

# Privacy Notice

## Encompass Health Employee Privacy Notice

Encompass Health Corporation and our affiliates and subsidiaries (“Encompass Health,” “we,” or “us”) are committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your employment with us (collectively, your “employment”). It applies to all current and former employees, workers, and contractors (collectively “employees”).

This privacy notice does not form part of any contract of employment or other contract to provide services. We may update this privacy notice at any time, but if we do so, we will provide you with an updated copy of this privacy notice as soon as reasonably practicable.

It is important that you read and retain this privacy notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights may be.

## Information We Collect About You

Personal information means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with an individual. It does not include data that cannot be associated with you or for which identifying elements have been removed (“deidentified information”).

We may collect, store and use the following categories of personal information about you:

- **Personal Identifiers:**
  - We collect your personal contact details such as name, title, addresses, telephone numbers and personal email addresses.
  - You provide us with bank account details, payroll records, and tax status information.
  - We may collect your driver’s license number, passport number, nationality/visa status, or related information to verify your employment eligibility and to provide travel arrangements for you.
  - We collect your Social Security Number for tax purposes.
  - We collect some information about your health, such as medical conditions and health and sickness records, when you report this information to the company. This includes details of any absences (other than holidays) from work, including time on statutory parental leave and sick leave; information related to biological screenings or testing for controlled substances; records related to administering and maintaining your healthcare and other benefits; and information about a condition needed for pensions and permanent health insurance purposes when you leave employment and the reason for leaving is related to your health.
- **Protected Classifications:** We collect your date of birth and gender in order to verify your identity. We collect your marital status and dependents for tax and benefits administration purposes. We also collect and maintain information about your racial and ethnic origin or sexual orientation if you choose to provide it during the application or onboarding process. We use this information only to support our efforts to attract and maintain a diverse workforce, including reporting required by federal law.

- **Internet or Other Electronic Network Activity Information:** We collect information about your use of Encompass Health computers and networks, including your use of the internet and your email communications using company computers or systems.
- **Geolocation Data:** We may collect geolocation data about you if, for example, you are operating a company-issued vehicle or device, such as a company-issued mobile phone, as part of the fulfillment of your employment duties.
- **Audio, electronic, visual, thermal, olfactory, or similar information:** We store photographs of you for identity verification, and we may record you on building security cameras. We do not collect any of your thermal, olfactory or similar information.
- **Professional or employment-related information:** We collect information about your professional and employment-related background through the recruitment process (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of your application to work at Encompass Health). We collect information regarding your salary, annual leave, retirement, work performance, disciplinary actions, and/or grievance information. We also may collect information regarding job titles, salary history, work history, working hours, holidays, absences, training records and professional memberships. For purposes of administering employee benefits, we collect health information, your marital status, and dependent information.
- **Education information:** Your employment records include information you provided during the employment process about the educational institutions you have attended or your level of education. We also collect and maintain information about any professional licenses you hold, certifications you receive, or additional education or training you undertake during your employment.
- **Inferences drawn to create a profile:** We do not create profiles about you reflecting your preferences or characteristics.

We determine the retention period for each of the categories of personal information listed above based on (1) the length of time we need to retain the information to achieve the business or commercial purpose for which it was obtained, (2) any legal or regulatory requirements applicable to such information, (3) internal operational needs, and (4) any need for the information based on any actual or anticipated investigation or litigation.

## How We Collect Your Personal Information

We collect personal information about employees, workers, contactors, and job applicants through the application and recruitment process, directly from candidates, employment agencies, and screening services or other background-check providers. We may collect additional information from third parties including former employers, credit reference agencies, or other sources that supply employment verification services.

We may collect additional personal information in the course of job-related activities throughout the period you work for us. This can be in the form of information you provide directly to us, information received from coworkers, or information which we collect automatically about you, such as monitoring computer access and usage.

## How We Use Personal Information About You

We will only use your personal information as permitted by law. Situations in which we use your personal information include:

- **Decisions related to your employment,** including reviewing your performance; evaluating your development as an employee; setting your job duties and assessing our staffing needs; assessing your qualifications for other roles within the company or promotion; determining salary and compensation for grievance or other disciplinary procedures, including termination; dealing with legal disputes involving you or other employees and contractors, including accidents at work; and ascertaining your fitness for work.
- **Business Purposes,** including conducting data analytics studies to review and better understand employee retention and attrition rates; and ascertaining and fulfilling education, training, and development requirements.
- **Administering payments and benefits,** including making tax and other required deductions and making decisions about salary and compensation.

- **Security measures and complying with health and safety obligations**, including ensuring the physical safety of our facilities, resources, employees, and other people from threats; preventing fraud and to secure our systems, data, resources, and facilities from unauthorized access or exploitation; monitoring compliance with our IT policies; ensuring network and information security, including preventing unauthorized access to our computer and electronic communications systems, and preventing malicious software distribution; and investigating theft and other illegal activities.
- **Compliance with legal obligations and lawful requests**, including verifying that you are legally permitted to work in the United States or to comply with legal process or with law enforcement or regulatory requests.

We may use any and all of the information collected for any of the purposes described in this privacy notice, unless limitations are listed. In some circumstances we may deidentify your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## Disclosure of Your Personal Information

We may disclose personal information that we collect or that you provide as described in this privacy notice:

- To our affiliates, subsidiaries, and other Encompass Health companies.
- To service providers, which are companies we use to support our business and who are bound by law and contractual obligations to keep your personal information confidential. Service providers may use information we share with them only for the purposes for which we disclose it to them and as otherwise permitted by law. The categories of service providers that we share information with are:
  - **Payroll services providers** that assist us in calculating and disbursing your salary and other compensation.
  - **Auditing and accounting firms**, such as firms that assist us in the creation of our financial records.
  - **Professional services consultants**, such as firms that perform analytics, assist with improving our business, provide legal services, or supply project-based resources and assistance.
  - **Recruitment vendors** that assist with the application process, including assessing candidate qualifications and providing the platform through which candidates submit their candidacy.
  - **Analytics services**, including entities that analyze traffic to and on our website and assist with identifying and communicating with potential customers.
  - **Security vendors**, such as entities that assist with security incident verification and response, service notifications, and fraud prevention.
  - IT vendors, such as entities that assist with website design, hosting and maintenance; data and software storage; and network operation.
- To other external parties when required by law or to protect Encompass Health or other persons, as described in this privacy notice.
- To future potential employers who seek to confirm your employment at Encompass Health.
- To licensing boards, certifying bodies, or accreditation agencies for purposes related to your or Encompass Health's licensure, certification, or accreditation.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of Encompass Health's assets, whether as a going concern or as part of bankruptcy, liquidation or a similar proceeding, in which personal information held by Encompass Health about our employees, workers and contractors is among the assets transferred. If this happens, the recipient of the personal information will continue to honor the promises made in this privacy notice, or else provide you notice of any changes.

We do not sell your personal information to any third parties. However, we may disclose aggregated or deidentified information without restriction.

## Special Information for California Residents

The California Consumer Privacy Act ("CCPA") provides California residents, referred to in the law as "consumers," with rights to receive certain disclosures regarding the collection, use and sharing of personal information, as well as rights to access

and control personal information. The CCPA defines “personal information” to mean “information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular” California resident. Certain information we collect may be exempt from the CCPA because it is considered public information or covered by a federal privacy law, such as the Gramm–Leach–Bliley Act, the Health Insurance Portability and Accountability Act, or the Fair Credit Reporting Act.

To the extent that we collect personal information about you that is subject to the CCPA, that information, our practices, and your rights are described in the below disclosures.

## Right to Information Regarding the Categories of Personal Information Collected, Sold, and Disclosed

You have the right to obtain information regarding the categories of personal information we collect, sell, or disclose. That information is provided in this privacy notice. For more examples of the types of information we collect, see the Information We Collect About You section above. For more details about how we use the personal information, see the How We Use Personal Information About You section above. The categories we use to describe the information are those enumerated in the CCPA.

Categories of Personal Information	How We Use It	Sold or Shared
<b>Identifying information</b> such as your name, gender, date of birth, and signature.	<ul style="list-style-type: none"> <li>Decisions related to your employment</li> <li>Business purposes</li> <li>Administering payments and benefits</li> <li>Security measures and complying with health and safety obligations</li> <li>Compliance with legal obligations and lawful requests</li> </ul>	No
<b>Demographic information</b> such as your race, ethnicity, marital status, disability, and veteran or military status.	<ul style="list-style-type: none"> <li>Business purposes</li> <li>Compliance with legal obligations and lawful requests</li> </ul>	No
<b>Contact information</b> such as your home address, phone number, email address, and emergency contact information.	<ul style="list-style-type: none"> <li>Business purposes</li> <li>Administering payments and benefits</li> <li>Security measures and complying with health and safety obligations</li> <li>Compliance with legal obligations and lawful requests</li> </ul>	No
<b>Dependents’ or other individuals’ information</b> such as their full name, address, date of birth, and Social Security Numbers.	<ul style="list-style-type: none"> <li>Business purposes</li> <li>Administering payments and benefits</li> <li>Security measures and complying with health and safety obligations</li> <li>Compliance with legal obligations and lawful requests</li> </ul>	No
<b>National identifiers</b> such as Social Security Number, passport and visa information, and immigration status and documentation.	<ul style="list-style-type: none"> <li>Business purposes</li> <li>Administering payments and benefits</li> <li>Security measures and complying with health and safety obligations</li> <li>Compliance with legal obligations and lawful requests</li> </ul>	No
<b>Educational and professional information</b> such as your work history, academic and professional qualifications, educational records, references, and interview notes.	<ul style="list-style-type: none"> <li>Decisions related to your employment</li> <li>Business purposes</li> </ul>	No
<b>Employment information</b> such as your job title, position, hire dates, compensation, performance and disciplinary records, and vacation and sick leave records.	<ul style="list-style-type: none"> <li>Decisions related to your employment</li> <li>Business purposes</li> </ul>	No

Categories of Personal Information	How We Use It	Sold or Shared
<b>Financial information</b> such as banking details, tax information, payroll information, and withholdings.	<ul style="list-style-type: none"> <li>• Business purposes</li> <li>• Administering payments and benefits</li> <li>• Security measures and complying with health and safety obligations</li> <li>• Compliance with legal obligations and lawful requests</li> </ul>	No
<b>Health and safety information</b> such as health conditions (if relevant to employment), job restrictions, workplace illness and injury information, and health insurance policy information.	<ul style="list-style-type: none"> <li>• Business purposes</li> <li>• Administering payments and benefits</li> <li>• Security measures and complying with health and safety obligations</li> <li>• Compliance with legal obligations and lawful requests</li> </ul>	No
<b>Information Systems information</b> such as your search history, browsing history, login information, and IP addresses on the company's information systems and networks.	<ul style="list-style-type: none"> <li>• Decisions related to your employment</li> <li>• Business purposes</li> <li>• Administering payments and benefits</li> <li>• Security measures and complying with health and safety obligations</li> <li>• Compliance with legal obligations and lawful requests</li> </ul>	No
<b>Geolocation information</b> such as time and physical location related to use of an Internet website, application, device, or physical access to a company office location.	<ul style="list-style-type: none"> <li>• Business purposes</li> <li>• Security measures and complying with health and safety obligations</li> <li>• Compliance with legal obligations and lawful requests</li> </ul>	No
<b>Sensory or surveillance information</b> such as COVID-19 related temperature checks or similar screening, call monitoring, and video surveillance.	<ul style="list-style-type: none"> <li>• Business purposes</li> <li>• Security measures and complying with health and safety obligations</li> <li>• Compliance with legal obligations and lawful requests</li> </ul>	No
<b>Sensitive personal information</b> including Social Security Number; driver's license number; state identification number; passport number; account log-in; precise geolocation information; racial or ethnic origin, religious or philosophical beliefs, or union membership; contents of email and text messages; health-related information; and information concerning sex life or sexual orientation.	<ul style="list-style-type: none"> <li>• Business purposes</li> <li>• Administering payments and benefits</li> <li>• Security measures and complying with health and safety obligations</li> <li>• Compliance with legal obligations and lawful requests</li> </ul>	No

We determine the retention period for each of the categories of personal information listed above based on (1) the length of time we need to retain the information to achieve the business or commercial purpose for which it was obtained, (2) any legal or regulatory requirements applicable to such information, (3) internal operational needs, and (4) any need for the information based on any actual or anticipated investigation or litigation.

## Right to Request Access, Correction, and Deletion of Information

You have the right to request access to personal information collected about you and information regarding the source of that personal information, the purposes for which we collect it, and the third parties and service providers to whom we sell or disclose it. You also have the right to request in certain circumstances that we delete personal information that we have collected directly from you or correct information that we have collected about you. As noted below, exceptions to these rights may apply.

## Right to Opt Out of Sale of Personal Information to Third Parties

We do not sell or share your personal information with third parties. Under the CCPA, a business "sells" personal information when it discloses personal information to a company for monetary or other benefit and a company "shares" personal

information when it discloses personal information to third parties for the purpose of “cross-context behavioral advertising” (targeted advertising based on activities across multiple websites, applications, or services). A company may be considered a third party either because we disclose personal information to the company for something other than an enumerated business purpose under California law, or because its contract does not restrict it from using personal information for purposes unrelated to the service it provides to us.

## **Right to Limit the Use and Disclosure of Sensitive Personal Information**

You have the right to limit the use and disclosure of sensitive personal information that we use to infer characteristics about you. We do not use sensitive personal information to infer characteristics about you.

## **Exercising Your Rights**

Please contact us at [privacyofficer@encompasshealth.com](mailto:privacyofficer@encompasshealth.com) to exercise these rights if you are a California resident.

You may authorize another individual or business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf.

We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

We must verify your identity before responding to your request. We verify your identity by asking you to provide personal identifiers that we can match against information we have collected from you previously. We may need to follow up with you to request more information to verify identity. We will not use personal information we collect in connection with verifying or responding to your request for any purpose other than responding to your request.

## **Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. We use physical, administrative, and technical safeguards to secure personal information. The safety and security of your information also depends on you. You are responsible for following all Encompass Health security policies.

Unfortunately, the storage and processing of information via internet-connected computers can never be completely secure. We cannot guarantee the security of your personal information stored or processed by us.

## **Transferring Your Personal Information Abroad**

Your personal information will be stored and processed in the United States. Encompass Health and its service providers may also transfer information that we collect about you, including personal information, across borders and from your country or jurisdiction to other countries or jurisdictions around the world. These jurisdictions may not have the same data protection laws as your jurisdiction. Wherever your personal information is transferred, stored or processed by us, we will take commercially reasonable steps to safeguard the privacy of your personal information.

## **Changes to this Privacy Notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact us at [privacyofficer@encompasshealth.com](mailto:privacyofficer@encompasshealth.com).