



PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

This Privacy Notice for California Residents (this “Notice”) is provided by Synovation Medical Group (“SMG”) to comply with the California Consumer Privacy Act of 2018 (the “CCPA”). The terms appearing both in this Notice and the CCPA will have the meaning set forth in the CCPA. This Notice was last updated on 1/3/2020.

Personal Information. SMG collects information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“Personal Information”). Personal Information does not include (i) publicly available information from government records; and (ii) deidentified or aggregate consumer information. SMG has collected in the preceding 12 months, and will continue to collect, the categories of Personal Information listed below for the (marked) purposes identified below:

Personal Information		Purpose			
Category	Examples	Website	PHI	HR	Business-to-Business
Identifiers	Real name, alias, postal address, unique personal identifier, online identifier Internet Protocol address, e-mail address, account name, social security number, driver’s license number, passport number.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Personal Information described in CA Civ. Code § 1798.80(e)	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, health insurance information.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Characteristics of Protected Classifications under CA or federal law	Age (40 years or older), ancestry, citizenship, color, genetic information, marital status, medical condition, physical or mental disability, pregnancy or childbirth, race, religion or creed, sex or gender, sexual orientation, veteran or military status.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Biometric Information	Fingerprint, face pattern, voice recordings, keystroke or gait patterns or rhythms, or sleep, health, or exercise data that contain identifying information.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Internet or Other Electronic Network Activity	Browsing history, search history, and information regarding interaction with a website, application, or advertisement.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Geolocation Data	Information on physical location and movement.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sensory Data	Audio, electronic, visual, thermal, olfactory, or similar data.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Professional or Employment-Related Information	Job history or performance evaluations.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Education Information	Non-publicly available personally identifiable information directly related to a student maintained by an educational institution (ex. grades and transcripts).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Inference Drawn from Personal Information	Profiles reflecting preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



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Purposes, Sources, and Limitations. The following describes the purposes identified above and potential limitations on the applicability of this Notice, the rights of a consumer (i.e. a natural person who is a California resident) described herein, and the CCPA:

- i. “Website” means that Personal Information is collected from visitors to SMG’s website as described in SMG’s website privacy policy, which generally involves the use of internet cookies, web beacons, and website e-mail functions.
- ii. “PHI” means that the Personal Information is collected as medical information under the Confidentiality of Medical Information Act (“CMIA”) and/or as protected health information under the Health Insurance Portability and Accountability Act (“HIPAA”) by a covered entity or business associate from a patient, another covered entity (ex. a healthcare provider or health plan), or another business associate. Therefore, (a) the CCPA and the rights identified in this Notice may not apply to the extent applicable law exempts such Personal Information from the requirements of the CCPA; and (b) the consumer/patient must refer to SMG’s Notice of Privacy Practices for a description of how SMG uses or discloses medical information/ protected health information and the rights associated therewith.
- iii. “HR” means that the Personal Information collected (a) is from an individual in the course of the individual acting as a job applicant to, or an employee, owner, director, officer, medical staff member, or contractor of, SMG (an “Employee”); (b) is the emergency contact information for the Employee; and/or (c) is necessary to retain or administer benefits for another individual relating to the Employee. Therefore, the CCPA and the rights identified in this Notice may not apply to the extent applicable law exempts such Personal Information from the requirements of the CCPA.
- iv. “Business-to-Business” means that the Personal Information reflects a written or verbal communication or a transaction between SMG and a consumer, where the consumer is a natural person who is acting as an employee, owner, director, officer, or contractor of a company, partnership, sole proprietorship, nonprofit, or government agency and whose communications or transaction with SMG occur solely within the context of SMG conducting due diligence regarding, or providing or receiving a product or service to or from, such company, partnership, sole proprietorship, nonprofit, or government agency. Therefore, the CCPA and the rights identified in this Notice may not apply to the extent applicable law exempts such Personal Information from the requirements of the CCPA.
- v. The CCPA provides other exemptions and limitations. Nothing contained in this Notice is intended to limit the applicability of such exemptions and limitations.

Sale. In the preceding 12 months, SMG has not sold Personal Information. A business does not sell Personal Information when (i) the consumer directs the business to intentionally disclose Personal Information; or (ii) the business transfers to a third-party the Personal Information as an asset that is part of a merger, acquisition, bankruptcy, or other transaction in which the third-party assumes control of all or part of the business, provided that the Personal Information is used or shared consistently with applicable law. The CCPA provides other exemptions and limitations.

Disclosures for a Business Purpose. In the preceding 12 months, SMG has disclosed the following (marked) categories of Personal Information for a business purpose:

<input checked="" type="checkbox"/>	Identifiers
<input checked="" type="checkbox"/>	Personal Information described in CA Civ. Code § 1798.80(e)
<input type="checkbox"/>	Characteristics of Protected Classifications under CA or federal law
<input type="checkbox"/>	Commercial Information
<input type="checkbox"/>	Biometric Information
<input checked="" type="checkbox"/>	Internet or Other Electronic Network Activity
<input checked="" type="checkbox"/>	Geolocation Data
<input type="checkbox"/>	Sensory Data
<input type="checkbox"/>	Professional or Employment-Related Information
<input type="checkbox"/>	Education Information
<input type="checkbox"/>	Inference Drawn from Personal Information

Use. SMG uses and discloses Personal Information for one or more of the following business purposes:

- i. To fulfill or meet the reason for which the Personal Information was provided or as described to the individual when the Personal Information was collected.
- ii. To provide services;
- iii. To conduct research and educational programs;
- iv. To provide information on products, services, and benefits;
- v. To manage SMG’s relationship with the individual;
- vi. To create, customize, maintain, and secure an individual’s account with SMG;
- vii. To respond to inquiries, investigate and address concerns, and improve SMG’s responses;
- viii. To improve and secure SMG’s website and present its contents to visitors and guests;
- ix. To respond to law enforcement requests or as required by applicable law, regulation, or court order; and
- x. To evaluate or conduct a merger, reorganization, dissolution, or asset acquisition in which Personal Information held by SMG may be among the assets transferred.



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Third-Parties. SMG may disclose Personal Information to a third-party for a business purpose. When SMG discloses Personal Information to a third-party, SMG generally requires the recipient to keep the Personal Information confidential. SMG shares Personal Information with the following categories of third-party recipients:

- i. SMG affiliates;
- ii. Workforce members (as defined by HIPAA);
- iii. Business associates (as defined by HIPAA);
- iv. Covered entities (as defined by HIPAA);
- v. Professional advisers (ex. lawyer and accountants);
- vi. Vendors and other service providers; and
- vii. Regulators, surveyors, and other authorities who ensure SMG's compliance with applicable laws.

Consumer Rights. The CCPA provides a consumer (i.e. a natural person who is a California resident) with rights regarding their Personal Information:

- i. **Access and Data Portability Rights.** The consumer has the right to request that SMG disclose information about SMG's collection and use of the consumer's Personal Information over the past 12 months. Once SMG receives and confirms a verifiable consumer request, SMG will disclose (a) the categories of Personal Information collected about the consumer; (b) the categories of sources from which the Personal Information was collected; (c) the business or commercial purpose for collecting or selling the Personal Information; (d) the categories of third-parties with whom the Personal Information was shared; and (e) the specific pieces of Personal Information collected about the consumer. However, the foregoing does not require SMG to (1) retain any Personal Information about a consumer collected for a single one-time transaction if, in the ordinary course of business, that information about the consumer is not retained; or (2) reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered Personal Information
- ii. **Deletion Request Rights.** The consumer has the right to request that SMG delete any of the consumer's Personal Information that SMG collected and retained from the consumer— subject to exemptions and limitations. Once SMG receives and confirms a verifiable consumer request, SMG will delete (and will direct its service providers to delete) the consumer's Personal Information from its records unless an exemption or limitation applies. SMG may deny a deletion request if the CCPA does not require deletion or if retaining the Personal Information is necessary for SMG or its service provider to do any of the following:
 - a. Complete the transaction for which the Personal Information was collected, provide a good or service requested by the consumer, or reasonably anticipated within the context of a business's ongoing business relationship with the consumer, or otherwise perform a contract between the business and the consumer;
 - b. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity;
 - c. Debug to identify and repair errors that impair existing intended functionality;
 - d. Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
 - e. Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code;
 - f. 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 businesses' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if the consumer has provided informed consent;
 - g. To enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with the business;
 - h. Comply with a legal obligation; and/or
 - i. Otherwise use the consumer's Personal Information, internally, in a lawful manner that is compatible with the context in which the consumer provided the information.
- iii. **Sale Opt In/Out Rights.** Consumers who are 16 years of age or older have the right to direct SMG not to sell their Personal Information at any time. SMG will not sell the Personal Information of a consumer SMG actually knows is less than 16 years of age unless SMG receives affirmative authorization from either the consumer if the consumer is between 13 and 16 years of age or the parent or guardian if the consumer is less than 13 years of age. Consumers who opt in to Personal Information sales may opt out of future sales at any time. SMG will wait at least 12 months from the opt out request before asking the consumer to reauthorize the sale of Personal Information. However, a consumer may opt back in at any time by sending a request to SMG. A Consumer has the right to request SMG to disclose to the consumer (a) the categories of Personal Information that SMG collected and sold about the consumer; (b) the categories of third-parties to whom the Personal Information was sold, by category or categories of Personal Information for each third-party to whom the Personal Information was sold; and (c) the categories of Personal Information that SMG disclosed about the consumer for a business purpose.



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Exercise of Rights and Choices. To exercise the rights described in this Notice, please submit a verifiable consumer request or opt out/in request to the following:

Synovation Medical Group
224 N. Fair Oaks Avenue Suite 300
Pasadena, CA 91103
Phone (Toll Free): (800)807-3422
E-mail: info@synovationmedicalgroup.com
Website: www.synovationmedicalgroup.com

A consumer is not required to create an account with SMG to submit a verifiable consumer request or to exercise the right to opt in/out of sales. However, a request can be made only by a consumer, a consumer on behalf of the consumer's minor child, or a natural person or a person registered with the Secretary of State and authorized by the consumer to act on the consumer's behalf. The request must (i) provide sufficient information to allow SMG to reasonably verify that the requestor is the consumer or an authorized representative of the consumer; and (ii) describe the request with sufficient detail to allow SMG to properly process the request. SMG will use the Personal Information provided in a request only to verify the requestor's identity and authority to make the request and to associate the Personal Information provided in the request to any Personal Information previously collected by SMG.

SMG can neither provide Personal Information nor respond to a request if SMG cannot verify the requestor's identity and authority to make the request and/or receive Personal Information. SMG is not obligated by the CCPA to provide information to the same consumer more than twice in a 12-month period.

Request Processing. SMG will use reasonable efforts to respond to a verifiable consumer request within 45 days of its receipt. If SMG requires more time, the consumer will be informed of the reason and the extension period (up to an additional 45 days) in writing. The response will cover only the 12-month period preceding the receipt of the verifiable consumer request. The response will be delivered through the consumer's account with SMG if the consumer maintains an account with SMG that permits delivery. The response will be delivered by mail or electronically (at the consumer's option) if the consumer does not maintain an account with SMG that permits delivery. For data portability requests, SMG will provide the Personal Information in a readily useable format that allows the consumer to transmit the Personal Information from one entity to another entity without hindrance. SMG will not charge a fee to process or respond to a verifiable consumer request except when the request is manifestly unfounded, excessive, or repetitive. If a request is manifestly unfounded, excessive, or repetitive, SMG may either charge a reasonable fee, taking into account the administrative costs of providing the information or communication or taking the action requested, or refuse to act on the request and notify the consumer of the reason for refusing the request.

Nondiscrimination. SMG will not discriminate against a consumer—because the consumer exercised any of the consumer's CCPA rights—by (i) denying goods or services to the consumer; (ii) charging different prices or rates for goods or services to the consumer; (iii) providing a different level or quality of goods or services to the consumer; (iv) suggesting that the consumer will receive a different price or rate for goods or services or a different level or quality of goods or services; and/or (v) engaging in any other discriminatory action because the consumer exercised any of the consumer's CCPA rights.

Changes to this Notice. SMG reserves the right to change this Notice at any time. Notice of the change will be provided either by e-mail or through a notice on SMG's website.

Contact Information. If you have questions, comments, or concerns about this Notice, please contact the following:

Synovation Medical Group
224 N. Fair Oaks Avenue Suite 300
Pasadena, CA 91103
Phone (Toll Free): (800)807-3422
E-mail: info@synovationmedicalgroup.com
Website: www.synovationmedicalgroup.com