



APREE HEALTH CANDIDATE PRIVACY NOTICE

Effective January 1, 2025

Last Updated: November 19, 2024

NOTE: apree health ("apree") as used herein, refers collectively to the company group consisting of Vera Whole Health ("Vera"), Castlight Health, Inc. ("Castlight") (including their affiliates and subsidiaries), as well as the friendly PCs of Vera Whole Health WA, PC & Kevin Wang MD, Inc.).

apree health ("apree," "it," "our," "us," or "we,") is committed to protecting the privacy and security of your personal information. This Candidate Privacy Notice ("**Notice**") describes the personal information apree collects about you (the "**applicant,**" "**candidate,**" "**employee,**" or "**former employee**") collectively referred to as the "**HR Candidate,**" when we process your personal information to determine your candidacy and/or managing your employment with apree.

We ask that you please review this Notice in its entirety before applying.

As an HR Candidate, you have the right to know and understand the categories of personal information we collect about you and the purposes for which we collect and/or use such personal information, pursuant to state law requirements, such as the California Privacy Rights Act of 2020, and any other current or forthcoming state and federal privacy laws.

Within this Notice, personal information is described as information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with an HR Candidate and applies to the personal information of apree's HR Candidates within the United States.

This Notice consists of the following eight (8) sections:

- [Section 1:](#) Types of HR Candidate Personal Information We Collect
- [Section 2:](#) Sources of HR Candidate Personal Information
- [Section 3:](#) How We Use HR Candidate Personal Information
- [Section 4:](#) How We Disclose HR Candidate Personal Information to Third Parties
- [Section 5:](#) Retention and Security of HR Candidate Personal Information
- [Section 6:](#) How HR Candidates Can Exercise Their Rights
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Section 1: Types of Personal Information We Collect

When you apply to work for us by visiting the [apree Career Page](#), we will collect personal information directly from you and may collect personal information from other sources, such as third-party providers to verify your eligibility to work for us. We collect, store, and use your personal information so that we can keep in touch with you and, if applicable, consider and process your application for employment with us.

The personal information we collect during the recruitment process may include, but not be limited to the categories of personal information identified below.



Categories of HR Candidate Personal Information We Collect	
Personal Identifiers	<p>We may collect personal identifiers such as:</p> <ul style="list-style-type: none">• Your name and other contact information (e.g., home address, phone number, personal email address) and other details provided on your resume/CV.• Your work permit or visa information.• Referrals or references, and whether you are subject to any prior employer obligations.• Personal identifiers from third-party data providers (e.g., employment vendors) who have the rights to provide us with your information. These partners collect your information from publicly available sources, or through third parties they work with.• Any other information you make publicly available or you provide to us (such as information included in your resume, cover letter, or on your Career Profile).
Education Information	<p>We may collect education information such as:</p> <ul style="list-style-type: none">• Specific details on degrees and certificates you earned, as well as dates when you completed your education.
Professional Information	<p>We may collect professional and other employment information such as:</p> <ul style="list-style-type: none">• Your work experience from your previous employers.• Job preferences such as your desired salary, willingness to relocate, other job preferences.• Responses to screening and interview questions, assessment results, and any other information you provide in connection with the recruitment process.• Publicly available information that you have made available on external sources such as LinkedIn or other job boards.
Sensitive Personal Information	<p>We may collect sensitive personal information such as, but not limited to:</p> <ul style="list-style-type: none">• Your Social Security, driver's license, state identification card, or passport number.• Racial or ethnic origin, religious or philosophical beliefs.• Health-related information, including physical or mental disability and information relating to accommodations that you may request during the recruiting process.
Characteristics of protected classifications,	<p>We may collect characteristics of protected classifications if you disclose such information to us, such as:</p> <ul style="list-style-type: none">• Race and National/Ethnic origin;• Gender identity;• Sexual orientation;• Age;• Disability; or• Veteran Status



Other Personal Information	<p>We may collect other categories of personal information such as:</p> <ul style="list-style-type: none"> • Information we obtain through third parties, such as background check verification company, during the recruitment process. • Any information that you provide to us through optional feedback surveys.
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Section 2: Sources of Personal Information

We collect personal information that HR Candidates voluntarily provide to us when you apply for a position to work with us, or when necessary, in completing the recruitment process. Such sources of HR Candidate personal information may include, but are not limited to the following.

Sources of HR Candidate Personal Information		
Application Information	Internal apree Recruiters and Interviewers	Educational Institutions or Credentialing/Licensing Services
Prior Employers and/or Professional References	Pre-Employment Screening Services	State and Federal Agencies
Publicly Available Sources / Social Media	Device Information / IP address and Device Identifiers	Surveys

Section 3: How We Use HR Candidate Personal Information

We use HR Candidate personal information described above in the context of your candidacy and to assess your suitability for employment opportunities with apree. In certain circumstances, we use your personal information for the following, but not limited to, purposes.

Uses of HR Candidate Personal Information	
Our Legitimate Interests	<p>In certain jurisdictions, we may use your personal information on the basis that it is necessary for our legitimate interests, in which our interests are not overridden by your data protection rights under applicable laws. For example, we may use your personal information to:</p> <ul style="list-style-type: none"> • Receive, process, and assess your candidate application, including interviewing you, assessing your skills, qualifications, and suitability for the role and in certain cases, for other opportunities at apree, and preparing an offer letter if your application is successful. • Verify your eligibility to work in a specific location, your qualification and experience and/or conducting background verifications (to the extent permitted by applicable laws), providing analytic services, providing storage, or providing similar services. • Keep you updated during the recruitment process. • Maintain and improve our recruiting processes, for internal planning and management reporting. • Keep records relating to our recruitment processes.



	<ul style="list-style-type: none"> Collect analytics and reporting to help us visualize and monitor the effectiveness of our recruitment processes, such as identifying trends and improving our recruitment process.
<p>With Your Consent</p> <p><i>Please note: Submission of this personal information is voluntary and will have no impact on your candidacy.</i></p>	<p>When applying to any of our open positions and i) agreeing to be bound by this Notice and/or ii) clicking “submit” or “apply” in the application process, you understand that you are consenting to:</p> <ul style="list-style-type: none"> apree retaining your personal information to review your skills, experience, and interests and to assess your suitability for, and notify you of, roles that might interest you. apree collecting diversity and inclusion data if applicable) to help us to inform our recruiting strategies and undertake appropriate actions and initiatives. For example, we may aggregate this personal information to generate diversity statistics. To stay connected with and engage with you for future opportunities or offer services to you if you are an eligible member, of which you can opt-out of these communications at any time. <p>You can also request for us to delete your personal information at any time as described in Section 6.</p>
<p>Where Necessary, to Administer a Contract of Employment</p>	<p>In certain circumstances, we may enter into an employment contract with certain types of HR Candidates. To the extent we use your personal information, we will rely on these details when executing specific provisions of your contract.</p>
<p>To Comply with Legal Obligation(s)</p>	<p>In certain circumstances, we may use your personal information to:</p> <ul style="list-style-type: none"> Protect our legal rights and compliance obligations, including use in connection with legal claims. Disclose such information in connection with a legal proceedings or litigation. Comply with regulatory, auditing, administrative, or fraud prevention or inquiries. To maintain the safety, integrity, and security of apree, its employees, and others as required or permitted by law, including but not limited to conducting background and security checks. To protect the health and safety of employees and others in our facilities to the extent permitted by applicable law (e.g. to monitor the spread of infectious diseases in the workplace (where appropriate). To create and submit reports as required by applicable law or regulation.

Section 4: How We Disclose Personal Information to Third Parties

We may share your personal information internally, as is necessary for the purposes described in this Notice, as well as with third parties, where we have contractual obligations requiring them to keep HR Candidate personal information confidential and prohibiting them from using your disclosed information for any purpose, except to perform the terms of their contract with us. The categories of personal information disclosed, include but are not limited to, the following types of third parties.



Disclosure of HR Candidate Personal Information	
apree health	<p>In general, we share your personal information with personnel that manage and support the recruitment process, such as Talent Acquisition, Human Resources, People Operations, Finance and Legal.</p> <ul style="list-style-type: none"> • HR Candidate personal information will only be shared with people within the apree organization who have a “need to know” the information in connection with the recruitment process.
Service Providers	<p>We use third party service providers to assist with the recruitment process, including the processing and validation of HR Candidate personal information. For example, we use a third party to perform background checks on certain HR Candidates, as well as reference check screening services; and hiring process management tools.</p>
Government Authorities and Law Enforcement	<p>In certain situations, we may be required to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, or in conjunction with any of the activities set forth under “To Comply with Legal Obligation(s)” column of Section 3.</p>
Change in Ownership	<p>Your personal information may be transferred to a third-party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part).</p>
Professional Advisors	<p>We may share your personal information with our professional advisors, consultants, and/or audit professionals for the purposes of improving our recruitment practices. Generally, information is shared in an anonymized manner, however to the extent any identifiable HR Candidate information is shared with such professionals, this personal information is subject to a Non-Disclosure & Confidentiality Agreement.</p>

Section 5: Retention and Security of HR Candidate Personal Information

We will retain your HR Candidate personal information for as long as is reasonably necessary for the business purposes described in this Notice, such as fulfilling our legitimate interests, processing your application, or to meet legal requirements, unless a longer retention period is required or allowed under applicable law.

Once we no longer need your HR Candidate personal information, we will take appropriate measures to remove your information or hold it in a form that no longer identifies you. We maintain administrative, technical, and physical safeguards to help protect against any unauthorized access or disclosure, alteration, or destruction of HR Candidate personal information. While we actively follow industry accepted standards to protect the personal information submitted to us, both during transmission and once we receive it, no security system is perfect, and methods of transmission over the Internet and electronic storage are never 100% secure. Therefore, we cannot guarantee absolute security, however, we rely on our implemented security measures and continuous secure efforts to protect your privacy and security.

Section 6: How HR Candidates Can Exercise Their Rights

As a matter of apree policy and pursuant to state privacy laws, you may exercise certain rights in relation to personal information that we collect about you in relation to your candidacy and/or employment with us by



contacting us at PeopleOps@apree.health. Before responding to your request, we will verify your identity to ensure the security and privacy of your HR Candidate Personal Information.

HR Candidate Privacy Rights	
Right to Access/Know	<p>You have the right to know:</p> <ul style="list-style-type: none"> • What personal information is collected about you. • Why we collect your personal information. • Who is collecting your personal information. • For how long your personal information will be collected. • How to file a complaint (see Section 7). • If there is data sharing involved, to which this Notice details.
Right to Correct	<p>You have the right to request us to correct any of your personal information, if it is out-of-date or inaccurate.</p>
Right to Request Deletion	<p>You may have the right to request we delete your personal information if:</p> <ul style="list-style-type: none"> • It is no longer necessary. • You withdraw such consent. • You object and we have no reason to continue processing it. • It is unlawfully processed. • It is necessary to comply with applicable legal obligations. <p>Following your request, limited information pertaining to your deletion request will be kept on file to ensure your personal information is not processed at a later date.</p>
Right to Withdrawal of Consent	<p>Where we may have asked for your consent, you may withdraw your consent at any time.</p>
Right to Non-Discrimination	<p>You have the right to exercise any of these rights, without discrimination.</p>
Right To Opt-Out / Do Not Sell My Personal Information	<p>You have the right to opt out of sharing your personal information with third parties for some purposes, including sharing that may be defined as a sale under applicable laws. Please note: apree does not sell your personal information, and we don't share it with third parties for cross-context behavioral advertising and have not done so in the twelve months prior to the effective date of this Notice.</p>

Section 7: How To Contact Us

As you progress through the recruitment process, you may reach out in one of the following ways:

- **Recruitment Status.** If you have questions about your application and/or the status of your employment with us, please contact us at recruiting@apree.health.
- **Exercising Your Right or Filing a Complaint.** If you would like to exercise a specific right as an HR Candidate, please contact us at PeopleOps@apree.health.
- **Legal.** If you have any other questions or concerns regarding this Notice, please contact us at legal@apree.health.



Section 8: Changes To This Notice

We reserve the right to make changes to this Notice as our business practices change or grow. If we make any material changes to the Notice, we'll prominently post the changes to the Notice on this page for a reasonable time and modify the "**Last Updated**" date at the upper left corner of this Notice and any additional steps as required by applicable law.