

# Global Privacy Notice

Castlight Health.

("we" or "us"), which can be reached at

150 Spear Street, 4th Floor , San Francisco, CA 94105.

has engaged Sterling Talent Solutions ("Sterling") to conduct background screening services before and during employment, volunteer, tenancy or other contractual relationships. You can find complete information about how Sterling handles and protects your personal information and how to contact Sterling here: <https://www.sterlingtalentsolutions.com/pven>.

Sterling's services include verification of some or all of the following types of information, depending on the services ordered by us:

- Address, contact information and address history
- Criminal, police or court records\*
- Driving records
- Education history
- Eligibility to work
- Employment or volunteering history, including fiduciary or directorship responsibilities
- Financial history, including credit history, bankruptcy and financial judgments\*
- Gap activities, including travel
- Health information, including drug tests\*
- Identity, including identifying numbers and identity documents\*
- Inclusion on watch or sanctions lists\*
- Membership, registration or disciplinary action with regulatory or professional bodies
- Mentions in online or print media
- Other people's opinions about your performance or character
- Social media activity

**We may collect some personal information that is sensitive or subject to special protections** under the law where you reside. These are denoted with an asterisk (\*) in the lists above and here: <https://www.sterlingtalentsolutions.com/pven/#why-we-collect>. A complete list of the **types and sources of personal information** we and Sterling may collect to carry out these services are listed here: <https://www.sterlingtalentsolutions.com/pven/#why-we-collect>. Some of these checks can only be carried out for specific roles or in certain countries. To understand exactly which types of personal information will be collected in your case and how they will be used, contact us.

Your personal information is collected and processed based on one or more of the following:

- It is necessary for us to carry out obligations in our contract with you.
- It is necessary for us to comply with our obligations under employment or other laws.
- We have legitimate interests to do so, taking into consideration your rights. Our legitimate interests may include one or more of the following:
  - Ensuring the reliability of employees and contractors
  - Protection of our workers, property and reputation
  - Compliance with foreign laws
  - Compliance with contractual obligations
- We have your freely given, specific, informed and unambiguous consent.
- It is otherwise permitted by law.

Sterling may **share your personal information with third parties** to validate its accuracy or obtain specialized services, such as data storage or translation services. Information about how Sterling may share your personal information can be found here: <https://www.sterlingtalentsolutions.com/pven/#when-why-how>.

Sterling will **retain your personal information** until we instruct them to delete it. Retention periods are determined based on applicable laws and our business requirements. To understand how long we and Sterling may retain your personal information, contact us.

Sterling **stores personal information in the United States, Canada and Ireland**. Sterling **processes personal information in the United States, Canada, the United Kingdom, India and the Philippines**. Sterling may also share your personal information with third parties in other countries to collect or translate information, such as your educational qualifications or employment history, from countries or regions where you have lived, worked or studied. Where there are legal restrictions on transfers of personal information, these transfers are done based on one or more of the following:

- Regulators have decided that personal information will be adequately protected in the country to which it is transferred. This is the case for personal information originating in the European Union (EU) and Switzerland that is transferred to Sterling in Canada and, under the Privacy Shield Framework, to Sterling in the United States, but not to India or the Philippines. You can find more information about Sterling's participation in Privacy Shield here: <https://www.sterlingtalentsolutions.com/pven/#privacy-shield-framework>.
- We have signed contractual clauses with Sterling that are deemed by the relevant authority to ensure adequate protection of personal information.
- We have your consent for us to transfer your personal information outside of your country of residence.
- The transfers are otherwise permitted by law.

You can find more information about international transfers of personal information here: <https://www.sterlingtalentsolutions.com/pven/#international-transfer>.

**You may have legal rights** concerning how we or Sterling handle your personal information, including rights to access, correct or delete your personal information, have it sent to another organization, restrict or object to its processing or complain to a regulator about how it is handled. You can find information about these rights here: <https://www.sterlingtalentsolutions.com/pven/#choices-collection-use>. To exercise these rights, contact us or Sterling.

**Providing your information to Sterling is voluntary.** If your personal information is collected based on your consent, you may also withdraw that consent. If you choose not to provide your personal information, or if you withdraw consent, Sterling will not be able to complete services on our behalf. To understand the consequences of deciding not to provide your personal information, contact us.


## Global Authorization

By signing or otherwise making a mark below, you authorize us, Sterling and Sterling's service providers to do the following:

- Collect and process your personal information as described above and here: <https://www.sterlingtalentsolutions.com/pven/>, including collection and processing of sensitive personal information.
- Share your personal information with, and obtain information from, the following third parties as necessary to carry out the requested services: police, courts, suppliers of court and police information, employers, employment agencies, educational institutions, credit and consumer reporting agencies, government agencies and other public bodies, regulatory or professional bodies, references you provide, other organizations with which you have been associated, and other publicly available print or online sources. You understand that these third parties may be located in countries or regions other than your country of residence, including places where you have previously lived, studied or worked.
- Where necessary, act as your agent to share or obtain your personal information when carrying out the services.

You declare that the information you provide to us and to Sterling is complete and accurate to the best of your knowledge. You understand that we will rely on the information you have provided when making a decision about your relationship with us, and a false statement or omission of facts may disqualify you from, or otherwise affect, your relationship with us.

This authorization is valid for the duration of your relationship with us, to the extent permitted by law.

Signature		Date (YYYY.MM.DD)
X		2021.07.21
Print Name	Srilekha Anumulapelli	