

One to One Health Privacy Statement

NOTICE REGARDING PROTECTED HEALTH INFORMATION CONFIDENTIALITY AND OTHER PROTECTIONS

The Company's health and wellness program is a voluntary wellbeing program available to all employees. The program is administered according to federal rules permitting employer-sponsored wellbeing programs that seek to improve employee health or prevent disease, including the Americans with Disabilities Act of 1990, the Genetic Information Nondiscrimination Act of 2008, and the Health Insurance Portability and Accountability Act (HIPAA), as applicable, among others. If you choose to participate in the wellbeing program you may be asked to complete a voluntary health assessment or "HA" that asks a series of questions about your health-related activities and behaviors and whether you have or had certain medical conditions (e.g., cancer, diabetes, or heart disease). You may also be asked to complete a biometric screening, which will include a blood test measuring LDL and A1C and non-blood test(s) measuring height, weight, BMI and blood pressure. The information from your HA and the results from your biometric screening will be used to provide you with information to help you understand your current health and potential risks, and may also be used to offer you services through the wellbeing program, such as additional education, health coaching and other resources. You also are encouraged to share your results or concerns with your own physician or other personal health-care professional.

You are not required to complete the HA or to participate in the blood test or other medical examinations to participate in the wellbeing program. However, employees who choose to participate in certain components of the wellbeing program may receive a financial incentive to do so. If the Company has such an incentive program in place, it will be described in the Program Portal. If such an incentive program is in place, although you are not required to complete the incentive-requirements, only those employees who do so will receive the incentive.

Additional incentives may be available for employees who participate in certain health-related activities or achieve certain health outcomes. If such additional incentives are available, they will be described in the Program Portal. If such incentive programming is in place and you are unable to participate in any of the health-related activities or achieve any of the health outcomes required to earn an incentive, you may be entitled to a reasonable accommodation or an alternative standard. You may request a reasonable accommodation or an alternative standard through the process that will be outlined in the incentive-program description presented in the Program Portal. You may also contact your division's human resources director with any questions about a reasonable accommodation or alternative standard related to the incentive programming.

Protections from Disclosure of Medical Information

The Company and its wellbeing vendors are required by law to maintain the privacy and security of your personally identifiable health information. Although the wellbeing program vendor and the Company may use aggregate information it collects to design a program based on identified health risks in the workplace, neither the Company nor its wellbeing vendors will ever disclose any of your personal information either publicly or to other employees at the Company except as necessary to respond to a request from you for a reasonable accommodation needed to participate in the wellbeing program, or as expressly permitted by law. Medical information that personally identifies you that is provided in connection with the wellbeing program will not be provided to your supervisors or managers and may never be used to make decisions regarding your employment.

Your health information will not be sold, exchanged, transferred, or otherwise disclosed except to the extent permitted by law to carry out specific activities related to the wellbeing program, and you will not be asked or required to waive the confidentiality of your health information as a condition of participating in the wellbeing program or receiving an incentive. Anyone who receives your information for purposes of providing you services as part of the wellbeing program will abide by the same

confidentiality requirements. The only individual(s) who will receive your personally identifiable health information are those to whom you choose to disclose it (such as a health coach, nurse, physician, etc.) in order to provide you with services under the wellbeing program.

In addition, all medical information obtained through the wellbeing program will be maintained separate from your personnel records, information stored electronically will be encrypted, and no information you provide as part of the wellbeing program will be used in making any employment decision. Appropriate precautions will be taken to avoid any data breach, and in the event a data breach occurs involving information you provide in connection with the wellbeing program, we will notify you immediately.

You may not be discriminated against in employment because of the medical information you provide as part of participating in the wellbeing program, nor may you be subjected to retaliation if you choose not to participate.

If you have any questions about the privacy of your PHI, HIPAA or discrimination contact your Company's human resources director.