Website Privacy Policy

This Website Privacy Policy ("Policy") describes how AltaMed Health Network, Inc. ("AHN") collects, uses, and discloses your personal information. This policy applies to www.altamedhn.com, and mobile application (collectively referred to as "Site"), as well as to information collected through telephone communication.

For information classified as Protected Health Information (PHI) for medical and/or mental health services, refer to AHN's Notice of Privacy Practices that describes how we use and disclose our members PHI, including the member's privacy rights.

Your use of our Sites is also subject to the Terms of Use. By continuing to use our Sites, you indicate your acceptance and agreement with us.

INFORMATION WE COLLECT

❖ Information You Submit

AHN, or an AHN vendor, collects personal information that you voluntarily provide to us. Types of personal information collected includes your name, address, email, birth date, gender, member ID, etc. The personal information you provide to us is used only for the purpose disclosed on the Sites. AHN does not sell, rent, or license your personal information. We only share your personal information with our vendors when it is necessary to support our operations and provide services to you, and in accordance with the law.

❖ Information We Collect Automatically

AHN uses different tracking technologies that automatically collect information when you use the Sites. This includes details about how you access and use the Sites (e.g., traffic data, location data, logs, crash analytics, and device information). This information is gathered to enhance the user experience and make improvements to the Sites.

Tracking technologies used include, but are not limited to:

- **Cookies:** Cookies are pieces of information that a website transfers to your computer. They can be either session or persistent cookies and are used to store data about your preferences and enhance your experience on the Sites. Session cookies are deleted when you leave the Sites, while persistent cookies stay on your computer even after closing the browser. Cookies help us remember you, see how

you use the Sites, and show you things you might be interested in. It's important to note that cookies do not personally identify users, and they are not used to share data with other websites or show you ads from third parties.

- **Web Beacons:** Web beacons, also called web bugs or pixel tags, are small invisible images placed on web pages or emails. Web beacons collect non-personal information like IP address and browser type, which help us understand how people use the Sites. They help us see which parts of the website you visited and what information you looked at. They also help us know if you open or interact with emails, so we can make your experience better.

- **IP Address:** An Internet Protocol Address ("IP address") is a number that automatically identifies your computer when you go on the Internet. It helps the server send you the webpages you want to see and shows which server your Internet Service Provider uses. Your IP address is used to find and fix any problems with AHN's server and to help with manage the website.

- **Sever Log Files:** Server log files record information about your interactions with our Sites. This information is kept in accordance with the law. They include details such as IP addresses, the date and time you visited, pages that you looked at, and what browser you used. These logs help us check how well the Site is working, keep it secure, and understand what users do to make it better and fix issues.

HOW WE USE YOUR INFORMATION

Your information may be used for many purposes, such as to:

- Provide you with the products and services you request, including the Site and its contents.
- Respond to your questions, comments, and provide customer support.
- Send you the information or materials you request.
- Analyze trends and statistics.
- Improve AHN's Sites.
- Keep you informed about AHN's products and services.
- Protect against fraud, unauthorized access, and manage risks.
- Enforce the terms of use and other agreements with you.
- Comply with applicable laws, regulations, or legal process as well as industry standards.
- Your information may also be used for other purposes that we will let you know at the time we request the information.

DISCLOSURE OF YOUR INFORMATION

We may disclose information:

- To affiliated companies, as allowed by law for AHN business.
- To regulatory agencies and law enforcement upon request and as authorized by law.
- To contractors, service providers, and third-party vendors who help us operate our business and our Sites, or perform services on our behalf, such as website maintenance. In these cases, 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.
- To persons and/or entities authorized by you in writing, such as your designated family members or friends.

EXTERNAL LINKS AND FEATURES

AHN's Sites may contain links to other websites owned, maintained, or hosted by other companies. AHN is not responsible for the privacy practices, advertising, products, or contents of any websites or mobile apps that AHN does not control. AHN encourages you to review their privacy policies and contact them directly if you have questions about how these websites or apps use your information.

HOW WE PROTECT INFORMATION ABOUT YOU

AHN values the security of your information and takes reasonable steps to protect it, such as implementing physical, administrative, and technical measures to prevent unauthorized access. Even though AHN does its best to protect your personal information, the nature of the Internet prevents us from guaranteeing absolute security and confidentiality of the information transmitted through our Sites. There is a possibility of unauthorized access, hacking, data loss, or other types of misuse. If such events occur, we must comply with notice and other requirements under HIPAA and State privacy laws.

POLICIES FOR CHILDREN UNDER 13

AHN's Sites are intended for adults only and are not directed to children under the age of 13, nor is personal information from such children knowingly collected without parental consent. Children under the age of 13 cannot use AHN's Sites without parental consent. If

AHN learns that personal information from a child under the age of 13 was collected, the information will be deleted in compliance with the Children's Online Privacy Protection Act ("COPPA").

If you are a parent, legal guardian, or personal representative and believe that your child under the age of 13 has provided us with information without your consent, please contact AHN at the information below.

PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

The Privacy Notice for California Residents ("CA Privacy Notice") is listed herein to comply with the California Consumer Privacy Act of 2018 and the California Privacy Rights Act of 2020. The CA Privacy Notice applies solely to visitors, users, and others who reside in the State of California ("consumers" or "you"). Any terms defined in the CCPA have the same meaning when used in this notice.

*****Note: Protected Health Information (PHI) and Personally Identifiable Information (PII) collected in the Sites for medical and mental health care services are governed by the federal Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act. As appropriate, HIPAA and the CMIA shall supersede the CA Privacy Notice.***

- **Information We Collect**

AHN's Sites 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, the Sites may have collected the following categories of personal information from consumers within the last twelve (12) months:

CATEGORY	EXAMPLE
Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.

CATEGORY	EXAMPLE
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, 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. Some personal information included in this category may overlap with other categories.
Protected classification characteristics under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
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.
Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.

CATEGORY	EXAMPLE
Geolocation data	Physical location or movements.
Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information, including audio recordings of customer care calls, video, or similar information.
Professional or employment-related information	Current or past job history or performance evaluations.
Non-public education information (per the Family Education 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 grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.
Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
Other information	Information that does not directly fit within one of the categories defined by the CCPA, including the contents of communications you send to us by phone, email, text, online chat, etc.

Personal information does not include:

- Publicly available information from government records or lawfully obtained, truthful information that is matter of public concern.
- De-identified or aggregated consumer information.

❖ **Sensitive Personal Information**

We do not collect, use, and disclose sensitive personal information (e.g., government identifiers, financial account, precise geolocation, and genetic data) through our Sites. We do not use or disclose sensitive personal information for purposes to which the right to limit use and disclosure applies under the CCPA.

❖ Use and Disclose of Your Personal Information

AHN may use or disclose the personal information it collects for one or more of the following purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you share your name and member ID to submit a grievance, we will use that personal information to respond to your inquiry.
- To provide, support, personalize, and develop the Sites.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve AHN's responses.
- To help maintain the safety, security, and integrity of the Sites, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve the Sites.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- 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 AHN's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by AHN is among the assets transferred.

AHN 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.

AHN 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
- Affiliated companies

❖ **Sources of Personal Information**

We may collect personal information from the following sources:

- **Directly from you.** For example, when you submit personal information to us voluntarily for an inquiry.
- **Automatically when you use our website or mobile apps.** For example, we may collect your usage history when you use our websites, systems, and applications.
- **AHN affiliates.** We receive personal information from AHN affiliates, as permitted, to enable us to manage our business.
- **Other parties.** For example, we may receive personal information from service providers who provide us with IT services.
- **Parties to corporate transactions.** As permitted by law, we may receive personal information as part of a corporate transaction or proceeding such as a merger, financing, acquisition, bankruptcy, dissolution, or at transfer, divestiture, or sale of all or a portion of a business or assets.

❖ **How Long We Keep Your Personal Information**

Category of Personal Information	Retention Period / Criteria
Identifiers	As required or authorized by law.
Personal information described in Cal. Civ. Code § 1798.80(e)	As required or authorized by law.
Characteristics of protected classifications	As required or authorized by law.
Commercial information	As required or authorized by law.
Biometric information	As required or authorized by law.
Internet or other electronic network activity information	As required or authorized by law.
Geolocation data	As required or authorized by law.
Sensory data	As required or authorized by law.

Category of Personal Information	Retention Period / Criteria
Professional or employment related information	As required or authorized by law.
Non-public education information	As required or authorized by law.
Inferences	As required or authorized by law.

We keep the categories of personal information described above for as long as is necessary for the purposes described in this CA Privacy Notice or otherwise authorized by law. This generally means holding the information for as long as one of the following apply:

- Your personal information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the information.
- Your personal information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the personal information was collected.
- The information is reasonably required to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case).
- We are otherwise required or permitted to keep your information by applicable laws or regulations.

Where information is used for more than one purpose, we will retain it until the purpose with the latest period expires. For more information about our retention policies, please contact us using the contact details below.

❖ Your California Privacy Rights

If you are a California resident, you are entitled to the following rights. To exercise any of these rights, please submit a request by email to compliance@altamedhn.com. Please note that if you submit a request to know, request to delete, or request to correct, you will be asked to provide two-to-three (2-3) pieces of personal information that we will match against our records to verify your identity. You may designate an authorized agent to make a request on your behalf; however, you will still need to verify your identity directly with us before your request can be processed.

Right to Know: You have the right to know what personal information we have collected about you, which includes:

1. The categories of personal information we have collected about you, including:
    a. The categories of sources from which the personal information was collected.
    b. Our business purposes for collecting or sharing personal information.
    c. The categories of recipients to which we disclose personal information.
    d. The categories of personal information that we disclosed for a business purpose, and for each category identified, the categories of recipients to which we disclosed that particular category of personal information.
2. The specific pieces of personal information we have collected about you.

Right to Delete Your Personal Information: You have the right to request that we delete personal information we collected from you, subject to certain exceptions.

Right to Correct Inaccurate Information: If you believe that personal information we maintain about you is inaccurate, you have the right to request that we correct that information.

Right to Opt Out of Sales and Sharing of Personal Information: We do not sale your personal information or share your personal information with a third party for cross-context behavioral advertising purpose to which the right to opt out of sales and sharing applies under the CCPA.

Right to Limit Use and Disclosure of Sensitive Personal Information: We do not use or disclose sensitive personal information for purposes to which the right to limit use and disclosure applies under the CCPA.

Right to Non-Discrimination for the Exercise of Your Privacy Rights: If you choose to exercise any of
your privacy rights under the CCPA, you also have the right not to receive discriminatory treatment by us.

- **California "Shine the Light"**

California's "Shine the Light" law permits California residents to request certain information regarding a business's disclosure of personal information to third parties for their own direct marketing purposes. We do not share personal information with third parties or affiliates for those third parties' or affiliates' own direct marketing purposes. Californians may request information about our compliance with this law by contacting us at compliance@altamedhn.com.

CHANGE IN STATEMENT

AHN reserves the right to update, revise or amend, make changes to the Website Privacy Policy at our discretion and at any time. When changes are made, we will post the updated version of these documents on the Sites and update the effective date. Your continued use of the site following the posting of changes constitutes your acceptance of the changes.

CONTACT US

If you want to submit a question or comment related to AHN's Website Privacy Policy or you wish to exercise your rights or file a complaint, please contact us at:

AltaMed Health Network, Inc.
Attention: Office of Compliance and Privacy
1401 N. Montebello Blvd., Montebello, CA 90640
1-213-513-4272
888-301-5197
compliance@altamedhn.com

You can also file a complaint with your health plan. Please refer to the *Grievance and Appeals* notice for further information.