

NETSMART PRIVACY NOTICE TO JOB APPLICANTS REGARDING THE COLLECTION OF PERSONAL INFORMATION

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I.SCOPE AND PURPOSE

Netsmart Technologies, Inc. and its subsidiaries and affiliates (“Company”, “we, or “us”) are committed to protecting the privacy and security of personal information of all individuals, including job applicants. The Company complies with the California Privacy Rights Act (“CPRA”) and all applicable data privacy laws and regulations in the jurisdictions in which we recruit and hire associates.

II. INFORMATION WE MAY COLLECT

We collect several types of information from and about you, including personal 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 consumer’s device. By interacting with websites or other internet locations made available by the Company as part of its business operations (“Sites”), we collect information from and about you in the following four ways:

- **Information we collect directly from you:**
We collect information you provide directly to us, including, but not limited to, when you voluntarily enter information into fields on the Sites, sign up for, or request, certain services or information, agree to participate in our surveys, register for a specific conference or webinar, or call our client support team. Depending on how you interact with us, we may ask for your name, practice/organization name, address, email address, telephone number, and demographic information such as your organization and/or role.
- **Information we collect with cookies and tracking technologies:**
When you access our Sites, we may collect information about your visit and your device using automatic data collection technologies as described in the “Cookies and Tracking Technologies” section below. This information may include IP address, geolocation information, browser type and version, device type, mobile device identifiers, and information reflecting how you searched, browsed, and were directed to the Sites.

Personal Information Categories Collected

Our Sites collect information which may identify, relate to, describe, reference, be capable of being associated with, or can reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). Specifically, we have collected the following categories of personal information from visitors to our Sites within the last twelve (12) months:

Category of Personal Information	Business or Commercial Purpose(s) for Collection	Period for which Personal Information will be Retained	Categories of Third Parties with Whom we Share
<u>Personal Identifiers</u> such as a real name, alias, postal address, unique personal identifier, online identifier, email address, account name, or other similar identifiers.	Hire the best-qualified applicants, comply with our legal and contractual requirements, and to establish/exercise our legal and contractual rights	As long as reasonably necessary to fulfill the purposes for the collection. Generally, personal information is retained for the duration of our hiring process or continuing relationship with you, plus any legally required record or data retention period and/or any period of time reasonably necessary to exercise our legal rights	Company personnel involved with hiring, including: <ul style="list-style-type: none"> •Recruitment service providers •Background check service providers •References you provide

Category of Personal Information	Business or Commercial Purpose(s) for Collection	Period for which Personal Information will be Retained	Categories of Third Parties with Whom we Share
			<ul style="list-style-type: none"> •Applicable law enforcement and government agencies •Our service providers •Other third parties that you authorize •Third parties as required by law
<u>Internet or other electronic network activity information</u> , such as IP addresses, social media account handles/usernames, device fingerprints, pixel tags, MAC addresses, and advertising identifiers	Hire the best-qualified applicants, protect Company and customer information and Company equipment and systems, comply with our legal and contractual requirements, and to establish/exercise our legal and contractual rights	As long as reasonably necessary to fulfill the purposes for the collection. Generally, personal information is retained for the duration of our hiring process or continuing relationship with you, plus any legally required record or data retention period and/or any period of time reasonably necessary to exercise our legal rights	Company personnel involved with hiring and IT; and our IT service providers. We may also collect and use Personal Information to help conduct our business more effectively and efficiently – for example, general resourcing, reporting or analytics, IT security management, business continuity, or financial planning
<u>Sensitive Personal Information, including:</u> <ul style="list-style-type: none"> •A consumer’s social security, driver’s license, state identification card, or passport number. •A consumer’s racial or ethnic origin, religious or philosophical beliefs, or union membership. 	Hire the best-qualified applicants, identification verification, comply with our legal and contractual requirements, and to establish/exercise our legal and contractual rights	As long as reasonably necessary to fulfill the purposes for the collection. Generally, personal information is retained for the duration of our hiring process or continuing relationship with you, plus any legally required record or data retention period and/or any period of time reasonably necessary to exercise our legal rights	Company personnel involved with hiring and IT; our IT service providers
<u>Inferences drawn from the personal information identified to create a profile about a consumer reflecting preferences, characteristics, predispositions, behavior, intelligence, abilities, and aptitudes</u>	Hire the best-qualified applicants, identification verification, comply with our legal and contractual requirements, and to establish/exercise our legal and contractual rights	As long as reasonably necessary to fulfill the purposes for the collection. Generally, personal information is retained for the duration of our hiring process or continuing relationship with you, plus any legally required record or data retention period and/or any period of time reasonably necessary to exercise our legal rights	Company personnel involved with hiring and our recruitment service providers.

III.HOW WE MAY USE YOUR INFORMATION

We may use or disclose personal information we collect, or you provide, as described in this Privacy Notice:

- To present our Sites and their contents to you.
- To fulfill any requirement of the recruitment process.
- To provide you with status on the recruitment process.
- To fulfill a purpose as described to you when collecting your Information.
- To provide you with notices about your account.
- To provide you SMS communications about your recruitment activity, with your consent, which is revokable by you.
- To carry out our obligations and enforce our rights arising from any agreements between you and us.

- To fulfill any other purpose for which you provide it, with your consent.

We may use the personal information we have collected from you to enable us to display advertisements to our target audiences. Even though we do not disclose your personal information to these third parties for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet the target criteria.

IV.SELLING OR SHARING YOUR INFORMATION

We do not sell your personal information to third parties. We do not share your personal information with third parties for their promotional or marketing purposes. We may disclose personal information that we collect, or you provide, as follows:

- To comply with legal requirements and corporate transactions.
- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of all of Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Company about our website users is among the assets transferred.
- To comply with any court order, law, subpoena, or legal process, including to respond to any government or regulatory request.
- If we believe in good faith disclosure is necessary or appropriate to protect the rights, property, or safety of our Company, our clients, or others, investigate fraud, for national security and/or law enforcement purposes.
- For any other purpose disclosed by us when you provide the personal information.

Notwithstanding the above, we may share personal information that does not identify you and could not reasonably be used to identify you (including personal information that has been aggregated, anonymized, or de-identified) except as prohibited by applicable law.

V.COOKIES AND TRACKING TECHNOLOGIES

Our Company, or third parties we contract with, may use tracking technologies, such as cookies, to collect certain information, including personal information, about visitors to our website and interactions with our online content or applications, including advertisements. We may collect personal information, including information about your online activities over time and across different websites.

We use cookies based on each cookie's functionality and intended purpose. Cookies are defined based on the following categories:

- **Essential Cookies**
Essential cookies, or strictly necessary cookies, are cookies that are essential for a website to function correctly. These cookies are essential for you to browse our Sites and use their features, such as page navigation and accessing secure areas of the Sites. Websites cannot function properly without these cookies.
- **Analytics & Customization Cookies**
Analytics cookies analyze usage for site optimization. These cookies collect information that is used either in aggregate form to help us understand how our Sites are being used, or to help us customize our Sites for you. Analytics cookies are used to understand how visitors interact with websites; they help provide information on metrics such as the number of visitors, bounce rate, and traffic source. Customization cookies help us to personalize your experience on the Sites with features like relevant content or products you may be interested in based on your previous views. These cookies are set by us or by third party providers who may add services and features to our Sites.
- **Advertising Cookies**
Advertising cookies help serve advertising content that is relevant to you. These cookies track your online activity to help advertisers deliver more relevant advertising, to limit how many times you see an ad, ensuring that ads are properly displayed, and in some cases selecting advertisements that are based on your interests. These cookies can share that information with other organizations or advertisers. Without them you will still see ads, but they may not be relevant to you.
- **Performance & Functionality**
Performance and functionality cookies facilitate measurement and analytics for improved browsing experience. These cookies are used to enhance the performance and functionality of the website. They are not essential, but their sole purpose is to improve website functions. This includes cookies from third-party analytics services that we may use.

We periodically scan and evaluate our Sites for cookie compliance pursuant to our internal policies and to block undesirable cookies. You can manage your cookie preferences via the banner available on our Sites under the Cookie Preferences option. Please note, in order to access and use our Sites, you cannot opt-out from essential cookies.

VI. SOCIAL MEDIA AND OTHER INTEGRATIONS

Some of our Sites and services may have social media and technology integrations that are operated or controlled by separate entities. We also may collect information from third party social media and marketing companies to enhance our data sets. Some examples include:

- **Links:** Our Sites include hyperlinks to websites, platforms, and other services not operated or controlled by us.
- **Liking, Sharing, and Logging-In:** We may embed a pixel or software development kit (SDK) on our Sites that allows you to “like” or “share” content or log into your account through social media. If you choose to engage with such integration, we may receive personal information from the social network that you have authorized to share with us. Please note that the social network may independently collect information about you through the integration.
- **Brand Pages and Chatbots:** We may offer our content through social media. Any personal information you provide to us when you engage with our social media content is treated in accordance with this Policy. Also, if you publicly reference our Sites on social media (e.g., by using a hashtag associated with Netsmart in a tweet or post), we may use your reference on, or in connection with, our Sites.

Please note that when you interact with other web properties, including when you leave our Sites, those entities may independently collect personal information about you and solicit personal information from you. The personal information collected and stored by those entities remains subject to their own policies and practices, including what information they share with us, your rights and choices on their services and devices, and whether they store personal information in the U.S. or elsewhere. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.

VII. YOUR CHOICE AND TRANSPARENCY

a. Rights and Choices

Data Privacy Requests

We want you to be in control of how your personal data is used by us. Subject to applicable laws, you may have the right to be informed of, and request access to, the personal information we process about you; update and correct inaccuracies in that information; have the information restricted or deleted; object or withdraw your consent to certain uses of data; and lodge a complaint with your local data protection authority. Where applicable, you may also have the right to opt-out of automated decision-making, including profiling, where it would have a legal or similarly significant effect on you. Additionally, you may have the right to data portability with regard to the personal information you provided to us.

Netsmart enables you to exercise those rights in a variety of ways, including by:

- Submitting a [Data Privacy Request](#) online
- Calling us at (800) 842-1973 and select the Privacy Office option
- Writing to us at Netsmart Technologies, Inc., Attn: Privacy Office - 11100 Nall Ave, Overland Park, KS 66211, United States

If you contact Netsmart with a request, we may require more information from you, such as identity verification, or notify you that a response may require additional time. You have the right to file your complaint with the applicable regulatory authority in your jurisdiction if you are unsatisfied with Netsmart’s response.

b. California Privacy Disclosure

As a California resident, under the California Privacy Rights Act (“CPRA”), you have the right:

- To know and to access the personal information we have collected about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing your personal information, the third parties to whom the business discloses personal information, and the specific pieces of personal information the business has collected about the consumer;
- To delete personal information that we have collected from you, subject to certain exceptions;
- To correct inaccurate personal information that we maintain about you;

- Of portability, or right to have us transfer your personal information to other persons or entities upon your request; and
- To limit the use of your sensitive personal information if we decide in the future to use such information for purposes other than the purposes listed above.

Netsmart does not sell your personal information to anyone for any purpose and does not discriminate in response to privacy rights requests from individuals.

We provide our personal information practices in this Privacy Policy. This includes what personal information is collected, the source of the personal information, and the purposes of use, as well as whether Netsmart discloses that personal information and if so, the categories of third parties to whom it is disclosed.

If you are a California resident and you or your authorized agent, would like to exercise your rights under the CPRA, requests may be made by:

- Submitting a [Data Privacy Request](#) online
- Calling us at (800) 842-1973 and select the Privacy Office option
- Writing to us at Netsmart Technologies, Inc., Attn: Privacy Office - 11100 Nall Ave, Overland Park, KS 66211, United States

Netsmart may ask you for personal information which we consider necessary to verify your identity for security and to prevent fraud. This information may include name, contact information, and information related to your transaction or relationship with our Company, but the specific personal information requested may differ depending on the circumstances of your request. If you request deletion of your personal information, please note, that we will both render certain personal information about you permanently unrecoverable and also de-identify certain personal information.

Protection of Personal Information

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. We use physical, electronic, and administrative safeguards designed to protect your personal information against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorized disclosure or access. The safety and security of your personal information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Sites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out personal information in public areas of the Sites such as message boards. The personal information you share in public areas may be viewed by any user of the Sites,

c. International Transfers

We are based in the U.S. and the personal information we collect is governed by applicable U.S. federal, state and local laws. If you are accessing the Sites from outside of the U.S., please be aware that personal information collected through the Sites may be transferred to, processed, stored, and used in the U.S. Data protection laws in the U.S. may be different from those of your country of residence. Your use of the Sites or provision of any personal information therefore constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of information about you in the U.S. as set out in this Privacy Policy.

d. Updates to this Privacy Notice

From time to time, we may develop new capabilities, features, or offer additional services which may require us to make material changes to this Privacy Policy. When we do, we'll let you know by revising the date this Privacy Policy was last updated on our website. Other times, we may provide you with additional notice (such as an email) with more information about the revisions. Unless stated otherwise when we introduce these new or additional services, they will be subject to this Privacy Notice and become effective when we post it on our website.

VII PRIVACY QUESTIONS

If you have any questions regarding this Privacy Policy, privacy related comments or concerns, or to submit a personal information privacy request or requires access to this Privacy Policy in an alternative format due to a disability, please contact us at:

- Submit a [Data Privacy Request](#) online
- Call us at (800) 842-1973 and select the Privacy Office option.
- Write to us at Netsmart Technologies, Inc., Attn: Privacy Office - 11100 Nall Ave, Overland Park, KS 66211, United States

We will investigate and attempt to resolve any concerns regarding the use and disclosure of personal information in accordance with this Privacy Policy and in accordance with applicable law.