

PROSPECTIVE EMPLOYEE PRIVACY NOTICE

This Prospective Employee Privacy Notice (“Privacy Notice”) describes, among other things, how UPMC Health Plan, Inc. (“UPMC” or the “Company”) collects, processes, and uses your personal information (“Personal Information”) during your recruitment process with UPMC. Should you be selected for a position at UPMC, you will be provided with UPMC Employee Privacy Notice, which further explains the processing of your Personal Information for purposes of establishing an employment relationship with UPMC and processing during and after the expiration of the employment relationship. This Prospective Employee Privacy Notice supplements our website Privacy Policy available at <https://www.upmc.com/patients-visitors/privacy-info>.

INFORMATION THAT WE COLLECT

We collect Personal Information from you when you provide it to us, such as when you communicate with us and submit information to us as part of the application process. We may also collect your Personal Information from third parties, such as recruiters who share information about potential candidates with us. We may collect and process the following Personal Information:

- Personal contact details such as name, job title, home addresses, telephone numbers, and personal email addresses;
- Recruitment information (including references, and other information included in a resume or cover letter or as part of the application process);
- Information about professional qualifications and employment eligibility;
- Employment history (as included in a resume or cover letter or as part of the application process);
- Inferences from any of the Personal Information categories we collect; and
- Any other information that you voluntarily provide to us.

SOURCES OF PERSONAL INFORMATION

The above information may be collected in the following methods listed below:

- Application form;
- Resume(s)/curriculum vitae(s);
- Contact details for references and references feedback;
- Information provided during job forums and recruitment events;
- Information obtained through social media or networking sites;
- Information forwarded by recruitment agencies and community partners; and/or
- Pre-employment screening services.

Note, the above information is received by UPMC in various forms including hard-copy and electronic form, delivered in-person or via email, text messages, fax, website, social media, etc.

PURPOSE OF PROCESSING

During the recruitment process, we only process data that is necessary to assess your suitability for the position you are applying to and, in the case of a successful candidacy, for the establishment of the employment relationship.

DISCLOSING YOUR PERSONAL INFORMATION

Access to your Personal Information within UPMC is limited to employees and staff who need to access the data for the performance of their work-related tasks and duties involving the recruitment process.

We will only transfer your data to third parties if it is necessary for the recruitment process. For example, we may use third party service providers, such as recruiting platform providers, who might have access to your Personal Information.

We do not sell or otherwise disclose Personal Information including any sensitive Personal Information we collect about our prospective employees, for monetary or other consideration, and we do not share Personal Information with any third parties for cross-context behavioral advertising.

YOUR PERSONAL INFORMATION RIGHTS

To the extent any data privacy law applies to the collection of your Personal Information, you may have certain rights in relation to your Personal Information. Subject to any limitations or exceptions under the law, these rights may include any of the following:

- *Right to Know / Access Your Personal Information, and Right to Receive Information regarding Sale of Personal Information.* You may have the right to know and/or access what Personal Information is processed by UPMC, and you have the right to request information regarding what Personal Information about you we have collected, used, disclosed, or sold. Specifically:
 - The categories of Personal Information we collect about you;
 - The categories of sources from which we collected your Personal Information;
 - The business or commercial purposes for collecting, selling, or sharing your Personal Information;
 - The categories of third parties to whom we disclosed your Personal Information;
 - The specific pieces of Personal Information we collected about you;
 - The specific pieces of Information we hold about you; and
 - The categories of Personal Information we have sold or shared about you to third parties and the categories of third parties to whom the Personal Information was shared or sold. As noted above, we do not sell or share Personal Information.

- *Right to Correct Inaccurate Personal Information.* If you believe that UPMC holds any incomplete or inaccurate data about you, you may have the right to ask UPMC to correct and/or complete the information.
- *Right to Delete.* You may have the right to request deletion of your Personal Information collected by UPMC.
- *Right to Opt Out of Sale or Sharing of Personal Information.* You may have the right to opt out of the sale or sharing of your Personal Information. However, UPMC does not sell or otherwise disclose employee Personal Information for monetary or other consideration to any third parties.
- *Right to Limit Use and Disclosure of Sensitive Personal Information.* You may have the right to direct UPMC to limit its use of your sensitive personal information to that use which is necessary for the purposes stated above. However, UPMC does not use or disclose sensitive Personal Information other than for the permitted purposes described above.
- *Right to Opt Out of Automated Decision-making Technology.* You may have the right to opt out of the automated processing of your Personal Information.
- *Right of No Retaliation Following Opt Out or Exercise of Privacy Rights.* UPMC does not discriminate or retaliate against data subjects who exercise their rights under applicable laws.

EXERCISING YOUR DATA SUBJECT RIGHTS

In order to exercise your rights under this Privacy Notice and applicable data protection laws, you may submit a request via the Your Privacy Choices form at upmchp.us/indiv-rights-CM or contact us using the information in the Contact Us section below.

If UPMC receives a request from you to exercise any of the above rights, UPMC may ask you basic questions to identify which Personal Information is associated with you and to verify your identity before acting on the request; this is to confirm that your data is protected and kept secure.

If permitted by the applicable data protection law, you may use an authorized agent to submit requests on your behalf provided that the authorized agent is a natural person or a business entity that you have authorized to act on your behalf. If you use an authorized agent, we will require: (1) proof of written permission for the authorized agent to make requests on your behalf, and identity verification from you; or (2) proof of power of attorney pursuant under applicable law. Only you or your authorized agent may make a verifiable request related to your personal Information. We may deny a request from an authorized agent that does not submit proper verification proof. If you designate an authorized agent to make a request on your behalf, we may require you to provide the authorized agent written permission to do so and to verify your own identity directly with us (as described above).

CONSEQUENCES OF NOT PROVIDING YOUR PERSONAL INFORMATION

You are not obligated to provide your Personal Information to UPMC. However, as this information may be required for UPMC to consider your application, UPMC may not be able to

extend an offer of employment or employ you without the provision of certain Personal Information.

RETENTION OF PERSONAL INFORMATION

UPMC will not maintain your Personal Information longer than is necessary for the purpose for which it was collected. UPMC will process your Personal Information until the end of the recruitment process (i.e., until a suitable candidate has been selected and an employment agreement has been concluded with said candidate).

We may further store your Personal Information for purposes of possibly considering you for future job openings at UPMC. You may request that UPMC remove your Personal Information at any time by e-mailing PrivacyAskUs@upmc.edu or submitting a request via the Your Privacy Choices form at upmchp.us/indiv-rights-CM.

SECURITY

UPMC uses commercially reasonable security measures to prevent Personal Information from being accidentally lost or used or accessed in an unauthorized way. We limit access to your Personal Information to those who have a genuine business need to know it. Those processing your Personal Information will do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any data security incident.

REVIEW

UPMC may revise this Privacy Notice from time to time and/or will update this Privacy Notice periodically.

CONTACT INFORMATION

For any questions you may have regarding this Privacy Notice, you may contact us as follows:

Email: PrivacyAskUs@upmc.edu

Toll Free Phone Number: 1-866-229-3507

Address: 600 Grant Street
PO Box 2965
Pittsburgh, PA

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