

## Privacy Notice for GHX Personnel and Applicants

This Privacy Notice (this “Privacy Notice”) applies to employees, officers, directors, job applicants, and contractors (collectively, “personnel”) of Global Healthcare Exchange, Inc. and its affiliates and subsidiaries worldwide (collectively, “GHX”, “we” or “our”). GHX is committed to protecting the privacy of personal information.

This Privacy Notice is not intended as legal advice, but rather to inform you about our current personal information collection, use, and disclosure practices, including the personal information we have collected, used, and disclosed in the past 12 months. GHX may modify this Privacy Notice from time to time, including to comply with changes in law or our practices or to improve this Privacy Notice. We will post updated versions on relevant sites, so be sure to check the current posted version on sites you use.

“Personal information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. Personal information may include information related to personnel and their designated beneficiaries and emergency contacts. This Privacy Notice does not use that term to include anonymized, de-identified, aggregated, or publicly-available information.

### Personal Information We Collect

GHX collects and otherwise processes personal information in the categories listed in the table below for the purposes described in this Privacy Notice. Not all the examples below may apply to all personnel or their beneficiaries or emergency contacts.

Categories <sup>1</sup> of Personal Information Collected	Examples
Identifiers	Name, alias or username, telephone number, postal address, unique personal identifier, online identifier, Internet Protocol (“IP”) address, or email address of you and/or your beneficiaries or emergency contacts
Non-public personal information <sup>2</sup>	<ul style="list-style-type: none"> <li>• Name, signature, date of birth, government-issued identification (such as a passport number, driver’s license number, United States Social Security Number, United Kingdom National Insurance Number, India National ID), postal address, telephone number, insurance policy number, and marital status</li> <li>• Education details and employment history</li> <li>• Background check information (to the extent permitted by applicable law)</li> <li>• Bank account or credit/debit card number, or other financial, medical, or health information</li> </ul>
Internet or similar network activity	Browsing history, search history, information about an individual’s interaction with a website or application
Geolocation data <sup>3</sup>	Precise and approximate physical location or location tracking
Professional or employment-related information	Any information contained in your application or personnel file and in other employment documents and records, including records related to hiring, job history, education details, licensing, certification, onboarding, citizenship/ immigration status, disability and accommodations, time and attendance, performance, workplace investigations, discipline, workplace injury, training, compensation,

<sup>1</sup> The categories provided in this table align with the CCPA, as it requires. There is some overlap and repetition in these categories and examples.

<sup>2</sup> This category includes California Customer Records in accordance with the definition of Cal. Civ. Code § 1798.80(e).

<sup>3</sup> Some location-enabled devices may send precise geolocation data and may allow this to be disabled.

Categories <sup>1</sup> of Personal Information Collected	Examples
	benefits, business expenses, payroll, tax forms, non-medical leave of absence details, and insurance
Inferences drawn from other personal information	Profile reflecting preferences, characteristics, attitudes, abilities, and/or aptitudes for purposes of hiring, employment and management decisions, such as staffing, assignments, responsibilities, team composition, hiring, promotion, demotion, and termination
Audio, electronic, visual, thermal, olfactory or similar data	Photos, CCTV footage, meeting recordings, actions within GHX systems and data, and voicemail
Sensitive personal information <sup>4</sup>	Sensitive personal information is any personal information identified as sensitive or “special” under law or regulation, such that it requires special protections and/or processing considerations. Sensitive personal information may include national identification numbers; complete financial account numbers and other financial and credit information; account passwords; genetic, biometric, or health data; racial or ethnic information; political or religious affiliation; trade union membership; precise geolocation information; information about sexual orientation; and criminal records.
Characteristics of protected classification	Information that may indicate protected classification under applicable law, such as demographic information, photos, family and beneficiary information, disabilities and accommodations participation in groups or events related to protected classes, etc.

**Sources of Personal Information**

GHX collects personal information from the following sources:

- Directly from you (for example, from forms or information you submit, including applications, emails, chats, AI prompts, and other communications, including on company-owned or -managed networks, systems, and devices)
- Indirectly from you (for example, from your interactions with GHX devices, websites, applications, and other technology resources, including surveillance cameras, badges, and card keys at our physical locations and security technology deployed on GHX devices and in GHX environments)
- From other GHX personnel (for example, from your manager or human resources personnel)
- From our vendors, including recruiting agencies, background check providers, credit and consumer reporting agencies, and information technology or security consultants
- Your prior employer(s) and/or references you provide to us
- Other publicly accessible sources, including public records and your public social media posts

**Purposes for Processing**

GHX processes personal information for the following primary purposes, but may process your personal information with your consent or for any purpose permitted by applicable law.

- Conduct our business operations
- Provide services you expect, such as payroll and benefits, fair evaluation of your application or job performance, and the ability to contact others in an emergency
- Manage our workforce, including to process your application, administer the employment relationship, provide workplace accommodations or meaningful equal opportunities (which may involve processing

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<sup>4</sup> We only use or disclose sensitive personal information for purposes permitted by applicable law. Because of this, our use of the sensitive personal information of California personnel does not give rise to the right to limit our use and disclosure of sensitive personal information.

sensitive personal information), conduct internal analytics and workforce planning, support performance management, and carry out communications and engagement activities

- Maintain the safety, security, and integrity of GHX facilities, resources, and technology, and investigate and help address security and privacy issues, wrongdoing, and/or violations of our policies
- Comply with our obligations, including legal, regulatory, due diligence, business operations, operational, or fiscal obligations
- Respond to inquiries and requests about our business or personnel
- As required by applicable law, court order, or governmental regulations, in connection with legal proceedings or requests from law enforcement or government entities
- Evaluate or conduct a sale or transfer of GHX, its businesses or assets, or any portion thereof, or any merger, reorganization, investment, dissolution, bankruptcy, or similar event

## **Monitoring**

To the extent allowed by applicable law, GHX may monitor use of and data in GHX-owned or -managed tools, systems, devices, networks, applications, accounts, facilities, and equipment, including online access and usage, system activity, security logs, badge and access records, location information, messages and communications, recordings, and video or CCTV footage, and may disclose such information, for the purposes and to the entities described in this Privacy Notice. Monitoring is limited to what is reasonably necessary for those purposes and is subject to applicable law. Subject to applicable law, these activities may occur at any and all times and by any lawful means.

## **Automated Decision-Making**

Different laws and regulations define automated decision-making differently, but typically automated decision-making means utilizing systems that use artificial intelligence, machine learning, algorithms, scoring or ranking tools, statistics, data processing, or similar technologies to evaluate personal information to make or facilitate decisions. We and our service providers use automated technologies for the purposes discussed above under Purposes of Processing. GHX requires human involvement in decisions about hiring, termination, compensation, promotion, discipline, or performance evaluation, and does not make final decisions on such matters based solely on automated processing, including profiling, unless separately disclosed and permitted by applicable law.

Examples of how we use, and permit our vendors to use, automated decision-making technologies include:

- reviewing job applications against the job description and prioritizing applicants for further evaluation and interviews
- data analysis, planning, administration, and reporting
- monitoring systems and facilities usage and activity for compliance with security, legal, and policy requirements
- performance evaluations, investigations, discipline, promotion, discharge, compensation, and other terms, privileges, or conditions of employment, where permitted by applicable law and GHX policy
- drafting and sending certain types of routine correspondence

Depending on where you live, you may have the right to more information about our use of automated decision-making technologies, to correct incorrect or inaccurate personal data in connection with such uses, or to opt out of or require human review of use of automated technologies in certain significant decisions we may make in connection with your application or employment. To exercise any of these rights, please contact us using the contact information below. GHX will not retaliate against you for exercising these rights.

## **Disclosure and Transfer**

GHX may disclose or transfer the personal information of personnel as reasonably necessary to meet our business needs, as long as it is not prohibited by applicable law. We disclose personal information to the following persons and entities to help with the purposes identified above.

- GHX affiliates, owners, investors, and personnel
- GHX current and prospective customers
- Our vendors, such as recruiting agencies, benefit providers, payroll companies, insurance companies, consultants, information technology support services, and background check providers
- Our external advisors, such as lawyers, accountants, owners, and auditors
- Employee tracking and talent management services that help us grow and manage our workforce
- Government agencies, such as for unemployment benefits, EEO reporting, and tax reporting

We may disclose personal information to another party if we sell or transfer all or a portion of our business or our assets, including during the negotiations of such sale or transfer. We also may disclose your personal information when necessary to protect the safety of our personnel and other people, to protect or defend our rights or property or those of others, or to comply with law enforcement, court, or other public authority requests.

GHX does not sell the personal information of personnel or share it with others for targeted (also known as cross-context behavioral) advertising purposes.

GHX may transfer, disclose, and store the personal information of personnel in the United States, where we are headquartered, or in any other country where we or our business partners or vendors, who process data on our behalf, operate. Your personal information may be transferred, for example, to provide you with services and benefits, as applicable, to be able to meet our legal or regulatory obligations, or to enable the administration of our company. We take appropriate measures in compliance with applicable law to protect any personal information that we transfer to another location or disclose to another party, including safeguards legally required to protect personal information during transfer and other processing outside the country where it was collected. For transfers outside the European Economic Area or the United Kingdom, we rely on approved transfer mechanisms under applicable data protection laws, such as standard contractual clauses or adequacy decisions.

### **Retention of Personal Information**

GHX retains personal information for as long as necessary for our business purposes or as required by any contractual obligation or applicable law. In deciding how long to retain each category of personal information, we consider many criteria, including its nature and sensitivity; the potential for harm from accidental or unauthorized processing; the purposes for which it was collected; relevant laws; applicable statutes of limitations for claims to which it may be relevant; and preservation of evidence obligations.

### **Your Privacy Rights**

In accordance with applicable law, some personnel (for example, those in California, other states in the United States, the European Economic Area, the United Kingdom, and India) may have the right to know what personal information we process about them and to review, access, correct, delete, port, restrict, object to, appeal, and/or file complaints about our processing of such personal information. If you are a California resident, applicable law also provides you the right to know information about the categories and sources of personal information collected; the purposes for which the personal information is collected, used, shared, and disclosed; and the categories of third parties to which personal information is disclosed.

If you, or someone you designate to act on your behalf, wish to exercise any of your privacy rights, please contact us through our [Compliance and Ethics Hotline](#) or call toll free at the appropriate number listed below or email [compliance@ghx.com](mailto:compliance@ghx.com).

<b>United States, Canada (English), Guam, and Puerto Rico</b>	<b>888-278-3164</b>
<b>Canada (French)</b>	<b>855-350-9393</b>
<b>Belgium</b>	<b>0800-77004</b>
<b>Germany</b>	<b>0800-1016582</b>
<b>India</b>	<b>022-5017-0377</b>
<b>Netherlands</b>	<b>0800-0226174</b>
<b>Switzerland</b>	<b>0800-562907</b>
<b>United Kingdom</b>	<b>0800-032-8483</b>

Please note that we may request additional information from you to verify your identity. If you designate someone to act on your behalf, you may still be required to verify your identity directly with us before your request can be processed.

GHX will honor any privacy rights provided to you by applicable law, unless an exception or restriction prevents us from fully honoring your request, in which case we will explain such exception or restriction in our response to you. We will never discriminate against you for choosing to exercise your privacy rights.

It is our policy not to disclose any information in response to a privacy rights request that may adversely affect the privacy of other persons, unless we are legally required to do so.

In certain countries, you may have the right to file a complaint with a data protection authority if you believe our processing of your personal information violates your rights under applicable data protection or privacy law. Although GHX has not independently verified its accuracy and disclaims all liability for any inaccuracies, a list of [data protection authorities](#) is maintained by the International Association of Privacy Professionals.

### **Updating Your Personal Information**

We rely on the accuracy, integrity, and reliability of your personal information to be able to comply with our business obligations. To help us with this, we expect you to report any changes to your personal information, such as changes to your contact information, name, marital status, or other information that might affect the benefits and services we provide to you, as applicable. You should report such changes or other inaccuracies in your personal information to our People Xcellence team or by updating your profile in the relevant GHX system.

### **Additional Notice for Personnel in the European Economic Area and United Kingdom**

Global Healthcare Exchange, Inc. is the data controller for personal information we collect and process regarding personnel. If you have concerns about how we handle your personal information or how we respond to your requests or concerns, you may file a complaint with your local data protection authority. In the United Kingdom, applicable law may require that you first submit a complaint to GHX and allow us a reasonable opportunity to respond before filing a complaint with the Information Commissioner's Office.

We rely on the following legal bases for processing personal information:

- **Our Contract with European Employees.** As part of our contract with you, we use personal information for employee onboarding, providing benefits and compensation, training and evaluating our personnel, and managing our workforce and duties assigned to our personnel.
- **Meeting Our Legal Obligations.** Sometimes laws, regulations, and other binding legal obligations require GHX to process personal information, including sensitive personal information. Examples

include our accounting and administrative requirements, compliance with labor and employment laws, meeting our government reporting obligations, and auditing our compliance.

- **Our Legitimate Interests.** When we rely on our legitimate interests, we do so only when they are balanced with your interests and rights. For example, we might rely on our legitimate interests when we process personal information to protect the security and integrity of our networks and systems, our physical premises, or our intellectual property; monitor our personnel's compliance with internal policies and procedures; protect against fraudulent or illegal activity; detect security incidents; or evaluate, maintain, and improve our own products and services. When we rely on our legitimate interests, we take into account the effects that these actions might have on you. If you have questions about our decisions regarding our legitimate interests, you may contact us at [compliance@ghx.com](mailto:compliance@ghx.com) or call toll free at the appropriate number listed in the table above.
- **Data Retention.** Our standard retention period for European personal data collected in the application process for unsuccessful applicants is up to 5 years from the date of a decision not to hire an applicant, subject to adjustment as described in this Privacy Notice. For successful applicants who become GHX employees, our standard data retention period is up to 10 years following the end of employment. We may adjust our standard retention periods in individual cases based on periodic reviews of the files and the facts and circumstances, the requirements of applicable law, our legitimate interest in the data, any applicable consents to retention, and data subjects' exercise of their rights under applicable law.
- **Your Consent.** We may ask for your consent for certain personal information processing. When you consent, you may withdraw your consent at any time by contacting us at [compliance@ghx.com](mailto:compliance@ghx.com) or calling toll free at the appropriate number listed in the table above.

We process sensitive personal information in accordance with the requirements of applicable law, including processing such information when necessary for carrying out our obligations and exercising our or your specific rights in the employment context, subject to required safeguards and conditions.

#### **Additional Notice for Personnel in India**

- GHX processes digital personal data of personnel located in India in accordance with the Digital Personal Data Protection Act, 2023 and the Digital Personal Data Protection Rules, 2025 (collectively, the "DPDPA"). GHX processes digital personal data of its personnel in India as a "legitimate use" for the purposes of employment and those related to safeguarding GHX from loss or liability, and for the provision of services and benefits sought by personnel.
- If you have questions, concerns, or grievances regarding how GHX handles your personal data, you may contact GHX's grievance officer at [compliance@ghx.com](mailto:compliance@ghx.com) or call toll free at the appropriate number listed in the table above. You also have the right to lodge a complaint with the Data Protection Board of India in certain circumstances.

#### **Questions**

If you have questions or comments about this Privacy Notice or wish to exercise your privacy rights under applicable law, please contact us at [compliance@ghx.com](mailto:compliance@ghx.com) or call toll free at the appropriate number listed in the table above. As a reminder, we do not recommend transmitting sensitive personal information by unsecured email.

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