

CALIFORNIA CONSUMER PRIVACY ACT

BrightStar Care takes your privacy seriously. We want you to know how we collect, use, share, and protect your Personal Information and about the rights of California Consumers under California law.

This Privacy Policy addresses the following topics

- The Scope of this Privacy Policy
- The Company's Collection, Use and Disclosure of Personal Information
- Your California Privacy Rights
- How to Exercise Your Rights
- Additional Rights Under California Law
- Changes to This California Privacy Policy
- For More Information

Assistance For The Disabled

Alternative formats of this Privacy Statement are available to individuals with a disability. Please contact us privacy@brightstarcare.com for assistance.

The Scope Of This Privacy Policy

What Is Personal Information?

"Personal Information". "Personal Information" means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California Consumer or household.

Whose Personal Information Is Covered By This Policy?

This California Privacy Policy applies to the Personal Information of residents of the State of California in their capacity as consumers ("California Consumers").

What Personal Information Does This Privacy Policy Cover?

This Privacy Policy applies to all Personal Information of California Consumers that we collect both online and offline, including through California Consumers' (a) visits to our website; (b) emails; and (d) use of our products and services that references this Privacy Policy (collectively, the "Services").

Whose Personal Information Is Not Covered By This Privacy Policy?

For purposes of this Privacy Policy, "Consumer" does not include:

- Individuals who are NOT California residents.
- California residents who are Company's employees, job applicants, or contract workers (collectively, "HR Individuals"), or the emergency contacts of HR Individuals or the dependents or spouses who receive Company benefits by virtue of their relationship to an HR Individual in their capacities as HR Individuals or emergency contacts, dependents, or spouses; or

- California residents who are employees or other agents of a business engaged in a transaction with Company in their capacities as employees or agents of that business.

The Company’s Collection, Use And Disclosure Of Personal Information

This section of the Privacy Policy describes, for the 12 months preceding the date last updated, above, (a) the categories of Personal Information we have collected about you, (b) the sources of that Personal Information, (c) the business and commercial purposes for use, and (d) the categories of third party recipients of your Personal Information. Unless we inform you otherwise, this section also serves as our “**Notice at Collection**” by informing you of your Personal Information to be collected in the future and the purposes for its use.

Categories Of Personal Information Collected

In the last 12 months, Company collected the following categories of Personal Information about California Consumers:

- **Identifiers**, including: real name, alias, postal address, unique personal identifier, email address, account name, and phone number.
- **Categories described in Cal. Civ. Code § 1798.80(e)** (except those already listed in “Identifiers” above), including: photograph, medical information, insurance information, social security number, and signature.
- **Characteristics of protected classifications under California or federal law**, including: race, ethnicity, gender, medical information, genetic information, physical or mental disability, age over 40.
- **Commercial information**, including: products and services purchased, length of usage, date of purchase, complaints and feedback on products and services.
- **Geolocation information**, including: GPS based location tracking
- **Financial Information**, including: personal financial statement, including assets and liabilities
- **Professional or Employment-Related Information**, present employer, title, description.
- **Non-public education information**, including: highest level achieved
- **Inference information**, including: preferences.

Sources Of Personal Information and Purposes For Using Personal Information

In the last 12 months, Company collected the categories of Personal Information listed above from the following sources: (1) clients or family members of clients; (2) prospective franchisees; (3) prospective clients; and used those categories of Personal Information for the following purposes:

Categories of Personal Information Collected in the Last 12 Months	Sources of that Personal Information	Business Purposes and Commercial Purposes for Collecting that Personal Information
Identifiers		

Categories of Personal Information Collected in the Last 12 Months	Sources of that Personal Information	Business Purposes and Commercial Purposes for Collecting that Personal Information
<p>(1) Collected From Clients or Family Members:</p> <ul style="list-style-type: none"> • Real name, alias, postal address, phone number, unique personal identifier, email address, account number, date of birth <p>(2) Collected from Prospective Clients</p> <ul style="list-style-type: none"> • Name, phone number, email address, postal address <p>3) Collected from Prospective Franchisees. Visit www.brightstarfranchising.com to review privacy policy.</p>	<p>(1) Sources of Collection</p> <ul style="list-style-type: none"> • Directly from clients and family members if clients <p>(2) Source of Collection</p> <ul style="list-style-type: none"> • Prospective clients 	<p>(1) Clients or Family Members</p> <ul style="list-style-type: none"> • To provide care services to clients • To match clients with local caregiver • Undertaking internal research for technological development and demonstration. • Undertaking activities to verify or maintain the quality or safety of service. • Facilitating communications, for example, by collecting and organizing contact information, establishing means of communications, and communicating with current and prospective clients, including regarding questions and feedback. <p>(2) Prospective Clients</p> <ul style="list-style-type: none"> • To provide care service to clients • Facilitate communications • Undertake activities for marketing and promotions
<p>Categories described in Cal. Civ. Code § 1798.80(e)</p> <p>Collected from Clients or Family Members</p> <ul style="list-style-type: none"> • Photograph, medical information, insurance information, social security number, signature 	<p>Sources of Collection</p> <ul style="list-style-type: none"> • Directly from clients or family members 	<p>From Clients or Family Members</p> <ul style="list-style-type: none"> • To provide care services to clients • To match clients with local care givers
<p>Characteristics of protected classifications under California or federal law</p> <p>Collected from Clients or Family Members</p> <ul style="list-style-type: none"> • Race, ethnicity, gender, medical information, genetic information, physical or mental disability, age 	<p>Sources of Collection</p> <ul style="list-style-type: none"> • Directly from clients or family members 	<p>From Clients or Family Members</p> <ul style="list-style-type: none"> • To provide care services to clients • To match clients with local care givers
<p>Commercial information</p> <p>Collected from Clients or Family Members</p>	<p>Sources of Collection</p>	<p>From Clients or Family Members</p>

Categories of Personal Information Collected in the Last 12 Months	Sources of that Personal Information	Business Purposes and Commercial Purposes for Collecting that Personal Information
<ul style="list-style-type: none"> • Products and services purchased, length of usage, date of service, complaints or feedback on products and service 	<ul style="list-style-type: none"> • Directly from clients or family members 	<ul style="list-style-type: none"> • Undertaking internal research for technological development and demonstration. • Undertaking activities to verify or maintain the quality or safety of service
<p>Geolocation data</p> <p>Collected from Service Provider</p> <ul style="list-style-type: none"> • GPS location tracking 	<p>Source of Collection</p> <ul style="list-style-type: none"> • Address verification service provider 	<p>From Service Provider</p> <ul style="list-style-type: none"> • To verify accuracy, timeliness, and quality of care service provided
<p>Professional or employment-related information</p> <p>From Prospective Franchisee</p> <ul style="list-style-type: none"> • Present employer, title, description 	<p>Source of Collection</p> <ul style="list-style-type: none"> • Prospective franchisee 	<p>From Prospective Franchisee</p> <ul style="list-style-type: none"> • Part of due diligence process, to verify background qualification
<p>Non-public education information</p> <p>From Prospective Franchisee</p> <ul style="list-style-type: none"> • Highest level of education achieved 	<p>Source of Collection</p> <ul style="list-style-type: none"> • Prospective franchisee 	<p>From Prospective Franchisee</p> <ul style="list-style-type: none"> • Part of due diligence process, to verify background qualification
<p>Financial Information</p> <p>From Prospective Franchisee</p> <ul style="list-style-type: none"> • Personal financial statement, including assets and liabilities 	<p>Source of Collection</p> <ul style="list-style-type: none"> • Prospective franchisee 	<p>From Prospective Franchisee</p> <ul style="list-style-type: none"> • Part of due diligence process, to verify background qualification
<p>Inference information</p> <p>From Clients or Family Members</p> <ul style="list-style-type: none"> • Preferences 	<p>Source of Collection</p> <p>Directly from clients or family members</p>	<p>From Clients or Family Members</p> <ul style="list-style-type: none"> • To match client with local caregiver

Disclosure Of Personal Information To Third Parties

In the last 12 months, Company disclosed the following categories of Personal Information about California Consumers to the following categories of third parties for a business or commercial purpose:

Category of Personal Information	Categories of Third Parties with Whom We Disclose Categories of Personal Information for a Business Purpose in the Last 12 Months
Identifiers From clients or family members	<ul style="list-style-type: none"> • To franchisees in order to provide care service • Government agencies, law enforcement, and other parties as required by law, including in litigation
Categories described in Cal. Civ. Code § 1798.80(e) From clients or family members	<ul style="list-style-type: none"> • To franchisees in order to provide care service
Characteristics of protected classifications under California or federal law From clients or family members	<ul style="list-style-type: none"> • To franchisees in order to provide care service
Geolocation Information From clients or family members	<ul style="list-style-type: none"> • Third-party address verification service (Smarty Streets)
Inference Information From clients or family members	<ul style="list-style-type: none"> • To franchisees in order to provide care service

No Sale Of Personal Information

The Company does not and will not sell California Consumers' Personal Information.

YOUR CALIFORNIA PRIVACY RIGHTS

a) Right to Know

California Consumers have the right to submit a verifiable request to know:

- The categories and specific pieces of Personal Information that Company has collected about them;
- The categories of sources from which Company collected the Personal Information;
- The categories of Personal Information that Company sold or disclosed to a third party (other than a service provider) for a business purpose and the categories of recipients of that information; and
- The business or commercial purposes for Company's collection, disclosure, or sale of the Personal Information.

b) Right To Delete

- California Consumers have the right to submit a verifiable request for deletion of their Personal Information that Company has collected from the Consumer.
- c) Right to Opt Out of Sale of Personal Information
- California Consumers have a right to opt-out of the sale of the Personal Information. However, as stated above, Company does not and will not sell Personal Information.

HOW TO EXERCISE YOUR RIGHTS

a) Making Requests

Company will respond to requests in accordance with applicable law if it can verify the identity of the individual submitting the request. California Consumers can exercise their rights in the following ways:

- a) Complete the online request form available <https://www.brightstarcare.com/ccpa-consumer-request-form>
- b) Contact by 866.618.7827
- c) **Corporate: 1125 Tri-State Parkway, Suite 700, Gurnee, Illinois, 60031**

b) Requests By Authorized Agents

You can have an authorized agent submit a CCPA request to us on your behalf by (a) providing us with a written authorization signed by you that designates the agent as your authorized agent for purposes of a CCPA request; (b) verifying your identity directly with us; and (c) directly confirming with us that the agent is authorized to submit the request.

c) How We Will Verify Your Requests

To prevent anyone other than you, or your authorized agent, from exercising the right to know or the right to delete with respect to your personal information, we follow procedures to verify your, or your agent's, identity. This process seeks to confirm that the person making a request is the person about whom we have collected personal information or that person's authorized agent. The verification process involves matching data points that you provide with your request against information about you we already have in our records and that we have determined to be reliable for purposes of verifying your identity. We will use information you provide in your completed request form to verify your identity, and we may request additional information if necessary to complete the verification process.

ADDITIONAL RIGHTS UNDER CALIFORNIA LAW

a) Your 'Do Not Track' Browser Setting

The Site does not collect personally identifiable information about your online activities over time and across third-party websites or online services. We support the Do Not Track (DNT) browser setting. DNT is a preference you can set in your browser's settings to let the websites you visit, including the Site, know that you do not want the sites collecting your personally identifiable information.

Third-Party Links And Services

We provide links to third party websites operated by organizations not affiliated with Company. We do not disclose your Personal Information to organizations operating such linked third-party websites. We do not review or endorse, and are not responsible for, the privacy practices of these organizations. We encourage you to read the privacy policy of each and every website that you visit. This Privacy Policy applies solely to information collected by Company through the Services.

Minors Under 16 Years of Age

We respect the privacy of children. Our Services are not designed to attract an audience younger than sixteen (16), and we do not knowingly collect Personal Information from children under sixteen (16). If you are under the age of sixteen (16), you are not permitted to use our Services and should not send any information about yourself to us through the Services. Please contact us using the contact details below if you believe we may have collected information from your child under the age of sixteen (16), and we will work to delete it.

CHANGES TO THIS PRIVACY POLICY

If we change this Privacy Policy, we will post those changes on this page and update the Privacy Policy modification date above. If we materially change this Privacy Policy in a way that affects how we use or disclose your personal data, we will provide a prominent notice of such changes and the effective date of the changes before making them.

FOR MORE INFORMATION

For questions or concerns about Company's privacy policies and practices, please contact us at privacy@brightstarcare.com