

# Össur Americas and its Affiliated Entities

## Notice of Employment Privacy Practices for California Residents

**Effective Date:** January 1, 2020

This **Notice of Employment Privacy Practices for California Residents (the “Notice”)** applies solely to California Residents whose personal information is collected by Össur Americas and its affiliated entities (“Össur,” “we,” “us,” or “our”) in the following situations:

- In connection with a job application;
- In connection with being an employee of, owner of, director of, officer of, medical staff member of, or contractor of Össur (collectively referred to as “Workforce Member”), to the extent that the personal information is collected and used by Össur solely within the context of such role or former role as a Workforce Member of Össur.
- In connection with emergency contact information of the Workforce Member, to the extent that the personal information is collected and used solely within the context of having an emergency contact on file.
- Personal information that is necessary for the business to retain to administer benefits for another natural person relating to the Workforce Member to the extent that the personal information is collected and used solely within the context of administering those benefits.

We refer to such California Residents as “you” or “your” throughout this Notice.

We adopt this Notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and any terms defined in the CCPA have the same meaning when used in this Notice.

This notice does not address our treatment of certain of your personal information that is excluded from CCPA’s scope, including any protected health information that is regulated by the Health Insurance Portability and Accountability Act (“HIPAA”).

### **PERSONAL INFORMATION WE COLLECT**

For the purposes of this Notice, Össur generally collects the following categories of your personal information:

<b>Category:</b>	<b>This Includes:</b>
<b>A. Identifiers.</b>	A real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, Social Security number, driver's license or other government ID number, passport number, employee ID number, or other similar identifiers.

<p><b>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</b></p>	<p>A 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.</p> <p>Some personal information included in this category may overlap with other categories.</p>
<p><b>C. Characteristics of protected classifications under California or federal law.</b></p>	<p>Age, race, color, ancestry, national origin, immigration status, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>
<p><b>D. Professional or employment-related information.</b></p>	<p>Current or past job history or performance evaluations, corporate expense information, salary information, tax rates, retirement fund information, compensation information, bonus information, benefits information, or stock option information.</p>
<p><b>E. Internet or other electronic network activity information.</b></p>	<p>Browsing history, search history, and information regarding a consumer's interaction with an internet web site, application, or advertisement.</p>
<p><b>F. Inferences.</b></p>	<p>Inferences drawn from any of the information identified in categories (A) through (G) to create a profile about you reflecting your preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>

**HOW WE COLLECT YOUR PERSONAL INFORMATION**

Össur obtains the categories of personal information listed above from the following categories of sources:

- **Directly from you.** For example, we collect the personal information you provide to us in connection with your job application or application for Össur benefits. We will also collect the personal information you provide to us throughout the duration of your employment with Össur.
- **From your beneficiaries and dependents.** For example, your beneficiaries and dependents may provide us with your personal information in the course of their receipt of benefits provided or administered by us.
- **From our service providers.** For example, if you are a new hire, we will collect your personal information from the service provider that provide background checks for us.

We may also receive your personal information from service providers who help us run our business, including payroll, software and travel management providers.

- **From Workforce Members.** For example, if a Workforce Member provides your personal information in connection with an application for Össur-provided benefits.
- **From benefits administrators.** For example, we may receive personal information about you from the companies that administer the benefits plans offered by Össur.
- **From third parties.** For example, a recruiter may provide your personal information to us in connection with our search for a Workforce Member. In addition, Össur receives background reports, driving record and drug screening reports from third parties.
- **Automatically.** For example, we may automatically collect personal information from the computers and other devices we issue to you, or from certain personally-owned devices that you use in the course of being a Workforce Member. We may also collect such personal information from the electronic platforms we provide to you, including Össur's email, word processing and "chat" platforms.

### **HOW WE USE YOUR PERSONAL INFORMATION**

We may use the categories of your personal information listed above for one or more of the following purposes:

- To support our organizational and operational functions.
- To provide services and benefits to you as an Össur Workforce Member.
- To properly administer our workforce and its benefits and compensation programs.
- To evaluate your candidacy or performance as an Össur Workforce Member.
- To confirm your fitness to perform job responsibilities, which may include your ability to operate motor vehicles if this is part of your tasks as a Workforce Member.
- To respond to law enforcement requests and as required or permitted by applicable law, court order, subpoena, or governmental regulations.
- To safeguard our information technology infrastructure, detect security incidents and take other actions as required or permitted by applicable law to protect and defend Össur, our affiliates and subsidiaries, and our Workforce Members, including in connection with legal proceedings.
- As directed by you.
- As otherwise described to you when collecting your personal information or as otherwise set forth in the CCPA.

## **HOW WE SHARE YOUR PERSONAL INFORMATION**

In connection with Össur's collection and use of your personal information as described above, Össur may disclose your personal information in the following ways:

- With our parent company, subsidiaries and affiliates.
- With our service providers and benefits administrators.
- With our auditors, actuaries, accountants, attorneys, governments or other third parties, as required or permitted by applicable law.
- As directed by you.
- To comply with the law or to protect our company. This includes responding to court orders or subpoenas, or defending Össur in a lawsuit. This may also include sharing your personal information if a government agency or investigatory body requests this data. We may share also your personal information when we are investigating a security incident, allegation, or a potential fraud or violation of law.
- With any successors to all or part of our company. For example, if we merge with, acquire or are acquired, or sell part of our company to another entity. This may include an asset sale, corporate reorganization or other change of control.
- As otherwise described to you when collecting your personal information or as otherwise set forth in or permitted the CCPA.

## **CHANGES TO OUR NOTICE**

Össur reserves the right to amend this Notice at our discretion and at any time. When we make changes to this Notice, we will update the Notice's effective date and make available the updated Notice as required by law.

## **CONTACT INFORMATION**

If you have any questions or comments about this Notice, the ways in which Össur collects, uses and shares your personal information, please do not hesitate to contact us at:

**Email:** [legal@ossur.com](mailto:legal@ossur.com)

**Postal Address:** 27051 Towne Centre Dr Suite 100, Foothill Ranch, CA 92610

**Phone:** 949-382-3553