



California Health Sciences University

UNIVERSITY

PRIVACY POLICY - EMPLOYEES

PURPOSE

The purpose of this policy is to explain the University's commitment to protecting the personal information of applicants, employees, and faculty consistent with the requirements of federal and state law, including, but not limited to the California Consumer Privacy Act and the California Privacy Rights Act. The policy explains the University's collection, use, retention, and disclosure of personal and sensitive personal information of employees.

SCOPE

This policy applies to all University employees who provide protected personal information to the University. Where relevant, it also applies to job applicants, interns, independent contractors, and other individuals whose information CHSU collects in connection with providing employment.

POLICY STATEMENT

In connection with its operations, California Health Sciences University ("CHSU") collects, uses, retains, and shares certain personal and sensitive employee information. CHSU values employees' privacy and is committed to protecting their personal information consistent with the requirements of state and federal law.

DEFINITIONS

A. California Consumer Privacy Act (“CCPA”): passed in 2018 and effective in 2020, a comprehensive privacy law aimed at enhancing California residents’ privacy rights and consumer protection.

B. California Privacy Rights Act (CPRA): a comprehensive consumer privacy law that requires covered businesses to follow strict privacy requirements with respect to the personal information they collect about consumers.

C. Personal Information: Personal information is any information that can be used to distinguish, identify, or contact a specific individual, including real name, alias, postal and email address, telephone number, driver’s license number, passport number, Social Security number, bank account numbers, other similar identifiers, or other information as defined by California state law.

Protected personal information does not include business contact information and publicly available information,. Publicly available information refers to data that is legally accessible from federal, state, or local government records. Further, if individuals use their home contact information as their business contact information, then CHSU considers the contact information provided to be business contact information and not subject to protection as personal information.

RELATED INFORMATION AND PROCEDURES

A. Sources of Information Collection. CHSU receives information from the following sources:

1. Directly from individuals (e.g., applications, forms, or communications)
2. Third parties (e.g., prior employers, recruiters, background check agencies)
3. Automated collection (e.g., website cookies, IP addresses)

B. How Personal Information is Used.

CHSU uses privacy information for the following purposes:

1. Employment and hiring processes
2. Security and compliance with legal obligations
3. Payroll and benefits administration
4. IT security and network monitoring
5. Accreditation and regulatory agencies

C. Right to Know

Individual employees have the right to:

1. **Know** what personal information is collected by CHSU about them and any third parties to which CHSU has disclosed their personal information.
2. **Request deletion** of personal information.
3. **Opt-out** of certain data collection and data use practices, such as the sharing of personal information.
4. **Opt-in** for specific data collection and data use practices.
5. **Request corrections** to their personal information.
6. **Limit** the use and disclosure of sensitive personal information if CHSU is using or disclosing personal information for purposes other than those permitted by law.
7. **Not be discriminated against** for exercising their privacy rights.

CHSU does not sell employees' personal information . Such information is only shared with authorized third parties for lawful and necessary purposes.

D. Employee RIGHTS AND CHOICES

1. Cookies. Employees can disable cookies at any time by adjusting their browser settings.
2. Do Not Track. CHSU does not track its users over time and across third party websites to provide targeted advertising and therefore does not respond to Do-Not-Track (DNT) signal.

E. INFORMATION SECURITY

CHSU takes reasonable measures to protect employees' Personal Data and other information received from or about them in an effort to prevent loss, misuse and unauthorized access, disclosure, alteration, and destruction of such information.

Unfortunately, the transmission of information online is not completely secure. Although CHSU does its best to protect all information collected, the University cannot completely guarantee the security of Personal Data collected and/or transmitted. Any transmission of personal information by employees is at their own risk.

F. THIRD-PARTY LINKS

Our Sites may contain links to websites that are not operated by CHSU, and these websites may have their own privacy policies which should be reviewed. CHSU is not responsible for the privacy practices of these websites, nor any adverse consequences that may result from **an employee's** interaction with third party websites. These other websites may send their own cookies to users, collect data or solicit Personal Data. CHSU has no control or influence over the privacy practices of third-party websites. Please exercise caution and consult the data protection policies posted on each third-party website for further information.

G. CONSENT

Except as otherwise described in this Policy, CHSU will use, and disclose employees' personal information only with the knowledge and consent of the individual whose personal information is at issue. However, submission of personal information over a secure and encrypted internet connection is tacit consent to collection, use and disclosure of personal information by CHSU.

This privacy policy is readily available to CHSU's employees. It is posted with CHSU's policies and specifies the nature of the information uses by the University. Faculty and other employees may advise CHSU of their intent to opt-out as described in Section C(subject to later agreed-to legal or contractual restrictions and reasonable advance notice).

H. LIMITING USE, DISCLOSURE AND RETENTION

Employees' personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as described in this Policy or as may be required by law.

1. Personal information will be stored in confidence and accessed only by authorized CHSU employees and agents or consultants retained by CHSU.
2. Personal information that is no longer required will be destroyed, erased, or made anonymous in accordance with the CHSU Document/Records Retention Policy as may be revised from time to time.
3. CHSU is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission.

I. SAFEGUARDS

CHSU will take commercially reasonable steps to protect personal information from theft and loss, as well as unauthorized access, disclosure, copying, use or modification. The methods of protection may include:

1. Physical measures (locked filing cabinets, restricted access to files and offices);
 2. Technological measures (passwords, encryptions, firewalls, and audits);
 3. Organizational measures (clearances, “need-to-know” access, etc.); and
 4. Staff training that includes the sharing of all CHSU privacy policies and procedures.
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RESPONSIBILITIES

A. Office of Human Resources ensures compliance with privacy laws in employment-related data collection.

HISTORY (R*) (PDC Administrative support to fill in)

Approval Date:

03/28/2025

Revision Date(s):

Dates that the policy was last revised

Reviewed Date(s):

03/26/2025

03/13/2025

RACI

R: Office of Human Resources

A: Office of Human Resources, Office of Information Technology, Office of Legal Affairs

C: Office of Human Resources, Office of Information Technology, Office of Legal Affairs

I: CHSU