

## **PRIVACY NOTICE FOR CALIFORNIA RESIDENTS**

This Notice describes what information InnovAge collects that is subject to the California Consumer Privacy Act of 2018 (CCPA), how we collect and use that information, your rights under the CCPA, and how you can exercise those rights. Any terms defined in the CCPA have the same meaning when used here.

### **1. Applicability**

This Privacy Notice for California Residents applies to individuals who live in the State of California and whose personal information is collected and/or maintained by InnovAge.

Please note that the CCPA does not apply to protected health information (PHI) that is collected by a covered entity governed by the Health Insurance Portability and Accountability Act of 1996 (HIPAA), or to a covered entity governed by HIPAA, to the extent the covered entity maintains patient information in the same manner as PHI.

As a HIPAA covered entity, substantially all the personal information InnovAge collects from its PACE participants is PHI and/or is treated as such. Additionally, all personal information that InnovAge collects from potential PACE participants, participants' caregivers and other information relating to participants' care or payment for care, is maintained in the same manner as PHI. For more on how InnovAge uses and discloses PHI, see our HIPAA Notice of Privacy Practices at [myinnovage.com](http://myinnovage.com).

The CCPA also does not apply to public information that is lawfully made available from federal, state or local government records, or to consumer information that is de-identified or aggregated.

Finally, through December 31, 2022, the CCPA will not apply to personal information that is collected by a business such as InnovAge about its job applicants, employees, owners, directors, officers, medical staff members, or contractors; emergency contact information of a job applicant, employee, owner, director, officer, medical staff member, or contractor of a business; or to personal information that is necessary for the business to retain in the administration of its employee benefits program.

While this Notice addresses InnovAge's collection and use of information generally, the applicability of the CCPA to InnovAge is subject to the above limitations, as well as any other applicable limitations and exemptions set forth in the CCPA and its implementing regulations, as amended.

### **2. Information We Collect**

InnovAge periodically collects individuals' personal information, including: identifiers such as names, postal and email addresses, social security numbers and Medicaid numbers; personal information such as bank account numbers and other financial information, medical information and health insurance information; protected classification characteristics such as age, race, marital status, medical condition and veteran or military status; professional or employment-related information; publicly available information; and other information related to InnovAge's administration of the PACE program.

### **3. Where We Collect Information**

We collect the types of information listed above primarily from the following sources:

- Substantially all the information we collect comes directly from you, for example, from forms you voluntarily complete, or information you provide at [myinnovage.com](http://myinnovage.com). For more on how InnovAge manages information received through its website, see our Privacy Statement at [myinnovage.com](http://myinnovage.com);

- Indirectly from you, for example, in the course of providing health care services to you; and
- From third parties, such as contracted health care providers and government agencies.

#### **4. How We Use Information**

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To provide PACE services to you and to coordinate care with your third party health care providers;
- To determine your eligibility for the PACE program, and to evaluate how we may best serve your needs within that program;
- To process payment to your third party health care providers for services covered under PACE;
- To respond to an inquiry from you regarding InnovAge, or the PACE program;
- To market PACE services to you, in accordance with other applicable state and federal laws.

#### **5. Sale of Your Information**

InnovAge will not sell, share, trade or otherwise use any information you provide unless you expressly provide permission for such use. InnovAge collects this information for its own internal use to improve our service and to help us determine your individual needs so we may serve our participants better individually as well as collectively.

#### **6. Your Rights Under the CCPA**

The CCPA provides California consumers the following rights regarding their personal information:

- You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months;
- You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions.

The rights described above are subject to certain qualifications and requirements which are set forth in the CCPA. To learn more these rights, please visit the California Attorney General's website at <https://oag.ca.gov/privacy/ccpa>. You can submit a verifiable consumer request to us by either:

- Calling the InnovAge Privacy Officer at (844) 704-9613
- Emailing the InnovAge Privacy Officer at [Privacy@myinnovage.com](mailto:Privacy@myinnovage.com)

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information.

#### **7. Changes to this Notice**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, the updated notice will be posted on our website homepage.