

California Applicant Privacy Policy & Notice at Collection

Last Updated: 1/1/2023

This California Applicant Privacy Notice (“**Applicant Notice**”) describes our information practices relating to applicants and candidates for employment at CIGNA Corporation, or our affiliates or subsidiaries (“**CIGNA**,” “**we**,” “**our**,” “**us**,” or the “**Company**”) who are California residents (each an “**Applicant**” or “**you**”). This Applicant Notice is intended to satisfy the requirements of the California Consumer Privacy Act (as amended by the California Privacy Rights Act of 2020), codified at Cal. Civ. Code §§ 1798.100 - 1798.199.100 and the California Consumer Privacy Act Regulations issued thereto, Cal. Code Regs. tit. 11, div. 6, ch. 1, each as amended (collectively “**CCPA**”).

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1. Scope and Relation to Other Policies

This Applicant Notice applies to the Personal Information we collect about our Applicants. This Policy supplements other agreements, including any Non-Disclosure Agreement(s), if applicable. This Applicant Notice applies to any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you (subject to some exemptions under the CCPA) (“**Personal Information**”). Note, our information practices may vary depending upon the circumstances, such as the location or role for which you are applying for.

This Applicant Notice does not address or apply to our information practices that are not subject to the CCPA, such as:

- **Publicly Available Information.** Information that is lawfully made available from federal government records, information we have a reasonable basis to believe is lawfully made available to the general public by you or by widely distributed media, or by a person to whom you have disclosed the information and not restricted it to a specific audience.

- **Deidentified Information.** Information that is deidentified in accordance with applicable laws.
- **Aggregated Information.** Information relates to a group from which individual identities have been removed.
- **Protected Health Information.** Information governed by the Health Insurance Portability and Accountability Act or California Confidentiality of Medical Information Act.
- **Activities Covered by the Fair Credit Reporting Act.** This includes information we receive from consumer reporting agencies that are subject to the Fair Credit Reporting Act, e.g., information contained in background check reports we obtain as part of our vetting process.

This Notice also does not apply to the Personal Information we collect from our customers, contractors, employees, or our Applicants in the context of their personal use of our products and services, which are subject to different notices. For additional information on our general privacy practices, please visit our [Online Privacy Policy](#).

We may provide Applicants additional notices about our information practices that are covered by other laws (e.g., if we conduct a background check).

2. What Personal Information Do We Collect?

The following identifies the categories of Personal Information we collect about Applicants (and have collected in the prior 12 months), as enumerated by the CCPA.

- **Identifiers.** Such as, name, address, phone number, email address, date of birth, driver's license.
- **Characteristics of Protected Classifications.** Such as, race, ethnicity, national origin, gender, gender identity, age, disability status, sexual orientation.
- **Internet or Other Electric Network Activity Information.** Such as, Search history, browsing history, interactions online.
- **Geolocation Data.** Such as, IP address location information.
- **Audio, Electric, Visual, or Similar Information.** Such as, photo.
- **Employment-Related Information.** Such as, job history, reference information, background check information/screening.
- **Education Information.** Such as, degrees earned, schools attended and other education history, accreditations, certifications, professional license number.
- **Financial Information.** Such as, salary information.
- **Sensitive Personal Information.** Such as, race, ethnicity, social security number, driver's license number, state ID card number, passport number, citizenship, IP address location information, results of screenings.
- **Inferences and Preferences.** Such as, information provided as part of assessment or interview process.

3. Where Do We Get Your Personal Information?

We generally collect the categories of Personal Information identified above from the following categories of sources:

- Directly from you;
- Recruiters and recruiting platforms;
- Publicly available information and sources;
- Former employers;
- Our service providers, representatives, and agents; and
- Any references you provide.

4. Why Do We Collect Personal Information?

We generally collect Personal Information as reasonably necessary for the following business or commercial purposes, as permitted by applicable laws:

- **Recruiting and Hiring.** We use Personal Information from your application and through the interview process to evaluate your qualifications and eligibility for employment. This includes identifying Applicants, scheduling interviews, conducting background checks, evaluating qualifications, extending offers, communicating with Applicants, maintaining Applicant information for future consideration, and supporting our equal opportunity employment practices.
- **Defending and Protecting Rights.** To protect and defend our rights and interests and those of third parties, including to manage and respond to Applicant and other legal disputes, to respond to legal claims or disputes, and to otherwise establish, defend or protect our rights or interests, including without limitation, CIGNA's trade secrets and other intellectual property, and protecting the rights, property, and reputation of CIGNA and its workforce, or the rights, interests, health or safety of others, including in the context of anticipated or actual litigation with third parties.
- **Compliance with Legal Obligations.** Related to our compliance with applicable legal obligations (such as determining hiring eligibility or responding to subpoenas and court orders) as well as assessments, reviews and reporting relating to such legal obligations, including under employment and labor laws and regulations, Social Security and tax laws, environmental regulations, workplace safety laws and regulations, and other applicable laws, regulations, opinions and guidance.

5. Disclosure of Personal Information

A. Purposes for Disclosing Personal Information

We may disclose the categories of Personal Information identified in Section 2 for the following business purposes.

- **Evaluate Candidacy.** We may disclose your Personal Information when it is necessary to provide services you request and where it is necessary to identify Applicants, schedule interviews, and otherwise evaluate your qualifications and eligibility for employment.
- **Protection of Us and Others.** We may disclose Personal Information if required to do so by law, to protect rights, property, or safety of our employees, contractors, owners, members, and guests, ourselves or others; or where we have a legitimate interest in doing so.

B. Who We Disclose Personal Information To

We may disclose Personal Information to the following categories of recipients:

- **Affiliates and Business Partners.** We may disclose your Personal Information with our affiliates and business partners where it is necessary to evaluate your candidacy for employment or for business operations purposes.
- **Service Providers.** We may disclose Personal Information to our service providers who perform services on our behalf, such as our recruitment platform provider. Our service providers are required to take appropriate security measures to protect your Personal Information in line with our policies and are not permitted to use Personal Information for their own purposes.
- **Government Entities and Agencies.** To comply with our legal obligations and where otherwise required by law, we may disclose the following categories of Personal Information to applicable regulatory and government entities: identifiers, characteristics of a protected classifications, and employment-related information.

6. How Long Do We Retain Personal Information?

We store your Personal Information for as long as needed, or permitted, based on the reason why we obtained it (consistent with applicable law). When deciding how long to keep your Personal Information, we consider whether we are subject to any legal obligations (e.g., any laws that require us to keep records for a certain period of time before we can delete them) or whether we have taken any legal positions that require data retention (e.g., issued any legal holds or otherwise need to preserve data).

Rather than delete your Personal Information, we may also deidentify it in accordance with the CCPA, by removing identifying details. If we deidentify any Personal Information, we will not attempt to reidentify it.

7. Security

CIGNA takes reasonable and appropriate administrative, technical, and physical measures designed to protect the Personal Information we collect from accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access.

Please be aware that despite our efforts, no data security measures can guarantee security. You should take steps to protect against unauthorized access to your passwords and login details.

8. How You Can Update Your Personal Information

It is important that the information contained in our records is both accurate and current. We offer various self-help functions within our recruitment platform (such as through Workday) that will allow you to update certain Personal Information (such as name and email), or if haven't created a candidate home account using the methods for contact described below. If your Personal

Information changes during the interview process, you can also update certain Personal Information.

9. Your California Privacy Rights

A. Applicant Privacy Rights

If you are a resident of California, starting January 1, 2023, you may have additional rights regarding your Personal Information under the CCPA. These rights include:

- **Right to Know/Access.** You have the right to request (subject to certain exemptions):
 - The categories of Personal Information we collected about you;
 - The sources from which we have collected that Personal Information;
 - Our business or commercial purpose for collecting, selling, or sharing that Personal Information;
 - The categories of third parties to whom we have disclosed that Personal Information; and
 - A copy of the specific pieces of Personal Information we have collected.
- **Right to Correct.** You have the right to request that we correct inaccuracies in your Personal Information. Applicants merely seeking to update their information (for example to update your bank information for payroll or provide a new mailing address) may do so at any time by using the processes described in Section 9 above.
- **Right to Delete.** Subject to certain exceptions, you have the right to request deletion of Personal Information that we have collected from you. Please note, CIGNA is not obligated to delete Personal Information that is necessary to provide services that you request (such as benefits and compensation) or required to comply with applicable laws.
- **Right to Opt-Out.** Under the CCPA, California residents may have the right to opt-out of the “sale,” “sharing,” and certain use or disclosures of “sensitive personal information.” California CCPA defines a “sale” as disclosing or making available to a third-party Personal Information in exchange for monetary or other valuable consideration, and “sharing” broadly includes disclosing or making available Personal Information to a third party for purposes of cross-context behavioral advertising. While we do not disclose personal information to third parties in exchange for monetary compensation, if you apply to an open position on our website, we may “sell” or “share” (as defined by the CCPA), the following categories of Personal Information: Identifiers, and Internet or Other Electric Network Activity Information to third-party advertising networks, analytics providers, and social networks for purposes of marketing and advertising. We do not sell or share sensitive personal information, nor do we sell or share any Personal Information about individuals who we know are under sixteen (16) years old. Where applicable, to opt out from the sharing or sale of Personal Information, please click on the “Do Not Sell or Share My Personal Information” link on the bottom of the website homepage. We do not use or disclose Applicant Sensitive Personal Information for purposes except as described herein (and as permitted pursuant to Cal. Code Regs. tit. 11, § 7027(l) (2022)).
- **Right to Non-Discrimination.** We will not discriminate against you for exercising any of the rights described in this section.

B. Exercising Your California Privacy Rights

To exercise any of these CCPA rights, please contact us at HRoperations@cigna.com or at the 1.800.551.3539 and let us know you are a California resident. You must indicate you are exercising your “CCPA rights.” CIGNA may require additional information to confirm your identity before fulfilling the request, such as your zip code and email address used for your application. In some cases, we may request additional information in order to verify your identity, or where necessary to process your request. If we are unable to verify your identity after a good faith attempt, we may deny the request and, if so, will explain the basis for the denial.

You may designate someone as an authorized agent to submit requests and act on your behalf. To do so, you must provide us with written permission to allow the authorized agent to act on your behalf. We may also ask you directly to verify that you have authorized your authorized agent to act on your behalf.

10. Changes to This Applicant Notice

This Applicant Notice is reviewed and updated periodically consistent with applicable law and to ensure it accurately describes our information practices and procedures. When we update this Applicant Notice, we will also revise the “Last Updated” date at the top of this document. You can find the most up to date version of the Applicant Notice on the [Cigna Career Site](#).

11. Contact Us

If you have questions or concerns regarding this Applicant Notice or the handling of your Personal Information, please contact us at:

HRoperations@cigna.com