



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 as amended by the California Privacy Rights Act (collectively the “*CCPA*”). Nothing contained herein is intended to provide additional or different rights than those under the *CCPA*. This *Notice* was last updated on December 27, 2022.

Collecting and Retaining. A “*Consumer*” (pl. “*Consumers*”) is a natural person who is a California resident. A “*Household*” is a group of *Consumers* who cohabitate with one another at the same residential address and share use of common devices or services. *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 lawfully made available from government records; and (ii) deidentified or aggregate *Consumer* information. FURTHERMORE, *SMG* IS A HEALTHCARE PROVIDER; THEREFORE, THIS NOTICE AND THE RIGHTS DESCRIBED HEREIN DO NOT APPLY TO PERSONAL INFORMATION COLLECTED FROM A PATIENT 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*”).

SMG collects *Personal Information* from the following categories of sources:

“*B2B*” (i.e., business-to-business) means the source is a person from whom *Personal Information* may be collected as part of a written or verbal communication or a transaction between *SMG* and a *Consumer*, where the communicating *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.

“*HR*” (i.e., human resources) means the source is a person who provides *Personal Information* (i) in the course of the person acting as a job applicant to, or an employee, owner, director, officer, medical staff member, or contractor of, *SMG* (an “*Employee*”); (ii) as emergency contact information for an *Employee*; and/or (iii) to retain or administer benefits for a *Consumer* relating to an *Employee*.

“*Web*” (i.e., website) means the source is a person who visits *SMG*’s website and from whom *Personal Information* may be collected as described in *SMG*’s website privacy policy, which generally involves the use of internet cookies, web beacons, and website e-mail functions.

In the preceding Twelve (12) months, **SMG** has collected the categories of **Personal Information** listed below from the corresponding categories of sources (if marked):

Category	Examples / Description	Source			Retention Period
		B2B	HR	Web	
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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	5 to 10-yr period(s)
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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	5 to 10-yr period(s)
Characteristics of Protected Classifications	Age (40 years or older), ancestry, citizenship, color, genetic information, marital status, leave requests, 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"/>	5 to 10-yr period(s)
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"/>	
Biometric Information	Fingerprint, face pattern, voice recordings, keystroke or gait patterns or rhythms, or sleep, health, or exercise data that contain identifying information	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5 to 10-yr period(s)
Internet or Other Electronic Network Activity	Browsing history, search history, and information regarding interaction with a website, application, or advertisement	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	5 to 10-yr period(s)
Geolocation Data	Information on physical location and movement	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	5 to 10-yr period(s)
Sensory Data	Audio, electronic, visual, thermal, olfactory, or similar data	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5 to 10-yr period(s)
Professional or Employment-Related Information	Job history or performance evaluations.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5 to 10-yr period(s)
Education Information	Non-publicly available personally identifiable information directly related to a student maintained by an educational institution	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5 to 10-yr period(s)
Inference Drawn from Personal Information	Used in “ Profiling ” (i.e., any form of automated processing to evaluate certain personal aspects relating to a Consumer and in particular to analyze or predict aspects concerning that Consumer’s performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location, or movement)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5 to 10-yr period(s)

Category—Sensitive Personal Information	Source			Retention Period
	B2B	HR	Web	
Personal Information that reveals social security number, driver license or identification card number, passport number	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5 to 10-yr period(s)
Personal Information that reveals account log-in, financial account, debit or credit card number (with required security or access code)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Personal Information that reveals precise geolocation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Personal Information that reveals racial or ethnic origin, religious or philosophical beliefs, union membership	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5 to 10-yr period(s)
Personal Information that reveals content of mail, email, or text message (and SMG is not the intended recipient)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Personal Information that reveals genetic data	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The processing of biometric information for the purpose of uniquely identifying a Consumer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Personal Information collected and analyzed concerning a Consumer's health	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5 to 10-yr period(s)
Personal Information collected and analyzed concerning a Consumer's sex life or sexual orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

SMG retains the following **Personal Information** for the corresponding period starting from the later of the date the **Employee's** relationship with **SMG** ended or the fulfillment of the purpose for which the **Personal Information** was collected; however, the retention period is subject to subsequent extensions, each of the same duration, (i) to comply with a legal obligation; (ii) to defend or prosecute a legal action; or (iii) when retention is allowed by, or exempt from, the **CCPA**:

Personal Information in E-mail Account Assigned to Executive or Professional Employee	10 years
Personal Information in E-mail Account Assigned to Other Employee	6 years
All Other Personal Information	5 years

Sharing and Selling. “**Share**” (pa. t. “**Shared**” prog. “**Sharing**”) means sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, **Personal Information** to a **Third-Party** for cross-context behavioral advertising, whether or not for monetary or other valuable consideration. “**Sell**” (pa. t. “**Sold**” prog. “**Selling**”) means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, **Personal Information** to another business or a **Third-Party** for monetary or other valuable consideration. A “**Third-Party**” (pl. “**Third-Parties**”) is a person who is neither **SMG** nor a person to whom **SMG** discloses **Personal Information** for a **Business Purpose** pursuant to a written contract that meets the **CCPA's** requirements for exclusion. “**Business Purpose**” is the use of **Personal Information** for operational purposes or other notified purposes, provided that the use of **Personal Information** shall be reasonably necessary and proportionate to achieve the operational purpose for which the **Personal**

Information was collected or processed or for another operational purpose that is compatible with the context in which the **Personal Information** was collected. **Business Purpose** is distinguishable from “**Commercial Purpose**,” which means to advance a person’s commercial or economic interest (ex. by inducing another person to buy, join, or exchange a product or service). **Personal Information** is not considered **Sold** when (i) the **Consumer** directs **SMG** to intentionally disclose **Personal Information** and/or interact with one or more **Third-Parties**; (ii) **SMG** uses or **Shares** an identifier for the **Consumer** who has opted out of the **Sale** of the **Personal Information** or limits the use of the **Consumer**’s sensitive personal information for the purposes of alerting persons that the **Consumer** has opted out of the **Sale** of the **Personal Information**; or (iii) **SMG** 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.

In the preceding Twelve (12) months, (i) **SMG** has neither **Sold** nor **Shared** any **Personal Information** and does not have actual knowledge that it has **Sold** or **Shared** the **Personal Information** of minors under Sixteen (16) years of age; but (ii) **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 checked="" type="checkbox"/>	Characteristics of Protected Classifications
<input type="checkbox"/>	Commercial Information
<input checked="" type="checkbox"/>	Biometric Information
<input checked="" type="checkbox"/>	Internet or Other Electronic Network Activity
<input checked="" type="checkbox"/>	Geolocation Data
<input checked="" type="checkbox"/>	Sensory Data
<input checked="" type="checkbox"/>	Professional or Employment-Related Information
<input checked="" type="checkbox"/>	Education Information
<input checked="" type="checkbox"/>	Inference Drawn from Personal Information
<input checked="" type="checkbox"/>	Sensitive Personal Information
<input checked="" type="checkbox"/>	that reveals social security, driver license, identification card, or passport number
<input type="checkbox"/>	that reveals account log-in, financial account, or debit or credit card number in combination with any required security or access code, passcode, or credentials allowing access to an account
<input type="checkbox"/>	that reveals precise geolocation
<input checked="" type="checkbox"/>	that reveals racial or ethnic origin, religious or philosophical beliefs, union membership
<input type="checkbox"/>	that reveals content of mail, email, or text message (and SMG is not the intended recipient)
<input type="checkbox"/>	that reveals genetic data
<input type="checkbox"/>	that is biometric information for the purpose of uniquely identifying a Consumer
<input checked="" type="checkbox"/>	collected and analyzed concerning a Consumer ’s health
<input type="checkbox"/>	collected and analyzed concerning a Consumer ’s sex life or sexual orientation

Recipients. *SMG* may disclose *Personal Information* to another business or a *Third-Party* for a *Business Purpose* and/or *Commercial Purpose*. When *SMG* discloses *Personal Information*, *SMG* generally requires the recipient to keep the *Personal Information* confidential. *SMG* discloses *Personal Information* to the following categories of 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. Insurers and payors;
- vi. Patients;
- vii. Visitors to *SMG*'s website;
- viii. Professional advisers (ex. lawyers and accountants);
- ix. Benefit administrators;
- x. Vendors and other service providers; and
- xi. Regulators, surveyors, and other authorities who ensure *SMG*'s compliance with applicable laws.

Use. *SMG* collects, uses, and discloses *Personal Information* for one or more of the following *Business Purpose* and/or *Commercial Purpose*:

- i. To fulfill or meet the reason for which the *Personal Information* was provided or as described to the individual/*Consumer* when the *Personal Information* was collected;
- ii. To recruit personnel;
- iii. To conduct job-related screenings and checks;
- iv. To ensure workplace safety;
- v. To monitor employment eligibility and work-related credentials;
- vi. To conduct payroll management and benefits administration;
- vii. To conduct performance-related reviews;
- viii. To provide services and sell products;
- ix. To conduct research and educational programs;
- x. To provide information on products, services, programs, and benefits;
- xi. To manage *SMG*'s relationship with the individual/*Consumer*;
- xii. To create, customize, maintain, and secure a *Consumer*'s account with *SMG*;
- xiii. To respond to inquiries, investigate and address concerns, and improve *SMG*'s responses;
- xiv. To improve and secure *SMG*'s website and present its contents to visitors and guests;
- xv. To respond to law enforcement requests;
- xvi. To comply with by applicable law, regulation, court order, or legal process;
- xvii. To exercise or defend legal claims; and
- xviii. To evaluate or conduct a merger, reorganization, dissolution, or asset acquisition in which *Personal Information* held by *SMG* may be among the assets transferred.

Consumer Rights.

- i. **Right to Know.** A *Consumer* has the right to request that *SMG* disclose information about *SMG*'s collection, use, disclosure, and *Sale* of the *Consumer*'s *Personal Information*. 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 Purpose* or *Commercial Purpose* for collecting, *Selling*, or *Sharing* 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*.
- ii. **Right to Request Correction.** A *Consumer* has the right to request that *SMG* correct inaccurate *Personal Information* about the *Consumer* maintained by *SMG*. Once *SMG* receives and confirms a verifiable *Consumer* request, *SMG* will use commercially reasonable efforts to correct the inaccurate *Personal Information* pursuant to (and in accordance with) applicable law.
- iii. **Right to Request Deletion.** A *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, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, 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 that conforms or adheres to all other applicable ethics and privacy laws, when *SMG*'s deletion of the *Personal 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.
- iv. **Sale or Sharing Opt In/Out Rights.** *SMG* does not *Sell Personal Information* and does not engage in cross-context behavioral advertising. *Consumers* who are Sixteen (16) years of age or older have the right, at any time, to direct *SMG* not to *Sell* or *Share* (to *Third-Parties*) their *Personal Information*. *SMG* will neither *Sell* nor *Share* (to *Third-Parties*) the *Personal Information* of a *Consumer* *SMG* actually knows is less than Sixteen (16) years of age unless *SMG* receives affirmative authorization from either the *Consumer* if the *Consumer* is at least Thirteen (13) years of age and less than Sixteen (16) years of age or the parent or guardian if the *Consumer* is less than Thirteen (13) years of age. *Consumers* who opt in to a *Sale* or *Sharing* of *Personal Information* may opt out of future *Sales* or *Sharing* at any time. *SMG* will wait at least Twelve (12) months from the opt out request before asking the *Consumer* to reauthorize the *Sale* or *Sharing* (to *Third-Parties*) 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* or *Shared* about the *Consumer*; (b) the categories of *Third-Parties* to whom the *Personal Information* was *Sold* or *Shared*, by category or categories of *Personal Information* for each category of *Third-Party* to whom the *Personal Information* was *Sold* or *Shared*; and (c) the categories of *Personal Information* that *SMG* disclosed about the *Consumer* for a *Business Purpose* and the categories of persons to whom it was disclosed for a *Business Purpose*.
- v. **Right to Limit Use and Disclosure of Sensitive Personal Information.** A *Consumer* has the right, at any time, to direct *SMG* to limit the use of the *Consumer's* sensitive personal information to that use which is necessary to perform the services or provide the goods reasonably expected by an average *Consumer* who requests those goods or services and to perform services permitted or authorized by applicable law or regulation. Sensitive personal information that is collected or processed without the purpose of inferring characteristics about a *Consumer* is not subject to the foregoing and shall be treated as *Personal Information* for all other purposes.

Exercise of Rights and Choices. To exercise the rights described in this *Notice*, a *Consumer* must 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* or *Sharing* (to *Third-Parties*). However, a request can be

made only by a **Consumer**, a **Consumer** on behalf of the **Consumer**'s minor child, a natural person or a person registered with the Secretary of State and authorized by the **Consumer** to act on the **Consumer**'s behalf, or a person who has power of attorney or is acting as a conservator for the **Consumer**. 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** (ex. 2 or more identifiers and/or a copy of the **Consumer**-signed authorization or power of attorney); 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**. For requests to know, (i) **SMG** is not obligated by the **CCPA** to provide information to the same **Consumer** more than twice in a 12-month period; and (ii) **SMG** is not required to search for **Personal Information** if (a) **SMG** does not maintain the **Personal Information** in a searchable or reasonably accessible format; (b) **SMG** maintains the **Personal Information** solely for legal or compliance purposes; (c) **SMG** does not **Sell** the **Personal Information** and does not use it for any **Commercial Purpose**; and (iv) **SMG** describes to the **Consumer** the categories of records that may contain **Personal Information** that it did not search because it meets the foregoing conditions. If **SMG** denies a verifiable **Consumer** request because of a conflict with federal or state law or of an exception to the **CCPA**, **SMG** shall inform the requestor and explain the basis for the denial unless prohibited from doing so by law.

Request Processing. **SMG** will use reasonable efforts to confirm receipt of a request within Ten (10) business days and to respond to a verifiable **Consumer** request within Forty-Five (45) calendar 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 Forty-Five (45) calendar days—in writing. 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 or retaliatory 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*, or would like a copy of *SMG*'s privacy policy, 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

Website Privacy Policy: <https://www.synovationmedicalgroup.com/privacy-policy/>

HIPAA Notice of Privacy Practices: <https://www.synovationmedicalgroup.com/notice-of-privacy-practices/>