Notice at Collection and Privacy Policy for California Job Applicants

Please take notice that WebMD, LLC and its affiliates (together, “WebMD”, “us”, or “we”) collects certain information about you. This Notice and Privacy Policy for California Job Applicants applies solely to job applicants who reside in the State of California (“Applicants”).

The California Privacy Rights Act (“CPRA”) provides Applicants with certain rights:

- Knowledge of information collected;
- Deletion of information collected;
- Opt-out of information collected;
- Correction of information collected;
- Limit use of information collected;
- Not to be discriminated or retaliated against for exercising rights under the law.

Categories of Personal Information

WebMD has collected the following categories of personal information from Applicants within the last twelve (12) months:

A. Identifiers, such as a name, government-issued identifier (such as Social Security Number), and unique identifiers (such as an employee ID)
B. Personal Information, such as real name, signature, SSN, address, telephone number, email address, passport number, driver’s license or state identification card number, passport number, federal identification authorizing work in the United States, access and/or passcodes, insurance policy number, education, employment, employment history, bank account number, other financial information, medical information, or health insurance information;
C. Protected classification characteristics under California or federal law such as age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), immigration status, sexual orientation, and veteran or military status.
D. Professional or employment-related information such as current or past job history.
E. Sensitive Personal Information, including social security number, driver’s license, state identification card, and passport number.

Where We Get Your Information From

WebMD collects information about you from the following sources: 1) you; 2) prior employers, references, recruiters, job-related social media platforms; 3) third-party sources of demographic information; 4) third-party companies, such as background check companies; and 5) claim administrators and investigators. Depending on Internet Brand’s interactions with you, we may or may not collect all of the information identified about you.

Purposes for Collecting and Using Personal Information

We only collect and use Applicant personal information when we have a legitimate business reason or legal requirement to do so. Personal information from Applicants may be collected and used for the following purposes:

- For hiring, recruiting, retention, and employment purposes, such as:
  - Building job candidate profiles
  - Communication, such as scheduling interviews
  - Verification of information for employment
  - Internal record-keeping
  - Onboarding management
• Day to day business operations
• Complying with laws and regulations
• Any other purposes authorized by the California Privacy Protection Agency, California or Federal law.

We may or may not have used Sensitive Personal Information about you for each of the above purposes.

Retention of Personal Information

We retain your personal information for as long as it is needed to carry out the purposes described above. Additionally, we may retain personal information if retention is reasonably necessary to comply with our legal or regulatory obligations, resolve disputes, prevent fraud and abuse, or if it is not technically feasible to delete your personal information.

Using and Sharing of Personal Information

We disclose your personal information for a business purpose to the following categories of third parties: (a) our service providers, including recruitment services such as LinkedIn, Jobvite, Indeed, and others (b) facilities management, (c) mail and shipping providers, (d) background check providers, (e) other software programs that you may be required to use and create an account with or use in the course of your recruitment, such as video meeting platforms.

We do not “sell” or “share” your personal information, or sensitive personal information, with any third parties, as those terms are defined under CPRA.

Your Access and Deletion rights

Access

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months or beyond the 12-month period on or after January 1, 2022. You may request, up to two (2) times each year, that we disclose to you, once we receive and verify your Applicant request, the: (i) categories and specific pieces of personal information that we have collected about you; (ii) categories of sources from which your personal information is collected; (iii) business or commercial purpose for collecting your personal information; (iv) categories of personal information that we disclosed for a business purpose.

Deletion

Subject to certain exceptions and up to two (2) times each year, you may request that we delete any of your personal information that we collected from you. Once we receive and confirm your request for deletion, we will delete such personal information from our records, unless an exception applies.

Right to Correct your inaccurate Personal Information

You have the right to request that we correct any inaccurate personal information about you. Once we receive and verify your request, we will use commercially reasonable efforts to correct your inaccurate personal information from our records, unless it is impossible or involves a disproportionate effort.

Right to Non-Discrimination for Exercising Your Privacy Rights

We will not discriminate against you for exercising any applicable data privacy rights.

Exercising Access, Data Correction, and Deletion Rights
You can exercise any of these rights by sending an email to hrcentral@webmd.net. Applicants should indicate in their request that they are making the request in their capacity as a job applicant of WebMD.

Effective Date: January 1, 2023