

Privacy Notice to Network Providers

Last Updated: July 1, 2023

Coventry Health Care Workers Compensation, Inc. (“Coventry”) and its subsidiaries are providing you this notice pursuant to the California Consumer Privacy Act (CCPA), including any amendments thereto, and any terms defined in the CCPA have the same meaning when used in this notice.

Information We Collect

We may 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 or household ("Personal Information"). In particular, the Company has collected the following categories of Personal Information from network providers within the last twelve (12) months:

Category	Examples ¹	Collected	Purpose	Third Parties Shared
A. Identifiers	A real name, alias, postal address, email address, Social Security number	YES	(a) Credentialing (b) Necessary for our legitimate interests (c) Necessary to comply with a legal obligation	(a) Credentialing Services Vendor
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A name, Social Security number, address, telephone number, education, employment, employment history	YES	(a) Credentialing (b) Necessary for our legitimate interests (c) Necessary to comply with a legal obligation	(a) Credentialing Services Vendor

¹Examples listed herein are illustrative of the types of personal information included in each category and may or may not be the specific types of personal information collected. Additionally, personal information included in the categories may overlap with other categories.

Category	Examples ¹	Collected	Purpose	Third Parties Shared
C. Protected classification characteristics under California or federal law	race, sex/gender	YES	(a) Credentialing (b) Necessary for our legitimate interests (c) Necessary to comply with a legal obligation	(a) Credentialing Services Vendor (b) Publicly available provider directories
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	NO	N/A	N/A
E. Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data	NO	N/A	N/A
F. Internet or other similar network activity	Browsing history, search history, information on your interaction with a website, application, or advertisement	NO	N/A	N/A
G. Geolocation data	Physical location	YES	(a) Credentialing (b) Network	(a) Credentialing Services Vendor

Category	Examples ¹	Collected	Purpose	Third Parties Shared
			Adequacy	(b) Publicly available provider directories
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information	NO	N/A	N/A
I. Professional or employment-related information	Current or past job history	YES	(a) Credentialing (b) Necessary for our legitimate interests (c) Necessary to comply with a legal obligation	(a) Credentialing Services Vendor
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf	YES	a) Credentialing (b) Necessary for our legitimate interests (c) Necessary to comply with a legal obligation	(a) Credentialing Services Vendor
K. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, behavior, attitudes, abilities, and aptitudes	NO	N/A	N/A
L. Sensitive personal information	Personal information that reveals government IDs; racial or ethnic origin;	Yes, however information is collected and used consistent with the permissible uses under the CCPA	(a) Credentialing (b) Necessary for our legitimate interests (c) Necessary to comply with a legal obligation	(a) Credentialing Services

Use of Personal Information

The Company 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, to credential you as part of our provider network.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.

The Company 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.

Disclosure of Personal Information

We may share your personal information for business purposes by disclosing it to the categories of third parties identified in the chart above.

We do not sell or share (as the term is defined in the CCPA²) your personal information.

We also do not disclose or use sensitive personal information outside of the permissible uses identified within the CCPA.

Your Rights and Choices

You may have rights regarding your personal information. This section describes those rights and explains how to exercise those rights.

Access to Specific Information

You may have the right to request that Coventry disclose certain information to you about our collection and use of your personal information over the past 12 months, including:

- 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, selling, or sharing that personal information.
- The categories of third parties with whom we sold or shared that personal information.
- The specific pieces of personal information we collected about you.

² The CCPA defines “sharing” as communicating personal information to a third party for cross-context or targeted behavioral advertising.

- If we sold or shared your personal information or disclosed your personal information for a business purpose, identification of the personal information categories that each category of recipient obtained.

You may also have the right to receive a copy of the personal information the Company has collected about you in the past 12 months.

Deletion Request Rights

You may have the right to request that the Company delete your personal information that we collected from you and retained, subject to certain exceptions. If we are unable to comply with your request, we will provide a response explaining why your data cannot be deleted.

Correction Request Rights

You may have the right to request that the Company correct any inaccurate personal information we may hold about you. We will use commercially reasonable efforts to correct inaccurate personal information, taking into account the nature of the personal information and the purpose for our processing.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights.

Exercising Your Rights

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

- Call the toll-free number at 833-848-0124
- Email at legal@enlyte.com

We may need to validate your request and, to do so, we may ask you for additional information. Only you or an authorized agent may make a request related to your personal information. To designate an authorized agent, you must provide us with written permission to allow your authorized agent to act on your behalf. We may also verify the identity of your authorized agent.

Sensitive Personal Information.

We also do not disclose or use sensitive Personal Information outside of the permissible uses identified within the California Consumer Privacy Act and we do not use sensitive Personal Information to “infer” characteristics about you.

Retention Periods.

Coventry will generally retain information about you for so long as we have a legal or business purpose for it or a legal requirement to maintain it. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you or provide services to you (for example, for as long as you are a client with us or keep using our services (and the length of time thereafter during which we may have a legitimate need to reference your personal information to address issues that may arise:
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Changes to This Privacy Notice

Coventry will continue to review and revise our privacy practices and policies as our services and use of data evolves. We will not retroactively use or share data in a manner that is materially different from this notice without first providing you notice.