

Privacy Addendum

This Privacy Addendum (together with the Privacy Policy, Terms of Use, and any other policies referenced on our Website) identifies how Privia Health, LLC (“Privia,” “us,” “we” or “our”) will collect and handle any Personal Information that we collect from consumers or Website visitors located in California, the European Economic Area (“EEA”), the United Kingdom (“UK”), or Switzerland, as applicable, as well as any Personal Information that they provide to us.

Our privacy practices comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (together, the “CCPA”). An explanation of your rights under the CCPA can be found [here](#).

If you are a resident of the EEA, UK, or Switzerland, additional policies applicable to our collection and processing of your Personal Information can be found [here](#). Non-EEA countries do not have the same data protection laws as the EEA, UK, or Switzerland. We will, however, take steps to ensure that any transfer of Personal Information will be secure and complies with applicable data protection laws.

As our services evolve and we perceive the need or desirability of using the Personal Information we collect from you in ways that are not described in this Privacy Addendum, we may from time to time amend this Privacy Addendum. The effective date appears at the end of this Privacy Addendum. We encourage you to check our Website frequently to review the current Privacy Addendum in effect and any changes that may have been made to it.

1. Introduction

This Privacy Addendum describes how Privia collects, uses, and shares Personal Information of our clients, prospective employees, visitors to our websites at www.priviahealth.com and www.myprivia.com as well as the websites of our affiliated doctors and care centers (collectively, “Website”), and individuals who contact us to request information. The Website and our other programs and services are referred to in this Privacy Addendum as the “**Services**.” This Privacy Addendum describes how we collect and use Personal Information (information which can be used to identify a specific individual) and anonymous data (which cannot be used to identify a specific individual).

Region-specific provisions. Certain provisions of this Policy, which are clearly labelled, apply only to users who are citizens or residents of particular regions (e.g., the EU or California).

Children. Our Services are not directed to children. See [Protecting children’s privacy](#), below.

2. What Personal Information does Privia collect?

For purposes of this Policy, “**Personal Information**” means information (whether stored electronically or in paper-based filing systems) relating to a living individual who can be identified from that data (or from a combination of that data and other information in our possession). The table below describes the categories of Personal Information we may collect.

Category	Description
Identifiers	Name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number or state identification card number, passport number, or other similar identifiers.
Protected Classes	Race, age, gender, religion, citizenship, ancestry, national origin, 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
Commercial Information	Records of personal property, purchasing or consuming histories or tendencies
Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, face prints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.
Internet Activity	Browsing history, search history, IP address, website interactions
Geolocation Data	GPS coordinates, location history or movements
Sensory Data	Audio, electronic, visual, thermal, olfactory, or similar information
Professional Data	Current or past job history or performance evaluations
Education Data	Educational background, grades, scores
Other Data	Financial information, medical information, health insurance information
Inferences	Profiles drawn from other Personal Information reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

The examples given in this table are not meant to provide an exhaustive list, but are examples of the kinds of data included in each category. Sections 2.1 through 2.4, below, specify the categories of information we do collect.

Please note that "Personal Information" does not include

2.1 Personal Information and Sensitive Personal Information
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Privia collects only that Personal Information that is relevant for the purposes for which the data is requested. Privia does not use your Personal Information in any way that is incompatible with the purposes for which it was collected or for which you have consented.

Some of the categories of Personal Information include “Sensitive Personal Information,” and Privia may collect and maintain your Sensitive Personal Information, which includes the following (if the information is not publicly available):

- **Identifiers:** social security number, driver’s license, state identification card, or passport number.
- **Other Data:** Most data in this category includes sensitive Personal Information, such as health information and data, account log-ins, financial account information, debit or credit card numbers in combination with any required security or access code, password, or credentials allowing access to an account.
- **Protected Classes:** a consumer’s racial or ethnic origin, religious or philosophical beliefs, or union membership, or information concerning a consumer’s sex life or sexual orientation.
- **Biometric Information:** a consumer’s genetic data, or any biometric information processed for the purpose of uniquely identifying a consumer.
- **Internet Activity:** the contents of a consumer’s mail, email, and text messages, unless Privia is the intended recipient of the communication.
- **Geolocation Data:** a consumer’s precise location.

Privia only uses and discloses your Sensitive Personal Information for the purposes specified in California Civil Code, Section 7027, subsection (m). We do not collect or process Sensitive Personal Information for the purpose of inferring characteristics about you.

2.2 Personal Information Collected about Clients

In order to provide our clients with individualized services, we collect certain non-public, Personal Information about you from documents you provide to us, such as patient consent forms and government-issued identification documents (e.g., driver’s license. In addition to receiving Personal Information directly from you, we may also receive information from your attorneys, banks, and other sources. We will only obtain such information from third parties with your express consent and as permitted by law.

2.3 Personal Information Collected about Prospective Employees

We may collect Personal Information from individuals seeking employment with Privia and entering information within the Privia employment portal, which is operated by SmartRecruiters, Inc., and accessible via our Website. If we extend an offer of employment that is accepted by a prospective employee, we may collect additional information, such as a

social security number, for purposes of facilitating a background check, which is conducted by Inflection Risk Solutions, LLC, a subsidiary of Checkr Group, Inc., or one of its affiliates, such as GoodHire or Checkr. We do not collect **Commercial Information, Biometric Information, Internet Activity** or **Sensory Data** from prospective employees.

2.4 Personal Information Collected about Website Visitors or Callers

We may collect Personal Information from visitors to our website and others who contact us to request information. In addition, our web server automatically collects and stores the following information from visitors to our Site:

- We collect information from web browsers, mobile devices, and servers, including browser type, IP address, unique device identifiers, language preference, referring website, date and time of access, operating system and mobile network information.
- We may also determine the approximate location of your device from your IP address. We collect and use this information to determine statistics about our website, including how many people visit our website from certain geographic regions.
- Our Site uses cookies and pixel tags to collect this information, including Google Analytics cookies.
- You can block our use of cookies through settings in your browser. Because these settings are different in different browsers, we recommend that you visit All About Cookies at www.allaboutcookies.org, where you can find comprehensive information on cookie management and blocking for a wide variety of browsers.

We do not collect any other categories of information from our website visitors or individuals who contact us to request information.

3. Personal Information from Vendors and Business Partners

We collect Personal Information from representatives of our vendors and business partners in the course of our business when the representative or the company they work for is a customer or vendor of Privia. We collect this information from the following sources:

- Their employer in connection with the work they do for their employer and how that relates to the Services.
- Third parties Privia works with, such as business partners, and through introductions from other individuals or companies.

When you or the company you work for interacts with Privia (for example, when providing technical services to us), we collect the following types of Personal Information:

- Contact information: such as your email address, phone number, and any other information you provide relating to your work or to you personally (for example, your name, job title or other information in your email signature).
- Financial Information, which can include bank account information.
- Information relating to our dealings with you or the company you work for, such as information used to administer your company account, verify financial transactions, details of goods or services that Privia has exchanged with you, and information that you give us or we otherwise obtain when you interact with Privia.

4. How does Privia use Personal Information?

4.1 Personal Information Collected about Clients

We will use this information:

- to provide you with the Services that you request from us;
- to assess your satisfaction with the Services;
- to carry out our obligations arising from any contracts entered into between you and us or any affiliated companies or third-party vendors;
- to contact you in the future to provide you with information about other products and services we offer;
- to manage your online account(s) and send you technical notices, updates, security alerts, and support and administrative messages;
- to detect, investigate, and prevent security incidents and other malicious, deceptive, fraudulent, or illegal activity, and protect the rights and property of Privia and others;
- to notify you about changes to our Services;
- to comply with applicable laws and regulations.

4.2 Personal Information Collected about Prospective Employees

We will use this information:

- to respond to and process your job application;

- in the case of candidates who accept employment with Privia, to administer employment benefits;
- to make inquiries about you for reference purposes.

4.3 Personal Information Collected about Website Visitors or Callers

We will use this information:

- to provide information you requested about our Services;
- to improve our Website to ensure that content is presented in the most effective manner for you and for your computer;
- as part of our efforts to keep our Website safe and secure.

4.4 Personal Information Collected from Vendors and Business Partners

We will use this information:

- to contact you in connection with the services you or your company provide to us;
- to fulfill our contractual and business obligations, and ensure that you fulfill your obligations;
- to confirm that you have the ability and resources to provide services to us, which may include making inquiries about your financial status and business experience, as well as your past commercial practices.

5. Do we disclose your Personal Information to any third parties?

5.1 Personal Information Collected about Clients

Privia does not sell your Personal Information to any third parties, or share your Personal Information to facilitate advertising goods or services by others.

Privia may share your information with service providers and contractors to provide the Services. The Personal Information we share with service providers and contractors can include all of the categories of Personal Information that we collect. When we do, we enter into a written agreement requiring that party to comply with all applicable laws, such as the CCPA, and restricting that party from the following: selling or sharing Personal Information; using the Personal Information for any purpose other than the purpose specified in the agreement; using, retaining, or disclosing the Personal Information other than as specified in the agreement; or combining the Personal Information with Personal Information the service provider or contractor receives or collects in other contexts. There are times when a service provider or contractor may engage another party to assist in providing the Services; in those cases, the service provider or contractor must notify us in advance, and must have an agreement restricting the use, sale, and sharing of the Personal Information that is similar to our agreement with our service provider or

contractor. Privia does not share Personal Information of any person who is less than 16 years old without their or their legal guardian's explicit consent.

By using our Services and providing your Personal Information, you agree that we have the right to disclose the categories of Personal Information we collect, as identified in Section 2, to our service providers or contractors for the business purposes identified in Section 4.

There are other circumstances when we may share your Personal Information:

- **Merger or Sale** – We may share information in conjunction with a prospective purchase, sale, or merger of all or part of our business, provided that we take appropriate precautions (for example, through a written confidentiality agreement) so the prospective purchaser does not disclose information obtained in the course of the review. If we sell all or a part of our business or assets, or merge with another company, we will disclose Personal Information to the purchaser as part of the transaction.
- **Legal Proceedings** – We may share Personal Information in connection with actual or threatened legal proceedings or alternative dispute resolution proceedings, either initiated by or against us, provided we disclose only the information necessary to file, pursue, or defend against the lawsuit, and take reasonable precautions to ensure that the information disclosed does not become a matter of public record.
- **Legal Obligations** – If we are under a duty to disclose your Personal Information in order to comply with any legal obligation, or any lawful request by public authorities (including to meet national security or law enforcement requirements), or in order to enforce or apply our terms of use and other agreements, or to protect the rights, property, or safety of us, our customers, or others.

5.2 Personal Information Collected about Prospective Employees

We do not disclose any Personal Information about prospective employees and job applicants except as permitted or required by law. Personal Information about prospective employees and job applicants may be disclosed to service providers or contractors for the following business purposes:

- To verify information provided on the job application.
- To perform a background check on the job applicant, but only after obtaining consent to do so.

In some instances, we receive Personal Information about prospective employees and job applicants from third-party services providing employment referrals. In such situations, once we receive the Personal Information we do not disclose it except as described in this section.

5.3 Personal Information Collected about Website Visitors or Callers

We do not disclose to any third parties Personal Information collected from Website visitors or callers seeking additional information about our Services.

6. Our storage of your Personal Information

Privia uses reasonable and appropriate measures to protect your Personal Information from loss, misuse, and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in processing the Personal Information and the nature of the Personal Information we collect. For more detailed information about how we store and protect your Personal Information, please refer to [Section 2 of our Privacy Policy](#).

We will keep your Personal Information for as long as we need it, or as otherwise prescribed by law, for the purposes set out above. This period will vary depending on your interactions with us and the Services we provide to you. We may also keep a record of correspondence with you (for example, if you have made a complaint about our Services) for as long as is necessary for us to defend a legal claim.

7. Access to other websites

Our Website may include links to and from other websites of affiliates or other unaffiliated third parties. If you follow a link to any of these websites, please note that these websites are not covered by this Privacy Addendum. We are not responsible for the privacy practices of any third parties or the content of linked sites, and we encourage you to read the applicable privacy policies and terms and conditions of such parties or websites. This Privacy Addendum only applies to how Privia collects and uses your Personal Information, and it does not apply to any other company or any other company's websites even if you access them from our Website. Please check those websites' policies before you submit any Personal Information to them.

8. Protecting children's privacy

We are strongly committed to protecting the safety and privacy of children who visit our Website. Our Website is not designed nor is it intended to be used by children under 13, and we do not knowingly collect Personal Information online from children under 13 and have adopted techniques to ensure compliance with this Privacy Addendum and the Children's Online Privacy Protection Act of 1998 ("COPPA"). Our Website includes content that we believe to be unsuitable for children under 13, and we encourage all parents to talk to their children about online safety and to monitor their children's use of the Internet.

9. Policies for California Residents

The CCPA affords California consumers certain rights with respect to their Personal Information, as set forth in this section.

9.1 Your Rights with Respect to Your Personal Information

Subject to certain exceptions, you have the following rights with respect to your Personal Information:

- To request that Privia disclose what Personal Information it has collected, used, or disclosed, over the 12-month period preceding Privia's receipt of such a request;
- To request that Privia disclose whether any of your information was sold or shared with third parties, to whom such information was sold or shared, and the business purpose for selling or sharing the information;
- To request that any inaccurate or incomplete Personal Information maintained by Privia be corrected or supplemented; and
- To request deletion of your Personal Information maintained by Privia.

All of these rights are subject to certain conditions and exemptions. For example, Privia will not be obligated to delete your Personal Information if we need to retain it to protect ourselves in the event of a legal claim. Similarly, Privia will not be obligated to disclose your Personal Information that Privia has collected, used, or disclosed within the last 12 months, if responding to such request may require Privia to expend disproportionate efforts (e.g., when the Personal Information that is the subject of the request is not in a searchable or readily-accessible format, is maintained only for legal or compliance purposes, is not sold or used for any commercial purpose, and there is no reasonably foreseeable material impact to you by our not responding).

9.2 Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not deny you any Services or offer you a different price, level, or quality of Services because you exercise any of your rights under the CCPA; however, we may not be able to provide the Services if you refuse to provide us the Personal Information that is necessary for us to provide the Services, or if you ask us to delete your Personal Information.

9.3 Submitting a CCPA Data Request

To submit a request to Privia regarding your Personal Information as described in this section, please contact us by calling this toll-free number (877)-541-9048 or emailing us at privacy@priviahealth.com.

Privia is required to verify the identity of the individual requesting access to a consumer's data or requesting deletion of a consumer's data. To verify your identity, we will rely upon information we have previously collected about you, such as phone calls received from a known phone number or emails received from a known email. We will also rely upon our personal relationship with our clients to verify the identity of a requester.

If you submit a request and you are not a Privia client (which may be the case if you requested information through our Website or a phone call to our “contact us” number but did not become a client or employee), then we will verify your identity by using the information we collected, such as phone number or email address.

9.4 Authorized Agent

You may designate an authorized agent to exercise a CCPA right on your behalf. If you use an authorized agent to exercise your rights under the CCPA, we will need the following proof that you have authorized the agent to act on your behalf:

- Written proof that you have authorized the agent to act on your behalf, and separately verify your identity as described above; or
- Proof that the authorized agent holds a power of attorney to act on your behalf pursuant to California Probate Code §§ 4000-4465.

9.5 Exclusion for Data Subject to Other Privacy Laws

Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), clinical trial data, or other qualifying research data **are not subject** to the CCPA. You do not have the rights described in this section with respect to that information. For information regarding your rights and Privia’s obligations with respect to information covered by HIPAA, please review our [HIPAA Privacy Notice](#).

10. Policies for Residents of EEA, UK and Switzerland

In addition to the other policies described in this Privacy Addendum, residents of the EEA, the UK, and Switzerland have the following additional rights and protections as required by the European Union General Data Privacy Regulation (“GDPR”), and UK and Swiss data protection laws. The additional rights and protections set forth in this section of this Policy apply only to residents of the EEA, the UK, and Switzerland. For ease of reference, when we refer to GDPR in this section, we are referring to the UK and Swiss data protection laws, as well as the GDPR. For the purposes of the GDPR, Privia is a “Controller,” which means Privia determines the purposes for which, and the manner in which, any Personal Information is Processed and used in its business.

10.1 Definitions

The following additional definitions apply to this section of this Privacy Addendum:

“**Processor**” means any Person Processing Personal Information.

“**Person**” means a natural person, corporation, association, organization, partnership, or other legal entity.

“**Process**” or “**Processing**” is any activity that involves use of the Personal Information. It includes, without limitation, obtaining, recording, or holding the Personal Information, or carrying out any operation or set of operations on the Personal Information including organizing, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring Personal Information to third parties.

10.2 **The legal basis for Processing your Personal Information**

In order to comply with the GDPR, we are required to set out the legal basis for the Processing of your Personal Information. The legal basis for Processing your Personal Information will be one of the following:

- our own legitimate business interests, or the legitimate business interests of our third-party partners, promoters, affiliates, distributors, suppliers, vendors, and subcontractors, such as, for example, providing direct marketing to our customers of our products and services that we think would be of interest, permitting prospective employees to search and apply for job opportunities, handling inquiries from our promoters, affiliates, distributors, vendors, and customers, or other instances where we have carried out a legitimate interests assessment and have established an existing legitimate interest;
- the performance of a contract that we have in place with you;
- your consent, where appropriate; or
- compliance with our legal obligations, including to meet national security or law enforcement requirements.

10.3 **Where we store your Personal Information**

The data that we collect from you is stored on secure servers, as more fully described in [Section 2 of our Privacy Policy](#). By submitting your Personal Information, you agree to this transfer, storing, and Processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Addendum.

The transmission of information via the Internet is not completely secure. Although we take reasonable steps to protect your Personal Information, we cannot guarantee the security of your data transmitted to our Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

10.4 **Addendum to how long we store your Personal Information**

In some cases, there is a legal requirement to keep Personal Information for a minimum period of time. Except in those circumstances, we do not keep your Personal Information

for any longer than is necessary for the purposes for which the Personal Information was collected or for which it is to be further Processed.

10.5 Your rights with respect to your Personal Information

Subject to certain exceptions, you have the following rights with respect to your Personal Information:

- To receive or access a copy of the Personal Information that we hold about you;
- To request that any inaccurate or incomplete Personal Information be corrected or supplemented;
- To have your Personal Information erased, unless we have a legitimate reason to retain the Personal Information (such as if we are required to do so for legal reasons); and
- To ask us not to Process your Personal Information for a particular purpose, including for marketing.

All of these rights are subject to certain conditions and exemptions. For example, Privia will not be obligated to erase your Personal Information if we need to retain it to protect ourselves in the event of a legal claim.

To exercise any of these rights, please submit a written request to us using the contact information set forth in Section 12, [below](#). Privia reserves the right to charge a fee in dealing with such a request as permitted by applicable law and regulations. You may also opt out of receiving additional marketing information by using the unsubscribe feature in any marketing email we send you.

11. Conditions of use and changes to our Privacy Notice

If you choose to receive our Services or visit our Website, any dispute over privacy is subject to this Privacy Addendum and our Terms of Use, including limitations on damages, resolution of disputes, and application of the law of the State of California. If you have any concern about our privacy practices, please contact us with a thorough description, and we will try to resolve it. As our business changes, our Privacy Addendum and Terms of Use may change also. We may e-mail periodic reminders of our notices and conditions, but you should check our Website frequently to see recent changes. Unless stated otherwise, our current Privacy Addendum applies to all information that we have about you and your account.

12. Contacting us

This Website is owned and operated by Privia. If you have any questions or suggestions with respect to this Privacy Addendum or our privacy practices, please e-mail us at privacy@priviahealth.com or you can contact us by mail or telephone at:

Privacy Officer

950 N. Glebe Rd., Suite 700
Arlington, VA 22203

CCPA-Specific Requests

Please submit CCPA-specific data requests through the procedures set forth in [Section 9](#).

GDPR/UK/Swiss-Specific Requests

For residents of the EEA, the UK or Switzerland, please e-mail us at privacy@priviahealth.com or contact us by mail or telephone at:

Privacy Officer
950 N. Glebe Rd., Suite 700
Arlington, VA 22203
(877)-541-9048

Updated June 2023