



Title:	Employee and Applicant Privacy Notice		
Effective Date:	5/13/2025	Original Effective Date:	5/13/2025

Purpose

This Employee and Applicant Privacy Notice (“Privacy Notice”) describes the types of information that any entity affiliated with the Sevita brand (“Sevita”, “we”, “us”, “our”, or “the Company”) collects from job applicants and employees (“you”), including when you access our careers websites, e.g., <https://jobs.sevitahealth.com/us/en> or any other website where this Privacy Notice is posted (“Websites”), and how we may use and disclose that information.

Scope

This Privacy Notice applies to any Company employee as well as applicant to open positions at the Company. Nothing in this Privacy Notice is intended to create an employment contract between you and the Company. Provisions of this Privacy Notice dealing with individuals employed with the Company are not applicable until you begin working for us.

This Privacy Notice does not apply to your use of the Company’s services as a consumer, which is instead governed by our Notice of Privacy Practices, available upon request made to your program contact or through the contact information listed below. When appropriate, we may provide additional notice at the point of collection with respect to any additional processing activities not mentioned in this document.

If you are an applicant or employee that resides in California, please see the section below titled “Supplemental Privacy Notice to Residents of California” for California-specific information.

Categories of Personal Information We Collect

We receive information about you that identifies you or has the potential to identify you as an individual natural person (“Personal Information”) throughout the job application process, and if applicable, throughout the time you are employed to work with the Company. This information is provided in both electronic and hard copy form and may come directly from you, indirectly from you via automated technologies, or from external parties (including publicly available sources). Personal Information includes information that identifies you, relates to you or is reasonably capable of being associated with you.

Although providing us Personal Information may be optional in some instances, certain Personal Information is required during the application process and during the scope of your employment. If we are not able to collect and use certain Personal Information, we may not be able to work with you.

The specific categories of Personal Information we collect from you will vary depending on our relationship with you. However, we may collect the following categories of Personal Information during the application process (including when you inquire about open positions) or during the course of your employment at the Company and for as long as the Company has a business need or is legally required to maintain/use such information:

- **Identifiers.** Your real name, alias, physical address, email address, phone number, IP address, unique personal identifier, Social Security number, employee ID number, driver's license number, passport number, government issued identification number, Employment Authorization Document card number, visa number, emergency contact(s), or other identifiers.
- **Characteristics and Demographic Information.** Information regarding your race, age (40 years or older), color, ancestry, national origin, citizenship, religion or creed, marital status, medical conditions, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran status, military service, household composition, genetic information (including familial genetic information) or other similar information.
- **Biometric Information.** We may collect certain biometric information such as such as genetic, physiological, behavioral, biologic characteristics, fingerprints, faceprints and voiceprints of employees for identification and time capture at certain locations.
- **Sensory Data.** We may collect audio, electronic, visual, thermal, olfactory or similar information, call monitoring, and other sensory information, such as audio and video recordings and video surveillance.
- **Internet or other Electronic Information.** We may collect certain information from you automatically through cookies, web beacons, pixel tags and other online tracking mechanisms, including browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement.
- **Professional and Employment Related Information.** Information regarding your employment history and current and previous work experience, licenses or certifications and information regarding military service. We also collect time and attendance information and information in support of eligibility for employment, as well as job title, position, office location, department, employment agreement, start and end date, attendance at work, working time records, absence records, holiday dates, sick leave, or any other absence, appraisals, performance reviews, disciplinary and grievance procedures, training needs and training received, career plans, reported wrongdoings, information collected in workplace investigation processes in which you are the alleged wrongdoer or where you are the reporter or are interviewed as a witness, measures to address such concerns, travel arrangements, travel or other business expenditures for which you have filed expenses, hobbies, social preferences, answers to feedback surveys.
- **Education information.** 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, student disciplinary records, schools attended, professional licenses, and or certifications.
- **Sensitive Personal Information.**
 - **Identifiers.** Social Security number, driver's license number or state identification card number, passport number, Employment Authorization Document card number, visa number, government issued identification number.
 - **Financial information.** Banking information for direct deposit purposes (including bank account number), account login, credit card number, debit card number in combination with any required security or access code, password, or credentials allowing access to an

account, financial information, income history and income information and benefits information as well as information regarding your beneficiaries, tax information, or payroll information.

- **Characteristics.** Racial, ethnic, national origin information, citizenship or immigration information, or religious or philosophical beliefs.
- **Messages.** Content of mail, email and texts to or from Company employees or using Company assets or networks unless the business is the intended recipient of the communication.
- **Geolocation Data.** Precise geolocation data, including any data that is derived from a device and that is used or intended to be used to locate a consumer within a geographic area that is equal to or less than the area that is equal to or less than the area of a circle with a radius of 1,850 feet, except as prescribed by regulations.
- **Biometric Information.** We may process certain biometric information for the purpose of uniquely identifying a Company employee.
- **Health Information.** Medical information, health information, any workers' compensation claims, disability claims, leaves, or workplace accommodations. We may also receive information about short-term and long-term sickness or disabilities, health assessments, and reports from medical professionals. Information for genetic data, unique biometric information used for identification, sex life or sexual orientation.
- **Commercial Information.** Records of personal property.
- **Inferences drawn from other personal information.** Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

If you are offered and accept employment with the Company, the information collected during the application and recruitment process will become part of your employment record.

Personal Information does not include publicly available information from government records, lawfully obtained, truthful information that is a matter of public concern, information that a business has a reasonable basis to believe is lawfully made available to the general public by the employee or from widely distributed media, information made available by the employee or a person to whom the employee has disclosed the information if the employee has not restricted the information to a specific audience, de-identified or aggregated information, or other information specifically exempted by California law (such as health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and other sector-specific privacy laws (including the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act, the California Financial Information Privacy Act, and the Driver's Privacy Protection Act of 1994).

Sources from Which We Collect Personal Information

We collect Personal Information when you provide it to us directly, including through use of our chatbot and through other communication channels such as telephone, email, text, applications, or in person. We also generate Personal Information about you as part of our relationship with you.

Subject to applicable law, we may collect Personal Information about you from others, such as:

- **Third-Party Sources.** Examples of third-party sources include employment screening agencies, background check agencies, recruiting agencies, service providers, former employers and/or

schools and educational institutions, publicly available information on websites or social media (e.g., when applying through LinkedIn, where relevant for recruitment purposes and allowed by applicable law), and others where they are legally allowed to disclose your Personal Information to us. For example, if you register to be contacted by prospective employers on another website, that website may provide your Personal Information to us.

- **Information Automatically Collected.** We collect information from you automatically when you use our Websites. This information may not identify you directly. For example, we may collect IP address, browser, or operating system information, and referring website. Our Websites may use cookies, which are small text files stored on your computer that help us to maintain your session or provide other interactive features. You can turn off cookies through your browser. However, turning off cookies may limit some functionality of the site, such as changing the layout of your personalized content. The site may also use web beacons, which allow us to know if you visited a certain page. Additionally, we collect information from you when you use Company equipment, systems, and applications. Please see our Privacy Policy to learn more about our use of cookies and online tracking technologies, located at <https://sevitahhealth.com/privacy-policy/>.
- **Individuals Who Refer You.** Other individuals may give us your Personal Information. For example, if a friend thinks you may be interested in a job at the Company, they may give us your contact details and resume.
- **Combining Personal Information from Different Sources.** We may combine the Personal Information we receive from various sources with the Personal Information we collect from you and use it as described in this Notice.

Purposes for Which We Collect Personal Information

We use the Personal Information we collect from you as a job applicant or as an employee for the following purposes:

- **Recruiting.** We may use Personal Information to communicate with you regarding the recruiting process, to learn where you heard about the Company, and to evaluate and improve our recruiting process.
- **To Manage the Application Process.** We may use your Personal Information to process your job application, to verify the information (including qualifications for the position) you have provided in your application, check if you have a legal right to work for us, to communicate with you regarding your application, to answer your questions regarding the application process and to confirm your eligibility for a position. Eligibility for the position includes verification of your identity for work authorization in compliance with all federal, state and local laws. We may also save your information for future job openings within the Company for a reasonable amount of time consistent with applicable state law and our document retention policies.
- **To Manage the Hiring Process.** We may use your Personal Information in the hiring process to conduct interviews and determine whether to employ (or engage) you. We may also use your Personal Information to perform background and reference checks, with your consent, if you are offered a position.
- **To Communicate with You.** We may use your Personal Information to provide information to you, to respond to your questions, to notify you of changes to your compensation and benefits

program or to notify you of emergencies. To Manage the Onboarding Process. Upon being hired by the Company, we will collect Personal Information when you complete new hire paperwork to assist us in administering salary and benefits and to assist us with complying with governmental and legal requirements.

- **To Administer Compensation and Benefits Programs.** We will use the Personal Information you provide to process payroll, pay taxes, help employees address employment related tax issues, administer benefits and handle work-related expense reimbursement. We may also use this Personal Information to manage requests for accommodations and to evaluate the appropriate reasonable accommodations. We also use this to administer employee claims such as workers' compensation, leave, or unemployment benefits.
- **For Performance Management.** We collect Personal Information in order to assess your performance, assist in career development, track work hours, conduct pay and grading reviews, and to handle any employment related disputes. We may also use Personal Information to respond to violations of internal policies and to gather information for disciplinary actions. We use Personal Information for purposes of the internal performance improvement and disciplinary process and to respond to complaints.
- **Monitoring.** We may monitor any activity you perform online while using a Company device and activity while connected to the Company's internet may be tracked by the Company, such as monitoring the Websites you visit and your activity on those Websites. This includes social media websites or applications and databases. We may also track the emails you send using your Company-provided email address, the phone calls and other communications you send and receive using or to a Company-provided device, and the chat messages you are involved in using through Company-provided instant messaging program(s) or through other applications that enable chat functionality, including virtual meeting platforms.
- **Education and Professional Services.** We may use your Personal Information to assist with education, training and professional development.
- **To Conduct Workplace Investigations.** We may use your Personal Information to facilitate or conduct a fair and thorough examination of actual or potential issues raised and any potential risk to the Company and or employee(s) of its entities. We may use investigations outcomes to further mitigate risk and prepare and track analysis of report trends. All Company employees who access Personal Information related to a workplace investigation are required to keep and treat the information as confidential, to the extent possible.
- **To Respond to Law Enforcement and Court-Related Matters.** We may disclose your Personal Information in response to a subpoena, a search warrant, or other legally valid process as required by applicable law, court order, or governmental regulations. We may use your Personal Information to cooperate with law enforcement or other government entities if you are suspected of having violated applicable laws.
- **To Respond to Legal and Regulatory Requests.** We comply with lawful requests by public authorities (e.g., a court or government agency), including to meet employment, immigration, health and safety, taxation rules and other laws and regulations to which the Company is subject to.
- **Fraud.** We use Personal Information to prevent and detect fraud or other criminal offenses.
- **Record Keeping.** We use Personal Information to comply with applicable legally required or industry standard business and employment record keeping requirements and to respond to governmental requests for information.
- **Health and Safety.** We use Personal Information to protect your health and safety, or the health and safety of others, including through the use of technology to allow contact tracing if you may

have exposed to communicable diseases, such as COVID-19. We may also use this information to respond to an employee- or consumer-related emergency.

- **Protect Our Legal Rights.** We may use your Personal Information to protect our legal rights, to defend a claim or lawsuit, and to investigate or prevent actual or suspected loss or harm to persons or property. We may use your Personal Information to seek legal, accounting, or other professional advice when necessary to identify, contact or bring a legal action against someone who may cause or be causing harm to, or interfering with the legal rights of, the Company or any other party.
- **Security.** We may use your Personal Information to monitor the use of our information systems and electronic resources, to conduct internal audits and investigations and for safety and security of Company employees, visitors and facilities. We may prevent unauthorized access to or use of Company property, including information systems, electronic devices, network and data. We also may use such information to protect the Company against illegal activity and misconduct such as fraud, deceptive practices and data security incidents. We use your Personal Information to offer, operate, maintain, deliver, troubleshoot and update our programs, network and systems used by the Company in the course of its business.
- **To Terminate Employment and Manage Post-Employment Relationship.** We manage voluntary and involuntary exit of employees from the Company (including resignations, termination of employment, and retirement) and administer any termination and post-termination matters.
- **Others.** As described to you when collecting Personal Information.

How We Disclose Your Personal Information

We disclose your Personal Information in the following circumstances:

- **Within the Company.** We may disclose your Personal Information internally within the Company for purposes of evaluating applicants, resource planning, and talent and recruiting, human resources, and other business administration functions. All Company employees who access or process applicant Personal Information are required to comply with the Company's confidentiality, privacy and security policies.
- **Service Providers.** We may disclose your Personal Information to third party service providers that help us provide and administer our talent and recruiting, human resources and other business functions. This includes, but is not limited to: payroll service providers, IT service providers, insurance providers, law firms, and training service providers. Any such third-party service providers may collect or access information about you only for the purposes of performing services specified in the applicable services contract with the Company, and we require these providers to undertake security measures to protect your Personal Information.
- **Advertising Partners.** We may disclose your information to third parties that assist in tailoring and serving advertisements that are relevant to you. We may also allow third-party advertising technologies (e.g., ad networks and ad servers) to use cookies and similar technologies on our Websites to deliver relevant and targeted content and advertising to you relating to our recruitment and employment opportunities on Websites you visit and applications you use.
- **Recruitment Agencies.** We may disclose your Personal Information to recruitment agencies to whom you provided your Personal Information or make your Personal Information publicly accessible to recruitment agencies.
- **Change in Ownership.** We may use and disclose Personal Information in connection with the evaluation of a change of control of the Company such as in the event of a merger, acquisition,

or sale of assets. We may provide Personal Information in connection with a due diligence process, or a transfer as part of the change of control to subsequent owner(s). If we (or our assets) are acquired or if we go out of business, enter bankruptcy, or go through some other change of control or reorganization, Personal Information and other information could be one of the assets transferred to or acquired by a third party, or reviewed as part of the due diligence process.

- **Response to Legal Requests.** We may disclose your Personal Information to third parties, including government officials or regulatory authorities, when we reasonably believe disclosure is required or permitted in order to comply with a subpoena, court order or other applicable law, regulation, or legal process.
- **Protection of the Company and Others.** We may disclose your Personal Information when we believe it is appropriate to protect the rights, property, or safety of the Company, our products or services, our customers, our applicants, employees or others.
- **Consent.** We may disclose your personal information in other ways if you have asked us to do so or have given consent.

Aggregate or De-Identified Information

We may aggregate and/or de-identify your Personal Information so that it does not identify you individually and disclose such aggregated and/or de-identified information internally within the Company or with certain third parties for purposes such as research, reporting and benchmarking.

Retention of your Personal Information

We retain Personal Information for as long as necessary to meet the purpose for which we collect it and to fulfill the purposes outlined in this Privacy Notice and as otherwise needed to address tax, corporate, compliance, litigation, and other legal rights and obligations. These purposes, rights, and obligations are the primary factors we use in determining how long to keep information.

Access and Manage Personal Information

For employees, you may access, review, update and correct certain Personal Information you provide to us through the online tools available to you. You can access these tools through the Company's human capital management platform. We will require proper credentials for you to be able to access your Personal Information.

If you have questions about this Privacy Notice, please contact:

E-mail: compliance.officer@sevitahealth.com

Toll-Free Telephone: 800-245-3860

Mail: Attn: Compliance Officer
6600 France Avenue South, Suite 350
Edina, MN 55435

Supplemental Privacy Notice for Residents of California

THIS SECTION PROVIDES ADDITIONAL PROVISIONS APPLICABLE ONLY TO RESIDENTS OF CALIFORNIA. If any information in this section conflicts with the main body of this Notice above, the information in this section shall control to the extent applicable to you.

Capitalized terms used in this section but that are not defined in this Notice have the meanings set forth in the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 and its implementing regulations (collectively, "CCPA").

Categories of Data Collected. In the past twelve (12) months, the Company has collected the Personal Information set forth in the "Categories of Personal Information We Collect" section above.

Sources of Data Collected. The categories of third parties from whom we may collect Personal Information is described in the "Sources from Which We Collect Personal Information" section above.

Categories of Personal Information Disclosed For a Business Purpose. In the last 12 months we may have disclosed all of the categories set forth in the "Categories of Personal Information We Collect" section for the business purposes detailed in the "How We Disclose Your Personal Information" above.

Categories of Personal Information Sold or Shared. In the past 12 months we have not sold or shared any Personal Information of any employee. In the past 12 months, we have not sold any Personal Information of any applicant for monetary compensation, however we have "sold" or "shared" the following categories of applicant Personal Information for cross-context behavioral advertising:

- Identifiers (i.e., IP address)
- Internet or other Electronic Information

We do not have any actual knowledge that we have sold or shared Personal Information of any consumer under the age of 16 for monetary or other compensation or for cross-contextual behavioral advertising.

Sensitive Personal Information. We have not used or disclosed Sensitive Personal Information for any reason other than the reasons for which it was provided to us and what is permitted by California law. We do not use Sensitive Personal Information to infer characteristics about individuals.

California Consumer Rights. You have specific rights regarding your Personal Information under California law. This section describes your CCPA rights and how to exercise those rights by submitting a request. Subject to certain limitations such as (a) exceptions permitted by applicable law and (b) verification of your identity, as a California resident, you may exercise the following rights with regard to your Personal Information:

Right to Request Access. You have the right to request access to, and receive a copy of, the specific pieces of Personal Information that we have collected in the last 12 months, and to have this delivered, either (a) by mail or (b) electronically in a portable format and, to the extent technically feasible, in a readily useable format.

Right to Request to Know. You have a right to request information about the Personal Information we have collected and used about you, including any of the following that occurred in the last 12 months:

- the categories of Personal Information we collected from you (including Sensitive Personal Information if applicable),
- the categories of sources from which the Personal Information was collected,
- the business or commercial purpose for collecting, Selling or Sharing your Personal Information,
- the categories of third parties with whom we disclosed, Sold or Shared your Personal Information,
- the specific pieces of Personal Information we collected from you, and
- a list of categories of Personal Information we Sold, Shared or disclosed for a Business Purpose.

Once we receive a verifiable request we will be able to disclose the aforementioned pieces of Personal Information to you.

Right to Request Deletion. You have the right to request that we delete any or all of your Personal Information we collected from you and about you, subject to certain statutory exceptions. We will comply with such verifiable requests, we will identify the Personal Information, confirm that you want that Personal Information deleted, and then delete such Personal Information and direct our service providers to do the same, subject to certain exceptions permitted by applicable law.

Sale or Sharing of Your Personal Information. Under the CCPA, California residents also have the right to request disclosure of the categories of Personal Information that businesses have sold or shared for cross-contextual behavioral advertising in the 12-month period prior to the request, if any, and the categories of third parties to whom they have sold or shared it.

You may request to opt-out of this “sale” or “sharing” by contacting us through one of the methods provided below in the section, How to Exercise Your Rights. We also respond to Global Privacy Control browser signals as opt-out of sale/sharing requests.

For additional information regarding how we use third-party advertising and marketing technologies to support our recruitment and application process, please see above section titled “Advertising Partners” as well as our Privacy Policy.

Right to Request Correction of Inaccurate Personal Information. You have the right to request that we correct inaccurate Personal Information that we maintain about you, and we will make commercially reasonable efforts to make any such corrections as required by applicable law.

Right to Limit Use and Disclosure of Sensitive Personal Information. You have the right to limit our use and disclosure of your Sensitive Personal Information to only uses that are necessary to perform the Services the Company provides to you. We do not use or disclose Sensitive Personal Information for any purpose other than the purpose for which it was collected, such as the use necessary for the performance of services and use to ensure security and integrity.

Right to Non-Discrimination. You have a right to not receive discriminatory treatment for exercising any of your rights under the CCPA. Should you wish to exercise any of your rights as detailed above, we will not discriminate against you by offering you different Services based solely upon your exercise of the above rights.

How to Exercise Your Rights. To exercise your rights described in this Notice, you, or your authorized agent, may submit your request to us by contacting us at any of the following:
E-mail: compliance.officer@sevitahealth.com

Toll-Free Telephone: 800-245-3860

Mail: Attn: Compliance Officer
6600 France Avenue South, Suite 350
Edina, MN 55435

You must provide sufficient information to allow us to reasonably verify you are the person about whom we collected Personal Information, and you must describe your request with sufficient detail to allow us to properly understand, evaluate, and respond to your request. You may only make a request twice within a twelve (12) month period.

When we receive your rights request (i) we will acknowledge receipt of your request; (ii) we will try to match the information you provide in making the request with information we already maintain about you; (iii) if required to verify your identity, we may ask you to provide additional information, which may include Personal Information; and (iv) we will consider various factors when determining how to verify your identity, such as the sensitivity and value of the data, the risk of harm, the likelihood of fraud, etc..

We will only use Personal Information we collect during the verification process for the purpose of verifying your identity. If we are unable to verify your identity as required by applicable laws and regulations, we will decline to comply with your request, and let you know why.

We may charge a fee to process or respond to your request if it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why and provide you with a cost estimate before completing your request.

You have a right to submit requests to exercise your rights using an authorized agent, in which case you must still verify your identity directly with us. We may deny a request from an authorized agent if we do not have legal documentation (such as power of attorney documentation) or written permission that they are authorized by you to act on your behalf. Furthermore, a parent or legal guardian may make a request on behalf of their child.

We endeavor to respond to verifiable requests within forty-five (45) days after receipt. If we require more time (up to 45 days) we will inform you of the reason and extension in writing. We will deliver our written response(s) by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding receipt of the verifiable request. If we deny (or cannot comply with) the request, we will explain why.

CALIFORNIA'S "DO-NOT-TRACK" REQUIREMENT. WE CURRENTLY DO NOT HONOR "DO NOT TRACK" REQUESTS.

Policy/Document Association

The MENTOR Network (TMN) is rebranding as Sevita. All TMN affiliated entities are included in Sevita referenced policies, as applicable.