

Privacy notice for California consumers

California | Anthem Blue Cross | Medi-Cal Managed Care

This *Privacy Notice for California Consumers* applies to individuals who live in the State of California and whose data is subject to the *California Consumer Privacy Act of 2018 (CCPA)*, as amended and supplemented by the *California Privacy Rights Act of 2020 (CPRA)*. Below describes what information Anthem Blue Cross (Anthem) collects that is subject to the CCPA and CPRA, your rights under the CCPA and CPRA, and how you can enforce those rights under the CCPA and CPRA. Any terms defined in the CCPA and CPRA have the same meaning when used here.

Definitions

As defined by the CCPA and CPRA:

Consumer: A consumer is a natural person who is a California resident, living in California for other than a temporary or transitory purpose, or individual domiciled in California.

Personal information (PI): Information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device. PI does **not** include:

- Publicly available information lawfully made available from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA and CPRA's scope, like:
 - Health or medical information covered by the *Health Insurance Portability and Accountability Act of 1996 (HIPAA)* and the *California Confidentiality of Medical Information Act (CMIA)* or clinical trial data.
 - Personal Information covered by certain sector-specific privacy laws, including the *Fair Credit Reporting Act (FCRA)*, the *Gramm-Leach-Bliley Act (GLBA)* or the *California Financial Information Privacy Act (FIPA)*, and the *Driver's Privacy Protection Act of 1994*.

Sensitive personal information (SPI): A subset of PI that includes:

Corelon Research is an independent company providing services on behalf of the health plan.

Medicaid services provided by Anthem Blue Cross, trade name of Blue Cross of California. Anthem Blue Cross and Blue Cross of California Partnership Plan, Inc. are independent licensees of the Blue Cross Association. Blue Cross of California is contracted with LA. Care Health Plan to provide Medi-Cal Managed Care services in Los Angeles County.

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- Government identification numbers, such as Social Security numbers, driver's license numbers, state identification, numbers, or passport numbers.
- Account login information.
- Financial account, credit or debit card numbers, combined with a password, PIN, or other required security or access code.
- Precise geolocation.
- Racial or ethnic origin, religious or philosophical beliefs, or union membership.
- Content of postal mail, email, or text messages, unless Anthem is the intended recipient of those communications.
- Biometric data that uniquely identifies an individual or information concerning an individual's health, sex life, or sexual orientation; and
- Genetic data.

Information we collect

Anthem has collected the following categories of PI, including SPI, from its consumers within the last 12 months:

Category	Examples	Collected?
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers	YES

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B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	<p>Information that is protected against security breaches such as: name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information</p> <p>Some personal information included in this category may overlap with other categories and may not be subject to all the rights under the CCPA/CPRA.</p>	YES
C. Protected classification characteristics under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information)	YES
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	NO
E. Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data	YES
F. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement	YES
G. Geolocation data	Physical location or movements	NO

H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information	NO
I. Professional or employment-related information	Current or past job history or performance evaluations	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records	NO
K. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	NO

We generally do not collect additional categories of PI or use the PI we collected for significantly different or meaningfully unrelated purposes without providing you notice.

If certain types of information are exempt from the CCPA or CPRA, this policy will not apply to such exempted data, and other Anthem privacy policies may apply, such as our *HIPAA Notice of Privacy Practices*.

Retention of PI

We follow data minimization principles and retain PI for periods of time reasonably necessary to perform our services, except where retaining data for longer periods is necessary to improve or provide services or as otherwise disclosed in our applicable policies.

We retain PI that is serving a legitimate business purpose, is relevant to pending or reasonably anticipated litigation, and/or is required to be retained in compliance with applicable laws and regulations and for certain periods of time depending on the level of sensitivity in the data which may be tied to:

- Business processes and programs.
- Legal obligations under applicable statutes, regulations and/or contracts.
- Individual consent to use PI.

Where we obtain PI

We obtain the categories of PI listed above from the following categories of sources:

- Directly from you or your devices. For example, from forms you complete on our website
- Indirectly from you. For example, from observing your actions on our website, managing and monitoring access to our secured facilities, or interactions with our advertisers
- Other users of our services
- Affiliates
- Advertising networks
- Internet service providers
- Government entities
- Operating systems and platforms
- Social networks
- Resellers including consumer data brokers
- Business partners. For example, pharmacy benefit managers or providers
- Publicly accessible sources. For example, National Provider Identifier

Use of PI

We may use or disclose the PI we collect for one or more of the following business and commercial purposes:

- Fulfilling or meeting the reason you provided the information. For example, if you share PI in order to be a credentialed provider in Anthem's provider network, we will use that personal information for the credentialing process.
- Providing you with information, products, or services that you request from Anthem
- Providing you with email alerts, event registrations, and other notices concerning Anthem's services, or news that may be of interest to you
- Sending you text messages or push notifications
- Updating your status on social networks, sending messages on your behalf to your social networks, and providing other features and services to you
- Facilitating the connection of third-party services or applications, such as social networks
- Marketing purposes, such as developing and providing promotional and advertising materials that may be useful, relevant, valuable, or otherwise of interest to you
- Facilitating transactions and payments
- De-identifying and aggregating information collected through our services and using it for any lawful purpose
- Processing your job application
- Responding to trust and safety issues that may arise
- Carrying out our obligations and enforce our rights arising from any contracts or other terms entered into between you and Anthem, including billing, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency
- Auditing related to a current interaction with you and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards
- Personalizing your experience on our services, such as presenting tailored content
- Undertaking activities to verify or maintain the quality or safety of our services, and to improve, upgrade, or enhance our services

- For testing, research, analysis, and product development, including the development of data models and algorithms, and for demonstration purposes
- Auditing related to a current interaction with you and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
- Debugging to identify and repair errors that impair existing intended functionality
- Short-term, transient use
- Contracting with service providers to perform services on our behalf or on their behalf, including maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider
- Otherwise enabling or effecting, directly or indirectly, a commercial transaction
- For other purposes for which we provide specific notice at the time the information is collected
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations
- As described to you when collecting your PI or as otherwise set forth in the CCPA

Anthem job applicants and employees

As of January 1, 2023, for job applicants, employees, owners, directors, officers, medical staff members, or contractors of Anthem, who reside in California and from whom we collect personal information as a business under California law, we collect, use, and disclose your PI in accordance with the specific business purposes below:

- **Recruitment:** To receive, evaluate, and process job applications, verify your information, and conduct background checks, as permitted by law, communicate with you about the recruitment process and your application, schedule interviews, and improve the recruitment process.
- **HR operations:** To fulfill your employment agreement, manage employee onboarding, promotions, transfers, and secondments, manage HR related claims and litigation, provide trainings, performance reviews, and evaluations, manage

business and travel expenses, and create reports for workforce planning, such as headcount, attendance, and employee turnover.

- **Payroll and benefits:** To administer pay and benefits, process business and travel expense reimbursements, calculate tax and Social Security withholdings, comply with wage garnishment orders, and process leaves.
- **To identify wellness opportunities:** To identify and target benefit and wellness programs that may benefit our employees. We will never share your personal information with third parties without your consent.
- **IT and security:** To provide IT and security support, manage IT resources and provisions of new IT applications, manage log-in credentials, monitor IT systems and networks for suspicious activity, detect intrusions, and monitor and control access to facilities to protect us, our personnel, and property.
- **Legal and compliance:** To comply with legal obligations and internal policies regarding HR analytics, including requests from government statistics services, process conflict of interest reporting, process employee work-related claims such as worker compensation or insurance claims ensure compliance with our employee policies and security requirements gather evidence for and to support any internal investigations, litigation, disciplinary action, termination, or related activities, protect, enforce, and defend the legal rights, privacy, safety, or property of us and our employees, agents, and contractors, protect against fraud and manage risk, and comply with applicable laws, regulations, legal processes, or enforceable governmental requests.
- **Acquisition or merger:** To manage acquisitions, mergers, and reorganizations or sale of some or all of a company.
- **Other business purposes:** For other purposes that you would reasonably expect, or for which we provide specific notice at the time the information is collected.

If you have any questions, comments, or concerns about our processing activities, please contact your HR or recruiting representative, as appropriate.

Sharing of PI

Anthem may disclose your PI to a third party for a business or commercial purpose. When we disclose PI for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that PI confidential and not use it for any purpose except performing the contract.

In the preceding 12 months, Anthem has disclosed the following categories of PI for a business purpose:

Category A: Identifiers

Category B: California customer records

Category C: Protected classification characteristics under California or federal law.

Category F: Internet history

Category I: Professional or employment-related information

In the preceding 12 months, Anthem has not disclosed PI for a commercial purpose. However, for California consumers, the *CCPA* and the *CPRA* define **selling** PI to include providing it to a third party in exchange for money or valuable services. We may in the future disclose data in any of the categories above to certain third parties for commercial purposes, in our products and services or in exchange for valuable services, such as advertising or social media engagement services, which may constitute a **sale** under the *CCPA/CPRA*.

Pursuant to our [Privacy Notice](#), we share your information with the following categories of third parties for a business purpose:

- **Advertising providers:** advertising technology companies, such as advertising networks
- Internet service providers (ISPs)
- Analytics providers
- **Government:** government entities
- **OS/platform providers:** operating systems and platforms
- Social networks
- **Resellers:** consumer data brokers
- Affiliates
- **Vendors:** vendors and service providers
- **Integrated third parties:** third parties integrated into our services
- **Third parties as legally required:** third parties as required by law and similar disclosures
- **Third parties in merger/acquisition:** third parties in connection with a merger, sale, or asset transfer
- **Third parties with consent:** other third parties for whom we have obtained your permission to disclose your PI

For avoidance of doubt, we do not sell health information subject to *HIPAA* without your express authorization. If you give us such an authorization, you may revoke it in writing at any time. Your revocation will not affect any use or disclosure permitted by your authorization while it was in effect.

Your privacy rights and choices

The *CCPA* and *CPRA* provide consumers with specific rights regarding their PI. This section describes your *CCPA* and *CPRA* rights and explains how to exercise those rights.

The *CCPA* and *CPRA* provide consumers with specific rights regarding their personal information. This section describes your *CCPA* and *CPRA* rights and explains how to exercise those rights. To exercise your *CCPA* and *CPRA* rights, you (or your authorized representative) may submit a request to us by [selecting this link](#) or by contacting Anthem. We will respond to requests as indicated in the chart below.

If you have questions, comments, rights requests, and other *CCPA*-related inquiries you may contact Anthem via the contact information listed at the end of this notice.

Right	To exercise this right	Time frame and response from Anthem	If we cannot complete your request
Access to specific information and the categories of sources and purposes for collection, use, disclosure, and sale in the last 12 months, after verification of your identity	Submit your request and confirm your <i>verifiable consumer request</i> via the contact information below.	We will evaluate and respond to your request by mail (at your request) within 45 days. If we require more time, we will inform you of the reason and extension period in writing.	We will explain the reasons we cannot comply with a request in our response.

Deletion of information. You have the right to request that Anthem delete your PI, subject to certain exceptions and after verification of your identity.	Submit your request and confirm your <i>verifiable consumer request</i> via the contact information below.	<p>We will evaluate and respond to your request by mail (at your request) within 45 days. If we require more time, we will inform you of the reason and extension period in writing.</p> <p>Once we confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our</p>	<p>We will explain the reasons we cannot comply with a request in our response.</p> <p>The law does not require us to honor requests to delete where it is necessary in certain circumstances for us or service provider to maintain personal information.</p> <p>These include:</p> <p>Provide a good or service, perform our contract, or take action reasonably anticipated in the context of our ongoing relationship with you.</p> <p>Detect and protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.</p> <p>Debug products to identify and repair errors that impair existing intended functionality.</p>
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		records, unless an exception applies.	<p>Exercise and/or support free speech provided for by law.</p> <p>Comply with the <i>California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et seq.)</i>.</p> <p>Engage in research for which you provided informed consent that complies with applicable laws when deletion will seriously impair the research.</p> <p>Use internally for purposes aligned with your expectations and our relationship.</p> <p>Comply with a legal obligation or make other lawful use compatible with the context in which information was provided.</p>
Opt-out of the sale or sharing of PI in some circumstances	Submit your request and confirm your <i>verifiable consumer request</i> via the contact information below.	We will evaluate and respond to your request by mail (at your request) within 45 days. If we require more time, we will inform you of the reason and extension period in writing.	We will explain the reasons we cannot comply with a request in our response.

Correction of PI You have the right to have Anthem correct errors in the PI it maintains about you.	Submit your request and confirm your <i>verifiable consumer request</i> via the contact information below.	We will evaluate and respond to your request by mail (at your request) within 45 days. If we require more time, we will inform you of the reason and extension period in writing.	We will explain the reasons we cannot comply with a request in our response.
Limit use and disclosure of SPI in some circumstances	Submit your request and confirm your <i>verifiable consumer request</i> via the contact information below.	We will evaluate and respond to your request by mail (at your request) within 45 days. If we require more time, we will inform you of the reason and extension period in writing.	We will explain the reasons we cannot comply with a request in our response.

Verifiable consumer request

To exercise your rights to access or delete your PI under the CCPA/CPRA, you must submit a *verifiable consumer request*. Only you, or a person registered with the California Secretary of State whom you authorize to act on your behalf, may make a *verifiable consumer request* related to your PI. You may also make a verifiable consumer request on behalf of your minor child.

A verifiable consumer must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected PI or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

If we cannot verify your identity or authority to make the request, we will not be able to fulfill your request. The information provided for verification will only be used for that purpose.

Authorizing an agent

To authorize an agent to make a request to know or delete on your behalf, please write to the contact address below. To authorize an agent to make an opt-out request on your behalf, please send a written authorization signed by you and the authorized agent to us via the Contact Information section.

Processing fees

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

PI sales opt-out and opt-in rights

In some circumstances, you may opt out of the sale of your PI. If you are 16 years of age or older, you have the right to direct us to not sell your PI at any time (the right to opt-out). We do not sell the PI of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the right to opt-in) from either the consumer who is between 13 and 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to PI sales may opt-out of future sales at any time. We may ask for information from you to verify your identity and help ensure your request does not infringe upon the rights of others, for example, an individual who has not opted out but has a similar name as you.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by [selecting this link](#) or via the contact information below.

Once you make an opt-out request, we will wait at least 12 months before asking you to reauthorize the sale of your PI.

However, you may change your mind and opt back into PI sales at any time by visiting our website and sending us a message. We will only use PI provided in an opt-out request to review and comply with the request.

Non-discrimination

We will not discriminate against you for exercising any of your CCPA or CPRA rights. Unless permitted by the CCPA or the CPRA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

We may offer you certain financial incentives such as discounted prices, rates, or quality levels. Any permitted financial incentive we offer will reasonably relate to your PI's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Shine the Light

California's *Shine the Light* law (*Civil Code Section § 1798.83*) permits users of our website who are California consumers to request certain information regarding our disclosure of PI to third parties for their direct marketing purposes. To make such a request, please send us an electronic message through our website or write us at our address listed below.

Changes to our privacy notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the website and update the notice's effective date. **Your continued use of our website following the posting of changes constitutes your acceptance of such changes.**

Contact information

You can contact Anthem with your questions, comments, rights requests, and other CCPA-related inquiries by:

Mail:
Anthem
Privacy Office
220 Virginia Ave
Indianapolis, IN 46204

You may also contact the applicable areas below:

- Carelon Research: **833-905-1643**
- Broker Credentialing and Licensing: **877-304-6470**
- Provider Services: **800-677-6669**
- Human Resources: **866-777-9636**
- Human Resources Wellness: **866-777-9636**
- Travel, Expense Management, and Procurement: **877-811-3112**
- Sydney Community: Link appears on the app login page.
- Ethics Department: **877-725-2702**

If you believe your PI was accessed without permission, please contact Anthem by the means listed above.

Modifications and revisions

Version	Date approved	Description
V 1.0	8/25/2020	Incorporated changes to CCPA
V 1.1	11/09/2022	Added provisions from CPRA
V 1.2	2/03/2023	Rebranded HealthCore to Carelon Research

V 1.3	12/13/2023	Incorporated required Notice at Collection language that requires anticipated retention periods or criteria
V 1.4	3/22/2024	Added clarifying language for Rights
V 1.5	4/17/2024	Updated applicable business areas