



CANDIDATE PRIVACY NOTICE

Last Updated: August 1, 2024

This Privacy Notice describes how Perfect Health, Inc. dba ConcertoCare and our affiliates (collectively, "ConcertoCare," "we," "us," or "our") collect, process and retain your Personal Information when you use the career pages of our website [concertocare.com](https://www.concertocare.com), and other ConcertoCare job-related websites linked where this Privacy Notice is displayed (collectively, the "Site(s)/Services"). If you have questions about this Privacy Notice or wish to exercise your rights and choices, please contact us at privacy@concertocare.com.

Additionally, please note that **Section I** of this Privacy Notice, which describes our collection and use of information through our Site, also serves as our **Notice at Collection for California residents** for purposes of the California Consumer Privacy Act (CCPA).

This Privacy Notice does not form part of any contract of employment or other contract to provide services.

This Notice is limited to the collection and use of personal information collected in the context of an application for employment. If an individual who is an applicant interacts with a website owned and operated by ConcertoCare as a consumer, the privacy policy for that website applies.

The entire Privacy Notice has been designed to be accessible to people with disabilities. If you experience any difficulties accessing the information in the Privacy Notice, please contact us at privacy@concertocare.com.

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I. NOTICE AT COLLECTION; COLLECTION AND USE OF PERSONAL INFORMATION

We collect two types of information: Personal Information and Other Information.



Personal Information is any information:

- that identifies or can be used to identify you;
- that relates to, describes, is capable of being associated with, or could reasonably be linked (directly or indirectly) with you;
- that can be used to authenticate you or provide access to an account through your application with ConcertoCare;
- that relates to you and that might be sensitive.

The table below and additional paragraphs immediately following the table are a summary of the categories of Personal Information we have collected over at least the last twelve (12) months, the purposes for collection and use of that Personal Information, and how long we keep each category of Personal Information. If you would like to opt-out of the sale or sharing of any of the information as described below, please email us at privacy@concertocare.com.

Categories of Personal Information	Our Business or Commercial Purposes for Collecting and Using Personal Information
<p>Personal Identifiers, such as your name, addresses, phone number, e-mail, alias, as well as Social Security number, and information that appears on your Driver’s license, Green card, National ID, State ID, or Passport/Visa, which are considered Sensitive Personal Information.</p>	<p>We do not sell or share your Personal Identifiers. We use the information for:</p> <ul style="list-style-type: none"> • Recruitment and intake of new candidates for possible employment, including background checks; • Communicating with you regarding potential job opportunities, interviews, and other recruitment and hiring activities as well as your inquiries.
<p>Demographic Information, including gender, race, age, and your citizenship and military status, some of which are considered Sensitive Personal Information.</p>	<p>We do not sell or share your Demographic Information. We use the information for:</p> <ul style="list-style-type: none"> • Recruitment and intake of new candidates for possible employment; • Used to reflect past or current employment.
<p>Financial Information, including payment card number, bank account number and account details, direct deposit information, income and other financial information.</p>	<p>We do not sell or share your Financial Information. We use the information for:</p> <ul style="list-style-type: none"> • Collected and used when an offer is made to an individual for the purposes of running background checks.
<p>Professional, Employment, and Educational Information, including information about your education, employment and employment history, collected during the application, recruiting, interview, or hiring stages with ConcertoCare, including information you provide to us in your application, resume, curriculum vitae, survey or test results, or cover letter.</p>	<p>We do not sell or share your Professional, Employment or Educational Information. We use the information for:</p> <ul style="list-style-type: none"> • Recruitment and intake of new candidates for potential employment; • Assessing candidates’ skills, qualifications, and suitability for the work and role for which they apply.

<p>Audio and Visual Information, including your photo (when provided), image documentation, CCTV cameras, video and/or audio security footage of you on our premises image documentation and your voice recordings (when provided).</p>	<p>We do not sell or share your Audio and Visual Information. We use the information for:</p> <ul style="list-style-type: none"> • Provide you access to our premises if needed; • Maintaining the security of our premises and the safety of customers, guests, and job applicants, and employees.
<p>Internet Network, Activity, Device Information, Online Identifiers (IP Address, Device ID, cookies IDs). This includes usage data of the Site(s) (e.g., the date and time the app on your device accesses our servers and what information and files have been downloaded to or presented through the app), information collected through cookies, web beacons and other technologies, and aggregated information about your visits to, or use of, our Sites/Services, as well as across other sites, and various attributes associated with your device (e.g., IP address, installed fonts, language and browser settings, and time zone in order to create a device fingerprint or identifier so that we can recognize your device). While that information alone may not reveal your specific individual identity, we may associate this usage and Other Information we collect with Personal Information about you.</p>	<p>We sell or share your Internet Network, Activity, Device Information, and Online Identifiers with third parties for targeted advertising on and off the Site. We also use this information to:</p> <ul style="list-style-type: none"> • Provide our services in a form that can be viewed most easily from your device; • Use your IP address to determine the general geographic region from which you are accessing the Site which allows us to present appropriate content and inform you of special rules or rights that may apply to people in your jurisdiction; • Review statistical information about use of the Sites/Services in order to improve their design and functionality, to understand how they are used, and to assist us with resolving questions about the Sites/Services; • Recognize you, your device or your browser when you use the Sites/Services so that we can facilitate navigation, display information more effectively, store your preferences and otherwise display information more effectively.
<p>General Location Information (e.g., zip code and IP address).</p>	<p>We sell or share your location information with third parties for targeted advertisements on and off the Site. We use the information for:</p> <ul style="list-style-type: none"> • Internal operations including to identify the location of the IP address to the City level for recruitment purposes.
<p>Inferences drawn from Online Identifiers, Demographic Information, Device, Internet, and Network Activity Information, and General Location Information to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	<p>We sell or share your inferences with third parties for targeted advertisements on and off the Site. We also use this information:</p> <ul style="list-style-type: none"> • To help us personalize your experience on the Site, including the advertisements displayed to you on the Site; and • To recognize you, your device or your browser when you use our services so that we can facilitate navigation and display information more effectively



Additional Uses. We may also use **all** the Personal Information noted above as we believe necessary:

- (1) to assess and monitor your compliance with our application policies and procedures;
- (2) to comply with applicable legal or regulatory obligations regarding your application, including to ensure meaningful equal opportunity monitoring and reporting, preventing corruption and crimes, and confirming your legal work status;
- (3) for security, safety, and due diligence purposes, including measures to protect and prevent unauthorized access to our physical premises, systems, and networks;
- (4) if we determine a policy violation has occurred, to enforce our rights, or to enforce agreements;
- (5) to identify, contact, or bring legal action regarding the rights and property of ConcertoCare or its affiliates;
- (6) to perform audits;
- (7) to identify usage trends in the context of the application site and service for the purpose of improvements and changes;
- (8) to communicate with you about your application, including responding to your inquiries and notifying you of Site or policy updates, all based on our legitimate interest related to a potential employment relationship with you and the protection of our rights.

Aggregate or De-identified Information. We may collect, use and share information that does not identify you (including information that has been aggregated or de-identified) except as prohibited by applicable law. We will maintain and use de-identified information in de-identified form and will not attempt to re-identify the information, except to make sure the information is truly de-identified.

Retention. We will retain your Personal Information for as long as is needed to carry out the purposes we've described, or as otherwise required by law. The criteria used to determine the applicable retention period for your Personal Information includes the length of time we have an ongoing relationship with you as an applicant and whether there is a legal obligation to which we are subject that requires us to retain your Personal Information. Generally, this means we will keep your Personal Information until the end of the application process with us, plus a reasonable period as necessary to respond to any inquiries, deal with legal, tax, accounting or administrative matters, or to provide you with ongoing pensions or other benefits.

Where we have no continuing purpose to process your Personal Information, we will either delete or anonymize it or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further processing until deletion is possible.

II. SOURCES OF PERSONAL INFORMATION

We collect and obtain information from:

- **You.** We collect your information when you provide it to us directly, offline or online, through a web form or direct communication with us by e-mail or other message system.



- **Service Providers and Contractors.** We work with service providers and contractors who collect information on our behalf to provide services to us. We only allow our service providers and contractors to collect and use your Personal Information in connection with the services they provide us. Our service providers who provide software as a service collect cookies and provide us with reporting which includes the IP address, activity, network, web browser used and, in some cases, a device identifier so that we can understand how our systems are being used.
- **Affiliate Providers.** Affiliate Providers are affiliated practices. We may collect information about you from our affiliated practices in connection with your job application.
- **Third Parties.** We purchase lists of potential job candidates from **data brokers and trade shows.** We also collect your Personal Information from **third party job sites** for the purpose of recruitment.
- **Cookies and Similar Technologies.** We may use online tracking technologies, such as cookies, web beacons and/or embedded scripts, to help us remember devices associated with users of the Site, analyze the parts of our Sites that users visit, the length of time spent at any area, the general geographic location of the IP address and the specific functionalities that users choose to use. Essentially, cookies are a user's identification card for our servers. Web beacons are small graphic files linked to our servers that allow us to track your use of our Site. An embedded script is programming code that is designed to collect information about your interactions with us. All these help us remember and respond to what you do on our Site.

III. DISCLOSURES OF PERSONAL INFORMATION TO OTHER ENTITIES

During at least the past twelve (12) months, we have disclosed your Personal Information outlined in the table above to the following categories of entities:

Affiliate Providers. Affiliate Providers are affiliated practices. We may disclose all categories of Personal Information listed in the Notice at Collection of this Privacy Notice for potential employment opportunities.

Service Providers and Contractors. We may disclose all categories of Personal Information outlined above to our service providers. The categories of service providers and contractors that we share personal information with and the services they provide are:

- Auditing and accounting firms, such as firms that assist us in the creation of our financial records.
- Professional services consultants, such as firms that perform analytics, assist with improving our business, provide legal services, or supply project-based resources and assistance.
- Recruitment vendors that assist with the application process, including assessing candidate qualifications and providing the platform through which candidates submit their candidacy.
- Temporary staffing agencies that provide contingent workers for assignments at ConcertoCare.



- Analytics services, including entities that analyze traffic to, from, and on our website and assist with identifying and communicating with potential customers.
- Security vendors, such as entities that assist with security incident verification and response, service notifications, and fraud prevention.
- IT vendors, such as entities that assist with website design, hosting and maintenance; data and software storage; and network operation.
- Vendors to complete background and credit checks.

Third Parties. We may disclose **General Location Information, Internet Network, Activity, Device Information, and Online Identifiers** with third parties, such as our advertising and marketing partners. We may work with advertising partners to serve you third-party advertisements, including interest-based advertisements, on the Site and on other services. You may be presented with an opportunity to receive information and/or marketing offers directly from third parties. If you do agree (or do not decline where permitted by law) to have your Personal Information shared, your Personal Information will be disclosed to such third parties and all information you disclose will be subject to the privacy policy and practices of such third parties. We are not responsible for the privacy policies and practices of such third parties and, therefore, you should review the privacy policies and practices of such third parties prior to agreeing to receive such information from third parties. If you later decide that you no longer want to receive communication from a third party, and unless stated otherwise in this Privacy Notice, you will need to contact that third party directly.

We may disclose all the categories of Personal Information outlined above with the following categories of third parties: **government agencies, financial institutions** for reviewing and processing your employment application, and **fraud prevention agencies** to prevent fraudulent or unauthorized actions related to our systems, network and premises.

Facilitating Requests. We disclose all the categories of Personal Information listed above at your request or direction.

Consent. We disclose all the categories of Personal Information listed above if we have let you know what information will be shared, with whom, and obtained your consent.

IV. CALIFORNIA RESIDENTS ONLY: YOUR CHOICES REGARDING YOUR PERSONAL INFORMATION

A. Your California Privacy Rights

If you are a California resident, you have certain rights with respect to Personal Information provided to us in the context of applying for a job with ConcertoCare. For purposes of this subsection, the terms consumer, categories of Personal Information, business purpose, third party, sell, and share have the meanings ascribed to them respectively in the applicable state specific privacy laws. Terms defined under the applicable state specific privacy laws may differ in meaning from the common usage of the same terms used elsewhere in this Privacy Notice. To the extent provided for under the applicable laws, you may have the right to:

- *Access and Disclosure.* You can request, up to two times every twelve (12) months, that we disclose to you (i) the categories of Personal Information we collected about you, (ii) the categories of sources from which we collected the Personal Information,

(iii) the business purpose for collecting, selling, or sharing your Personal Information, (iv) the categories of third parties with whom we shared the Personal Information, and (v) the specific pieces of Personal Information we collected about you. You also have the right to request a portable copy of your Personal Information.

- *Correction and Deletion.* You can request that we correct or delete Personal Information that we have about you, subject to certain exceptions allowed under applicable law. You can also delete your profile by simply deleting all the data fields, which will cause our server to delete the information from its online form.
- *Do Not Sell or Share My Personal Information.* Under certain U.S. State Privacy Laws, you may be able to request that we not sell, or share for targeted behavioral advertising, your Personal Information. You may also have the right to opt-out of targeted advertising. We may sell, share, and use for targeted advertising the following categories of Personal Information to companies that provide marketing and advertising services to us, as well as advertisers that place advertisements on the Site, **Device, Internet, and Network Activity Information, and General Location Information.** This information is shared to help us understand who our users are, so that we can sell ads on the Site and advertise and market the Site to new users. You can request that we not sell or share your Personal Information by sending an e-mail to privacy@concertocare.com with your request.
- *Opt-out Preference Signals; Global Privacy Control.* You have the right to submit a request to opt-out of the selling and sharing of Personal Information through an opt-out preference signal. If you use an opt-out preference signal, we will apply the opt-out to the device or browser which sends the opt-out preference signal and to any consumer profile associated with that browser or device, including pseudonymous profiles. You can use an opt-out preference signal by downloading a supported browser or extension. If known, we will also treat the opt-out preference signal as a valid request to opt-out of sale/sharing for the user. Some browsers allow you to send a Do Not Track signal, an older request to block tracking of users by third parties. We may not honor these older signals, either.
- *Sensitive Personal Information.* You may also have the right to limit the use of your Sensitive Personal Information under California law to those uses that are necessary to perform the services reasonably expected by an average person and to certain other permitted business purposes. These business purposes include helping to perform services reasonably expected by users of this Site who have requested such services, ensuring security and integrity (to the extent the use of the information is reasonably necessary and proportionate for these purposes), ensuring physical safety of natural persons (to the extent the use of the information is reasonably necessary and proportionate for these purposes), short-term, transient use (subject to certain conditions), performing certain services, and engaging in certain activities related to quality or safety of our services or products. **We do not collect, use or disclose your Sensitive Personal Information for any purpose other than permitted business purposes.**
- *No Discrimination.* You will not be discriminated against for exercising any of the above rights, as an applicant.
- *No Financial Incentive.* We do not offer any programs to you as an applicant that would be considered a “financial incentive” for sharing your Personal Information under California law.
- *Submission of Requests.* You may exercise the above rights by e-mailing us at privacy@concertocare.com or by submitting the request online [here](#). Note that we



may deny certain requests, or fulfill a request only in part, based on our legal rights and obligations. For example, we may retain Personal Information as permitted by law, such as for tax or other record keeping purposes, to maintain an active account, and to process transactions and facilitate customer requests.

- *Authorized Agent.* State specific privacy laws may permit consumers to designate authorized agents to submit requests on their behalf. Under certain state specific privacy laws, an authorized agent is a natural person or a business entity in the applicable state that a person has authorized to act on their behalf subject to the requirements. If you would like to designate an authorized agent to submit a request to know, a request to delete, or a request to correct Personal Information on your behalf, please call our toll-free at 877-597-1440. When submitting the request, please ensure the authorized agent identifies himself/herself/themselves as an authorized agent.

In addition, we may also require you to do the following directly with us:

- Verify your own identity with us;
- Confirm you have provided the authorized agent permission to submit the applicant request(s).
- Once verified, your authorized agent may act on your behalf.
- Whether you submit a request directly on your own behalf, or through an authorized agent, we will take reasonable steps to verify your identity prior to responding to your requests under applicable state law.

In response to verified requests for **access and disclosure** or a portable copy of your Personal Information, we will confirm receipt of the request within ten (10) business days of receipt of the request and disclose and deliver the required information to you free of charge within forty-five (45) days of receiving a verifiable consumer request. We may extend this period to deliver information once by an additional forty-five (45) days when reasonably necessary. We will provide notice of the extension within the first forty-five (45) day period.

In response to verified requests to **correct or delete**, we will confirm receipt of the request within ten (10) business days of receipt of the request.

Following verification of your request to **delete**, we may require you to separately confirm that you want your Personal Information to be deleted. We will delete the information within forty-five (45) days of receiving a verifiable consumer request (subject to certain exceptions). We may extend this period once by an additional forty-five (45) days when reasonably necessary. We will provide notice of the extension within the first forty-five (45)-day period.

Following verification of your request to **correct**, we may require you to provide documentation, if necessary, to rebut our own documentation that the Personal Information is accurate. If we determine, based on the totality of the circumstances, that the information is not accurate, we will respond to the request by correcting the information, deleting the information (if deletion of the information does not negatively impact you), or providing you with the name of the source from which we have received the alleged inaccurate information (if we are not the source). We will correct the



information within forty-five (45) days of receiving a verifiable consumer request. We may extend this period once by an additional forty-five (45) days when reasonably necessary. We will provide notice of the extension within the first forty-five (45)-day period. You have the option to submit a 250-word written statement per each alleged inaccurate piece of Personal Information if it is considered health information or is concerning your health, and if you request, this statement will be made a part of your consumer record with us.

- *Appeals.* You may have a right to appeal decisions concerning your ability to exercise your Consumer rights. Please contact us at privacy@concertocare.com to request an appeal concerning decisions on your Consumer request.

B. Promotional Communications

We directly market to you through e-mail, direct mail, and SMS text messaging with your consent. You can opt out of receiving e-mails at any time by clicking the “unsubscribe” link in the e-mail. Please note that your opt-out is limited to the email address used to opt-out. You can opt out of receiving SMS text messaging at any time by texting “STOP.

Please note that we may continue to contact you to the extent necessary for the purposes of your job application and our ongoing business relations.

C. Tracking Technologies

Google provides tools to allow you to opt out of the use of certain information collected by Google Analytics at <https://tools.google.com/dlpage/gaoptout>, by Google Analytics for Display Advertising or the Google Display Network at <https://www.google.com/settings/ads/onweb/>, or downloading the Google Analytics Opt-out Browser Add-on.

To learn more about targeted ads and how to opt out of receiving certain targeted ads from third parties, please visit: (i) for website targeted ads from DAA participants, <https://www.aboutads.info/choices>; (ii) for app targeted ads from DAA participants, <https://www.aboutads.info/appchoices>; and (iii) for targeted ads from NAI participants, <https://www.networkadvertising.org/choices/>. Opting out only means that the selected participants should no longer deliver certain targeted ads to you but does not mean you will no longer receive any targeted content and/or ads (e.g., in connection with the participants’ other customers or from other technology services).

You may also limit our use of information collected from or about your mobile device for purposes of serving targeted ads to you by going to your device settings and turning off tracking for advertising purposes.

Most browsers allow you to control certain tracking tools on your web browser. You do not have to accept cookies to use our website; however, if you disable cookies, certain functionality on our Website may be lost. Most browsers allow you to delete cookies or decline to accept cookies by going to the preferences, tools or options menus of your browser. Selections you make are device-specific and browser-specific, meaning that you should update your preferences on each device you use and within each browser.

Please note that if you opt out using any of these methods, the opt out will only apply to the specific browser or device from which you opt out. We are not responsible for the effectiveness of, or compliance with, any opt-out options or programs, or the accuracy of any other entities’ statements regarding their opt-out options or programs.



V. SECURITY OF PERSONAL INFORMATION

The security of your Personal Information is a priority. We make reasonable efforts to use standard security technologies designed to help ensure that the information we collect about our users is secure. However, we would like to remind you that the Internet is not 100% secure, and technology is no substitute for common sense. We strongly encourage users to keep their login names and passwords secret and to change their password when they think they have become compromised. Furthermore, we recommend that our users communicate over secure channels wherever possible, disable the automatic login features found in some browsers, and empty their browser caches regularly. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately e-mail us at privacy@concertocare.com.

VI. OTHER IMPORTANT INFORMATION

A. Notice of Changes

This Privacy Notice reflects our current practices and is subject to change and update from time to time. When we post changes to this Privacy Notice, we will modify the "Effective Date" at the top of this Privacy Notice to indicate when such changes have come into effect. If we change this Privacy Notice in a material way, we will inform you through a notice advising of such change at the beginning of this Privacy Notice and on the Site.

B. Third-Party Sites and Services

This Privacy Notice does not address, and we are not responsible for, the privacy, security, or other practices of any third parties operating any site or which our services link. The inclusion of a link on our services does not imply endorsement of the linked site or service by us or by our affiliates.

In addition, we are not responsible for the information collection, usage, disclosure, or security policies or practices of other organizations.

C. Jurisdiction – United States Only

Our services are controlled and operated by us from the United States and are not intended to subject us to the laws or jurisdiction of any state, country, or territory other than those of the United States. Information about you is not stored and processed in any other country.

VII. MINOR CHILDREN

We do not hire individuals under the age of eighteen (18). We do not knowingly collect information from individuals under the age of eighteen (18).

VIII. CONTACT US

If you would like any more information about ConcertoCare or its Online Privacy Notice, please e-mail us at privacy@concertocare.com. If you are interested in exploring a career with ConcertoCare, please visit our Site <https://concertocare.com/careers>.