

TRIMEDX HOLDINGS, LLC – APPLICANT PRIVACY POLICY

LAST UPDATED: August 25, 2025

This Applicant Privacy Policy (the “Policy”) provides information about the categories of Personal Information TRIMEDX Holdings, LLC and its affiliates (including, but not limited to, Centurion Service Group) (collectively, “TRIMEDX,” “we,” “us,” “our”) collects about U.S. job applicants and prospective job applicants (collectively, “Applicants”).

This Policy also includes some disclosures that are required by the California Consumer Privacy Act, as amended by the California Privacy Rights Act, and its implementing regulations (collectively, the “CCPA”). The CCPA gives California residents certain rights and requires businesses to make certain disclosures regarding their collection, use, and disclosure of Personal Information. Accordingly, some sections of this Policy apply only to Applicants who are residents of California. We have noted at the beginning of those sections that they apply only to California Applicants and not to Applicants who are residents of other U.S. states.

Please note that this Policy only addresses TRIMEDX’s collection, use, and disclosure of Applicant-related Personal Information. For further details about our privacy practices pertaining to non-Applicant Personal Information, please see the [TRIMEDX Privacy Policy](#).

DEFINITIONS

- **Personal Information**: As used in this Policy, “Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Applicant or household. Personal Information includes Sensitive Personal Information, but does not include protected health information covered by the Health Insurance Portability and Accountability Act (“HIPAA”), nonpublic personal information under the Gramm-Leach-Bliley Act (“GLBA”), or any other information which is exempt from the CCPA.
- **Sensitive Personal Information**: As used in this Policy, “Sensitive Personal Information” includes Personal Information that reveals an Applicant’s (i) social security number, driver’s license, state identification card, or passport number, (ii) account log-in, financial account, debit card, or credit card number in combination with any required security or access code, (iii) precise geolocation, (iv) racial or ethnic origin, citizenship or immigration status, religious or philosophical beliefs, or union membership, (v) mail, email, and text messages contents, unless TRIMEDX is the intended recipient of the communication, (vi) genetic data, or (vii) neural data. Sensitive Personal Information also includes biometric information for the purpose of uniquely identifying an Applicant, Personal Information concerning an Applicant’s health, and Personal Information concerning the Applicant’s sex life or sexual orientation.
- **Other CCPA Definitions**: As used in this Policy, the terms “Collect,” “Processing,” “Service Provider,” “Third Party,” “Sale,” “Share,” “Consumer,” and other terms defined in the CCPA and their conjugates, have the meanings afforded to them in the CCPA, whether or not such terms are capitalized herein, unless contrary to the meaning thereof.

APPLICANT PERSONAL INFORMATION WE COLLECT

We collect and have collected in the past 12 months the following categories of Personal Information about Applicants:

- (1) Identifiers, such as name, alias, contact information (e.g., address, phone number and email), online identifiers, Social Security numbers, and other government-issued ID numbers (e.g., driver’s license number or passport number);
- (2) Contact and financial information, including phone number, address, email address, and banking information required for administration of direct deposit purposes;

- (3) Characteristics of protected classifications under applicable state or federal law (e.g., age, race, color, ethnicity, citizenship, physical or mental disability, sex, gender, gender identity, gender expression, veteran or military status);
- (4) Internet or network activity information, such as browsing history, search history, online behavior, and interactions with our and other websites, applications, and systems;
- (5) Professional or employment-related information, such as work history, prior employer, information relating to references, CV, details of qualifications, skills and experience, human resources data, and data necessary for benefits and related administration services;
- (6) Education information, as defined in the federal Family Educational Rights and Privacy Act, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records;
- (7) Inferences drawn from any of the Personal Information listed above to create a profile or summary about, for example, an individual's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes; and
- (8) Sensitive Personal Information, including:
 - a. Personal Information that reveals:
 - i. Social security, driver's license, state identification card, or passport number; or
 - ii. Racial or ethnic origin;
 - b. Personal Information collected and analyzed concerning an Applicant's health.

PURPOSES FOR COLLECTING, PROCESSING, & DISCLOSING APPLICANT PERSONAL INFORMATION

We collect, process, and disclose the categories of Applicant Personal Information described in this Policy:

- To operate, manage, and maintain our business;
- To evaluate a potential employee relationship with you;
- For our employment and vendor management purposes, including to provide information, notices or announcements concerning our business operations, opportunities, or policies, assess ability, fitness or eligibility to fulfill or perform prospective job duties and work in relevant corporate location and environment, or reimburse for expenses;
- To perform background checks and verify past employment, educational history, professional standing, and other qualifications;
- To evaluate, determine, and arrange compensation, payroll, and benefits;
- To contact you regarding your application and potential employment with us;
- To perform identity verification;
- To perform accounting, audit, or other internal functions, such as internal investigations;
- To comply with law, legal process, and internal policies;
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- To maintain records in accordance with law, internal policies and industry standards;
- To protect the rights, property, life, health, security, and/or safety of us or any third party;
- To exercise and defend legal claims; or
- For any other purpose for which the Personal Information is provided or to which you consent.

In addition to the purposes identified above, TRIMEDX may use and disclose any and all Applicant Personal Information that we collect as necessary or appropriate to:

- Comply with laws and regulations, including (without limitation) applicable tax, health and safety, anti-discrimination, immigration, labor and employment, and social welfare laws;
- Monitor, investigate, and enforce compliance with and potential breaches of TRIMEDX policies and procedures and legal and regulatory requirements;
- Comply with civil, criminal, judicial, or regulatory inquiries, investigations, subpoenas, or summons; and
- Exercise or defend the legal rights of TRIMEDX and its employees, affiliates, customers, contractors, and agents.

We may also deidentify any Personal Information, including any Sensitive Personal Information, that we collect about you. When we do so, we take reasonable measures to ensure that the information cannot be associated with an Applicant or household, and we maintain and use the information in deidentified form. We will not attempt to reidentify the information, except that we may attempt to reidentify the information solely for the purpose of determining whether our deidentification processes satisfy applicable legal requirements. After it has been deidentified, the information is no longer Personal Information and is not subject to this Policy.

We may use artificial intelligence (“AI”) when carrying out some of the purposes described above. This may involve the use of your Personal Information from the sources described herein. All AI-driven processes are subject to human oversight, and we are committed to upholding fairness, transparency, and accountability in their use. If you have questions about how AI may be used in a decision about you, please contact us using the methods listed in the “Contact Us” section, below.

To the extent we collect Sensitive Personal Information about California Applicants, we do not process it for purposes other than those permitted by the CCPA regulations.

RETENTION OF APPLICANT PERSONAL INFORMATION

We retain each of the above-listed categories of Personal Information for the duration of your application process and, if applicable, subsequent employee relationship with us, as applicable, and longer as may be required by applicable laws, necessary for our legitimate business purposes, or in accordance with our data retention policies.

SALE & SHARING OF CALIFORNIA APPLICANT PERSONAL INFORMATION

This section applies only to California Applicants. We do not sell or share, and have not sold or shared in the past 12 months, the Personal Information we collect about California Applicants, as the terms “sell” and “share” are defined by the CCPA. Subject to some exceptions, a “sale” is the disclosure of Personal Information to a third party for monetary or other valuable consideration, and a “share” is the disclosure of Personal Information to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration.

We also do not knowingly sell or share the Personal Information of California consumers under the age of 16.

HOW WE DISCLOSE APPLICANT PERSONAL INFORMATION

We disclose and have disclosed in the past 12 months the categories of Personal Information listed in the “Applicant Personal Information We Collect” section, above, in the following contexts:

- *To our Affiliates and Service Providers.* TRIMEDX discloses the categories of Personal Information we collect to our affiliates and to our service providers who act on our behalf. For example, we use service providers to provide us with benefits and wellness services, website services, as well as other products and services, such as web hosting, data analysis, customer service, infrastructure services, technology services, email delivery services, legal services, and other similar services. These service providers may need Personal Information about you to perform their obligations. We contractually require our service providers to keep the Personal Information they process on our behalf confidential and to use it only to provide services on our behalf.
- *As Described in a Privacy Notice or With Your Consent.* We may disclose Personal Information as described in any privacy notice we provide to you, or with your consent if we obtain it from you in a particular context.

- *In Aggregate or De-Identified Form.* We may aggregate or de-identify the Personal Information we collect, and we may disclose aggregated and/or de-identified information to our vendors, and to third parties for our business operational purposes and for any other purposes permitted by applicable law.

We may also disclose Personal Information in the following contexts:

- *As Part of a Business Transfer.* We may disclose Personal Information to a successor organization if, for example, we transfer the ownership or operation of all or a portion of our business to another organization, we merge with or are acquired by another organization, or if we liquidate our assets. If such a transfer occurs, we will seek assurances that the successor organization will treat the Personal Information we disclose to it in accordance with this Policy.
- *To Comply with Laws and Protect Our Rights and the Rights of Others.* We may disclose Personal Information when we, in good faith, believe disclosure is appropriate to comply with the law, a court order, or a subpoena. We may also disclose Personal Information to prevent or investigate a possible crime, such as fraud or identity theft; to protect the security of our services; to enforce or apply our other agreements; or to protect our own rights or property or the rights, property, or safety of our Applicants or others.

SOURCES OF APPLICANT PERSONAL INFORMATION

We collect Personal Information directly from Applicants. We also collect Personal Information from joint marketing partners, public databases, providers of demographic data, publications, professional organizations, educational institutions, social media platforms, service providers and third parties that help us screen and onboard individuals for hiring purposes, and service providers and third parties when they disclose information to us.

YOUR PRIVACY RIGHTS

This section applies only to California Applicants. As a California Applicant, you have the following rights regarding our collection and use of your Personal Information, subject to certain exceptions.

California Applicants may exercise their data subject rights or submit a request by contacting our Human Resources Department at info@trimedx.com, by calling 877-TRIMEDX, or by clicking [here](#). You may also authorize an agent to make a data subject request on your behalf, and the authorized agent may do so via the above-listed submission methods. In such instances, authorized agents may use the same methods as you to submit the requests on your behalf. To verify your identity and protect your Personal Information, we may ask the requestor to provide information that will enable us to verify your identity in order to comply with your data subject request, such as asking your agent to provide proof of signed permission from you, or we may ask you to confirm with us directly that you provided the agent with permission to submit the request. In some instances, we may decline to honor your request if an exception applies under applicable law. We will respond to your request consistent with applicable law.

- **Right to Know:** You have the right to know the following details about our privacy practices at or before the point of collection. You may also request that we provide you with information about the following aspects of how we have handled your Personal Information specifically in the 12 months preceding your request:
 - The categories of Personal Information we have collected about you;
 - The categories of sources from which such Personal Information was collected;
 - The business or commercial purpose for collecting, selling or sharing Personal Information about you;
 - The categories of Personal Information about you that we disclosed and the categories of third parties to whom we disclosed such Personal Information;
 - The categories of Personal Information about you that we sold or shared, and the categories of third parties to whom we sold or shared such Personal Information;

- The categories of Sensitive Personal Information we collect, the purposes for which it is collected or used, and whether that information is sold or shared; and
- The length of time we intend to retain each category of Personal Information, or if that is not possible, the criteria used to determine that period.
- **Right to Delete:** You may request that we delete any Personal Information about you we that we collected from you.
- **Right to Correct:** You may request that we correct any inaccurate Personal Information we maintain about you.
- **Right to Access Specific Pieces of Personal Information:** You may ask to obtain the specific pieces of Personal Information we have collected about you in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the Personal Information to another entity without hindrance. You may not exercise this right more than two times in a calendar year.
- **Non-Discrimination.** We will not discriminate against you for exercising your data subject rights. For example, we will not make hiring, firing, promotional, or disciplinary decisions, or otherwise retaliate against you, as a result of you exercising your data subject rights.

HOW WE PROTECT APPLICANT PERSONAL INFORMATION

We maintain reasonable and appropriate administrative, physical, and technological measures to protect the confidentiality and security of Personal Information we collect about you. Unfortunately, no website, server, or database is completely secure or "hacker proof." We therefore cannot guarantee that your Personal Information will not be disclosed, misused, or lost by accident or by the unauthorized acts of others.

OTHER DISCLOSURES

- **Financial Incentives for California Applicants.** We do not provide financial incentives to California Applicants who allow us to collect, retain, sell, or share their Personal Information. We will describe such programs to you if and when we offer them to you.

CHANGES TO THIS POLICY

This Policy is effective as of the last updated date stated at the top of this Policy. We may change this Policy from time-to-time. When we make material changes to this Policy, we will notify you by posting an updated Policy on this page and listing the effective date of such updates.

CONTACT US

More information about our general privacy practices can be found in the [TRIMEDX Privacy Policy](#). If you have any questions regarding this Policy or TRIMEDX's collection and use of your Personal Information, or would like to exercise your data subject rights under the CCPA, please call or email TRIMEDX's Human Resources Department at 877-TRIMEDX, info@trimedx.com, or by clicking [here](#). If you are unable to review or access this notice due to a disability, you may contact TRIMEDX's Human Resources Department at info@trimedx.com to access this notice in an alternative format.