



VaxCare’s Privacy Policy for California Residents

Last revised: July 23, 2024

This **Privacy Policy for California Residents** supplements the information contained in VaxCare’s Privacy Policy and applies solely to all website visitors, job applicants, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020, and its implementing regulations (collectively, the “**CCPA**”). Any terms defined in the CCPA have the same meaning when used in this Policy. For purposes of this Privacy Policy for California Residents, the term “personal information” does not include: (a) information subject to HIPAA or the California Confidentiality of Medical Information Act; (b) deidentified or aggregated consumer information; or (c) publicly available information that (i) has been lawfully made available from government records; (ii) we have a reasonable basis to believe has lawfully been made available to the general public by you or from widely distributed media; or (iii) has been made available by a person to whom you disclosed the information unless you restricted such information to a specific audience.

1. Notice at Collection

Section I of this Privacy Policy for California Residents sets forth VaxCare’s Notice at Collection (“**Notice**”) is to inform you that VaxCare is collecting your Personal Information and Sensitive Personal Information to support its business operations, including for the business purposes listed in the chart below.

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“**Personal Information**”). In particular, the below chart identifies which categories of Personal Information we have collected within the last twelve (12) months. We retain your Personal Information for as long as necessary to achieve the purposes set out herein.

| Personal Information Category | Business Purpose | Sold or Shared |
|---|--|----------------|
| Identifiers, such as name, date of birth, and contact information | Performing services, auditing interactions with consumers, security, delivering personalized ads | Shared |



| Personal Information Category | Business Purpose | Sold or Shared |
|---|--|----------------|
| California Customer Records personal information, such as name, Social Security Number, and contact information | Performing services, auditing interactions with consumers, security, delivering personalized ads | Shared |
| Protected classification characteristics under California or federal law, such as sex, gender, gender identity, and national origin | Performing services, certain short-term uses, security | No |
| Commercial information, such as records of services you have purchased | Performing services, auditing interactions with consumers, delivering personalized ads | Shared |
| Internet or other similar network activity, such as your browsing history and interactions with our website | Performing services, security, auditing interactions with consumers, delivering personalized ads | Shared |
| Professional or employment-related information, such as current or past job history or performance evaluations | Performing services, security | No |
| Non-public education information, which may include education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades and transcripts. | Performing services, security | No |
| Inferences drawn from other personal information | Performing services, delivering personalized ads | Shared |



| Personal Information Category | Business Purpose | Sold or Shared |
|---|-------------------------------|----------------|
| Sensitive Personal Information with respect to job applicants and employees, such as government identifiers, racial or ethnic origin, and citizenship or immigration information. | Performing services, security | No |

Note: While we collect information that falls within the Sensitive Personal Information categories listed in the CCPA, the CCPA does not treat this information as sensitive because we do not collect or use it to infer characteristics about a person.

OUR RETENTION OF YOUR PERSONAL INFORMATION AND SENSITIVE PERSONAL INFORMATION.

VaxCare retains Personal Information and Sensitive Personal Information for as long as necessary to provide the services and fulfill the transactions you have requested, or for other legitimate purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements. Because these needs can vary for different data types, the context of our interactions with you or your use of services, actual retention periods can vary significantly.

Other criteria used to determine the retention periods include:

- **Is the Personal Information considered to be of a sensitive type?** If so, a shortened retention time would generally be adopted.
- **Has VaxCare adopted and announced a specific retention period for a certain data type?** As examples:
 - VaxCare retains email communications not proactively deleted for one year, unless a longer retention period is necessary for a legal or business reason.
 - Once a customer agreement terminates or expires, VaxCare aims to expunge customer data after 6 months from the date of termination or expiration.
- **Has the individual provided consent for a longer retention period?** If so, we will retain data in accordance with the individual’s consent.
- **Is VaxCare subject to a legal, contractual, or similar obligation to retain or delete the data?** Examples can include mandatory data retention laws in the applicable jurisdiction, government orders to preserve data relevant to an investigation, or data retained for the purposes of litigation.

If you have any questions about this Notice or need to access it in an alternative format due to having a disability, please contact us via email at privacy@vaxcare.com and/or by calling us at 888-829-8550.



2. Sources of Personal Information

We obtain the categories of Personal Information we collect from the following categories of sources:

- Directly from you. For example, when you communicate with us electronically or purchase products or services.
- Indirectly from you. For example, from observing your actions on our website.
- Internet cookies.
- Data analytics providers.
- Job applications and the interview process.

3. Our Use of Personal Information

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

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our services, we will use that Personal Information to respond to your inquiry. If you provide your Personal Information to purchase a service, we will use that information to process your payment and facilitate delivery.
- To provide, support, personalize, and develop our website and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our website, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our website, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our website, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- Evaluation of job applicants, including communicating with job applicants about their candidacy for employment.



- Analyzing our application and recruitment process.
- As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

4. Disclosure and Sharing of Personal Information

We may disclose your Personal Information to service providers or contractors for the business purposes outlined below. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the Personal Information confidential, and prohibit using the disclosed information for any purpose except performing the contract. In the preceding twelve (12) months, VaxCare has disclosed Personal Information for a business purpose to the service providers and contractors indicated in the chart below. In addition to service providers and contractors, we may also share your Personal Information with the following categories of third parties:

- Internet cookie information recipients;
- Affiliates and Partners;
- Parent or subsidiary organizations; and
- Government entities.

We do not sell Personal Information we collect. Because we do not sell Personal Information or Sensitive Personal Information, we do not offer users the ability to opt-out of such Personal Information sales. For the sake of clarity, we may transfer Personal Information to a third party in the context of a merger, sale, or bankruptcy proceeding which is not considered a sale.

However, we do share certain Personal Information with third parties for cross-context behavioral advertising purposes, as noted in the chart below.



| Personal Information Category | Category of Third-Party Recipients for Business Purpose Disclosures | |
|--|--|---|
| | Business Purpose Disclosures to Service Providers and/or Contractors | Sharing to Third Parties for Cross-Context Behavioral Advertising |
| Identifiers | <ul style="list-style-type: none"> • Performing services on behalf of the business • Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards • Marketing | Yes |
| California Customer Records Personal Information Categories | <ul style="list-style-type: none"> • Performing services on behalf of the business • Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards • Marketing | Yes |
| Protected Classification Characteristics Under California or Federal Law | <ul style="list-style-type: none"> • Performing services on behalf of the business | No |
| Commercial Information | <ul style="list-style-type: none"> • Performing services on behalf of the business • Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of | Yes |



| | | |
|---|--|-----|
| | <p>ad impressions, and auditing compliance with this specification and other standards</p> <ul style="list-style-type: none"> • Marketing | |
| Internet or Other Similar Network Activity | <ul style="list-style-type: none"> • Performing services on behalf of the business • Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards • Marketing | Yes |
| Professional or Employment-Related Information. | <ul style="list-style-type: none"> • Performing services on behalf of the business | No |
| Non-Public Education Information. | <ul style="list-style-type: none"> • Performing services on behalf of the business | No |
| Inferences Drawn from Other Personal Information. | <ul style="list-style-type: none"> • Performing services on behalf of the business • Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards • Marketing | Yes |

The categories of third parties we may share your Personal Information with include:

- Data analytics providers;
- Advertisers and advertising networks;
- Social media companies;



- Internet cookie information recipients, like Google;
- Affiliates;
- Partners;
- Parent or subsidiary organizations; and
- Government entities.

5. Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

a. Right to Know and Data Portability

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months (the “right to know”). Once we receive your request and confirm your identity (see Exercising Your Rights to Know, Delete, or Correct), we will disclose to you:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purpose for collecting or sharing that Personal Information.
- The categories of third parties to whom we disclose that Personal Information.
- If we shared or disclosed your Personal Information for a business purpose, two separate lists disclosing:
 - The categories of Personal Information that we shared about you and the categories of third parties to whom the Personal Information was shared; and
 - The categories of Personal Information that we have disclosed for a business purpose and the categories of persons to whom it was disclosed for a business purpose.
- The specific pieces of Personal Information we collected about you (also called a data portability request).

b. Right to Delete

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions (the “right to delete”). Once we receive your request and confirm your identity (see Exercising Your Rights to Know, Delete, or Correct), we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.



- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which it was provided to us.

We will delete or deidentify Personal Information not subject to one of these exceptions from our records and will direct the same of our service providers, contractors, and, unless impossible or involves disproportionate effort, all third parties with whom we shared the information.

c. Right to Correct

You have the right to request that VaxCare correct inaccurate Personal Information that we maintain about you. Once we receive your request and confirm your identity (see Exercising Your Rights to Know, Delete, or Correct), we will review your request and use commercially reasonable efforts to correct the inaccurate Personal Information.

d. Exercising Your Rights to Know, Delete, or Correct

To exercise your rights described above, please submit a request by either:

- Submitting the [Privacy Choices webform](#);
- Calling us at 888-829-8550 and dialing "2" when prompted to speak with a customer service representative; or
- Emailing us at privacy@vaxcare.com.

Please note that household data is exempted from our right to know, deletion, and correction response obligations. Please also note that you may only submit a request to know twice within a 12-month period.

Only you, or someone legally authorized to act on your behalf, may exercise your rights. If you would like to submit a request on behalf of another person as that person's authorized agent, unless you are the person's power of attorney, you will be required to: (1) provide proof that the person gave you signed permission to submit the request; and (2) verify your identity with us.

Note that only a parent or legal guardian may submit a request to know, delete, or correct Personal Information about a consumer under the age of 13 or provide consent for that child's Personal Information sharing opt-in request. A parent or legal guardian may make such a request by signing and returning a consent form to us.

Your request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.



We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. You do not need to create an account with us to submit a request to know or delete.

We will only use Personal Information provided in the request to verify the requestor's identity or authority to make it.

Note: For information about your opt-out or opt-in rights, see Personal Information Sharing Opt-Out and Opt-In Rights.

e. Response Timing and Format

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact privacy@vaxcare.com.

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

f. Personal Information Sharing Opt-Out and Opt-In Rights

If you are age 16 or older, you have the right to direct us to not share your Personal Information at any time (the "right to opt-out"). Note that we do not intend to collect Personal Information from individuals between the ages of 13 and 15, and if we discover that we have received any such Personal Information, we will seek appropriate affirmative authorization before we share such information.

Consumers may opt-out of future sharing at any time. Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize Personal Information sharing. However, you may change your mind and opt back in to Personal Information sharing at any time by clicking "[Your Privacy Choices](#)" in the footer of our website. You can also opt out by visiting our Website with a legally recognized opt-out preference signal enabled, such as the Global Privacy Control. Please note that you may need to renew your opt-out choice if you visit the Website with another device or browser, or if you clear your cookies. You may opt back in to Personal Information sales or sharing at any time using the same link.

You do not need to create an account with us to exercise your opt-out rights. We will only use Personal Information provided in an opt-out request to review and comply with the request.

We do not sell the Personal Information of consumers, and therefore do not offer a process for opting out of Personal Information sales.

6. Non-Discrimination



We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you services;
- Charge you different prices or rates for services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of services; or
- Suggest that you may receive a different price or rate for services or a different level or quality of services.

7. Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to privacy@vaxcare.com or call us at 888-829-8550.

8. Changes to Our Privacy Policy for California Residents

We reserve the right to amend this Policy at our discretion and at any time. When we make changes to this Policy, we will post the updated notice on the Website and update the notice's effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

9. Contact Information

If you have any questions or comments about this Policy, the ways in which VaxCare collects and uses your information described here and in the Privacy Policy, your choices and rights regarding such use, or if you need to access this Policy in an alternative format due to having a disability, please do not hesitate to contact us at:

Phone: 888-829-8550

Website: <https://www.vaxcare.com/contact/>

Email: privacy@vaxcare.com

Postal Address:

VaxCare, LLC
Attn: Privacy Officer

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