

# COMPANY PRIVACY ADDENDUM FOR CALIFORNIA RESIDENTS

Effective Date: 01/01/2023

This Privacy Addendum for California Residents (the “California Addendum”) applies solely to all job applicants to, employees and contractors of Press Ganey Associates LLC (“Company”) who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) as amended by the California Privacy Rights Act (“CPRA”). Any terms defined in the CCPA have the same meaning when used in this notice.

## Information We Collect

Within the context of your role as an employee or prospective employee, we collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“**personal information**”). We collect personal information only as reasonably necessary and proportionate to achieve the purposes for which it was collected and processed and will not further process in a manner incompatible with those purposes. In particular, we have collected the following categories of personal information from its employees or prospective employees within the past twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address (when you access our network resources), email address, username, Social Security number, or other similar identifiers. If provided by you as proof of eligibility to work or as part of your business travel profile, driver’s license number and passport number.	YES
B. Personal information categories 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, insurance policy number, education, employment, employment history, bank account number, credit card number, or health insurance information.  If provided by you as proof of eligibility to work or as part of your business travel profile, passport number, driver’s license or state identification card number,  Some personal information included in this category may overlap with other categories.	YES

C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions, veteran or military status.	YES, if you choose to provide this information.
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on your interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as degree type, GPA, and attendance.	YES
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

L. Sensitive Personal Information.	Social Security Number, Driver's License Number, Passport Number, Credit Card Number	YES
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Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994;

Company obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete when applying for a job or as part of the onboarding process.
- Indirectly from you. For example, from observing your actions when you use or interact with our information technology resources and facilities.
- From third parties, such as information disclosed in background checks (including criminal convictions), drug testing (if permitted in your jurisdiction and taken by you) and any information that is disclosed by your former employers, educational institutions, and other references you list on your application materials or that are referred to us.
- By us, when we create it during the course of your employment.

## Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business or commercial purposes:

- Recruiting;
- Delivering pay and benefits;
- Managing our workforce and your career;
- Delivering training programs, and measuring and recording the results of training;
- Administering employee benefits, such as insurance benefits;
- Communicating with Company personnel;
- Maintaining information about your work history, work performance, and disciplinary actions;
- To run and manage business operations, including to schedule work, manage the business organization, business assets, travel and expense reimbursement, managing corporate credit cards and card payment history, maintaining corporate contact directories and organizational charts, managing and storing records;
- Processing IT infrastructure, including email, internet, social media systems, and file shares;
- Maintaining the security and safety of our facilities, personnel, and other assets, including to authenticate personnel to access Company's IT resources and facilities;

- To conduct screening and background and compliance checks before and during your employment at Company and maintaining records on such screening and checks;
- Providing employment programs such as on-site health services, company cars, stock options, and other similar benefits;
- To comply with legal requirements, including to report accidents, salary, and tax information to regulatory authorities;
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Company about our Website users is among the assets transferred;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity; and
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

Company will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

## Sharing Personal Information

Company may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We may share your personal information with the following categories of third parties:

- Service providers, such as payroll processors and other organizations we use to maintain our employment and training records;
- Affiliates, parents, and subsidiary organizations of Company;
- Benefits providers, such as health insurance and retirement providers;
- Governmental authorities, such as state, local, and federal tax, employment, and occupational safety authorities;
- Security personnel used to protect our assets and facilities;
- To third parties involved in a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets.

## Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, Company has disclosed the following categories of personal information for a business purpose:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category C: Protected classification characteristics under California or federal law (for statistical reporting purposes only and/or Company diversity initiatives)

Category F: Internet or other similar network activity.

- Category G: Geolocation data.
- Category H: Sensory data.
- Category I: Professional or employment-related information.
- Category J: Non-public education information.
- Category K: Inferences drawn from other personal information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers;
- Affiliates, parents, and subsidiary organizations of Company;
- Benefits providers;
- Governmental authorities, such as state, local, and federal tax, employment, and occupational safety authorities;
- Security personnel used to protect our assets and facilities;
- To third parties involved in a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets.

## Sales of Personal Information

We do not sell your personal information (as the term "sale" is defined in the CCPA).

# Your Rights and Choices

## Access to Specific Information and Data Portability Rights

You have the right to request that Company disclose certain information to you about our collection and use of your personal information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request (**see Exercising Access, Data Portability, and Deletion Rights**), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information. The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).

## Deletion Request Rights

You have the right to request that Company delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or

prosecute those responsible for such activities.

- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

## Opt-out rights

- You have the right to know how automated decision technologies work and their likely outcomes and to refuse to have your personal information or sensitive personal information used to make automated conclusions, such as profiling for targeted behavioral advertising.
- You have the right to opt-out of having your personal information sold or shared with third parties, including for cross-context behavioral advertising.

## Correction Rights

You have the right to request correction of inaccurate information provided verifying information is provided to support the correction.

# Exercising Access, Data Portability, Deletion, and Correction Rights

To exercise the access, data portability, deletion, and correction rights described above, please submit a verifiable consumer request to us by either calling us at [1-800-232-8032](tel:1-800-232-8032) or by email at [privacy@pressganey.com](mailto:privacy@pressganey.com).

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity.

## **Data Retention and Destruction**

Company will retain your personal information for no longer than is reasonably necessary for the purpose for which the data was collected, including as required by applicable state and federal retention requirements.

## **Changes to Our Privacy Notice**

Company reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice and update the notice's effective date.

## **Contact Information**

If you have any questions or comments about this notice or the ways in which Company collects and uses your information described above, please do not hesitate to contact us through the HR Department.