

## **HEALTH ASSESSMENT PRIVACY NOTICE**

**Effective Date:** July 22, 2020

This Health Assessment Privacy Notice (“Notice”) explains how your personal information is collected, used, and disclosed by Oxford Finance LLC and its subsidiaries (“Company”) and its health-assessing service providers (“Service Providers”) (collectively, “we,” “our,” or “us”) when you enter a Company office (“Facility”) within the United States.

We may change this Notice from time to time. If we make changes, we will notify you by revising the date at the top of this Notice and, in some cases, we may provide you with additional notice (such as by emailing you a notification). We encourage you to review the Notice each time you arrive at a Facility to stay informed about our information practices and the choices available to you.

Please note, depending on your relationship to Oxford Finance LLC (such as an employee, contractor, or visitor), you and your personal information may be subject to additional privacy notices, rights, and related obligations.

### **1. COLLECTION OF INFORMATION**

Upon entering a Facility, we collect personal information you provide directly to us. For example, we may collect your identifiers (such as your name, telephone number, email address, or other similar identifiers), professional or employment-related information (such as the name and contact information of your employer or business you are representing), and personal information described in California Civil Code Section 1798.80(e) (such as medical and health information including whether you have or display certain symptoms related to COVID-19 or related illnesses). We may also collect information about whether you have recently been in contact with anyone who has exhibited any of these symptoms or tested positive for COVID-19 or related illnesses, whether you have recently returned from domestic or international travel (including travel subject to any Centers For Disease Control and Prevention (“CDC”) or U.S. State Department Travel Advisory), and any other information you provide.

Additionally, we will collect the location of the Facility you are entering and we may draw inferences based on the information we’ve collected about you (such as whether you may have or been exposed to COVID-19 or related illness(es)).

### **2. USE OF INFORMATION**

We use the collected information to reduce the risk of spreading the COVID-19 virus or related illness(es) in a Facility. For example, any individual, whether an employee, contractor, or visitor, who reports or is observed having any symptoms, or who has recently been in contact with symptomatic individuals will not be permitted to enter any Facility at that time.

Additionally, we use the collected information:

- To comply with our legal, regulatory, and compliance obligations;

- For reasonable internal uses aligned with your relationship with us and the context in which we collected the information; and
- To carry out any other purpose described to you when the information was collected.

### **3. SHARING OF INFORMATION**

We may share the collected information as follows or as otherwise described in this Notice:

- With Service Providers, vendors, consultants, and others needing access to such personal information in order to perform services for us, such as companies providing maintenance, security, or occupational health services;
- With our lawyers and other professional advisors where necessary to obtain advice or otherwise protect and manage our business interests;
- Between and among Oxford Finance LLC and our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership;
- In response to an information request if we believe disclosure is in accordance with, or required by, any applicable law, regulation or legal process, including requests by public authorities to meet national, state, or local security, law enforcement, or public health requirements; and
- With your consent, at your direction, or as otherwise permitted by law.

### **4. YOUR CALIFORNIA PRIVACY RIGHTS**

The California Consumer Privacy Act or "CCPA" (California Civil Code Section 1798.100 et seq) affords California residents certain rights with respect to their personal information. If you are a California resident, this section applies to you. Please note, this Notice and your related rights listed herein relate only to the personal information collected, used, and shared for the purposes listed in this Notice.

In the preceding 12 months, we have collected the following categories of personal information: identifiers, professional or employment-related information, personal information described in California Civil Code Section 1798.80(e), location, and inferences. For examples of the precise data points we collect and the sources of such collection, please see "Section 1. Collection of Information." In the preceding 12 months, we have collected this personal information for the business and commercial purposes described in "Section 2. Use of Information" and have shared with the recipients described in "Section 3. Sharing of Information." Please note, Oxford Finance LLC does not and will not sell your personal information collected pursuant to this Notice.

California Consumer Rights: Subject to certain limitations and the scope of this Notice, you have the right to (1) request to know more about the categories and specific pieces of personal information we collect, use, and share, (2) request deletion of your personal information, and (3) not to be discriminated against for exercising these rights. You may make these requests by calling 1-888-471-0174 or at <https://oxfordfinance.com/contact-us/>. We will verify your request by asking you to provide information related to your recent interactions with us, such as information regarding a recent Facility visit. We will not discriminate against you if you exercise these rights.

If we receive your request from an authorized agent, we may ask for evidence that you have provided such agent with power of attorney or that the agent otherwise has valid written authority to submit requests to exercise rights on your behalf. If you are an authorized agent seeking to make a request, please contact us at 703-519-4900.

## **5. CONTACT US**

If you have any questions or concerns about this Notice, please contact us at: 703-519-4900 or Oxford Finance LLC, 115 S. Union Street, Suite 300, Alexandria, VA 22314.

**By signing below, I acknowledge and confirm that I have received and read and understand this Notice.**

\_\_\_\_\_  
Signature Date

\_\_\_\_\_  
Date

\_\_\_\_\_  
Print Your Full Name

\_\_\_\_\_  
Email Address or Phone Number