

# PRIVACY NOTICE TO CALIFORNIA PERSONNEL REGARDING THE COLLECTION OF PERSONAL INFORMATION

Effective Date: 1/21/2025

Bay Medical Management, LLC, Bay Imaging Consultants Medical Group, Inc., and its operating groups, subsidiaries and affiliates, (the “Company” or “we”) are committed to protecting the privacy and security of personal information of our current and former employees (“Employees”) and contractors, job applicants, interns, agency workers, consultants, and others whose personal information we collect in connection with providing employment or services (together referred to as “Personnel”). For clarity, this policy refers to "Personnel" but does not imply any individual’s specific employment status with the Company.

This Privacy Notice is provided in compliance with the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA). It contains a comprehensive description of our practices regarding the collection, use, sharing, and retention of personal information, as well as your rights regarding this information.

This Privacy Notice applies only to individuals residing in the State of California who are considered Personnel from whom we collect “Personal Information” (as defined in the CCPA). When we refer to Personnel, we mean you to the extent you are a California Employee, contractor, job applicant, intern, agency worker, or consultant.

We are committed to protecting your privacy and maintaining transparency in how we handle personal information. From time to time, this Privacy Notice may be updated to reflect changes in our practices or applicable law. Any updates will be made available on our intranet or by contacting Human Resources at [humanresources@bmmi.net](mailto:humanresources@bmmi.net).

## WHAT CATEGORIES OF PERSONNEL INFORMATION DO WE COLLECT AND HOW DO WE USE THIS INFORMATION?

We collect the following categories of personal information for the purposes described below:

Category of Personal Data	Personal Information Collected	Purpose
Personal identifiers	Examples: <ul style="list-style-type: none"><li>– Real name</li><li>– Preferred name</li><li>– Postal address</li><li>– Email address</li></ul>	The Company collects personal identifiers to onboard Personnel; enroll and administer benefits; enter into contracts; and use

	<ul style="list-style-type: none"> <li>- Unique personal or online identifier</li> <li>- Internet Protocol address</li> <li>- Social Security number</li> <li>- Passport number, driver's license or state identification card number</li> <li>- Age or date of birth</li> <li>- Other similar identifiers</li> </ul>	for general human resource purposes.
Records identified by state law (including the California Customer Records statute (Cal. Civ. Code § 1798.80(e)))	<p>Examples:</p> <ul style="list-style-type: none"> <li>- Name</li> <li>- Signature</li> <li>- Social Security number</li> <li>- Address</li> <li>- Telephone number</li> <li>- Passport number, driver's license or state identification card number</li> <li>- Insurance policy number</li> <li>- Education</li> <li>- Employment history</li> <li>- Bank account number</li> <li>- Credit card information or any other financial information</li> <li>- Medical information or health insurance information</li> </ul>	The Company collects this information to process job applications; onboard Personnel; enroll and administer benefits; enter into contracts; and use for general human resource purposes. The Company collects pay information – such as pay rate, payroll deduction information banking information for direct deposit, and credit card information for expense reimbursement – to pay its Personnel and comply with applicable laws.
Protected classification characteristics under state or federal law	<p>Examples:</p> <ul style="list-style-type: none"> <li>- Race</li> <li>- Religious creed</li> <li>- National origin</li> <li>- Ancestry</li> <li>- Physical or mental disability</li> <li>- Medical condition</li> <li>- Marital status</li> <li>- Sex, gender, gender identity, or gender expression</li> <li>- Age</li> <li>- Sexual orientation</li> <li>- Military and veteran status</li> </ul>	The Company collects equality and diversity information, such as minority, veteran, and disability status, through voluntary self-disclosure and other means to comply with applicable laws. The Company collects health and safety information to maintain a safe workplace; assess your working capacity; administer health and Workers' Compensation insurance programs; and comply with applicable laws. The Company also collects

		information necessary for benefits enrollment and administration purposes.
Commercial information	<p>Examples:</p> <ul style="list-style-type: none"> <li>– Records of personal property, products or services purchased, obtained, or considered</li> <li>– Other purchasing or consuming histories or tendencies</li> </ul>	If you are a contractor, we may collect commercial information from or about you in connection with obtaining services from you.
Internet or other similar network activity information	<p>Examples:</p> <ul style="list-style-type: none"> <li>– Email, computer, internet, telephone, and mobile device usage</li> <li>– IP address, log-in information, and location information</li> <li>– Browsing history, search history, or information regarding your interaction with a website, application or advertisement</li> </ul>	The Company collects this information to protect Company, customer, and Personnel property, equipment, and confidential information; monitor Personnel performance; and enforce the Company's electronic communications acceptable use policies.
Sensory data	<ul style="list-style-type: none"> <li>– Audio and visual information</li> </ul>	The Company may collect audio and visual information of Personnel through photographs used for identification purposes and to promote the Company. The Company collects audio and video recordings of training sessions.
Professional or employment-related information	<ul style="list-style-type: none"> <li>– Performance management information, such as employment status (full-time or part-time, regular or temporary), work schedule, job assignments, hours worked, accomplishments and awards</li> <li>– Training and development information</li> <li>– Performance evaluation</li> </ul>	The Company collects professional and employment-related information to manage its relationship with Personnel.

	<p>information</p> <ul style="list-style-type: none"> <li>- Discipline and counselling information</li> <li>- Employment termination information</li> </ul>	
Personal Data about children under the age of 16	Personal information about Employees' dependents under the age of 16.	The Company collects information about Employees' dependents under the age of 16 if Employees voluntarily provide such information in connection with the enrollment and administration of benefits and other human resource purposes that involve such dependents.
Legal and Contractual Information	Information necessary to: respond to law enforcement and governmental agency requests; comply with legal and contractual obligations; exercise legal and contractual rights; and initiate or respond to legal claims	The Company collects this information to comply with legal and contractual requirements and to establish, exercise, and defend legal and contractual rights and claims.
Emergency Contact Information	<ul style="list-style-type: none"> <li>- Name and contact information</li> <li>- Relationship to Employee</li> </ul>	The Company collects this information to contact the Employee's designated emergency contact persons in the event of an emergency.
Beneficiary Information	<ul style="list-style-type: none"> <li>- Name and contact information</li> <li>- Relationship to the Employee</li> <li>- Birth date</li> <li>- Social Security Number</li> <li>- Information necessary to process benefits claims</li> </ul>	The Company collects this information to enroll and administer benefits programs for beneficiaries of Employees.

**SOURCES OF PERSONAL INFORMATION**

We collect personal information directly from you. We may also combine personal information collected from other sources with the personal information you provide to us. For example, we may collect information from:

- Recruiters
- Prior employers (e.g., for references)
- Professional references you provide to us
- Educational institutions
- Pre-employment screening services
- Credentialing and licensing organizations
- Publicly available sources such as your social media profile (e.g., LinkedIn, Twitter and Facebook)
- Third parties as necessary for providing you with benefits and ancillary services
- Other sources as directed by you

## **DISCLOSURE OF PERSONAL INFORMATION**

We may share your personal information as necessary for the purposes described in this Privacy Notice. For example, we share your personal information with the following parties:

- **Affiliates:** We may share your personal information with our affiliates.
- **Service Providers:** We use service providers to operate, host, and facilitate our operations and business (including human resources operations). These include hosting, technology, and communication providers; security and fraud prevention consultants; analytics providers; insurance carriers and brokers (for benefits administration, claims processing, and risk management); background and reference check screening services; and hiring process and benefits management and administration tools.
- **Government authorities and law enforcement:** In certain situations, we may be required to disclose Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- **Business transfers:** Your personal information may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part).
- **Professional advisors:** We may share your personal information with our professional advisors.
- **Other:** We may also share your personal information with third parties for purposes of fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities; protecting the rights, property or safety of you, us or another party; enforcing any agreements with you; responding to claims; and resolving disputes.

## **RETENTION OF PERSONAL INFORMATION**

We retain your personal information for as long as necessary to fulfill the purposes for which it was collected. This includes meeting any legal, accounting, contractual, or reporting requirements. For more information on our data retention policies, please contact Human Resources at [humanresources@bmmi.net](mailto:humanresources@bmmi.net).

## MONITORING AND USE OF RESOURCES

The Company reserves the right to monitor your use of its offices, networks, computers, and other resources in accordance with company policies. For more details, please refer to our Employee Handbook.

## YOUR RIGHTS UNDER CCPA AND CPRA

As a California resident, you have the following rights regarding your personal information:

- **Right to Know:** You have the right to request information about the categories and specific pieces of personal information we have collected about you, the sources of this information, the purposes for collection, and the third parties with whom we share it.
- **Right to Delete:** You can request that we delete personal information we have collected from you, subject to certain exceptions.
- **Right to Correct:** You may request corrections to any inaccurate personal information we maintain about you.
- **Right to Limit Use and Disclosure of Sensitive Personal Information:** If applicable, you may request that we limit the use of your sensitive personal information to the purposes allowed by the CCPA and CPRA.
- **Non-Discrimination:** You have the right not to be discriminated against for exercising any of your privacy rights.

## CONTACT FOR QUESTIONS

If you have any questions or concerns regarding this Privacy Notice or the collection of your personal information, please contact: Human Resources at [humanresources@bmmi.net](mailto:humanresources@bmmi.net).

Personnel with disabilities may access this notice in an alternative format by contacting Human Resources at [humanresources@bmmi.net](mailto:humanresources@bmmi.net).