

**COMPANY DATA PROTECTION AND DATA PRIVACY STATEMENT FOR
EMPLOYEES/JOB APPLICANTS/OFFICERS/DIRECTORS/OWNERS/MEDICAL STAFF
MEMBERS/CONTRACTORS**

This protection and data privacy statement (this *Statement*) has been developed by and is confidential to California Forensic Medical Group, Inc. and, its managers and owners (collectively, the *Company*). It is intended for internal use only and should not be circulated outside of the Company.

1. Data Protection and Data Privacy

During the course of its activities, the Company will collect and use personal information of current, past and prospective employees, job applicants, officers, directors, owners, medical staff members and contractors in their roles or former roles to the Company. The Company takes data protection and data privacy seriously and will treat this information in an appropriate and lawful manner. Data protection and data privacy protects a person's fundamental right to privacy, and every individual has rights with regard to how their personal information is collected and used.

In the State of California, the California Consumer Privacy Act (the **CCPA**) sets out how certain for-profit entities doing business in California may collect and process the personal data of California residents.

In applying for a job at the Company, or otherwise provided work or services for the Company, you may have provided certain information about yourself to the Company as part of the application, interview or onboarding process. This information is processed in accordance with the provisions of this Statement.

Upon your commencement of employment or performance of services, and thereafter, the Company will process personal data about you. The Company is a business that collects the personal information of current, past and prospective employees, job applicants, officers, directors, owners, medical staff members and contractors in their roles or former roles to the Company. As a business that collects the personal information of current, past and prospective employees, job applicants, officers, directors, owners, medical staff members and contractors in their roles or former roles to the Company, the Company has a responsibility to establish practices and policies for the proper handling of personal data.

This Statement informs you of how the Company will collect and use your personal data in relation to your employment with the Company. It should be read in conjunction with your offer letter, Employee Handbook, and related policies and procedures which the Company may put in place from time to time.

2. Personal Data

Personal data collected by the Company includes the following:

- personal and household information, including name; contact information; date and place of birth; personal public service number; gender; education; signature; physical characteristics or description; and other background; civil status; bank account details;

- and any other information that is capable of being associated with, or may reasonably be linked, directly or indirectly, with a particular consumer or household;
- information relating to your job, such as position/title; company identification number; contact information; reporting lines; working hours; wages, benefits, compensation, expense and payroll details; other terms of your employment; job performance and related evaluative information; details of any applicable disciplinary action or investigation by the Company; details of any grievance raised by you and any resulting proceedings; and
 - information provided to the Company by you, or about you, relating to you or members of your household and other dependents.

The contents of e-mail communications using company email accounts, insofar as the communications relate solely to the business activity of the Company, shall not be deemed to be the personal data of the senders or recipients. Where the contents of such communications relate to an employee or employees of the Company (for example, in relation to a human resource matter), the communications shall be the personal data of the employee or employees in question.

3. Purposes

The purposes for which the Company collect and/or use personal information include but is not limited to the following:

- meeting legal and regulatory obligations, such as in relation to taxes; health and safety obligations; employment protection legislation; equal opportunities monitoring; and immigration requirements;
- maintaining and improving effective employee administration and otherwise complying with its contractual obligations and management reporting requirements, including personnel administration, allocating work, and administration of employee benefits and salary, expenses, IT or communications equipment, entertainment and internal and external employee directories;
- training requirements and determining qualifications for specific assignments;
- facilitating employee performance reviews and monitoring compliance with contractual obligations, and policies and procedures that may be put in place by the Company from time to time;
- maintaining, improving, and monitoring security;
- storing, preparing and maintaining health records and any medical reports (to monitor sick leave, review sick pay, administer benefits and make decisions as to your ability to work, with or without a reasonable accommodation);
- gathering information required to carry out disciplinary and grievances hearings and internal investigations (including reports, which may be submitted anonymously, made through any whistle blowing procedure); and
- due diligence or transfer in the event of a potential sale or investment in part or all of the Company, its business, assets or any part thereof.

4. Monitoring

The Company may monitor or record your use of the Company's communication systems and equipment (including telephone, mobile phone, voicemail, e-mail, instant messenger, computer or other electronic systems). Any use by you of the Company's communication systems and equipment shall be regarded as work related, and, accordingly, there should not be any expectation of privacy when utilizing the Company's communication systems and equipment. Private communications should be conducted outside of working hours, away from the Company's premises and without using the Company's communication systems or equipment. CCTV cameras will also be in operation in the Company's office building for safety, security and where required to verify grievance or disciplinary matters.

5. Third Parties

The Company may disclose or transfer has disclosed or transferred, personal data to:

- third parties who provide a service to the Company, including auditors and outside professional advisers, IT or communications suppliers, medical practitioners, data security or storage providers, private health companies, pensions providers, facilities and catering companies and other benefits providers
- a public, legal or regulatory authority in the event that the Company is required to do so by applicable law, rule or regulation
- a third party where the Company is under a duty to disclose or share personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements, or to protect the rights, property or safety of the Company, its customers or others
- in the event that the Company sell or buy any business or assets, a prospective seller or buyer of such business or assets
- a third party where it is necessary to protect the vital interests of the data subject or another natural person

Where these third parties process your personal data on the Company's behalf, the Company shall be the business that discloses employees' personal information for a business purpose and such third parties shall be the Service Provider as defined under the CCPA. In some cases, such as third parties in connection with health insurance or pension, such third parties may need to process your data for their own independent legitimate purposes, and in such cases the third party shall also be a business that discloses employees' personal information for a business purpose in respect of this processing.

In addition, the Company may disclose your personal information to any group company, which includes its ultimate holding companies and their subsidiaries.

6. Information about Dependents

If you provide the Company with data about members of your family and/or other dependents, such as information related to health and other benefits that they may obtain through your employment, it is your responsibility to obtain the consent of these individuals for the processing of their data.

7. Legal Basis

The Company will conduct the processing described in this Statement on the basis that it is strictly necessary for the purposes of legitimate purposes outlined in this Statement. The processing shall comply with the principles of proportionality and subsidiarity. Where any new processing of employee data is proposed, it will be subjected to a proportionality test to consider whether all data are necessary, whether this processing outweighs the general privacy rights of employees, and what measures must be taken to ensure that the impact on employees is limited to the minimum necessary.

8. Retention

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9. Your Rights to Rectification, Access, Portability and Deletion of Data

Where you believe personal data is inaccurate or outdated, you may update your personal data by contacting Human Resources

Under the CCPA, you have a right to access a copy of your personal data by making a request to the Senior Director, Human Resources via email hrbpquestions@wellpath.us. Requests may also be made by phone at 858-283-8600.

The Company is required to delete personal data when it is no longer required for a legitimate purpose. The Company upholds your right to deletion without any need for you to make a formal request.

As required by law, the Company will provide information on action taken on these requests without undue delay and in any event within forty-five (45) days of receipt of the request, unless otherwise required sooner under applicable federal, state or local law. Unless other applicable federal, state or local law applies, that period may be extended by 45 days where necessary, taking into account the complexity and number of the requests. The Company will inform you of any such extension within forty-five (45) days of receipt of the request, together with the reasons for the delay.

10. Changes to this Statement

This Statement will be kept under review and may be changed from time to time to reflect any changes in the processing of employee personal data by the Company.

11. Comments or Questions

Comments or questions in relation to this Statement should be directed to the Chief Compliance Officer of Wellpath. The Chief Compliance Officer of Wellpath will take care to treat all such comments, suggestions and questions with appropriate discretion.

12. **Definitions**

Board of Directors means the Company's board of directors.

Chief Compliance Officer means Carla Wallace or her successor

Senior Director, Human Resources means Heather Hole or her successor.

Effective Date: March 23, 2020

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Chief Compliance Officer means Carla Wallace or her successor

Vice President, Human Resources means Javier Rincon or his successor.

Effective Date: March 23, 2020

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