California Notice at Collection: Business to Business (B2B)

Last updated: November 6, 2024

Para acceder a una versión de esta política en español, por favor hacer click aqui.

The California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively CPRA) gives California residents the right to know what categories of Personal Information we collect and the purposes for which we use that information. The CPRA has a broad definition of "consumer," which covers all California residents, including individuals acting as representatives of their employers. This Business to Business (B2B) notice ("Notice") addresses California-specific requirements and serves as our California notice at collection.

If you are a resident of California, this Notice, together with our Digital Privacy Policy (DPP) and Notice of Privacy Practices (NPP), may apply to you.

We may update this Notice from time to time. If we make material changes, we will revise the Last Updated date above, which will serve as ongoing notice of such changes. We encourage you to review this Notice regularly to stay informed about our information management practices and the choices available to you.

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Personal Information

Personal Information includes information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly with a particular consumer or household.

U.S. State Privacy Laws do not apply to health or medical information regulated by the Health Insurance Portability and Accountability Act of 1996 (HIPAA), and this Notice does not apply to such data, or other data types which are excluded under U.S. State Privacy Laws. However, other governing documents, such as a HIPAA Notice of Privacy Practices (NPP), may apply.

The services we provide to our clients are driven primarily by the collection of health data. We perform certain functions or activities that involve the use or disclosure of protected health information (PHI) and are considered a business associate, as defined by HIPAA, of our group health plan/self-funded customers. As such, the extent to which we collect and use PHI as a business associate subject to HIPAA makes us generally exempt from the scope and applicability of CPRA; however, we are still in scope for CPRA with respect to B2B data, such as Personal Information about individual representatives of employers.

Collection, Use, and Disclosure of Personal Information for Business Purposes

The following table provides appropriate details on the categories of Personal Information that we collect, and the purpose for collection, regarding B2B data:

Category and Sources of Personal Information (PI)	Representative Data Elements	Purpose for Collecting the PI	Categories of Parties to whom this type of PI is Provided or Disclosed for a Business Purpose
Contact Information We collect this type of information directly from you: • Such information may be retained following our record retention schedule.	Data elements in this category include: • Full name, nicknames, or previous names (such as maiden names) • Honorifics and titles, and preferred form of address • Mailing address • Email address • Telephone number, including mobile number	We use this type of information to identify you and communicate with you, including: • To personalize our communications and provide customer service • To respond to your inquiry • For our everyday business purposes	We disclose this information to contracted service providers, contractors, and third parties for everyday business purposes.

We may use or disclose the Personal Information that we collect for one or more of the following everyday business purposes:

- For identity and credential management, including identity verification, authentication, and system and technology administration.
- To protect the security and integrity of systems, networks, applications, and data, including detecting, analyzing, and resolving security threats and collaborating with cybersecurity centers, consortia, and law enforcement about imminent threats.
- For fraud detection and prevention.
- For legal and regulatory compliance, including all uses and disclosures of Personal Information required by law or reasonably needed for compliance with company policies and procedures, security and incident response programs, and intellectual property.
  protection programs, and corporate ethics and compliance hotlines, as well as for compliance with civil, criminal, judicial, or regulatory inquiries, investigations, subpoenas, or summons

- To exercise or defend the legal rights of the business and its employees, affiliates, customers, contractors, and agents.
- To comply with applicable laws.
- For corporate audit, analysis, and reporting.
- To make backup copies for business continuity and disaster recovery purposes.
- For corporate governance, including mergers, acquisitions, and divestitures.
- Marketing purposes include developing and providing promotional and advertising materials that may be useful, relevant, valuable, or otherwise of interest to you.

Other Details About Our Information Management Practices

We do not sell or share your Personal Information. We will only sell or share your Personal Information if we modify this Notice and take the additional steps required under applicable state law. We do not have actual knowledge that our business sells or shares the Personal Information of consumers under 16 years of age. We do not collect your Sensitive Personal Information.

Consumers Personal Data Rights

Residents of California have certain rights concerning the use and disclosure of Personal Information:

- **Right of Access | Right to Notice.** If you are a resident of California, you have the right to request that we disclose to you:
    - the categories of Personal Information we have collected about you, the specific pieces of Personal Information we have collected about you, the categories of sources from which the Personal Information is collected, the business purpose or commercial purpose for collecting, selling, or sharing (if applicable) Personal Information, the categories of third parties with whom we share Personal Information, and the categories of Personal Information we have disclosed about you for a business purpose.
    - a copy of the specific pieces of Personal Information we have collected and retained per the organization's record retention policy.
- **Right to Deletion**. If you are a resident of California, you have the right to request that we delete the Personal Information we collect from you. However, in certain situations, we are not required to delete your Personal Information, such as when the information is necessary to complete the transaction for which the Personal Information was collected, to provide a good or service requested by you, to comply with a legal obligation, to engage in research, to secure our websites or other online services, or to otherwise use your Personal Information internally in a lawful manner that is compatible with the context in which you provided the information.
- **Right to Correct Inaccurate Personal Information.** If you are a resident of California, you have the right to have us correct errors in the Personal Information we maintain about you.
- **Right to Appeal.** You may have the right to appeal our refusal to act on your request. Please enclose a copy of or otherwise specifically reference our decision on your data subject request

so that we may adequately address your appeal. We will respond to your appeal in accordance with applicable law.

- To exercise the rights described above, you or your authorized agent can call us at 833-777-5785 or visit Submit a Privacy Request. We will collect Personal Information about you, such as your name, phone number, physical address, and email address, so we can search this information against our systems to validate your identity.

Nondiscrimination

We do not discriminate against any resident because they exercised any U.S. State Privacy Law rights described above.

Notice of Financial Incentives

We do not offer financial incentives for collecting or selling Personal Information.

Contact Us

You can also direct any questions or concerns regarding your rights to us by calling the phone number listed above.