abc.org, etc.); the IP address which is automatically assigned to your computer when you get on the Internet (a static IP address may be identifiable as being connected to you, while a dynamic address is usually not identifiable); the type of browser and operating system you use; the date and time you visited; the pages you viewed; and the address of the website you linked from, if any. The analytics provider stores this information, but it is only provided to SCPMG in aggregated, de-identified form.

We use this Web log information to help us design our Website to identify popular features, to resolve user technology issues, to make the Website more useful to visitors, and for security purposes.

#### Web Beacons

We may also occasionally use "Web beacons" (also known as "clear gifs," "Web bugs," "1-pixel gifs," etc.) that allow us to collect non-personal information about your response to our email communications, and for other purposes. Web beacons are tiny images, placed on a Web page or email that can tell us if you've gone to a particular area on our website. Since Web beacons are used in conjunction with persistent cookies (described above), if you set your browser to decline or deactivate cookies, Web beacons cannot function.

#### **Internet Cookies**

We may place Internet "cookies" on the computer hard drives of visitors to the Website. Information we obtain from cookies helps us to tailor our site to be more helpful and efficient for our visitors. The cookie consists of a unique identifier that does not contain information about you. We use two types of cookies, "session" cookies and "persistent" cookies.

A session cookie is temporary and expires after you end a session and close your web browser. We use session cookies to help customize your experience on our site and to track your "click path" through our Web pages.

Persistent cookies remain on your hard drive after you've exited from our website and we use them for several reasons. We sometimes use this type of persistent cookie with a "Web beacon" (see below). Persistent cookies will not contain any personal information about you.

You may have software on your computer that will allow you to decline or deactivate Internet cookies, but if you do so, some features of the Website may not work properly for you. For instructions on how to remove cookies from your hard drive, go to your browser's website for detailed instructions. In addition, further information regarding cookies may be available on other websites or from your Internet service provider. Commonly used browsers include Safari, Chrome, Firefox, Internet Explorer, and iOS.

### California Consumer Privacy Act Notice

The California legislature has adopted various laws to safeguard Californians' privacy, the latest of which is the California Consumer Privacy Act of 2018 (the "CCPA"). The CCPA was enacted to give consumers certain rights with respect to their personal information collected by businesses, including the right to know what personal information is being collected about them.

In the context of an employment or contractor relationship, the CCPA requires a business to inform Covered Individuals of the categories of personal information collected and the purposes for which those categories of personal information are used. For purposes of the CCPA, a "Covered Individual" is natural person who is acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of a business ("Covered Individual").

This CCPA Notice to Covered Individuals (the "CCPA Notice") is being provided to you to inform you of the categories of personal information SCPMG may collect and the purposes for which SCPMG collects that information.

Categories of Personal Information Collected – The relevant categories of personal information SCPMG may collect in the context of an employment relationship, through this Website or via other interactions with you, includes:

- Name
- Contact information (address, phone, email address)
- Unique personal identifiers (e.g., Social Security number)
- Information about your financial accounts and health insurance
- Information necessary to run drug and health screening or provide workers compensation insurance and care
- Information about your educational, professional, employment and internet browsing history

**Purposes of Use** – SCPMG may use the above categories of personal information for personnel-related functions, including communications, recruitment, contracting, payroll and payroll administration, benefits and benefits administration, taxes, workers' compensation administration, personnel/performance file recordkeeping, interactive process discussions, demographic analysis, etc.

If you have any questions about this CCPA Notice, please contact SCPMG Physician Recruitment at (800)541-7946 or <a href="mailto:PhysicianRecruitmentSCPMG@kp.org">PhysicianRecruitmentSCPMG@kp.org</a>.

### Security

The Website has security measures in place that are intended to help protect against the loss, misuse, unauthorized access, or alteration of information under our control. These measures include encryption of data using the Secure Socket Layer (SSL) system. Despite these measures, the confidentiality of any communication or material transmitted to the Website by email cannot be guaranteed. At your discretion, you may contact us at the email or mailing address listed in the **Questions, complaints, and contacts** section at the end of this Privacy Policy.

### Other Things to Know

#### Children

We do not knowingly collect personally identifiable information from children under the age of 13. If SCPMG is made aware of collecting information from a child under 13, we will delete this information.

#### **Data Retention**

We will retain your information for as long as your profile is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

#### Social Media

Our Website include social media features, such as the Twitter button. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features are either hosted by a third party or hosted directly on our Website. Your interactions with these features are governed by the privacy statement of the company providing them.

### Links to third-party websites

Our Website includes links to other websites whose privacy practices may differ from those of SCPMG. If you submit personal information to any of those sites, your information is governed by their privacy statements. We encourage you to carefully read the privacy statement of any website you visit.

### Revisions to the Privacy Policy

We may revise this Privacy Policy from time to time as we add new features or modify the way in which we manage information, or as laws change that may affect the Website. If we make material changes to our Privacy Policy, we will post notice of this on our Website prior to the changes becoming effective. Any revised Privacy Policy will apply both to information we already have about you at the time of the change, and any personal information created or received after the change takes effect. We include a version number on this Privacy Policy consisting of the date (year, month, and day) it was last revised. We

encourage you to periodically reread this Privacy Policy, to see if there have been any changes that may affect you.

# Questions, complaints, and contacts

If you have any questions about this Privacy Policy or would like to review or update the personal information you provide through the Website, you can contact us via email at <a href="mailto:PhysicianRecruitmentSCPMG@kp.org">PhysicianRecruitmentSCPMG@kp.org</a> or by U.S. mail at the address below:

Physician Recruitment 393 E. Walnut, Street, 3<sup>rd</sup> Floor Pasadena, CA 91188

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