



For LanguageLine Solutions' Privacy Notice please see pages 1 to 5



For Health Advocate's Privacy Notice please see pages 6 to 10



<b>Policy #: 120</b>	<b>PRIVACY NOTICE</b>
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## **PURPOSE**

At LanguageLine, we are committed to respecting your privacy and the protection of your personal information. LanguageLine uses some of your personal information to ensure that we can meet the requirements related to your employment with us. We also gather your personal information in our effort to comply with laws and regulations, respond to requests from supervisory authorities, handle legal claims, detect and prevent fraud, and carry out our business activities.

This Privacy Notice explains how LanguageLine processes your personal information. We regularly review the Privacy Notice in an effort to keep it up to date. **Please read this Privacy Notice carefully.** For more information about our Privacy Program, please see the [Privacy Policy](#).

## **PERSONAL INFORMATION WE COLLECT**

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, to you as an employee/contractor or a device associated with you (“personal information”). We may collect, share, or disclose the following categories of personal information for our business purposes:

- Identifiers, such as, email address, postal address, online identifier, Internet Protocol address, social security number, driver's license number, passport number, or other similar identifiers.
- Government ID and public records, which include name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.
- Protected classification characteristics under state or federal law
- Biometric information
- Internet or similar network activity
- Sensory data (audio, electronic, visual or similar information)
- Professional or employment related information
- Non-public education information
- Inferences drawn from other personal information

We obtain the categories of information listed above from the following categories of sources:



- Directly from you or indirectly from sources you authorize (e.g., references from previous employers, credit checks, background checks).
- Directly and indirectly from your activity on our intranet or our websites. For example, we collect information from systems or event monitoring systems for performance evaluation, quality assurance, and fraud prevention. As a further example, we collect information from submissions through our website portal or website usage details collected automatically.

If you have questions about the cookies we use on our websites, please see our [Cookie Policy](#).

We retain your information throughout the duration of your employment or your contract with us. That information is held for an additional period of time as required by local laws and regulations.

If you do not provide the information above, we cannot enter into an employment or contractor relationship with you.

#### **HOW WE PROCESS PERSONAL INFORMATION**

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill the reason for which the information is provided. For example, to facilitate payroll service or other job-related benefits for you.
- To provide you with information that you request from us.
- To provide you with company email alerts, event registrations, and other notices that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including employment.
- To improve our website.
- To present our website contents to you, for example through online employment training, or for the annual employee/contractor performance review process.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.



- Some of the personal information we collect may be considered sensitive. **We process sensitive personal information only when the law requires or allows and in compliance with the requirements under applicable laws.** Health Advocate is committed to diversity and inclusion. We may gather and process equality and diversity information to support and demonstrate this commitment.
- We will not process the personal information we have collected for materially different, unrelated, or incompatible purposes without providing you notice.

## PERSONAL INFORMATION WE DISCLOSE

We may disclose information to government agencies or offices (e.g., retirement or social security agencies) as required by or permitted under local law. We may disclose information at your request, e.g., in providing employment references to other prospective employers.

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We may disclose your personal information for a business purpose to the following categories of third parties:

- Companies within the Teleperformance Group.
- Service providers.

Neither LanguageLine nor Teleperformance sells personal information.

## PERSONAL INFORMATION WE MONITOR

At LanguageLine, we are committed to excellent service while helping our employees/contractors grow. Throughout your employment with LanguageLine we will use technologies to monitor your work, your work environment, and our coaching efforts. We do this in a variety of ways:

**Monitoring**, to the extent permitted by applicable law, the use of the computer systems and labor tools, used by you and allocated to you ("**LL IT Systems**") for the purposes of LanguageLine conducting its business and to ensure that those LL IT Systems are being used in a lawful appropriate, compliant and secure manner. Types of monitoring may include, among others: detection of account misuse (e.g., shared accounts, identity theft); detection of confidential data exfiltration via communication channels (e.g., chat, email); detection of unusual suspected behavior (e.g., copy/paste confidential and/or unauthorized) data from one app to another); blocking of unapproved activities (e.g., interpreters unapproved accessing of certain tools or the internet). Additionally, for work at home operations use of a Web Video Camera and audio surveillance (as part of the computer sign-on process and during the work shift to authenticate



employee/contractor identity, to visually monitor the work environment during work hours, and to facilitate communication).

**Listening and Recording**, to the extent permitted by applicable law, of communication interactions under the performance of the work (e.g., phone calls, emails, message conversations, etc.):

- Upon our Client's request for: evaluation of service provided by LanguageLine (for example, contractual KPIs); training/coaching of employees/contractors on Client's material; improvement of the quality of service (e.g., business intelligence, speech analytics); updating the services provided by the Client; compliance policy implementation; storage / archiving of interaction for retrieval for probation purposes in case of a claim; and/or storage / archiving of proof of the conclusion of a contract or execution of a contract.
- For LanguageLine's following purposes: training/coaching of employees/contractors, improvement of their skills; evaluation of employees/contractors, for example to determine their variable pay; management of disciplinary procedures (e.g., following an incident of fraud or non-compliant behavior); and/or management of judicial and/or criminal procedures (e.g., following an incident of fraud or non-compliant behavior).

**CCTV and Access Control:** To protect the security of our employees/contractors, visitors and business, LanguageLine uses CCTV and video, security badges (including photo identification), and entry/exit logs to monitor building access points and access to secure areas and systems.

**Coaching via Audio/Video Recording Sessions:** Management may use audio and video recording systems to observe and evaluate interactions between interpreters and supervisors for purposes of training and employee/contractor performance improvement. Data from those tools are recorded and/or stored for the purposes: training/coaching of employees/contractors, improvement of employees'/contractors' skills; demonstration of best practices/effective communication techniques; evaluation of service provided by LanguageLine to Clients (for example, contractual KPIs); training/coaching of employees/contractors on Client's material; and improvement of the quality of service.

## YOUR PRIVACY RIGHTS

Subject to limitations and the applicability of local laws and regulations, you may:

- Ask LanguageLine to access, rectify, erase, and restrict how we process your Personal Information.
- Object to how we process your data.
- Review the Personal Information we have in our Information and Communications systems concerning you and make corrections to that Personal Information.



- In certain circumstances, you may even ask that we delete some of the Personal Information we may have collected about you or restrict how we process that information.

We will endeavor to respond to your requests within 30 days. Should we be unable to comply within 30 days, we will contact you and let you know of any delay. To make a request or if you have a complaint in relation to our handling of your personal information please contact [SStratton@languageline.com](mailto:SStratton@languageline.com). We will respond to your request consistent with applicable law. LanguageLine will not discriminate against you because you have made a request to exercise your privacy rights. LanguageLine does not use your Personal Information as part of a Financial Incentive Program.

### CHANGES TO OUR PRIVACY NOTICE

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you and/or provide a notice on our website homepage.

I acknowledge receipt of this Privacy Notice and agree and accept the processing as set out above in "Personal Information We Monitor." I agree and accept that LanguageLine may provide recordings of any type to LanguageLine's clients for LanguageLine's business related purposes.

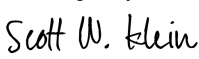
### COMPLIANCE

Violating these requirements can lead to severe employment consequences, including termination of employment.

### CONTACTS

If you have any concerns or would like to report behavior that contradicts the requirements in this policy, please contact:

LanguageLine Solutions  
 One Lower Ragsdale Drive, Building 2, Monterey, CA 93940  
 Attention: Chief Compliance Officer  
 Phone: 831-648-5444 Email: [SStratton@languageline.com](mailto:SStratton@languageline.com)

DocuSigned by:  
  
 0FA5585BB96344C...

07/22/2021

\_\_\_\_\_  
 Scott W. Klein  
 President and CEO-LanguageLine Solution

\_\_\_\_\_  
 Date

**Creation Date:** 02/08/2017

**Revision #:** 2

**Revision Date:** 7/22/2021

# HealthAdvocate<sup>SM</sup>

## PRIVACY NOTICE

### PURPOSE

At Health Advocate, we are committed to respecting your privacy and the protection of your personal information. Health Advocate uses some of your personal information to ensure that we can meet the requirements related to your employment with us. We also gather your personal information in our effort to comply with laws and regulations, respond to requests from supervisory authorities, handle legal claims, detect and prevent fraud, and carry out our business activities.

This Privacy Notice explains how Health Advocate processes your personal information. We regularly review the Privacy Notice in an effort to keep it up to date. **Please read this Privacy Notice carefully.** For more information about our Privacy Program, please see the [Privacy Policy](#).

### PERSONAL INFORMATION WE COLLECT

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, to you as an employee/contractor or a device associated with you (“personal information”). We may collect, share, or disclose the following categories of personal information for our business purposes:

- Identifiers, such as, email address, postal address, online identifier, Internet Protocol address, social security number, driver's license number, passport number, or other similar identifiers.
- Government ID and public records, which include name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.
- Protected classification characteristics under state or federal law
- Biometric information
- Internet or similar network activity
- Sensory data (audio, electronic, visual or similar information)
- Professional or employment related information
- Non-public education information
- Inferences drawn from other personal information

We obtain the categories of information listed above from the following categories of sources:

# HealthAdvocate<sup>SM</sup>

- Directly from you or indirectly from sources you authorize (e.g., references from previous employers, credit checks, background checks).
- Directly and indirectly from your activity on our intranet or our websites. For example, we collect information from systems or event monitoring systems for performance evaluation, quality assurance, and fraud prevention. As a further example, we collect information from submissions through our website portal or website usage details collected automatically.

If you have questions about the cookies we use on our websites, please see our [Cookie Policy](#).

We retain your information throughout the duration of your employment or your contract with us. That information is held for an additional period of time as required by local laws and regulations.

If you do not provide the information above, we cannot enter into an employment or contractor relationship with you.

## **HOW WE PROCESS PERSONAL INFORMATION**

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill the reason for which the information is provided. For example, to facilitate payroll service or other job-related benefits for you.
- To provide you with information that you request from us.
- To provide you with company email alerts, event registrations and other notices, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including employment.
- To improve our website.
- To present our website contents to you, for example through online employment training, or for the annual employee/contractor performance review process.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.



# HealthAdvocate<sup>SM</sup>

- Some of the personal information we collect may be considered sensitive. We process sensitive personal information only when the law requires or allows and in compliance with the requirements under applicable laws. Health Advocate is committed to diversity and inclusion. We may gather and process equality and diversity information to support and demonstrate this commitment.
- We will not process the personal information we have collected for materially different, unrelated, or incompatible purposes without providing you notice.

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We may disclose information to government agencies or offices (e.g., retirement or social security agencies) as required by or permitted under local law. We may disclose information at your request, e.g., in providing employment references to other prospective employers.

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

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**Monitoring**, to the extent permitted by applicable law, the use of the computer systems and labor tools, used by you and allocated to you (“**HA IT Systems**”) for the purposes of Health Advocate conducting its business and to ensure that those HA IT Systems are being used in a lawful appropriate, compliant and secure manner. Types of monitoring may include, among others: detection of account misuse (e.g., shared accounts, identity theft); detection of confidential data exfiltration via communication channels (e.g., chat, email); detection of unusual suspected behavior (e.g., copy/paste confidential and/or unauthorized) data from one app to another); blocking of unapproved activities (e.g., employees unapproved accessing of certain

## HealthAdvocate<sup>SM</sup>

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# HealthAdvocate<sup>SM</sup>

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We will endeavor to respond to your requests within 30 days. Should we be unable to comply within 30 days, we will contact you and let you know of any delay. To make a request or if you have a complaint in relation to our handling of your personal information please contact [jgreenley@healthadvocate.com](mailto:jgreenley@healthadvocate.com). We will respond to your request consistent with applicable law. Health Advocate will not discriminate against you because you have made a request to exercise your privacy rights. Health Advocate does not use your Personal Information as part of a Financial Incentive Program.

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## CONTACTS

If you have any concerns or would like to report behavior that contradicts the requirements in this policy, please contact:

### Health Advocate Solutions

Jennifer Greenley, Sr. Counsel • 3043 Walton Road, Plymouth Meeting, PA 19462 • 610-397-7495

DocuSigned by:

*Matt Yost*

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07/22/2021

Matt Yost

Date

President and CEO-Health Advocate Solutions

Creation Date: 7/12/2021

Revision #: NA

Revision Date: NA