

CCPA Privacy Notice

This CCPA Privacy Notice (“Notice”) is provided to you in accordance with the requirements of the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 and related regulations (collectively referred to herein as the “CCPA”). This Notice applies solely to individuals who reside in the State of California.

Hoag Orthopedic Institute, LLC (“HOI”) collects and uses personal information, including sensitive personal information, to support its business operations as described below and in the HOI Privacy Policy. To view HOI’s full privacy policy, visit <https://www.hoagorthopedicinstitute.com/privacy-policy/>.

HOI may collect the personal information and sensitive personal information categories listed in the table below. However, the specific information collected from or about you, and the purposes for which such information is collected, used, or disclosed, will vary depending on the context in which it was collected.

Category of Personal Information	Examples
Identifiers	Real name, alias, postal address, IP address, unique personal identifier or other online identifiers, email address, date of birth, Social Security number, identification documents such as driver’s license or passport, or other similar identifiers
Personal information categories listed in the California Customer Records statute	Name, signature, address, telephone number, social security number, passport number, driver’s license, membership in professional organizations, licenses and certifications, insurance policy number, education, employment, employment history, bank account number, or medical information
Characteristics of protected classifications	Sex, gender identity, gender expression, age
Commercial information	Records of HOI products or services you purchased or considered
Internet or other similar network activity	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement
Geolocation data	Approximate physical location
Biometric information	Fingerprints
Sensory data	Audio, electronic, visual and similar information (for example, video surveillance, call monitoring, or photos for identification badges).

Professional or employment-related information	Current or past job history, professional license numbers, professional qualifications, references, education records, performance and disciplinary records
Non-public education information	Education records, degrees and vocational certificates obtained
Sensitive personal information	Identification documents such as driver's license or passport, Social Security number, medical information, health insurance information (to the extent not excluded from the CCPA)

HOI may use or disclose the personal information, including sensitive personal information, we collect for one or more of the following purposes:

- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To communicate with you or otherwise fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request more information about our services or products, we will use that personal information to respond to your inquiry and assist with offering you HOI services.
- As needed to carry out HOI's business activities and operations and allow its service providers and contractors to carry out contracted activities.
- To provide, maintain, develop and improve our website, products, and services, including to perform analytics and non-personalized advertising activities.
- To provide you with customer support, to respond to your inquiries, and to perform audit, quality assurance, and improvement activities, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your HOI website experience and to deliver content and product and service offerings relevant to your interests.
- To help maintain the safety, rights, security, and integrity of our website, products and services, databases and other technology assets, employees, third parties, members of the public and/or business, including at any physical facilities.
- To evaluate current or potential workforce members.
- To seek and process independent contractor arrangements, including maintaining and administering independent contractor agreements and payments.
- To manage and facilitate access to HOI's facilities and systems.
- To maintain records and comply with HOI's record retention requirements.
- To provide data maintenance and support services.
- To conduct internal audits and investigate complaints, grievances, and suspected violations of HOI policy.
- To respond to law enforcement requests and, as permitted or required by applicable law, court orders, subpoenas or governmental regulations.

- For branding, marketing and community outreach purposes and events (including HOI class and event registrations).
- To exercise or comply with our legal obligations, regulatory requirements, contractual obligations, rights, and policies, including to provide information to our legal and tax advisors.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our consumers is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

HOI does use cookies on the Website to track site usage, improve our services and collect information about your browsing activity, search history, IP address, and approximate location which may be made available to affiliates, service providers, marketing partners and analytics providers for the purpose of marketing, analytics, and business operations and may be considered a “sale” of personal information. If you wish to opt-out of the sale or sharing of this information, you may do so by customizing your cookie settings on the Website or adjusting your browser settings.

HOI does not otherwise sell any personal information or sensitive personal information collected nor do we share personal information or sensitive information with third parties for cross-context behavioral advertising.

As a general matter, HOI will retain your personal information for as long as necessary for its legitimate business interests and/or as needed or permitted for legal reasons. In certain situations, HOI will delete your information after it is no longer needed to provide a service. You may request a copy of HOI’s Record Retention Schedule Policy for more information on how HOI manages the retention, storage and destruction of business records.

If you have any questions about this Notice or need to access it in an alternative format due to having a disability, please email HOICorporateCompliance@hoag.org.

Effective Date: May 1, 2026