

JOB APPLICANT PRIVACY NOTICE

Last Updated: December 31, 2022

PLEASE READ THIS NOTICE CAREFULLY TO UNDERSTAND HOW WE TREAT YOUR PERSONAL INFORMATION AND WHAT CHOICES AND RIGHTS YOU HAVE IN THIS REGARD.

INTRODUCTION

Altera is committed to protecting the privacy and security of your personal information. We also believe in transparency, and this Policy explains how we treat your personal data when you apply for a job with us or one of our affiliates. Please read this Policy carefully to learn more about how we process personal information and what rights you may have under applicable law.

When does this Notice apply? This Notice describes our practices regarding the personal information we receive, collect, use, share, and otherwise process in connection with your application for employment and our hiring process. This Notice does not form part of any contract of employment. Our contact information is provided at the end of this Notice. We act as the “data controller” with respect to the information described in this Notice.

HOW WE PROCESS PERSONAL INFORMATION

What personal information do we collect? We collect and process the following personal information from you for the purposes described in the table below and in the “*Other HR Processing Activities*” section below. For residents of California, pursuant to the California Consumer Privacy Act, as amended (“CCPA”), we have identified the categories of personal information collected in addition to the purposes described below.

Category	Description
Contact Information	We collect and process your full name, address, telephone number, email address, and any other contact information that you choose to provide to us. We use Contact Information to communicate with you as an employee or potential employee. <i>CCPA Categories:</i> Identifiers; Categories Described in the Customer Records Statute; Geolocation Data
Education and Professional Experience Data	You may share your résumé or Curriculum Vitae (CV) with us, which may contain information regarding your educational history, work history, professional experience, competencies, certifications, and skills. We use Education and Professional Experience Data to assess and document your qualifications for the requirements of your role. <i>CCPA Categories:</i> Identifiers; Categories Described in the Customer Records Statute; Professional or Employment-related Information; Education Information
Background Check	During the assessment or on-boarding process or when otherwise permitted by law, we may collect information from you in the form of official documentation (such as your government-issued identification, passport, or other right to work evidence) and from third parties (references provided by you, former employers, and criminal background check agencies, to the fullest extent permitted by law). For example, when permitted under local law, we may ask you to provide an extract of your

	<p>criminal record. Background Check information may only be used by us for recruitment or human resources purposes for a limited period of time.</p> <p><i>CCPA Categories:</i> Identifiers; Categories Described in the Customer Records Statute; Geolocation Data; Audio, Electronic, Visual, thermal, or Similar Information; Professional or Employment-related Information; Education Information; Biometric Information; Sensitive Information</p>
Sensitive Information	<p>We may, with your specific consent, process certain “special categories” of sensitive personal information, such as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data, data concerning health or data concerning sex life or sexual orientation. This would include, for example, if you have a disability that affects your ability to work and information regarding accommodations you may need. We do this solely to determine if an accommodation is reasonable and appropriate and to make required accommodations/adjustments during your employment. We only collect and process the Special Information to carry out our obligations under employment law, for the performance of the employment relationship, or as applicable law otherwise permits. By clicking the box to sign this Notice, you consent to the uses of this Sensitive Information as set forth in this Notice.</p> <p><i>CCPA Categories:</i> Identifiers; Categories Described in the Customer Records Statute; Biometric Information; Inferences; Sensitive Information</p>
Travel and Educational Expenses Reimbursement	<p>When you seek reimbursement for hiring-related travel or education, we may ask you to complete a form to facilitate reimbursement of any travel expenses you incurred, in accordance with our reimbursement policies. This information may identify your location and other activities, including how much was spent, when, and why. We use Travel and Educational Expenses Reimbursement information to facilitate reimbursements and to prevent fraudulent payments.</p> <p><i>CCPA Categories:</i> Identifiers; Categories Described in the Customer Records Statute; Geolocation Data; Commercial Information</p>
Verification of Identity and Right to Work	<p>At various times, we may ask you to provide your full name, date of birth, residential address, government identification number, and a copy of your government-issue photo identification/passport. We use this information to confirm your identity and your entitlement to work in the applicable country.</p> <p><i>CCPA Categories:</i> Identifiers; Categories Described in the Customer Records Statute; Geolocation Data; Audio, Electronic, Visual, thermal, or Similar Information; Biometric Information; Sensitive Information</p>
<p><i>*Note:</i> The above list contains examples of personal and sensitive information we may have about you and it does not guarantee that we currently hold or have ever held this information about you.</p>	

Other HR Processing Activities. In addition to the specific processing activities described above, we may also process your personal information for the following Human Resources purposes:

- **Personnel and Human Resources Management.** This includes, for example, ordinary business practices related to the establishment, maintenance, and termination of relationships; personnel management and administration (including before, during, and after your employment with us); business management and planning; administering benefits; conducting performance reviews and disciplinary proceedings; processing employee work-related claims (for example, insurance and worker's compensation claims); and addressing labor relations issues.

- Operations Management. This includes, for example, the establishment, performance, and management of business activities of the company (such as maintaining internal networks and IT systems); operation, evaluation, and improvement of our recruiting system; accounting and auditing; obtaining or maintaining insurance coverage; managing risks; or obtaining professional advice.
- Security Management. This includes, for example, ensuring the security of our premises and information held by the company as well as the safety of our personnel; preventing fraud; and network and information security.
- Legal and Regulatory Compliance. This includes, for example, obtaining and releasing personal information as required by law (*e.g.*, tax, health and safety, anti-discrimination laws) or judicial authorization; maintaining records that can include personal information, such as government identifiers, information relating to sickness, maternity or parental leave, pension and retirement; and establishing, exercising, or defending legal claims, whether in court, administrative, or other proceedings.
- Anonymous Data. Under some circumstances we may anonymize your personal data so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.
- Consistent Purposes. We may also process the information described above for purposes that are consistent with, related to, and/or ancillary to the purposes and uses described in this Notice for which your personal information was provided to us.

How will we share/disclose your information? We may share each of the categories of personal information described above in the following contexts:

- Internally. Your information may be shared internally for human resources purposes. This includes members of our Human Resources teams, managers in relevant business areas, and IT staff (if access to the data is necessary for the performance of their roles).
- Affiliates. If you apply for a position with one of our parents, subsidiaries, or affiliates, Altera will share your information with that business. Altera's corporate Human Resources teams manage the hiring and on-boarding process.
- Attorneys and Advisors. We may disclose your information to our legal counsel and other advisors to obtain guidance, advice, and counsel related to your employment. We may also disclose your information to our legal counsel in the event of a complaint or litigation.
- Agents and Contractors. Your data will be shared with third party agents and contractors that supply services to us which require the processing of that personal information, such as recruiting and payroll services. You may also interact with individuals who are independent contractors of the company, and they will receive the information you share with them. We will only transfer your personal information where, when required by law, the agent or contractor has provided written assurances to us that it will protect any personal information disclosed to it in accordance with the provisions of this Notice.
- Legal Obligations and Rights. We may disclose your personal information in response to subpoenas, warrants, court orders, or other legal process, or to comply with relevant laws. We may also share your personal information in order to establish or exercise our legal rights; to defend against a legal claim; and to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property (such as by providing your health information to a doctor in a medical emergency), or a violation of employment policies or agreements.
- Acquisitions and Similar Transactions. We may disclose information in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our company assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding.

Lawful Basis of Processing. We process your personal information for the following purposes related to your employment:

- **To Carry Out Our Legitimate Interests.** Processing is necessary for the purposes of our pursuit of our legitimate interests in managing your employment or potential employment, in our ongoing assessment and verification of your suitability for working with us, and in keeping records of your employment. We also have a legitimate interest in processing data to deal with complaints, claims, and lawsuits made against us.
- **To Carry Out Our Legal Obligations and Perform a Contract.** Processing is necessary for our compliance with our legal obligations in the field of employment law, such as taking steps to enter an employment relationship with us, the performance of any employment relationship with us, and our performance of any employment agreement.
- **With Your Consent as provided in this Notice.** If we ask you to review and sign this Notice to obtain your express consent to the processing of your personal information for certain types of purposes identified in this Notice, and you do so, we will process your personal information in accordance with the Notice and your express consent, which you keep a right to withdraw at any point in time.

How do we collect this data? We collect information from you in a variety of ways, including directly from you (in writing, verbally, or electronically), in conversations, in reviews and evaluations, and through the use of office computer and telephony equipment. We may also collect information from third parties, including your former employers, credit reference agencies, background check providers, or publicly available resources (such as social media networks).

What if you do not provide personal data? You may object to our collection of data requested during your employment with us. However, if you do not provide the information, we may not be able to perform certain activities necessary to process your application for employment, maintain your employment, or comply with legal obligations.

California Residents. Because this notice supplements our Privacy Policy, please see our Privacy Policy at <https://www.alterahealth.com/privacy-policy/> for more information regarding our privacy practices pursuant to the California Consumer Privacy Act, as amended (“CCPA”). Please see the “*Your Rights and Choices*” section of this Notice below for your rights as a California resident. Requests to exercise your rights under the CCPA may be submitted and will be processed as described in our Privacy Policy.

OTHER IMPORTANT INFORMATION

International Data Transfer. We have operations in the United States, and personal information may be transferred to, stored, and processed in Canada, the United States, and other countries in which we or our affiliates, partners, service providers, or agents maintain facilities. By sending us personal information, you agree and consent to the processing of your personal information in locations such as the United States, which may not offer the levels of protection required in other countries. We rely on recognized legal bases to lawfully conduct cross-border/international transfers of personal information, such as express consent, when transfer is necessary for us to deliver services pursuant to an agreement, or when the transfer is subject to safeguards that assure the protection of the personal information.

How long do we store and use your information? We will retain your personal information as needed to fulfill the purposes for which it was collected, and this will depend on your employment status with us. We will retain and use your personal information as long as necessary to comply with our business requirements and legal obligations, to resolve disputes, to protect our assets, to provide our services, and to enforce our agreements. When we no longer have a purpose to retain your personal information, we will securely

destroy your personal information in accordance with applicable law and our policies. We take reasonable steps to delete the personal information we collect if you ask us to delete your information, unless we determine that doing so would violate our existing, legitimate legal, regulatory, dispute resolution, contractual, or similar obligations. For more information, please contact Human Resources via the contact information provided below.

How do we protect your information? We have put security measures in place to protect personal information from being accidentally lost, used, altered, or disclosed or accessed in an unauthorized manner and to detect fraudulent identify-verification activity, including when transmitting personal information in response to data subject requests. From time to time, we review our security procedures to consider appropriate new technologies and methods. However, no security system is perfect, and no data transmission is 100% secure. As a result, while we strive to protect personal data, we cannot guarantee or warrant the security of any information. We cannot guarantee that your data will remain secure in all circumstances. If a data breach compromises your personal information, we will notify you and any applicable regulator when we are required to do so by applicable law.

Your Rights and Choices. Depending on where you reside, you may have certain rights regarding your personal information. Please contact Human Resources if you wish to exercise or learn more about your rights under applicable law.

For individuals residing in the UK/EU/EEA:

- **Right of Access.** To the extent required by law, you have the right to receive confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and the following information: the purposes of the processing; the categories of personal data concerned; and the recipients or categories of recipient to whom the personal data have been or will be disclosed. We will provide a copy of your personal information in compliance with applicable law.
- **Right of Rectification.** Our goal is to keep your personal information accurate, current, and complete. Please contact Human Resources if you believe your information is not accurate or if it changes.
- **Right to Erasure.** In some cases, you have a legal right to request that we delete your personal information when (1) it is no longer necessary for the purposes for which it was collected, (2) consent has been withdrawn in certain instances, (3) you have objected to the processing in certain instances, (4) the personal information has been unlawfully processed, (5) the personal data have to be erased for compliance with a legal obligation; and (6) the personal data were collected in relation to the offer of information society services. However, the right is not absolute. When we delete personal information, it will be removed from our active servers and databases; but, it may remain in our archives when it is not practical or possible to delete it. We may also retain your personal information as needed to comply with our legal obligations, resolve disputes, or enforce any agreements.
- **Right to Restrict Processing.** You have the right to restrict the processing of your data when (1) the accuracy of the personal data is contested, for a period enabling the controller to verify the accuracy of the personal data; (2) the processing is unlawful and you oppose erasure and request a restriction instead; (3) we no longer need the personal data, but you need us to keep it for the establishment, exercise, or defense of legal claims; or (4) you have objected to us processing the personal information, pending resolution of the objection.
- **Right to Object.** In certain circumstances, you have the right to object to the processing of your personal information where the processing is necessary for performance of a task carried out in the public interest, for our legitimate interests, or for the legitimate interests of others. You also have the right to object where personal data are processed for direct marketing purposes or for scientific or historical research purposes or statistical purposes.

- **Right to Withdraw Consent.** If you have provided your consent to the collection, processing, and transfer of your personal information, you may have the right to fully or partially withdraw your consent. Once we have received notice that you have withdrawn your consent, in whole or in part, we will no longer process your information for the purpose(s) to which you originally consented and have since withdrawn unless there are compelling legitimate grounds for further processing that override your interests, rights, and freedoms or for the establishment, exercise, or defense of legal claims. To withdraw your consent, please contact Human Resources using the contact information provided below.
- **Right to Complain.** If you believe we have not processed your personal information in accordance with applicable law, we encourage you to contact us at alteradataprotectionofficer@alterahealth.com. You may also have the right to make a complaint to an applicable Supervisory Authority or seek a remedy through the courts. A list of Supervisory Authorities for residents of the EU or EEA is available at: https://edpb.europa.eu/about-edpb/board/members_en. If you need further assistance regarding your rights, please contact Human Resources using the contact information provided below, and we will consider your request in accordance with applicable law.

For individuals residing in California:

- **Right to Know.** You have the right to request: (1) the specific pieces of personal information we have collected about you; (2) the categories of personal information we have collected about you; (3) the categories of sources from which the personal information is collected; (4) the categories of personal information about you that we have sold or shared and the categories of third parties to whom the personal information was sold or shared; (5) the categories of personal information about you that we disclosed for a business purpose and the categories of third parties to whom the personal information was disclosed for a business purpose; (6) the business or commercial purpose for collecting, disclosing, selling, or sharing personal information; and (7) the categories of third parties to whom we disclose personal information. Our response will cover the 12-month period preceding our receipt of a verifiable request unless a longer period is requested by you.
- **Right to Delete.** You have a right to request the erasure/deletion of certain personal information collected or maintained by us. As described herein, we will delete your personal information from our records and direct any service providers (as defined under applicable law) to delete your personal information from their records. However, we are not required to honor a deletion request if an exemption applies under the law.
- **Right to Correct.** You have a right to correct inaccuracies in your personal information, taking into account the nature of the personal information and the purposes for which we process the personal information. We will use commercially reasonable efforts to correct the inaccurate personal information as directed by you.
- **Right to Limit Use and Disclosure.** You have the right to limit our use and disclosure of your sensitive personal information to that use which is necessary to perform our services and provide our goods as requested by you, or as otherwise permitted by law. We only use or disclose sensitive personal information for purposes permitted by the CCPA and to which the right to limit does not apply.
- **Right to Opt Out.** you have the right to direct us to stop selling or sharing your personal information to third parties and to refrain from doing so in the future. For purposes of this right, we do not sell or share personal information as defined under applicable law.

Non-Discrimination. You have the right not to receive discriminatory treatment by us due to your exercise of the above rights. We do not offer financial incentives and price or service differences, and we do not discriminate against consumers, employees, applicants, or independent contractors for exercising their rights under applicable law.

Updates and Changes. We may add to, change, update, or modify this Notice to reflect any changes to how we treat your information or in response to changes in law. If we update this Notice, we will provide you with a new privacy notice.

Contact HR. For more information, if you have any questions or concerns, or if you wish to exercise your rights or lodge a complaint with us, you may contact us by using the information below:

- **By Telephone:** +1-800-598-0111
- **By Email:** alteraprivacy@alterahealth.com

CONSENT

By signing below, you consent to the processing of certain types of personal data for the reasons set out in the Notice.

Signature Printed Name Date

By signing below, you provide your explicit consent to the transfer of your personal data to the United States and Altera Digital Health Inc.

Signature Printed Name Date

You have the right to withdraw this consent at any time by contacting Human Resources. We will then stop any processing of your personal data that relied upon your consent, without affecting the validity of such processing carried out before such withdrawal.