



PO Box 1986  
Cedar Rapids, IA 5240  
855-364-3061

**UPDATED JULY 2023**

## **Privacy Statement**

Involta is committed to protecting the privacy and confidentiality of Personal Information we may collect. This Privacy Policy describes the types of information collected, how it is collected, what Involta treats the information, and your choices with respect to the information that is collected. By visiting our websites or otherwise providing Involta with Personal Information by any means, you accept and consent to the practices set forth in this Privacy Policy.

This website is not designed for, or directed to, children under the age of 13. Involta does not intentionally collect information about anyone under the age of 13 on this website.

## **U.S – EU / Swiss – U.S Privacy Shield Frameworks**

Involta complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal information transferred from the European Union and Switzerland to the United States. This Section (U.S. – EU Privacy Shield) only relates to such information. Involta has certified to the Department of Commerce that it adheres to the Privacy Shield Principles and is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission. If there is any conflict between the terms in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield Program, and to view our certification, please visit <https://www.privacyshield.gov/>.

Involta's accountability for personal data we receive under Privacy Shield Frameworks and subsequently transfer to a third-party is described in the Privacy Shield Principles. Involta remains responsible and liable under the Privacy Shield Principles if third-party agents that we engage to process personal data on our behalf to do so in a manner inconsistent with the Principles, unless Involta proves that it is not responsible for the event giving rise to the damage.

Involta may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

## **HIPAA Notice of Privacy**

Involta is a managed service provider to various covered entities and will act in accordance with the privacy procedures established by federal regulations and agreements with such covered entities with respect to covered entity information and to fulfill covered entity requests. In many cases, such as within health systems and related sector companies, Involta has entered into a business associate agreement and other contracts or



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terms that require Involta to conform to a certain agreed Privacy Policy or other identified policies, as they pertain to limited use and disclosure and limited retention of certain data.

The internal Involta Security Team is responsible for assuring applicable security controls and compliance adherence to the applicable policies.

## **California Consumer Privacy Act (“CCPA”) and California Privacy Rights Act (“CPRA”)**

California’s California Consumer Privacy Act (“CCPA”) and California Privacy Rights Act (“CPRA”) provide California applicants and employees with certain rights:

- Knowledge of information collected;
- Deletion of information collected;
- Opt-out of information collected;
- Opt-in of information collected;
- Correction of information collected;
- Go to court;
- Limit use of information collected;
- Not to be discriminated or retaliated against for exercising rights under the law.

### **Where We Get Your Information From.**

The Company collects information about you from the following sources: 1) you; 2) prior employers, references, recruiters, job-related social media platforms; 3) third-party sources of demographic information; 4) third-party companies, such as background check companies, drug testing facilities; and 5) claim administrators and investigators. Depending on the Company’s interactions with you, we may or may not collect all of the information identified about you.

**The Personal and Sensitive Personal Information That We Are Collecting.** We are collecting the following information:

- Identifiers, such as name, government-issued identifier (e.g., Social Security number), and unique identifiers (e.g., employee ID);
- Personal information, such as real name, signature, SSN, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, passport number, federal identification authorizing work in the United States, access and/or passcodes, insurance policy number, education, employment, employment history, bank account number, other financial information, medical information, or health insurance information;
- Characteristics of protected classifications under California or federal law, such as age, marital status, gender, sex, race, color, disability, citizenship, primary language, immigration status, military/veteran status, disability, request for leave, and medical conditions;



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- Commercial information, such as transaction information and purchase history (e.g., in connection with travel or other reimbursements [or purchases from Company]);
- Internet or network activity information, such as browsing history and interactions with our online systems and websites and any personal information that you provide while accessing the Company's computer systems, such as personal credit card information and passwords;
- Geolocation data, such as device location from usage of the Company's devices;
- Biometric information related to access to the Company's secured access points;
- Audio, electronic, visual, and similar information;
- Professional or employment-related information, such as work history and prior employer;
- Non-public education information;
- Inferences drawn from any of the Persona and Sensitive Personal Information listed above to create a profile or summary about, for example, an individual's preferences and characteristics.

#### **How Your Personal and Sensitive Personal Information is Used.**

We may use Personal and Sensitive Personal Information:

- To operate, manage, and maintain our business;
- For hiring, retention, and employment purposes;
- To otherwise accomplish our business purposes and objectives, including, for example:
  - Emergency services;
  - Conducting research, analytics, and data analysis;
  - Maintaining our facilities and infrastructure;
  - Quality and safety assurance measures;
  - Conducting risk and security controls and monitoring;
  - Protecting confidential and trade secret information;
  - Detecting and preventing fraud;
  - Performing identity verification;
  - Performing accounting, audit, and other internal functions, such as internal investigations;
  - Complying with the law, legal process, and internal policies;
    - Maintaining records;
    - Claims processing;
    - Responding to legal requests for information and subpoenas; and
    - Exercising and defending legal claims.
  - Any other purposes authorized by the California Privacy Protection Agency, California or Federal law.

We may or may not have used Personal and Sensitive Personal Information about you for each of the above purposes.



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**Sharing of Personal Information.** We only share your information with the following third-party entities:

**Selling of Personal Information.** The Company DOES NOT sell your personal information.

**For Inquiries and/or to Submit Requests for Information, Deletion or Correction.** Please contact either: (1) [privacy@involta.com](mailto:privacy@involta.com), or (2) 855-364-3061 for inquiries about the Company's policy, or to submit your requests for information, deletion or correction.

## Definitions

**Anonymous Information** - Information that does not personally identify an individual, including aggregate demographic information.

**Cookies** - Small files that are stored by your web browser to help a particular system recognize you and the pages you visited in a website. Involta's Website uses cookies to store your account information between sessions and to maintain information regarding how you navigate our website. Involta does not collect any Personal Information from cookies. Most browsers automatically accept cookies but you can set your browser to refuse cookies, though you may not be able to use all the features of this website. Involta may use third party cookies (i.e. a cookie planted by a third party such as Google).

**Customer** - means an entity which receives services from Involta pursuant to a written agreement.

**Data Subject** - The individual to whom any given Personal Data covered by this Privacy Policy refers.

**Personal Data** - Any information relating to an individual residing in the European Union or Switzerland that can be used to identify that individual either on its own or in combination with other readily available data.

**Sensitive Information** - means personal information that reveals a natural person's race; gender; gender identification; ethnic origin; political, philosophical or religious beliefs; armed services participation or veteran status; trade union membership; information specifying a person's sex life; or that concerns a natural person's health or medical condition or treatment.

## How Involta Collects Information

Involta collects any information that you provide when you use our website or other managed services. For example, when you register for a download, webinar, or other service Involta may collect basic information about you such as your name, email address, physical address, phone number, and other personal and business demographic or contact information.

Cookies may be placed on your computer or internet-enabled device whenever you visit our website. This allows our web services to remember your computer or device and serves a number of purposes.

Involta shall practice limited collection; such that only the information noticed to the individual is collected.

## How Involta Uses Information



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Involta may use personal information for the following purposes:

- Process service requests and commitments, Incidents, and requests for change
- Process billing and/or shipping invoices
- Maintain accurate accounting information, manage customer relationships
- Market our products/services, including recommending new products/services
- Process applications for employment.
- Perform other functions as described at the time of collection.

### **Sharing and access to information**

Your personal information may be made available within Involta, and we sometimes employ other companies and individuals to perform functions on our behalf, e.g., providing technical support, product development, and marketing. These vendors may need access to your personal information to perform their functions but will not use your personal information for any other purpose.

Involta shall practice limited use and disclosure; such that only the information in With notice is disclosed to third parties. Involta shall only retain Sensitive Information as required by law or by contract, as specified within Involta procedures or those policies or procedures to which Involta is under contract or other commitment.

### **Email Communication**

Involta along with our partners and agents may use email to communicate with Customers, to respond to emails or to inform you about events or new products which you may be interested in. We will not send commercial solicitation emails to you if you request that such emails not be sent. Please see the “Choice” section below for more information about opting-out.

### **Choice**

If Personal Data covered by this policy is to be used for a new purpose that is materially different from that for which the Personal Data was originally collected or subsequently authorized, or is to be disclosed to a non-agent third party, Involta will provide Data Subjects with an opportunity to choose whether to have their Personal Data so used or disclosed. Requests to opt out of such uses or disclosures of Personal data should be sent to [privacy@involta.com](mailto:privacy@involta.com) commercial emails

### **Access**

Data Subjects whose Personal Data is covered by this Policy have the right to access such Personal Data and to correct, amend, or delete such Personal Data if it is inaccurate or has been processed in violation of the Privacy Shield Principles Requests for access, correction, amendment, or deletion should be sent to:

[privacy@involta.com](mailto:privacy@involta.com)

### **Security**



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Involta takes reasonable and appropriate measures to protect Personal Data covered by this Policy from loss, misuse, and unauthorized access, disclosure, alteration, and destruction, taking into due account the risks involved in the processing and the nature of the Personal Data. Involta has developed a set of security procedures that set forth the requirements for the protection of data including: Risk assessment, Configuration change management, periodic personnel training, security of electronic and physical boundaries, systems security management, account management, security status monitoring, vulnerability management, security incident response and recovery plans.

**Data Integrity and Purpose Limitation** Involta limits the collection of Personal Data covered by this policy to information that is relevant for the purposes of its processing stated in the section (How Involta Uses Information). Involta does not process such Personal Data in a way that is incompatible with its original purpose. Involta takes reasonable steps to ensure that such Personal Data is reliable for its intended use, accurate, complete, and current. Involta takes reasonable and appropriate measures to comply with the requirement under the Privacy Shield to retain Personal Data in identifiable form only for as long as it serves a purpose of processing. If you have any questions or concerns regarding this Privacy Policy or our information collection practices or, please contact our compliance department at [privacy@involta.com](mailto:privacy@involta.com).

### **Enforcement/Sanction**

Involta utilizes its Network Operations Center for providing an available method of contact and has an Administrative Manager assigned for resolution of employee issues and a Chief Security Officer assigned for the resolution of customer issues that involve breaches of information security. Involta also has a Security Incident process documented to aid in the resolution of this type of issue. Involta does utilize an audit plan and process to provide a mechanism to systematically identify the level of compliance to policies and procedures, with actionable items arising out of that process that are tracked.

### **Verification and Modification**

Involta uses a periodic self-assessment approach to assure our compliance with this Privacy Policy. We may update or modify this Privacy Policy to reflect changes to how we will collect, use and/or share Information. Our Privacy Policy will reflect the date it was last updated. If we make material changes to this Privacy Policy that do not affect Personal Information already collected by Involta, we will notify you by posting a notice of such changes on the privacy portion of this website. If Involta intends to use your Personal Information in a manner different from that stated at the time of collection, you will be notified via email. Please check this Privacy Policy each time you use our Website to ensure you are aware of any changes in our practices. Dispute Resolution Involta commits to resolve complaints about collection or use of your Personal Data or Sensitive Information. Individuals in the European Union or Switzerland with inquiries or complaints regarding our Privacy Shield policy should first contact Involta via email at [privacy@involta.com](mailto:privacy@involta.com) or via mail PO Box 1986, Cedar Rapids IA, 52406 Attn: Legal Department. For any Privacy Shield complaints that cannot be resolved with Involta directly, Involta has committed to refer unresolved Privacy Shield complaints to the Judicial Arbitration and Mediation Services (JAMS). JAMS can be contacted <https://www.jamsadr.com/eu-us-privacy-shield> the services of JAMS are provided at no cost to you. As further explained in the Privacy Shield Principles,



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a binding arbitration option will also be made available to you in order to address residual complaints not resolved by any other means. For individuals not in the European Union or Switzerland, if you have any questions or concerns regarding this Privacy Policy or our information collection or use practices or if you believe Involta has operated in a manner inconsistent with or in violation of this Privacy Policy, please contact Involta at [privacy@Involta.com](mailto:privacy@Involta.com) or via mail at: PO Box 1986, Cedar Rapids IA, 52406 Attn: Legal Department. Involta will promptly investigate any suspected violations and will attempt to resolve any complaints in accordance with the principles set forth in this Privacy Policy. If the violation or complaint is not resolved to your satisfaction, please contact JAMS (<https://www.jamsadr.com/eu-us-privacy-shield>) for an independent review and resolution of the issue.