


Policy & Procedure			
Title:	California Website Privacy Notice		
Policy #:			
Issuing Dept.:	Office of Compliance and Ethics	Effective Date:	January 1, 2023
Approved by:	Board of Directors	Revision Date:	December 30, 2024
Distribution:	<input checked="" type="checkbox"/> AHS Health Services <input type="checkbox"/> AHS Primary Care Services <input type="checkbox"/> AHS PACE/Senior BuenaCare <input type="checkbox"/> Other: (Internal Policy)	Review Date:	

Purpose

The purpose of this California Website Privacy Notice (“**Privacy Notice**”) is to describe how AltaMed Health Services Corporation (“**AHS**,” “**we**,” or “**us**”) collects, uses, and discloses personal information from California residents, in compliance with the California Consumer Privacy Act, as amended (the “**CCPA**”) as amended by the California Privacy Rights Act (“**CPRA**”).

Policy

I. Scope of This Privacy Notice

This Privacy Notice applies only to California residents and addresses information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with California residents (“**Personal Information**”). This Notice does not apply to publicly available, aggregated, or de-identified information, nor to Protected Health Information (“**PHI**”) regulated under the Health Insurance Portability and Accountability Act (“**HIPAA**”). Please refer to our [HIPAA Notice of Privacy Practices](#) for information about our PHI-related disclosures.


This Privacy Notice applies only to information governed by the CCPA. This Privacy Notice also does not cover Personal Information that may be collected about you as a job applicant or employee. Please visit our California Job Applicant Notice or our California Employee Notice for more information if you interacted with us in either of these capacities.

This Privacy Notice should be read in conjunction with our [Terms of Use](#) and any other document or agreement that governs your relationship with us. By using our website, mobile application, products, and services (collectively, “**Services**”), you consent to our Terms of Use and the privacy practices disclosed in this Privacy Notice. Please do not use our Services if you do not consent.

Unless otherwise noted, the disclosures herein cover our activities in the twelve (12) months preceding the Effective Date, as well as our current practices.


II. How and Why We Collect, Use, and Disclose Your Personal Information

AHS may collect, use, and disclose Personal Information for valid purposes consistent with applicable laws as identified below. Where we transfer applicable Personal Information to recipients, such as our service providers, we do so for the same business purposes described below. These examples may vary depending on the nature of your interactions with us.


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Category of Personal Information	Purposes for Collection, Use, and/or Disclosure	Categories of Recipients to Whom Personal Information is Disclosed for a Business Purpose
Identifiers , including real name, alias, account name, username, signature, postal address, unique personal identifier, online identifier, IP address, email address, or other similar identifiers	<input type="checkbox"/> To allow you to participate in the features we offer <input type="checkbox"/> To maintain your accounts with us <input type="checkbox"/> To communicate with you, including about our Services, updates to our terms and policies, and to obtain your feedback	<input type="checkbox"/> Service providers <input type="checkbox"/> Affiliates <input type="checkbox"/> Data analytics providers


Category of Personal Information	Purposes for Collection, Use, and/or Disclosure	Categories of Recipients to Whom Personal Information is Disclosed for a Business Purpose
	<input type="checkbox"/> To send you marketing materials and advertisements <input type="checkbox"/> To recognize you when you use our Services <input type="checkbox"/> To show you relevant ads while you browse the internet or use social media <input type="checkbox"/> To allow you to participate in promotions, sweepstakes, and contests <input type="checkbox"/> Auditing, research and analysis, to maintain and improve our Services, and for any other internal business purposes <input type="checkbox"/> To detect and prevent fraud against you and/or us	

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<p>Personal information described in Cal. Civ. Code § 1798.80(e), including name, address, telephone number, and financial payment information</p> <p><i>Some Personal Information included in this category may overlap with other categories</i></p>	<ul style="list-style-type: none"> <input type="checkbox"/> To allow you to participate in the features we offer <input type="checkbox"/> To maintain your accounts with us <input type="checkbox"/> To communicate with you, including about our Services, updates to our terms and policies, and to obtain your feedback <input type="checkbox"/> To send you marketing materials and advertisements <input type="checkbox"/> To recognize you when you use our Services <input type="checkbox"/> To show you relevant ads while you browse the internet or use social media <input type="checkbox"/> To allow you to participate in promotions, sweepstakes, and contests <input type="checkbox"/> Auditing, research and analysis, to maintain and improve our services, and for any other internal business purposes <input type="checkbox"/> To detect and prevent fraud against you and/or us 	<ul style="list-style-type: none"> <input type="checkbox"/> Service providers <input type="checkbox"/> Affiliates <input type="checkbox"/> Data analytics providers
<p>Characteristics of protected classifications under California or federal law, including age and date of birth, gender, languages spoken, marital status, and racial or ethnic origin</p>	<ul style="list-style-type: none"> <input type="checkbox"/> To allow you to participate in the features we offer <input type="checkbox"/> To send you relevant marketing materials and advertisements <input type="checkbox"/> To tailor our communications to you <input type="checkbox"/> To improve our Services, and our products, marketing and advertising <input type="checkbox"/> Auditing, research and analysis, to maintain and improve our Services, and for any other internal business purposes <input type="checkbox"/> To detect and prevent fraud against you and/or us 	<ul style="list-style-type: none"> <input type="checkbox"/> Service providers <input type="checkbox"/> Affiliates <input type="checkbox"/> Data analytics providers

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Commercial information , including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	<input type="checkbox"/> To allow you to participate in the features we offer <input type="checkbox"/> To provide you with appropriate products and recommendations <input type="checkbox"/> To help you find relevant products more quickly <input type="checkbox"/> To tailor our communications to you <input type="checkbox"/> To provide customer service and support <input type="checkbox"/> To allow you to participate in promotions, sweepstakes, and contests <input type="checkbox"/> To improve our Services, and our products, marketing and advertising <input type="checkbox"/> Auditing, research and analysis, to maintain and improve our Service, and for any other internal business purposes <input type="checkbox"/> To detect and prevent fraud against you and/or us	<input type="checkbox"/> Service providers <input type="checkbox"/> Affiliates <input type="checkbox"/> Data analytics providers

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<p>Internet or other electronic network activity information, including Internet or other similar activity, browsing history, search history, information on a consumer's interaction with a website, application logs, device data and registration, social media account information or advertisement</p>	<ul style="list-style-type: none"> <input type="checkbox"/> To allow you to participate in the features we offer <input type="checkbox"/> To provide you with appropriate products and recommendations <input type="checkbox"/> To help you find relevant products more quickly <input type="checkbox"/> To tailor our communications to you <input type="checkbox"/> To provide customer service and support <input type="checkbox"/> To allow you to participate in promotions, sweepstakes, and contests <input type="checkbox"/> To improve our Services, and our products, marketing and advertising <input type="checkbox"/> Auditing, research and analysis, to maintain and improve our services, and for any other internal business purposes <input type="checkbox"/> To detect and prevent fraud against you and/or us 	<ul style="list-style-type: none"> <input type="checkbox"/> Service providers <input type="checkbox"/> Affiliates <input type="checkbox"/> Data analytics providers
<p>Geolocation data, Approximate or precise location based on device settings</p>	<ul style="list-style-type: none"> <input type="checkbox"/> To allow you to participate in the features we offer <input type="checkbox"/> To deliver coupons to you <input type="checkbox"/> Auditing, research and analysis, to maintain and improve our Services, and for any other internal business purposes 	<ul style="list-style-type: none"> <input type="checkbox"/> Service providers <input type="checkbox"/> Affiliates <input type="checkbox"/> Data analytics providers
<p>Audio, electronic, visual, thermal, olfactory, or similar information, including audio recordings of customer care calls, video, or similar information</p>	<ul style="list-style-type: none"> <input type="checkbox"/> To provide you with customer service <input type="checkbox"/> To improve our Services 	<ul style="list-style-type: none"> <input type="checkbox"/> Service providers <input type="checkbox"/> Affiliates <input type="checkbox"/> Data analytics providers

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Professional or employment- related information <i>If you are an AHS employee, please contact Human Resources for additional disclosures. Job applicants can find additional disclosures at www.AltaMedCareers.org</i>	<input type="checkbox"/> Employment Inquiries <input type="checkbox"/> Application for Employment	<input type="checkbox"/> Service providers <input type="checkbox"/> Affiliates <input type="checkbox"/> Data analytics providers
Inferences used to create a profile, Preferences or characteristics derived from collected data	<input type="checkbox"/> To provide you with appropriate Services and recommendations <input type="checkbox"/> To improve our Services, and our products, marketing, and advertising <input type="checkbox"/> To provide you with a better Service experience <input type="checkbox"/> Auditing, research and analysis, to maintain and improve our Services, and for any other internal business purposes <input type="checkbox"/> To detect and prevent fraud against you and/or us	<input type="checkbox"/> Service providers <input type="checkbox"/> Affiliates <input type="checkbox"/> Data analytics providers
Other Information, such as information that does not directly fit within one of the categories defined by the CCPA, including the contents of communications you send to us by phone, email, text, online chat, etc.	<input type="checkbox"/> To communicate with you about our Services, your orders, and to provide customer service and support <input type="checkbox"/> To improve our Services and marketing <input type="checkbox"/> To allow you to participate in our promotions, sweepstakes, and contests <input type="checkbox"/> To detect and prevent fraud against you and/or us	<input type="checkbox"/> Service providers <input type="checkbox"/> Affiliates <input type="checkbox"/> Data analytics providers

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III. Sensitive Personal Information

We do not collect, use, and disclose Sensitive Personal Information. We do not use or disclose Sensitive Personal Information for purposes to which the right to limit use and disclosure applies under the CCPA. Reproductive health and SUD treatment data are protected under federal regulations, requiring explicit consent for sharing or disclosure.

IV. Purpose of Collecting Personal Information


We collect and use Personal Information for the following purposes:

- To provide services: Enable account creation, facilitate transactions, and manage your relationship with us.
- For marketing: Send promotional materials, personalize content, and improve marketing campaigns.
- To enhance functionality: Improve website performance, conduct analytics, and debug technical issues.
- To comply with legal obligations: Meet regulatory requirements, prevent fraud, and ensure security.
- For employment purposes: Process job applications (if applicable).

V. Disclosing Your Personal Information

We may disclose each of the categories of Personal Information identified above to the respectively identified categories of recipients for operational or business purposes consistent with the purposes for collection or use designated, as is reasonably necessary and proportionate to achieve those purposes, or for another purpose that is compatible with the context in which the Personal Information was collected including, but not limited to:

- Auditing related to ads;
- Helping to ensure security and integrity;

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- Debugging, repairing, and improving functionality;
- Short-term, transient use;
- Performing services on our behalf;
- Providing advertising and marketing services, as applicable;
- Internal research for technological development; and
- Verifying quality and/or safety.

In addition to the other purposes for collection, use, and disclosure of Personal Information and described in this Privacy Notice, we may collect, use, and disclose Personal Information as required by law, regulation or court order; to respond to governmental and/or law enforcement requests; to identify, contact or bring legal action against someone who may be causing injury to or interfering with our or others' rights or property; to support any actual or threatened claim, defense or declaration in a threatened or pending case or before any jurisdictional and/or administrative authority, arbitration or mediation panel; or in connection with disciplinary actions/investigations. Likewise, we may disclose Personal Information to other parties in connection with the sale, assignment, merger, or reorganization.

VI. Sources of Personal Information

We may collect Personal Information from the following sources:

- Directly from you:** Information you provide through forms, applications, or communication. For example, when you sign up to receive information from us, or any other time you submit Personal Information to us voluntarily.
- Automatically when you use our website or mobile apps:** Data collected through cookies, analytics tools, and similar technologies. For example, we may collect your usage history when you use our websites, systems, and applications.
- Third Parties:** Service providers, advertising networks, and affiliates. We receive Personal Information from AHS affiliates, as permitted, to enable us to manage our business. We may also receive Personal Information from service providers who provide us with IT services, advertising services, or help facilitate our sales.

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- Parties to corporate transactions:** As permitted by law, we may receive Personal Information as part of a corporate transaction or proceeding such as a merger, financing, acquisition, bankruptcy, dissolution, or at transfer, divestiture, or sale of all or a portion of a business or assets.
- Publicly Available Sources:** Information from public records or social media (if applicable).

VII. Cookies and Tracking Technologies


We may use tracking technologies, such as cookies, including tracking technologies managed by vendors or external parties to improve functionality, analyze usage, and personalize content.

Tracking technologies can generally be categorized as follows:

- Necessary or essential.** These tracking technologies are used for core functionality, for example for security and to enforce your privacy preferences. Without these cookies, some functionality on our websites and apps may fail.
- Functional or analytics.** These tracking technologies help to improve our websites and apps by allowing us to understand how they are used and how they perform. We may also use location-aware technologies for purposes such as verifying your location and delivering or restricting content based on your location.
- Advertising.** These tracking technologies help personalize ads that are shown to you on our websites and apps. If enabled, these tracking technologies will allow other parties to engage in advertising based on your use of online services

We may use Google Analytics or other providers for analytics services. We may also implement Google Analytics Advertising Features such as remarketing with analytics and interest-based ads. We may use first-party cookies or other first-party identifiers as well as third-party cookies or other third-party identifiers to, e.g., deliver advertisements, measure your interests, and/or personalize content. For more information on how Google Analytics uses data collected through our services, visit <http://www.google.com/policies/privacy/partners>. To opt out of Google Analytics cookies, visit <https://tools.google.com/dlpage/gaoptout> or download the Google Analytics Opt-Out Browser Add-On.

Depending on your device settings, you may also opt out of certain interest-based advertising through the device's "Limit Ad Tracking" or equivalent feature. Refer to your device for more information on what this opt out affects. For instance, you can adjust or reset the advertising identifiers on your mobile device in the device settings. iOS users can visit Settings > Privacy > Advertising > Reset Advertising Identifier.

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Android users can visit Google settings > Ads > Reset advertising ID


VIII. How Long We Keep Your Personal Information

We retain Personal Information for as long as necessary to fulfill the purposes outlined in this Notice, comply with legal obligations, and resolve disputes. Retention periods vary by data type and legal requirements.

Category of Personal Information	Retention Period / Criteria
Personal Information	As required or authorized by law.
Identifiers	As required or authorized by law.
Personal Information described in Cal. Civ. Code § 1798.80(e)	As required or authorized by law.
Characteristics of protected classifications	As required or authorized by law.
Commercial information	As required or authorized by law.
Biometric information	As required or authorized by law.
Internet or other electronic network activity information	As required or authorized by law.
Geolocation data	As required or authorized by law.
Audio, electronic, visual, thermal, olfactory, or similar information	As required or authorized by law.
Professional or employment-related information	As required or authorized by law.
Non-public education information	As required or authorized by law.
Inferences	As required or authorized by law.

We keep the categories of Personal Information described above for as long as is necessary for the purposes described in this Privacy Notice or otherwise authorized by law. This generally means holding the information for as long as one of the following apply:

- Your Personal Information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the information;

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- Your Personal Information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the Personal Information was collected;
- The information is reasonably required to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case); or
- We are otherwise required or permitted to keep your information by applicable laws or regulations.

Where information is used for more than one purpose, we will retain it until the purpose with the latest period expires. For more information about our retention policies, please contact us using the contact details below.

IX. Sharing and Selling Personal Information

We may sell or share the following categories of Personal Information with third parties for the purposes of cross-context behavioral advertising:

- Identifiers
- Internet or other electronic network activity
- Geolocation data

We may sell and/or share this Personal Information with third parties for advertising purposes. The third parties to whom this Personal Information was sold and/or shared are advertisers and analytics vendors.


We may also share your Personal Information with regulatory authorities to comply with legal requirements.

We offer you the ability to opt out of sales and sharing of your Personal Information as set forth in the “Right to Opt Out of Sales and Sharing of Personal Information” section below.

We do not knowingly sell or share the Personal Information of consumers under the age of sixteen (16).

X. Consumer Rights Under the CCPA/CPRA

If you are a California resident, you are entitled to certain rights. To exercise any of these rights, please submit a request via our Data Subject Access Request Form here: <https://ccpacomply.com> or call 888-418-1398. Please note that if you submit a request to know, request to delete, or request to correct, you may

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be asked to provide two-to-three (2-3) pieces of Personal Information that we will match against our records to verify your identity. You may designate an authorized agent to make a request on your behalf. However, you will still need to verify your identity directly with us before your request can be processed.

Right to Know. You have the right to know what Personal Information we have collected about you, which includes:


1. The categories of Personal Information we have collected about you, including:
 - a. The categories of Personal Information we collect, use, and disclose;
 - b. The sources of the Personal Information that was collected;
 - c. Our business or commercial purposes for collecting, selling, or sharing Personal Information;
 - d. The categories of recipients to which we disclose Personal Information;
 - e. The categories of Personal Information that we sold, and for each category identified, the categories of third parties to which we sold that particular category of Personal Information
 - f. The categories of Personal Information that we disclosed for a business purpose, and for each category identified, the categories of recipients to which we disclosed that particular category of Personal Information.
2. The specific pieces of Personal Information we have collected about you.

Right to Delete Your Personal Information. You have the right to request that we delete Personal Information we collected from you, subject to certain exceptions.

Right to Correct Inaccurate Information. If you believe that Personal Information we maintain about you is inaccurate, you have the right to request that we correct that information.

Right to Opt-Out of Sales and Sharing of Personal Information. You have the right to opt out of the sale of your Personal Information, and to request that we do not share your Personal Information for cross-context behavioral advertising. To opt-out, please review our [Cookie Settings](#).

If you choose to use the [Global Privacy Control](#) (“GPC”) browser signal, you will only be opted out of online

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sales or sharing of Personal Information, and will need to turn it on for each browser you use. To submit a request to opt out of offline sales and sharing which would not otherwise be controlled by GPC, please contact us as provided below.

Right to Limit Use and Disclosure of Sensitive Personal Information. We do not use or disclose sensitive Personal Information for purposes to which the right to limit use and disclosure applies under the CCPA.

Right to Non-Discrimination for the Exercise of Your Privacy Rights. If you choose to exercise any of your privacy rights under the CCPA, you also have the right not to receive discriminatory treatment by us.

California residents have the right to additional protections for reproductive health and SUD treatment records, including:


- The right to request restrictions on use and disclosure of such information.
- The right to know how sensitive health data has been disclosed in response to legal requests.

XI. Notice of Financial Incentive

AHS does not run any financial incentive programs. Financial Incentive Programs include “payments to consumers as compensation, for the collection of personal information, the sale or sharing of personal information, or the retention of personal information. A business may also offer a different price, rate, level, or quality of goods or services to the consumer if that price or difference is reasonably related to the value provided to the business by the consumer’s data.”

XII. Security Measures

We use appropriate administrative, technical, physical, and organizational safeguards to protect the Personal Information we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your Personal Information. This includes managerial measures, including establishment and implementation of internal management plan and periodic training for employees; technical measures, including controlling access rights to personal information processing systems and encryption of important data; and physical measures, including external security and management of system servers. While we implement security measures designed to be appropriate to the relevant risks, please note no data transmission over the internet or any wireless network can be guaranteed as being 100% secure. Use our services at your own risk.

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XIII. California “Shine the Light”

We do not share personal information with third parties or affiliates for those third parties’ or affiliates’ own direct marketing purposes. Californians may request information about our compliance with this law by contacting us at AltaMedPrivacyOffice@AltaMed.org.

XIV. Change in Statement

We reserve the right to amend this Privacy Notice at any time without advance notice in order to address future developments of AHS, our website/mobile application, or changes in industry or legal trends. We will post the revised Privacy Notice on our website’s [Regulatory Notices Page](#). You can determine when the Privacy Notice was revised by referring to the “Effective Date” legend on the top of this Privacy Notice. Any changes will become effective upon the posting of the revised Privacy Notice on our website.

XV. How to Contact Us

Please contact us with any questions as follows: Toll-Free Phone: (888)418-1398

Address: 2040 Camfield Ave, Los Angeles, CA 90040

Email: AltaMedPrivacyOffice@AltaMed.org