



WELLNESS PROGRAM PRIVACY NOTICE

The PASSPORT TO HEALTH™ is a voluntary wellness program. This program is offered by your Employer and is administered by Attentive Health LLC.

If you choose to participate, you may be asked to complete a health survey that asks about your health status, as well as health-related activities and behaviors. You may also be asked to complete a biometric screening, which will include measurements such as height, weight, blood pressure, BMI, cholesterol, and glucose.

The information from your health survey and the results from your biometric screening will be used to provide you with information to help you understand your current health and potential risks and may also be used to offer you services through the wellness program. You also are encouraged to share your results or concerns with your own doctor.

Although you are not required to complete the health assessment or to participate in the blood test or other medical examinations, incentives are available for employees who do.

Your personal medical information will not be provided to your employer, and you may not be discriminated against in your employment because of any medical information you provide as part of participating in the wellness program, nor be retaliated against if you choose not to participate.

If you are unable to participate in any of the activities required to earn an incentive, you may be entitled to request a reasonable accommodation or an alternative standard. You may request an accommodation by contacting Attentive Health via admin@attentivehealth.com.

PROTECTIONS FROM DISCLOSURE OF MEDICAL INFORMATION

Your employer has delegated the handling of private medical information to third-party vendors including Attentive Health and their affiliated service providers who operate under strict privacy agreements. Your employer and these vendors are required by law to maintain the privacy and security of your personally identifiable health information.

Your health information will never be sold or exchanged, and it will not be shared with your employer, except to the extent permitted by law to administer the wellness program. Medical information that you have provided in connection with the wellness program will not be shared with your supervisors or managers and may never be used to make decisions regarding your employment. You cannot be asked or required to waive the confidentiality of your health information as a condition of participating in the wellness program or receiving an incentive.

Anyone who receives your information for purposes of providing services as part of the wellness program will abide by the same confidentiality requirements. Individuals who may receive your personally identifiable health information may include health coaches, customer support, and data processing personnel in order to provide you with services in the wellness program.

SECURITY OF MEDICAL INFORMATION

All medical information obtained through the wellness program will be maintained separate from your personnel records. Information stored electronically will be encrypted, and appropriate precautions will be taken to avoid any data breach. In the event a data breach occurs involving your information, we will notify you immediately.

If you have questions or concerns regarding this notice, or about protections against discrimination and retaliation, please contact Alisha Alburger in Human Resources at aalburger@pennstainless.com.