



Privacy Policy

SCP Health (SCP) is committed to protecting your privacy. This Privacy Policy (“Policy”) applies to data collected by us through this website (“Site”). This Policy is incorporated into and subject to the Terms of Use <https://www.scp-health.com/terms-of-use/>. Please read this Policy carefully before using the Site or submitting personal information to us.

BY ACCESSING OR USING THE SITE, YOU CONSENT TO THE COLLECTION, USE, AND SHARING OF YOUR INFORMATION AS SET FORTH IN THIS PRIVACY POLICY.

Collection of your personal information

We may collect personal information that you provide directly to us, such as information you submit when you visit the Site. We may also collect information that is passively or automatically collected from you, such as information collected from your browser or device. We use this information to operate the Site, carry out our business, comply with laws and for other purposes described herein.

At some locations on this site, we ask you to provide personal information, such as your email address, name, or telephone number.

In order to access some portions of the site, select groups of users will be permitted to sign into a secure area of this website with an assigned user identification and password, which we refer to as your credentials. As part of creating your credentials, you will be required to provide your email address as well as a previously assigned identification number. Finally, a unique ID number will be assigned to your credentials, which will be used to identify your credentials and associated information.

To monitor utilization of the Site and continuously improve its quality, we may compile statistical information concerning the usage of the Site using analytics services, such as those provided by Google Analytics. Examples of this information would include: the number of visitors to the Site, or to sections or pages within the Site, patterns of traffic flowing through the Site, length of time spent on the Site, or in sections or pages of the Site, the other sites that refer visitors to the Site, the pages of the Site that visitors frequently use as entry and exit points, utilization of the browser and operating systems and versions used by visitors to the Site. The analytics services may transfer this information to third parties in case of a legal obligation or if a third-party processes data on behalf of that service.



To compile this information, we may collect and store:

- Your IP address
- Your operating system version
- Your browser version
- The pages you visit within the Site
- The length of time you spend on pages within the Site
- The site from which you linked to ours
- Search terms you used in search engines which resulted in you linking to the Site, etc.

While all of this information can be associated with the IP address your computer had while you visited the Site, it may be associated with you as an individual or associated with any other information you may submit through the Site, or that we may store about you for any other purposes.

Use of your personal information

In general, we will use the personal information we collect only for the purpose it was collected, for compatible purposes, as permitted or required by law, as necessary to carry out our contractual duties and obligations, and as otherwise provided in this Policy. For example, we may use your personal information for one or more of the following business or commercial purposes:

- To fulfill or meet the reason for which the information is provided.
- To collect and process the employment application; for recruitment, interviewing, and vetting candidates for employment; communicating with individuals about a current application, future job opportunities or current and past employment.
- Confirming eligibility for employment, drug tests, references, onboarding, and related recruiting efforts.
- Background checks for employment and client engagement services.
- Managing, evaluating, and documenting your employment, attendance, and job performance.
- Maintaining physician records and occupational health programs.
- Maintaining records and satisfying record retention requirements.
- Providing you with equipment, training, and support to carry out your duties and responsibilities.
- Processing payroll, other forms of compensation, and employee benefit plan and program design and administration including enrollment and claims handling and leave of absence administration.



- Traveling and expense reimbursement.
- Submitting relevant information to prospective employers.
- Preventing unauthorized access to, use, or disclosure/removal of the Company's property, including the Company's information systems, electronic devices, network, and data.
- Providing training and development opportunities.
- Investigating complaints, grievances, and suspected violations of Company policy.
- Designing, implementing, and promoting the Company's diversity and inclusion programs.
- Facilitating the efficient and secure use of the Company's information systems.
- Ensuring compliance with the Company information systems policies and procedures.
- For our internal operation purposes.
- To enroll in health insurance or during a leave of absence period.
- To provide you with information, products or services that you request from us.
- To fulfill or meet the reason for which the information is provided.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
- To protect the legal rights, privacy, safety or property of Company or its employees, agents, contractors, customers or the public.
- Responding to and managing legal claims against the Company and/or its personnel, including civil discovery in litigation.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.
- Organization management and administration, including staffing management, financial planning, internal audits, and other administration.
- Responding to employment verification inquiries.
- Communicating with you. This may include facilitating communications to and between employees and contractors, and communications with other bodies (e.g., regulatory authorities).
- External marketing activities, including marketing photos, brochures, website content, videos, social media posts, and other related marketing activities.
- Complying with applicable federal, state, and local laws, as well as regulatory requirements including state and federal health, labor, employment, disability, equal employment opportunity, workplace safety, and related laws, guidance, or recommendations.



- Reporting to appropriate government entities, including tax authorities and other governmental and regulatory agencies.
- Ensuring network and information security, including preventing unauthorized access to our computer and electronic communications systems and physical locations.
- Administering our applications, software, and systems.
- Preventing fraud.
- Responding to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- Statistical, research, and analytical purposes to understand and improve worker satisfaction, improve products & services, and performance as necessary.
- Facilitating other business administrative functions and strategic activities, such as risk management, information technology and communications, financial management and reporting, workforce and succession planning, and maintenance of licenses, permits and authorization applicable to Company operations.
- For any other purpose with your consent.

We 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.

Disclosing your personal information

In general, we will not disclose your personal information outside of SCP and its controlled subsidiaries and affiliates except with your consent and as described in this Policy unless otherwise permitted or required by law.

We may disclose your personal information for the same reasons that we may use it as described in this Policy. To carry out such purposes, we may disclose your personal information to our customers, clients, and affiliates. We occasionally hire service providers and contractors to provide limited services on our behalf, such as handling the processing and delivery of mailings, providing customer support, hosting websites, processing transactions, or performing statistical analysis of our services. Those companies will be permitted to obtain only the personal information they need to deliver the service. They are required to maintain the confidentiality of the information and are prohibited from using it for any other purpose.

We may also transfer and disclose your personal information to third parties to comply with law enforcement, governmental mandate, or other legal requirement; when it is necessary for us to provide it to our attorneys, accountants, regulators, auditors or other advisors; when we



believe in good faith that the law requires or permits it; at the request of governmental authorities conducting an investigation; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of third parties, visitors to our Site, as determined in our sole discretion or as permitted by applicable law.

Lastly, as we continue to develop our business, if another entity acquires us or all or substantially all of our assets, or assets related to the Site, in connection with a merger into another entity or any consolidation, share exchange, combination, reorganization, or like transaction, personal information that we have collected about the users of the Site may be disclosed to such entity as part of the due diligence process and will be transferred to such entity as one of the transferred assets. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

Security of your personal information

We are committed to protecting the security of your personal information. We use a variety of commercially reasonable security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure. For example, we store the personal information you provide on computer systems with limited access, which are located in controlled facilities.

If a password is used to help protect your accounts and personal information, it is your responsibility to keep your password confidential. Do not share this information with anyone. If you are sharing a computer with anyone, you should always choose to log out before leaving a site or service to protect access to your information from subsequent users.

Retention of Personal Information

We will retain your personal information for as long as necessary to fulfill the purposes described in the "Use of Personal Information" section above, unless otherwise required by applicable laws. We may retain your personal information for longer if it is necessary to comply with our legal or reporting obligations, resolve disputes, collect fees, maintain our relationship with you. We may also retain it if we have an obligation to a third party that involves your information, our retention or recordkeeping policies and obligations dictate that we retain your information, we have an interest in providing you with information about our products or services, or we have another legitimate business purpose for retaining your information. To determine the appropriate retention period for your personal information, we consider various factors such as the amount, nature, and sensitivity of your information,



the potential risk of unauthorized access, use or disclosure, the purposes for which we process your personal information, and applicable legal requirements.

Use of cookies

We may use technologies such as cookies, pixel tags, browser analysis tools, server logs and web beacons to recognize you when you return to the Site and to help us improve the quality of our service when you visit our Site.

A cookie is a small text file that is placed on your hard disk by a webpage server. Cookies contain information that can later be read by a web server in the domain that issued the cookie to you. Cookies cannot be used to run programs or deliver viruses to your computer. We or one of our third-party analytics service providers may place cookies or similar files on your device for security purposes, to facilitate site navigation, enable you to sign into our services, help personalize your online experience, tailor our products, services and advertising to suit your personal interests, estimate our audience size, track visits to our Site and, as applicable, to process your requests.

You may control cookies, including preventing or stopping the installation and storage of cookies, through your browser settings and other tools. Most browsers will allow you to block or refuse cookies. However, you may need to manually adjust your preferences each time you visit a site. For more information, see the Help section of your browser. Please note that if you block certain cookies, some features of the Website may not function properly or may be slower if you refuse certain types of cookies.

Social Media Plug-ins

Our Site may offer social media buttons that offer certain interactive features. We and the respective social media company track your interactions with these functions. Additionally, even if you do not choose to use these plug-ins, the relevant company may still collect certain tracking information about you and share it with us .

Embedded Content

The Site may contain embedded content (e.g., videos). Embedded content may place third party cookies on your device that track your online activity to enhance your experience or assess the success of their application. We have no direct control over the information these cookies collect, and you should refer to their website privacy policy for additional information.



Do Not Track

“Do Not Track” is a privacy preference that you can set in your Internet search browser that sends a signal to a website that you do not want the website operator to track certain browsing information about you. However, because our Site is not configured to detect Do Not Track signals from a user’s computer, we are unable to respond to Do Not Track requests.

Third Party Website Links

We may provide links to websites or resources outside of our Site for your informational purposes only. Such links do not constitute an endorsement by us of those other websites, the content displayed therein, or the persons or entities associated therewith. You acknowledge that we are providing these links to you only as a convenience, and you agree that we are not responsible for the content of such websites. Your use of these other linked websites is subject to the respective terms of use and privacy policies located on the linked websites.

We may also provide links to third party integrations. Third party integrations are websites or platforms that synchronize with our Site to provide you with additional functionality, tools, or services such as maps, sending requested information, etc.

You acknowledge and agree we are not responsible for the availability of third party sites, resources, or integrations and do not endorse and are not responsible or liable for any content, advertising, goods, services or other materials on, available through, or provided by such sites, resources, or integrations. We are not responsible for the privacy or other practices of such sites and cannot guarantee the security of personal information that you provide, or is collected by, such sites. We encourage you to review the privacy policies and terms and conditions on those linked sites.

Our Site and Children

Our Site is not directed to children under the age of 13 and we do not knowingly collect or solicit personal information from children under the age of 13. If the parent or guardian of a child under 13 believes a child has provided us with any personal information, the parent or guardian of that child should contact us and ask to have this information deleted from our files. If we otherwise obtain knowledge that we have personal information about a child under the age of 13 in our files, we will delete that information from our existing files so that it is not in retrievable form.



Your Choices Regarding Your Personal Information

You can always limit the information you provide to us, but if you choose not to provide certain requested information, you may be unable to access some of the services and content on the Site. You can also limit the communications that we may send you by following a simple opt-out process. Simply follow the instructions in our advertisement/promotional emails to opt-out of receiving future marketing communications.

Applicable law

This Policy is governed by the laws of the State of Delaware, without regard to its conflict of laws principles. Jurisdiction for any claims arising under or out of this Policy shall lie exclusively with the state and federal courts within Delaware. If any provision of this Policy is found to be invalid by a court having competent jurisdiction, the invalidity of such provision shall not affect the validity of the remaining provisions of this Policy, which shall remain in full force and effect.

Changes to this Privacy Policy

We will occasionally update this Privacy Policy to reflect changes in our services or data collection practices. When we post changes to this policy, we will revise the “last updated” date at the bottom of this statement. We encourage you to periodically review this policy to be informed of how we are protecting your information.

Contacting us

We welcome your comments regarding this Privacy Policy. If you have questions about this policy or believe that we have not adhered to it, please contact us through the “Contact Us” link on this website.

CALIFORNIA RESIDENTS

If you are a resident of California, the following information and rights are provided to you as required by the California Consumer Privacy Act of 2018 and its implementing regulations, as amended by the California Privacy Rights Act (“CCPA”). This California specific section (“CCPA Section”) describes our policies and practices regarding the collection, use, and disclosure of personal information we collect about you, including personal information we obtain when you access or use the Site or through other channels including but not limited to phone and email conversations, social media interactions on our websites and other third party websites such as social media sites, viewing our emails, attending an event, or through our authorized services providers.



This CCPA Section supplements and amends the information contained in the Site Policy with respect to California residents. Any terms defined in the CCPA have the same meaning when used in this notice. The other provisions of the Site Policy continue to apply except as modified in this CCPA Section.

Please read this CCPA Section carefully before using the Site or otherwise submitting information to us. By visiting the Site or otherwise submitting information, you indicate your understanding that the collection, use, and disclosure of your information is subject to the terms of this CCPA Section and our Terms of Use [<https://www.scp-health.com/terms-of-use/>]. Except as otherwise noted, any capitalized terms not defined in the CCPA Section have the meaning set forth in the Policy and Terms of Use.

IF YOU DO NOT CONSENT TO THE COLLECTION, USE, AND SHARING OF YOUR INFORMATION AS DESCRIBED IN THIS CCPA SECTION, PLEASE DO NOT PROVIDE US WITH SUCH INFORMATION.

Information We Collect

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”). In particular, we may collect or have collected the following categories of personal information from consumers within the last twelve (12) months:

- Identifiers. Examples: A real name, alias, postal address, unique personal identifier, Internet Protocol address, email address, Social Security number, driver’s license number, or other similar identifiers.
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). Examples: A name, signature, Social Security number, physical characteristics or description, address, telephone number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number
- Protected classification characteristics under California or federal law. Examples: Age (40 years or older), gender, race, ethnicity or national origin, or veteran or military status.
- Internet or other similar network activity. Examples: Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.
- Geolocation data. Examples: Physical location or movements
- Sensory data. Examples: Audio, electronic, visual or similar information
- Professional or employment-related information. Examples: Current or past job history.



- Inferences drawn from other personal information. Examples: Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
- Sensitive personal information. Examples: (1) Social Security number, driver's license number, state identification number; (2) financial account information; (3) precise geolocation information; (4) racial or ethnic origin, religious beliefs; (5) contents of mail, email, and text messages unless the business is the intended recipient of the communication; (6) health information.

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, such as:
 - 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.
 - Financial Information covered by the Gramm-Leach-Bliley Act and implementing regulations.

Use of Personal Information

Please see the Use of Your Personal Information section, above.

Sources

We obtain the categories of personal information listed above from the following categories of sources:

- You. We may collect Personal Information directly from you such as through your use of our website, facilities or systems, when you send us an email, contact us by phone, or otherwise communicate or interact with us. We may also collect information when you are an applicant for employment with us or employed by us.
- Related Entities and Affiliates. We may collect information about you from our related parties and affiliates.
- Social media and related services. We may collect information about you through your social media services consistent with your settings on such services.
- Third parties. We may collect information about you from third parties such as your references, background check vendors, staffing agencies, clients, or other third-party sources that are lawfully entitled to share your data with us. This may include service providers or contractors who collect or process your personal information on our behalf.



Disclosing Personal Information

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

- Identifiers
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- Protected classification characteristics under California or federal law
- Internet or other similar network activity
- Geolocation data
- Sensory data
- Professional or employment-related information
- Inferences drawn from other personal information
- Sensitive personal information

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

- Third parties as directed by you.
- Our clients or customers.
- Our business partners. For example, we might disclose your personal information to one of our business partners for purposes of collaborating on services or an event. Where applicable, we encourage you to review each such business partner's privacy statement before signing on with them.
- Services provider/contractors. For example, we may disclose information to service providers that assist with payment processing, analyzing data, processing and fulfilling orders, background checks, marketing and advertising companies, information technology providers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.
- Third parties as necessary to comply with federal, state, or local laws; comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities; cooperate with law enforcement agencies concerning conduct or activity that we reasonably and in good faith believe may violate federal, state, or local laws; detect, investigate and prevent fraud or other unlawful activities; to protect and defend ourselves, our property, our employees, our customers, and our users; and to exercise or defend legal claims.



Selling or Sharing Personal Information

We do not sell or share your personal information, as those terms are defined under the CCPA.

We do not have actual knowledge that we have sold or shared personal information of minors under age 16.

Sensitive Personal Information

We do not use or disclose your sensitive personal information for purposes that, with limited exceptions, are not necessary to provide our products and services as are reasonably expected by an average consumer requesting those goods and services.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information, subject to certain exceptions. This section describes your CCPA rights and explains how to exercise those rights.

Right to Know

You have the right to request that we disclose the following to you as it relates to the 12-month period preceding the Company's receipt of your verifiable consumer request (see below):

- a) The categories of personal information we have collected about you.
- b) The categories of sources from which the personal information was collected.
- c) The business or commercial purpose for collecting, selling, or sharing personal information.
- d) The categories of personal information we disclosed or sold for a business purpose.
- e) The categories of third parties we disclosed personal information to, by the category of personal information.
- f) The specific pieces of personal information we collected about you.

Right to Request Deletion

You have the right to request that we delete your personal information from our records, subject to certain exceptions.

Upon receipt of a verifiable consumer request (see below), and as required by the CCPA, we will delete and direct any service providers, contractors, and third parties to delete your personal information from their records.



Right to Request Correction

You have the right to request that we correct any incorrect personal information that we collect or retain about you, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see below), we will correct (and direct any of our service providers and contractors that hold your data on our behalf to correct) your personal information from our records, unless an exception applies.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights.

Exercising Your Rights under CCPA

If you wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: (800) 893-9698 ext. 1225

Email: privacy_officer@scp-health.com

Authorized Agents

You may authorize a natural person, or a business registered with the California Secretary of State to act on your behalf with respect to the right under this CA Addendum. When you submit a Request to Know or a Request to Delete, unless you have provided the authorized agent with a qualifying power of attorney, you must provide your authorized agent written permission (signed by you) to act on your behalf and verify the authorized agent's identity with us. We reserve the right to deny requests from persons or businesses claiming to be authorized agents that do not submit sufficient proof of their authorization.

Verification

We reserve the right to only respond to verifiable consumer requests. A verifiable consumer request is one made by any individual who is:

- the consumer who is the subject of the request,
- a consumer on behalf of the consumer's minor child, or
- by a natural person or person registered with the Secretary of State authorized to act on behalf of a consumer.

If we request, you must provide us with sufficient information to verify your identity and/or authority to act on behalf of a Consumer. In general, we may ask you to provide identifying information that we already maintain about you or we may use a third-party verification service. In either event, we will try to avoid asking you for sensitive personal information to verify your identity. We may not be able to 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. However, making a verifiable consumer request does not require you to create an account with us.

Additionally, you will need to describe your request with sufficient detail to allow us to review, understand, assess, and respond. We will not use the personal information we collect from an individual to determine a verifiable request for any other purpose, except as required by law.

We reserve the right to charge a fee to process or respond to your request if it is excessive, repetitive, or manifestly unfounded. If we determine that a request warrants a fee, we will attempt to notify you as to why we made that decision and provide a cost estimate before completing your request.

We will attempt to respond to a verifiable consumer request within forty-five (45) days of receipt, but we may require up to ninety (90) days to respond, under which circumstances we will notify you of the need for an extension.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the receipt of your verifiable consumer request. With respect to Personal Information collected on and after January 1, 2022, and to the extent expressly permitted by applicable regulation, you may request that such disclosures cover a period beyond the 12 months referenced above, provided doing so would not be impossible or require a disproportionate effort by us. The response we provide will also explain the reasons we cannot comply with a request, if applicable. To the extent permitted by the CCPA, we will respond to no more than two requests during any 12-month period.

Accessibility

Persons with disabilities may obtain this notice in alternative format upon request using the contact information above.

Last Updated: June 2023