

NVIH EMPLOYEE PRIVACY NOTICE FOR CALIFORNIA RESIDENTS ONLY

Last updated: 01/01/2023

NOTICE STATEMENT

This Privacy Notice provides you with necessary information about the personal information we collect, how this information may be used by Northern Valley Indian Health, Inc. (“NVIH”), your privacy rights and NVIH’s obligations in accordance with the California Privacy Rights Act (“CPRA”) and the California Consumer Privacy Act (“CCPA”) as applicable. This Notice supplements other HR-related privacy policies and notices of NVIH.

SCOPE

This Privacy Notice applies solely to natural persons residing in California, and does not apply to individuals living elsewhere, businesses or other corporate entities.

KEY TERMS

The following key terms are used in this notice:

We, us, our. For the purposes of this Privacy Notice, we will refer to Northern Valley Indian Health, Inc. as “NVIH”, and collectively as “we”, “our”, or “us”.

Personal information (“PI”). Any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked with a particular individual.

Sensitive personal information. Sensitive personal information is a subset of personal information that requires greater security protections and standards of care in handling. Sensitive personal information is defined as information that if lost, compromised, or disclosed could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual (e.g., an individual’s social security number, driver’s license and passport numbers, account numbers and credentials, precise geolocation, etc.).

Biometric Information. An individual’s physiological, biological, or behavioral characteristics, including information pertaining to an individual’s deoxyribonucleic acid (“DNA”), that is used or is intended to be used singly or in combination with each other or with other identifying data, to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.

Other terms used but not defined will have the meaning set forth in the CCPA, as amended, and accompanying regulations set forth under the applicable California Codes of Regulations.

RIGHT TO OPT-OUT / DO NOT SELL MY PERSONAL INFORMATION

NVIH does not sell PI within the meaning of the CCPA/CPRA.

PERSONAL INFORMATION (PI) WE COLLECT

We collect PI as necessary to enable us to carry out your instructions, to manage and operate our business, and to comply with our legal and regulatory obligations.

The PI that we may collect as your employer or potential employer, may include, but is not limited to, the following:

- Your name or other similar identifiers (email address, account name, social security number, driver's license number, passport number, or other identifiers);
- Your job title and company name;
- Your mailing address;
- Your contact details (such as telephone number and email address);
- Your employment and educational background and other relevant applicant information;
- Biometric information;
- Geolocation data;
- Information relating to the matter in which you are seeking our advice or care;
- Other PI contained in correspondence and documents which you may provide to us;
- Other sensitive personal information (Financial, account or billing information, including tax identification number, social security number, or credit/debit card information; diversity or demographic information, including race or ethnicity, gender or gender identity, religious or philosophical beliefs, political affiliation, opinion or association, veteran or disability status, or sexual preference; etc.); and/or
- Information we obtain from our IT and communications monitoring.

You confirm that you are authorized to provide to us the PI which we shall collect on your behalf. Where the PI relates to your agents, associates or family members, it is not reasonably practicable for us to provide to them the information set out in this Privacy Notice. Accordingly, where appropriate, you are responsible for providing this information to any such person.

HOW PERSONAL INFORMATION IS COLLECTED

We collect most PI directly from you. However, we may also collect PI from the following:

- Publicly accessible sources;
- Directly from a third party for background checks or due diligence providers;
- A third party, such as a bank, financial institution or advisor, with your consent;
- Consultants and other professionals we may engage in relation to your matter, with your consent;
- Our website, or through the use of Cookies (Please view our Internet Privacy Practices and Terms of Use for more information); and/or
- Our Information Technology (IT) systems, including:
 - Online management, document management and time recording systems;
 - Door entry systems and reception logs; and/or
 - Access control systems.

THE PURPOSE FOR WHICH PERSONAL INFORMATION IS COLLECTED

The purposes for which NVIH will collect or use your PI include:

- To carry out our business operations and associated administration in connection with your matters or as your potential employer;
- To comply with our internal business processes and policies;

- To comply with our legal, regulatory and professional obligations;
- For operational reasons, such as improving efficiency, training and quality control;
- To prevent unauthorized access and modifications to our systems;
- To manage Human Resource Functions;
- For updating records;
- For the purpose of conducting due diligence and background checks, as permitted by law;
- For the purposes of the prevention or detection of an unlawful act or for preventing fraud; and/or
- For the provision of confidential advice.

HOW LONG YOUR PI WILL BE KEPT

We will keep your personal information for as long as is necessary while you are employed by us. Thereafter, we will keep your personal information:

- To carry out our business operations and associated administration in connection with your matters or as your former employer;
- To enforce or apply our terms and conditions or to establish, exercise or defend the rights of NVIH;
- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly; and/or
- To keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this Privacy Notice. Different retention periods apply for different types of personal information.

SOVEREIGN IMMUNITY

Sovereign immunity extends to NVIH as a tribal organization and arm of its consortium tribes. NVIH is not governed by California's labor laws including the state's wage and hour laws. NVIH may provide information and documents which reference state laws or regulations from time to time, and in the event of inconsistency or conflict, NVIH policy shall govern. NVIH disclaims jurisdiction of any state enforcement. Nothing herein or otherwise shall be construed as a waiver of sovereign immunity of NVIH.

CONTACT

If you have any questions or concerns about this notice or the information we collect about you, please contact the Human Resources Department at hr@nvih.freshservice.com or 530-330-8800 x1806.

MODIFICATIONS AND REVISIONS

We reserve the right to modify, revise, or otherwise amend this Privacy Notice at any time and in any manner. Any new version of this Privacy Notice will be posted on nvih.org. This Privacy Notice will be reviewed annually and updated, as necessary.