**PRIVACY NOTICE FOR CALIFORNIA JOB APPLICANTS**

*Effective Date: 05/31/2024*

1. ***Overview***

The purpose of this Privacy Notice for California Job Applicants (“**Notice**”) is to inform California residents applying for employment (“**Job Applicant**” or “**you**”) with Forefront Management LLC, Forefront Dermatology West PC, and subsidiaries (collectively referred to herein as “**Forefront**,” “**us**,” “**we**”, or “**our**”), of our practices regarding the collection and use of Personal Information within the context of your application. This Notice is provided pursuant to the California Consumer Privacy Act, as amended (the “**CCPA**”), and should be read in conjunction with all other policies that govern your relationship with us. If you interact with us outside the job applicant context, additional policies may apply. Please see our [Privacy Policy](https://forefrontdermatology.com/privacy-policy/) for more information.

As used in this Notice, the term “**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 Job Applicant. Personal Information does not include information that is publicly available, de-identified, or aggregated, and the CCPA exempts certain additional categories of information from its purview, such as information subject to other laws and regulations. This Notice applies only to information governed by the CCPA.

Please note that you may provide Personal Information in the job applicant context when you apply for a position on our careers page. Our careers page is owned and controlled by iCIMS. You can learn more about iCIMS’s privacy practices [here](https://www.icims.com/legal/privacy-notice-services/).

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

1. ***Categories of Personal Information Collected***

Generally, we may collect the following categories of Personal Information about Job Applicants:

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| **Category of Personal Information** | **Purposes for Collection** |
| **Identifiers** and **personal records**, including name, address, telephone number, online identifier, IP address, email address, social media account, or other similar identifiers. *This category includes information described in Cal. Civ. Code § 1798.80(e).* | To open and maintain your application records  To assess your eligibility for employment  To communicate with you  To analyze trends, usage, and activity relating to our recruiting  To meet legal, compliance, and recordkeeping requirements  For quality assurance, auditing, security, fraud prevention, and debugging |
| **Professional or employment-related information**, including:  Recruitment information (such as skills, qualifications, references, recommendations, and other information included in a resume, CV, job application, or cover letter);  Background information commonly used for security screenings;  Answers to behavioral or other screening questions in an application or interview;  Information contained in any websites, social media pages, portfolios, or other documents shared with us;  Applicant profile information (languages spoken, processional licenses, training, disciplinary actions, malpractice claims, loss history, claims history, legal insurance, previous procedures performed, and membership in professional organizations);  Work history, including past employer information, positions held, responsibilities, and reasons for leaving;  Information about referral sources;  Sponsorship requirements;  Work authorization status; and  Compensation preferences and requirements | To open and maintain your application records  To assess your eligibility for employment  To communicate with you  To analyze trends, usage, and activity relating to our recruiting  To meet legal, compliance, and recordkeeping requirements  For quality assurance, auditing, security, fraud prevention, and debugging |
| **Commercial information**, including records of products or services purchased. | For expense reimbursements (e.g., if you travel for an interview) |
| **Internet or other electronic network activity information**, including information regarding interactions with our applications, websites, and electronic systems, including, e.g., browsing history and search history. | To communicate with you  To operate our websites, including tailoring our content and your online experience  To improve our websites, set default options, and provide you with a better application experience  To meet legal, compliance, and recordkeeping requirements  For quality assurance, auditing, security, fraud prevention, and debugging |
| **Geolocation data**, including geographic location, e.g., as inferred from your device IP address. | To communicate with you  To operate our websites, including tailoring our content and your online experience  To improve our websites, set default options, and provide you with a better application experience  To meet legal, compliance, and recordkeeping requirements  For quality assurance, auditing, security, fraud prevention, and debugging |
| **Audio, electronic, visual, thermal, olfactory, or similar information**, including closed-circuit images, photographs and video of you, and audio or video information as may relate to your job application, e.g., recordings of interviews. | To communicate with you  For quality assurance, auditing, security, fraud prevention, and debugging |
| **Non-public education information**, including school(s) attended, area of study, whether you graduated, and other information relating to secondary, post-secondary, and vocational education, including any graduate or professional degrees obtained. | To open and maintain your application records  To assess your eligibility for employment  To analyze trends, usage, and activity relating to our recruiting  To meet legal, compliance, and recordkeeping requirements  For quality assurance, auditing, security, fraud prevention, and debugging |
| **Inferences** (e.g., preferences, characteristics, behavior, attitudes, intelligence, abilities, and aptitudes based on other Personal Information collected). | To assess your qualification for employment  To analyze trends, usage, and activity relating to our recruiting and websites  For quality assurance, auditing, security, fraud prevention, and debugging |
| **Sensitive Personal Information**, including:  Social security, driver’s license, state identification card, or passport number;  Personal Information that reveals racial or ethnic origin, citizenship, and immigration status; and  Personal Information collected and analyzed concerning health. | To communicate with you  To improve our websites, set default options, and provide you with a better application experience  To meet legal, compliance, and recordkeeping requirements  For quality assurance, auditing, security, fraud prevention, and debugging |

We may also 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 case or before any jurisdictional and/or administrative authority, arbitration, or mediation panel; or for other purposes described in any other privacy notice or with your consent. Additionally, we may use and disclose Personal Information to third parties in connection with a sale, assignment, merger, reorganization, or other corporate transaction relating to all or part of our business.

1. ***Sources of Personal Information***

We may collect the categories of Personal Information described above from the following categories of sources:

* **Directly from you**. For example, during the application submission process.
* **Created by us**. For example, inferences about you.
* **Automatically**. For example, when you use our websites, electronic systems, and applications, or from security camera footage if you interview on-site.
* **From service providers that help us run our business**. For example, from information technology vendors, background check agencies, and other service providers.
* **From other sources**. For example, from clients, educational institutions, professional organizations, and other parties that may provide us with information relevant to your employment application.

1. ***Disclosures of Personal Information***

We may disclose each of the categories of Personal Information we collect to our service providers and contractors for the following business purposes:

* Performing services (including processing, maintaining, or collecting Personal Information) on our behalf (e.g., providing communications; technical, analytical, web hosting, cloud hosting and application support; support for the job application process; Job Applicant screening; or other services on our behalf).
* Ensuring security and integrity of Personal Information.
* Debugging to identify and repair errors that impair existing intended functionality.
* Undertaking internal research for technological development and demonstration.
* Undertaking activities to verify or maintain the quality or safety of our services.
* To comply with applicable laws and regulations.
* For safety and security.
* Detecting or protecting against malicious, deceptive, fraudulent, or illegal activity.

We may also disclose Sensitive Personal Information to comply with applicable laws and regulations, and to detect or protect against malicious, deceptive, fraudulent, or illegal activity.

1. ***How Long We Keep Personal Information***

We keep the categories of Personal Information described above for as long as necessary for the purposes described in this 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;
* 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 Personal 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 Personal Information by applicable laws or regulations.

Where information is used for more than one purpose, we will retain it until the purpose with the longest period expires.

1. ***Sales and Sharing of Personal Information***

We do not “sell” Personal Information or “share” it for cross-context behavioral advertising as those terms are defined under the CCPA, and we do not have actual knowledge that we sell or share the Personal Information of consumers under 16 years of age.

1. ***California Privacy Rights***

If you would like to submit a request relating to your Personal Information, please use email us at [privacy.officer@forefrontderm.com](mailto:privacy.officer@forefrontderm.com) or call toll-free at 1-844-231-8801. When submitting your request, please identify the type of request you’re making and your place of residency. Please note that if a request to know, request to delete, or request to correct is submitted, you will be asked to provide two-to-three pieces of Personal Information that will be matched against our records to verify identity. An authorized agent may be designated to make a request on your behalf; however, you will still need to verify their identity directly with us before the request can be processed. An authorized agent may submit a request on your behalf using the webform or toll-free number listed above.

***Right to Know***. California residents have the right to obtain more details about the Personal Information collected about them, including:

1. The categories of Personal Information we have collected about you, including:
   * The categories of sources from which the Personal Information was collected;
   * The business or commercial purposes for collecting, selling, or sharing Personal Information;
   * The categories of recipients to which Personal Information is disclosed;
   * The categories of Personal Information that we sold or shared, and for each category identified, the categories of third parties to which we sold or shared that particular category of Personal Information;
   * 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; and
2. The specific pieces of Personal Information we have collected about you.

***Right to Opt Out of Sales and Sharing of Personal Information***. We do not sell Personal Information about our Personnel or share it for cross-context behavioral advertising.

***Right to Delete Personal Information***. California residents have the right to request that we delete Personal Information collected from them, subject to certain exceptions. Where deidentification is used to satisfy a deletion request, we commit to maintaining and using the information in deidentified form and will not attempt to reidentify the information except to test whether our deidentification process is sufficient.

***Right to Correct Inaccurate Information***. California residents have the right to request that we correct inaccurate Personal Information we maintain about them.

***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 Privacy Rights***. If you choose to exercise any of the privacy rights under the CCPA, you also have the right not to receive discriminatory treatment from us.

1. ***Changes to this Notice***

By using our website, you acknowledge and consent to the terms of this Notice and our [Privacy Policy](https://forefrontdermatology.com/privacy-policy/), which we may change from time to time. Use of our website indicates acknowledgement and consent to this Notice and our [Privacy Policy](https://forefrontdermatology.com/privacy-policy/) at the time of use. Forefront will otherwise notify you of material changes to this Notice as appropriate.

1. ***How to Contact Us***

If there are any questions about how Personal Information is handled or if you need access to this Notice in an alternative format or language, please contact us at [privacy.officer@forefrontderm.com](mailto:privacy.officer@forefrontderm.com) or 1-844-231-8801.