California Notice at Collection: Employees, Contractors, and Applicants

Last updated: June 6, 2026

The California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively CPRA) gives California residents who are employees, contractors, and job applicants the right to know what categories of personal information we collect and the purposes for which we use that information.

This employee, contractor, and applicant notice ("Notice") addresses California-specific requirements and serves as our California notice at collection. We may update this Notice from time to time. If we make material changes, we will revise the Last Updated date above, which will serve as ongoing notice of such changes. We encourage you to review this Notice regularly to stay informed about our information management practices and the choices available to you.

If you are a resident of California, this Notice, together with our Digital Privacy Policy (DPP) and Notice of Privacy Practices (NPP), may apply to you.

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Personal Information

As used in this Notice, "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.

U.S. State Privacy Laws do not apply to health or medical information regulated by the Health Insurance Portability and Accountability Act of 1996 (HIPAA), and this Notice does not apply to such data, or other data types which are excluded under U.S. State Privacy Laws. However, other governing documents, such as a HIPAA Notice of Privacy Practices (NPP), may apply.

Collection, Use, and Disclosure of Personal Information for Business Purposes

The following table provides appropriate details on the categories of Personal Information that we collect and the purpose for which we collect them. The exact kinds of Personal Information we collect depend on the nature of our relationship with you and how far you proceed in the recruitment process. For example, some personal information is only collected if we make you an offer of employment.

We collect information from and about any references you provide. It is your responsibility to obtain any required consent from your references prior to sharing their information with us. We will also ask for your consent prior to contacting a reference that you have listed.

Category and Sources of Personal Information (PI)	Representative Data Elements	Purpose for Collecting the PI	Categories of Parties to whom this type of PI is Provided or Disclosed for a Business Purpose

Job Applicant Data
We collect this type of information directly from:
• You
• Such information may be retained following our record retention schedule.
	Data elements in this category include:
	• Name
	• Contact Information
	• Personal Details
	  ○ Gender
	  ○ Date of Birth
	  ○ Race/Ethnicity
	  ○ Veteran Status
	  ○ Disability Status
	  ○ Driver license/ state identification card
	  ○ Passport number
	  ○ Biometric data
	• Work Experience
	• Education
	• Skills
	• Certification/License
	• Awards/Recognitions
	• Screening Questionnaire Results
	• Reference Information (contact information of others)
	• Offer Details
		We use this type of information for:
		○ Workforce recruiting activities
		○ Reviewing job applicant submissions
		○ Comparing job requirements against qualifications
		○ Conducting any necessary background checks
		○ Communicating with you about job application status
			We disclose this information to:
			• contracted service providers, contractors, and third parties for everyday business purposes.

Work History and Performance Data We collect this type of information from: • You	Data elements in this category include: • Job Details (Position, Job Profile, Job Type (full-time or part-time), Shift, Length of Service, Hire Date) • Job History • Supervisory Management Chain • Organizational Chart • Organizational Details (Company, Cost Center, Location, Affiliate, Pay Group,	We use this type of information for: • workforce management systems • Payroll administration • Vacation/Leave administration • Regulatory reporting (e.g., to the Internal Revenue Service) • Maintaining performance information, including self-evaluations and manager reviews • Ensuring any necessary job	We disclose this information to: • contracted service providers, contractors, and third parties for everyday business purposes.

Category and Sources of Personal Information (PI)	Representative Data Elements	Purpose for Collecting the PI	Categories of Parties to whom this type of PI is Provided or Disclosed for a Business Purpose
	Operating Unit, Operating Group) • Union Membership (Active Date, Seniority Date, Membership Type) • Additional Data (Eligibility for Rehire, Mail Drop) • Tax Elections (Form W-4's) • Payment Elections (Direct Deposit Information) • Payslips • Tax Documents (Form W-2's) • Time off and Leave Requests • Time off Balance • Education • Previous Job History • Certifications/Licenses • Work Experience • Languages • Career Interests • Development Experiences • Individual Goals • Performance Reviews • Disciplinary Action • Name • Personal Details (Gender, Date Of Birth, Marital Status, Race/Ethnicity, Citizenship Status) • Documents (I-9, Telework Agreement, Etc.) • Veteran Self-Identification • Disability Self-Identification • Feedback Received • Feedback Requested	licenses, certifications, or clearances have been obtained	
Health Condition/Status • We collect this type of information directly from you. • Such information may be retained per our record retention schedule.	Data elements in this category include: • Screening questions such as whether you have a cough, fever, loss of smell or taste, or similar COVID symptoms, and whether you have been exposed to COVID or have traveled to a high-risk area	We use this type of information for: • Workplace health and safety purposes, including adherence to COVID screening and mitigation plans and protocols	We disclose this information to: • contracted service providers, contractors, and third parties for everyday business purposes.

Category and Sources of Personal Information (PI)	Representative Data Elements	Purpose for Collecting the PI	Categories of Parties to whom this type of PI is Provided or Disclosed for a Business Purpose
Compensation Data We collect this type of information from: • You	Data elements in this category include: • Pay Grade • Base Pay Range • Base Pay Rate • Eligible Compensation Plans Pay Change History	We use this type of information for: • Compensation administration purposes, including standard payroll, disbursement of bonuses, calculating merit increases, and reviewing pay profiles and structures	We disclose this information to: • contracted service providers, contractors, and third parties for everyday business purposes.
Benefits Data We collect this type of information from: • You	Data elements in this category include: • Benefits (Enrolled Plans, Coverage Dates, Coverage, Employee Cost, Employer Contribution) • Dependent name, relationship, Social Security number, Date of Birth, Gender, Contact Information, Student Status, Dates, Disability Status • Beneficiary name, relationship, Social Security number, Date of Birth, Gender, Contact Information	We use this type of information for: • Benefits administration purposes, including managing employee benefit elections, enrolling dependents in coverage • Coordinating any payment due to beneficiaries	We disclose this information to: • contracted service providers, contractors, and third parties for everyday business purposes.
Contact Data We collect this type of information from: • You	Data elements in this category include: • Emergency Contacts • Home Contact Information (Address, Phone, Email) • Work Contact Information (Address, Phone, Email)	We use this type of information for: • Employment administration purposes, including maintaining up-to-date contact information for you and your designees	We disclose this information to: • contracted service providers, contractors, and third parties for everyday business purposes.
Government Issued ID We collect this type of information from: • You	Data elements in this category include: • Social Security number	We use this type of information for: • Employment administration purposes, including identity validation • Regulatory reporting (e.g., to the Internal Revenue Service)	We disclose this information to: • contracted service providers, contractors, and third parties for everyday business purposes.

Category and Sources of Personal Information (PI)	Representative Data Elements	Purpose for Collecting the PI	Categories of Parties to whom this type of PI is Provided or Disclosed for a Business Purpose
Company Created ID We collect this type of information from: • You	Data elements in this category include: • Company Created ID	We use this type of information for: • Employment administration purposes, including managing your job/position profile and identity validation in our workforce management systems	We disclose this information to: • contracted service providers, contractors, and third parties for everyday business purposes.
Online & Technical Information We collect this type of information from you or your devices from observing your actions on our websites: • Via technologies such as cookies, web beacons, and/or pixels when you visit our website or other websites • Such information may be retained in accordance with our record retention schedule.	Data elements in this category include: • Internet Protocol (IP) Address • Service Set Identifiers (SSIDs) or other device identifiers or • Persistent identifiers	We use this type of information: • For system administration and technology management, including optimizing our websites and applications in furtherance of attracting and retaining talent • For information security and cybersecurity purposes, including detecting threats	We may disclose this type of information to our contracted service providers, contractors, and third parties such as data analytics companies, advertising and marketing networks, and social networks.

We may use or disclose the Personal Information that we collect for one or more of the following everyday business purposes:

- For identity and credential management, including identity verification, authentication, and system and technology administration.
- To protect the security and integrity of systems, networks, applications, and data, including detecting, analyzing, and resolving security threats and collaborating with cybersecurity centers, consortia, and law enforcement about imminent threats.
- For fraud detection and prevention.
- For legal and regulatory compliance, including all uses and disclosures of Personal Information required by law or reasonably needed for compliance with company policies and procedures, security and incident response programs, and intellectual property.
  protection programs, and corporate ethics and compliance hotlines, as well as for compliance with civil, criminal, judicial, or regulatory inquiries, investigations, subpoenas, or summons
- To exercise or defend the legal rights of the business and its employees, affiliates, customers, contractors, and agents.
- To comply with applicable laws.

- For corporate audit, analysis, and reporting.
- To de-identify the data or create aggregated datasets, such as for consolidated reporting, research, or analytics.
- To make backup copies for business continuity and disaster recovery purposes.
- For corporate governance, including mergers, acquisitions, and divestitures.
- Marketing purposes include developing and providing promotional and advertising materials that may be useful, relevant, valuable, or otherwise of interest to you.
- Processing your job application.

In addition to the purposes identified above, we may use and disclose any and all Personal Information that we collect as necessary or appropriate to:

- Comply with laws and regulations, including (without limitation) applicable tax, health and safety, anti-discrimination, immigration, labor and employment, and social welfare laws.
- Monitor, investigate, and enforce compliance with and potential breaches of Company policies and procedures and legal and regulatory requirements.
- Comply with civil, criminal, judicial, or regulatory inquiries, investigations, subpoenas, or summons.
- Exercise or defend the legal rights of Company and its employees, affiliates, customers, contractors, and agents.

Sensitive Personal Information

We only use sensitive personal information to the extent necessary to perform the services reasonably expected as described above under "purposes for collecting the PI". These purposes may include workforce management systems, payroll, vacation/leave administration, regulatory reporting (e.g., to the Internal Revenue Service), and maintaining job-related performance information. We may disclose this information to contracted service providers, contractors, and third parties for everyday business purposes.

Personal Information that we "Share," "Sell," or Use for "Targeted Advertising"

Under California law, a "sale" includes disclosing or making available Personal Information to a third party (other than a service provider or contractor) in exchange for monetary or other valuable consideration, and "sharing" includes disclosing or making available Personal Information to a third party for cross-context behavioral advertising.

We may allow certain third parties, such as analytics or online advertising service providers, to collect your browsing activity on our websites and applications in a manner that may be deemed to involve a "sale" or "sharing" of personal information under California law.

The following table provides appropriate details on the categories of Personal Information that we "sell" or "share":

Category and Sources of Personal Information (PI)	Representative Data Elements	Purpose for Collecting the PI	Categories of Parties to whom this type of PI is Provided or Disclosed for a Business Purpose
Online & Technical Information We collect this type of information from you or your devices from observing your actions on our websites: • Via technologies such as cookies, web beacons, and/or pixels when you visit our website or other websites • Such information may be retained in accordance with our record retention schedule.	Data elements in this category include: • Internet Protocol (IP) Address • Service Set Identifiers (SSIDs) or other device identifiers or • Persistent identifiers	We use this type of information: • For system administration and technology management, including optimizing our websites and applications • For information security and cybersecurity purposes, including detecting threats	We may disclose this type of information to our contracted service providers, contractors, and third parties such as data analytics companies, advertising and marketing networks, and social networks.

Opting Out of Sales, Sharing, and Targeted Advertising

You have the right to opt out of having your Personal Information sold, shared, or used for targeted advertising.

To exercise your right to opt out of the sale of your Personal Information in connection with third party tools used on this website, you can control and manage cookies using your browser settings. Most browsers allow you to view, manage, delete, and block cookies for a website. Guidance on how to control cookies for common browsers is linked below.

Google Chrome
Mozilla Firefox
MacOS Safari
Microsoft Internet Explorer
Microsoft Edge

Please note that if you set your browser preferences to block all cookies, you may not be able to access all or parts of the website or certain features may be limited or unavailable. If you delete cookies relating to the site, including your cookie preferences, you will be treated as a first-time visitor the next time you visit the site.

You can also opt out by visiting our website with a legally recognized opt-out preference signal enabled, such as the Global Privacy Control. Please note that, depending on which opt-out preference signal you use and whether you are logged into your account with us, our processing of the signal may be limited to the specific browser or device that you are using. You may need to renew your opt-out if you use a different browser or device to access our Services.

Automated Decision-Making Technology (ADMT)

Highmark Health uses automated decisionmaking technology ("ADMT") in its recruitment and hiring processes. ADMT processes candidate personal information and uses computation to make or substantially replace human decisions in employment matters.

Specifically, Highmark uses ADMT to automate the initial screening of job applications by:

- Screening for required qualifications (e.g., certifications, licenses)
- Applying knockout criteria to exclude candidates who do not meet minimum requirements
- Prioritizing and scheduling interviews for the most qualified candidates

These significant decisions—such as excluding resumes or prioritizing candidates—are made automatically based on Highmark's policies and requirements. Without ADMT, human recruiters would manually review applications and apply the same criteria, but the process would be slower, less consistent, and more prone to human error or bias.

Candidates have rights under the CCPA/CPRA regarding the use of ADMT as outlined below in Consumers Personal Data Rights.

Consumers Personal Data Rights

Residents of California have certain rights concerning the use and disclosure of Personal Information:

- **Right of Access | Right to Notice.** If you are a resident California, you have the right to request that we disclose to you:
    - the categories of Personal Information we have collected about you, the specific pieces of Personal Information we have collected about you, the categories of sources from which the Personal Information is collected, the business purpose or commercial purpose for collecting, selling, or sharing (if applicable) Personal Information, the categories of third parties with whom we share Personal Information, and the categories of Personal Information we have disclosed about you for a business purpose.
    - a copy of the specific pieces of Personal Information we have collected and retained per the organization's record retention policy.
- **Right to Deletion**. If you are a resident of California, you have the right to request that we delete the Personal Information we collect from you. However, in certain situations, we are not required to delete your Personal Information, such as when the information is necessary to complete the transaction for which the Personal Information was collected, to provide a good or service requested by you, to comply with a legal obligation, to engage in research, to secure our websites or other online services, or to otherwise use your Personal Information internally in a lawful manner that is compatible with the context in which you provided the information.
- **Right to Correct Inaccurate Personal Information.** If you are a resident of California, you have the right to have us correct errors in the Personal Information we maintain about you.
- **Right to Appeal.** You may have the right to appeal our refusal to act on your request. Please enclose a copy of or otherwise specifically reference our decision on your data subject request

so that we may adequately address your appeal. We will respond to your appeal in accordance with applicable law.

- To exercise the rights described above, you or your authorized agent can call us at 833-777-5785 or visit Submit a Privacy Request. We will collect Personal Information about you, such as your name, phone number, physical address, and email address, so we can search this information against our systems to validate your identity.

Nondiscrimination/ Nonretaliation

We do not discriminate or retaliate against any resident because they exercised any U.S. State Privacy Law rights described above.

Notice of Financial Incentives

We do not offer financial incentives for collecting or selling Personal Information.

Contact Us

If you have any questions regarding this Notice, you can contact the Human Resources department at HRServices@highmarkhealth.org.