



Job Applicant Privacy Policy

Effective Date: [July 1, 2022]

This Job Applicant Privacy Policy (“**Policy**”) describes the personal information Capsa Solutions, LLC d/b/a Capsa Healthcare and our subsidiaries and affiliates (collectively, “**Capsa**,” “**we**” or “**our**”) collect, use, disclose, transfer, and store (collectively, “**Process**”) in connection with our recruitment activities.

I. APPLICABILITY OF OTHER POLICIES

This Policy does not cover our Processing of personal information collected from you as a current or prospective Capsa customer or visitor of our websites. To learn more about Capsa’s data collection practices in these cases, please read our online Privacy Policy at <https://www.capsahealthcare.com/privacy-statement>.

In some cases, you may provide personal information to third parties that we work with. This could be, for example, a third-party website through which you applied for a job at Capsa. You understand that the information you provide to such third parties will be treated in accordance with the privacy policies of the third parties to which you provide the information. Please carefully review the applicable privacy policies before providing personal information to third parties and contact the third party with any questions regarding its privacy practices.

II. INFORMATION WE COLLECT

We collect information in connection with your application to work with us. For example, we may collect:

- Information you provide when submitting information in an application to us, including but not limited to full name, phone number, email address, address, gender, race and ethnicity, veteran status, disability status, availability, employment history (including whether you have previously worked for Capsa), qualifications, references, LinkedIn profile and website (if provided voluntarily), work authorization status, how you heard about the job;
- Certain information from a third-party platform (such as Facebook, Google, or LinkedIn), in accordance with the authorization procedure determined by that platform, if you connect your third-party account with your application using credentials from that platform, such as your name and email address;
- Information you provide to us in your resume, cover letter, and any other files you choose to upload or share with us regarding your qualifications, such as design portfolios;
- Information you provide to us during an interview or that we collect through the recruitment process (e.g., work authorization status, willingness to relocate, current salary, type of employment contract, interview notes, or results of any assessment);

- Reference information or information received from background checks if you are offered a job (where applicable), including information provided by third parties such as past employers, educational institutions, and references; and
- Information about your educational and professional background from publicly available sources, including online, that we believe is relevant to your application (e.g., your LinkedIn profile);

Your decision to apply for a position and provide your personal information to us is voluntary. We will tell you if information is required to move forward with your application.

Sensitive Information: In certain cases, where permitted by law and on a voluntary basis, we may ask questions about race or ethnicity, veteran status, and disabilities for specific purposes, such as to accommodate a disability or illness and to comply with legal obligations relating to diversity and anti-discrimination. You are free to decide whether to provide such information, and your application will not be affected by your decision. Except as specifically requested, we ask that you avoid submitting information which may qualify as sensitive information under applicable law, including race, religion, ethnicity, nationality, age, gender identity, sexual life or sexual orientation, medical or health information, genetic or biometric data, political opinions, political party or trade union membership, and judicial data such as criminal records.

Information About Others: If you provide us with personal information of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing such information to us.

III. HOW WE COLLECT YOUR INFORMATION

Most of the personal information we Process is obtained directly from you, such as when you submit a job application or when we conduct a phone or in-person interview. We may also receive information about you from other sources, such as from references you provide, persons who referred you for a position, background checks, recruiting agencies, third-party recruitment sources and websites, third-party services with which you have an account, if you choose to log into our application with that account (in accordance with their authorization procedures), and other publicly available sources such as your LinkedIn profile.

When you visit our sites, we collect certain information automatically. To collect this information, we may use cookies, web beacons, and similar technologies. For more information about how we use cookies, see our Cookie Policy at <https://www.capsahealthcare.com/privacy-statement>.

IV. HOW WE USE YOUR INFORMATION

We use your personal information to evaluate a potential employment relationship with you and for other business purposes. Such uses include:

- Assessment of your skills, qualifications, and suitability for the available position;
- Communication with you about the recruitment process;

- Verification of your information and completion of reference or background checks (where applicable), if we offer you a position;
- Streamline future hiring processes by retaining and referring back to records of unsuccessful applicants, such as their name, the date of their application, and the reason that their application was not successful;
- Legal and compliance purposes, such as responding to suspected fraud, security incidents, or other activity which is illegal or violates Capsa's policies, protecting Capsa's and others' rights and property, exercising a legal claim, cooperating with law enforcement investigations, and complying with applicable laws, regulations, legal processes, or governmental requests;
- Other uses with your consent, which you may withdraw at any time; and
- Other legitimate interests, including our interests in considering candidates for current and future employment opportunities and in managing and improving our recruitment and hiring process.

If we hire you, information we collect in connection with your application will become part of your employment record and used to manage the onboarding process and for other employment-related purposes in accordance with our internal employee Privacy Policy.

V. WHO MAY HAVE ACCESS TO YOUR INFORMATION

Within Capsa: We disclose personal information to Capsa personnel and affiliates who need to know the information for purposes described above, including personnel in the recruiting, human resources, and information technology departments, and in the department responsible for the position for which you are applying.

Third-Party Service Providers: We use third party service providers to perform services on our behalf. For example, we share certain information with service providers who facilitate our applicant tracking system, payroll system, video interviews, travel booking, expense management, relocation support, reporting and analytics, and verification/background checks.

Professional Advisors: We share information with recruitment agencies working with us in relation to your recruitment, as well as, if needed, with our professional advisors, including accountants, auditors, lawyers, insurers, and bankers. We only permit these advisors to Process your personal information for specified purposes and, as appropriate, in accordance with our instructions and the provisions of this Policy and applicable law.

Other Third Parties: In certain limited circumstance, we may share personal information with other third parties, including (a) to comply with our legal obligations, to protect the rights and property of Capsa, our customers, and the public, to cooperate with law enforcement investigations, and to detect and respond to suspected illegal activity and threats to the health or safety of any person or of our systems or services; (b) in connection with, or during negotiations of, any merger, joint venture, sale of company assets, financing, or acquisition of all or a portion of our business, assets or stock by another company (including in connection with any bankruptcy or similar proceedings); or (c) with your consent and at your direction.

We may also share aggregated, anonymized, or de-identified information, which cannot reasonably be used to identify you.

VI. CONTACTING CAPSA

If you have any questions regarding this Policy, please contact us at human.resources@capsahealthcare.com.

VII. POLICY UPDATES

We may change this Policy from time to time. Each version of this Policy is identified by its effective date. If we make changes to this Policy that have a material impact on your rights with respect to how we Process your personal information, we will notify you via appropriate communication channels.