Privacy Policy

Last updated: 1/12/26

This Notice at Collection and Privacy Policy ("**Policy**") explains how Optimum Healthcare IT, LLC ("**Company**", "**we**", "**our**", or "**us**") collects, uses, and shares your personal information when you interact with or use our website https://skillmarket.com and its subdomains, and the features, applications, products, and services available through the website and its subdomains, and related services we provide offline, including in connection with your employment or potential employment with us or our clients, or your appointment or potential appointment as a consultant, to fulfill roles on projects or engagements for our clients (collectively, "**Services**"). Please read it carefully. By interacting with our Services or providing us with your information, you agree to our collection, use, and sharing of your personal information as described in this Policy.

This Policy applies to our processing of personal information where we determine the purpose and means of processing. As used in this Policy, "personal information" means information that identifies, relates to, or describes, or is capable of being associated with, a particular individual.

This Policy applies only to personal information we collect:

- Through the Services; and
- In communications, including but not limited to email, text, chat, and other electronic means, between you and the Company.

Categories of Personal Information We Collect

When you use the Services, or otherwise communicate with us, including via email, text, chat, phone, or other means, you may provide us with personal information about you. This may include your name and contact information, your resume, and other personal information as described more fully below. When you use the Services, we may also collect information related to your use of the Services, as described more fully below, to help us improve our Services for you.

Depending on the information you provide, we may collect the following categories and types of personal information from and about you:

- **Account and Contact Information** – such as full name, addresses (such as current and prior home address, work address, or other address), email address, phone number, date of birth, username, account name and number, and other account and contact information you provide us.
- **Account History Information** - such as information about your account, offers for placements with clients, projects and engagements worked on for clients, and schedules, timesheets, and other information related to projects and engagements worked on for clients.
- **Assignment Information** – information regarding projects and engagements with us and our clients, such as onboarding steps, scheduling updates, start-date details, timekeeping reminders, and urgent notifications.
- **Identifiers** – such as name, alias, postal address, social security number, driver's license number, employee number, signature, passport number, state identification card number, I-9 documentation, IP address, social media account information, account name, phone number, online identifier, IP address, email address, unique personal identifier, and other similar identifiers,
- **Characteristics of Protected Classifications –** such as date of birth, gender, age, nationality, racial or ethnic origin, religion, marital status, citizenship status, military or veteran status, disability information, genetic information, or pregnancy and related information, if you provide this information as part of your application, during onboarding, or while working for us or one of our clients.
- **Audio/Visual Data** – such as images, audio, electronic, photographic, visual or similar data including videos, photographs, and audio recordings.
- **Device and Related Activities Information** – such as your IP address, device identifiers, operating system and version, preferred language, hardware identifiers, browser type and settings, browsing history, and other device and related activities information.
- **Professional and Employment-Related Information** – such as resume, previous place(s) of employment, position(s), work history, earnings, performance evaluations, credential, licensure, certification, professional memberships, references, and emergency contact information; whether you are authorized to work in the United States; and whether you will require sponsorship for a visa.

- **Education Information** – such as education history, degrees, grades, transcripts, classes taken, qualifications, and certifications.

- **Medical Information** – such as information about immunizations, physical screenings, and drug test results, if your role may require such immunizations, screenings or testing, or if our clients require such immunizations, screenings, or testing.

- **Accommodation Information** – such as information about accommodations you may need in order to perform services if you are selected for a placement with us or a client.

- **Sensitive Personal Information.** We may collect social security number, driver's license number, passport number, state identification card number, racial or ethnic origin, religious or philosophical beliefs, or union membership, and health information.

- **Additional Information You Choose To Provide** – such as content and information you elect to provide as part of your profile or in any reviews you make through the Services, or that you elect to provide us via emails, chats, or other communications sent to us.

Some of the information identified above may be considered sensitive personal information under certain laws. If required under applicable law, we will collect and process sensitive personal information only with your consent, which is hereby provided by you when you provide such information to us. If you choose not to provide or allow us to collect some information, we may not be able to provide you with requested features, Services, or information.

Sources of Personal Information

You Provide Personal Information to Us

We collect account and contact information, account history information, assignment information, identifiers, characteristics of protected classifications, audio/visual data, professional and employment-related information, education information, medical information, accommodation information, sensitive personal information, and other information you choose to provide us, when you provide it directly to us, whether through the Services or any other form of communication.

Automatically Through Our Services

As you navigate through and interact with our Services, we may use automatic data collection technologies to collect device and related activities information that may include personal information. Information collected automatically may include usage details, IP addresses, operating system, and browser type, and information collected through cookies including details of your interactions with our Services, such as traffic data, logs, and other communication data, and which resources and Services features that you access and use. Using automatic collection technologies helps us to improve our Services and to deliver a better and more personalized experience.

We use cookies for this automatic data collection. A cookie is a small file placed on your device when you interact with the Services. You may refuse to accept or disable cookies by activating the appropriate setting on your browser or device. However, if you select this setting, you may be unable to access certain features of the Services.

When you link out to a Third-Party Site, there are third parties that may use automatic collection technologies to collect information about you or your device. These third parties may include:

- Identity verification service providers.

- Identity and access management service providers for enabling social identity authentication and login services.

- Social identify authentication and login service providers (e.g., Microsoft, Google, Apple, and LinkedIn).

- Background check and compliance service providers.

These third parties may use tracking technologies to collect information about you when you use the Services. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites, apps, platforms, and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions, you should contact the responsible third party directly.

From Clients

We collect professional or employment information and assignment information from our clients regarding your performance and conduct on projects and engagements with our clients.

From Other Third Parties

We may collect personal information about you that we receive from other sources and combine that with information we collect directly from you. For example, we may obtain your contact information, assignment information, identifiers, characteristics of protected classifications, audio/visual data, professional and employment-related information, non-public education information, medical information, accommodation information, and sensitive personal information from third-parties including recruiters, LinkedIn, vendors, service providers, your references, identity verification service providers, social identify authentication and login service providers, identity and access management service providers for enabling social identity authentication and login service providers, background check and compliance service providers, analytics service providers, security and anti-fraud service providers, and data brokers..

How We Use Your Personal Information

We use information that we collect about you or that you provide to us, including any personal information, for the following purposes:

- **Services** – we use account and contact information, account history information, assignment information, identifiers, characteristics of protected classifications, audio/visual data, device and related activities information, professional and employment-related information, non-public education information, medical information, accommodation information, sensitive personal information, and additional information you choose to provide, to provide you with the Services and any content, features, information, products, or other services that we make available to you.

- **Recruiting and Hiring** - we use account and contact information, account history information, assignment information, identifiers, characteristics of protected classifications, audio/visual data, professional and employment-related information, education information, medical information, accommodation information, sensitive personal information, and other information you choose to provide us to make informed decisions on recruitment and assess your suitability for roles for us and/or our clients, to promote you to our clients, to communicate with you about your employment or potential employment with us or our clients, or your appointment or potential appointment as a consultant to fulfill roles on projects or engagements for our clients, for compliance purposes, and to respond to your inquiries and schedule interviews.

- **Background Checks** - where permitted by law and where your consent is obtained, our service providers may complete a background check on you. We may provide them with your identifiers, characteristics of protected classifications, professional and employment-related information, education information, and sensitive personal information to enable the completion of the background check. The results of the background check are provided to us, and are used by us to verify your identity, check your credit history, check your criminal history, confirm the validity of your application, and determine whether you meet applicable requirements for roles with us and our clients.

- **Credentialing** - if required for your role, we will use your account and contact information, account history information, assignment information, identifiers, audio/visual data, professional and employment-related information, education information, medical information, and sensitive personal information, to provide credentialing information to our clients.

- **Onboarding -** we use account and contact information, account history information, assignment information, identifiers, characteristics of protected classifications, audio/visual data, professional and employment-related information, education information, medical information, and sensitive personal information to complete our contract with you, enroll you in our employee and consultant databases, provide communication services, and administer your work, project, and engagement records.

- **Time and Attendance** - we use account and contact information, account history information, assignment information, identifiers, and sensitive personal information, to track your time and attendance and absences.

- **Management** - we use account and contact information, account history information, assignment information, identifiers, professional and employment-related information, and education information, for performance and talent management, procedures, and reviews and assessments.

- **Business Operations** - we use account and contact information, account history information, assignment information, identifiers, characteristics of protected classifications, device and related activities information, audio/visual data, education information, medical information, sensitive personal information, and professional and employment-related information for guiding our and our clients' recruiting, hiring, and onboarding efforts, maintaining records, planning, budgeting, calibration, headcount, database administration, diversity metrics, surveys, evaluations, reports, legal claims, compliance, regulatory, audit, investigative and disciplinary purposes (including disclosure of such information in connection with legal process or litigation) and other ethics and compliance reporting purposes, and to support our and our clients' business operations.

- **Analytical Purposes** - we use account and contact information, account history information, assignment information, identifiers, characteristics of protected classifications, professional and employment-related information, education information, and sensitive personal information to analyze trends and statistics, including analyzing and monitoring the equality, diversity and inclusivity of our workforce (as permitted by applicable law). We may do so in order to better understand our workforce, to prevent discrimination in the workplace, to comply with applicable laws and regulations, to report to government entities, and/or to respond to allegations or claims.

- **Educational Opportunities** – we may use account and contact information, account history information, assignment

information, identifiers, characteristics of protected classifications, device and related activities information, audio/visual data, education information, medical information, and sensitive personal information to notify you of educational opportunities with us or third parties.

- **Account Updates** – we may use your account and contact information, account history information, assignment information, identifiers, device and related activities information, and sensitive personal information to notify you when Services updates are available and about changes to any products or Services we offer or provide though them.

- **Other Purposes** – we may use account and contact information, account history information, assignment information, identifiers, characteristics of protected classifications, audio/visual data, device and related activities information, professional and employment-related information, non-public education information, medical information, accommodation information, sensitive personal information, and additional information you choose to provide, to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, to fulfill any other purpose for which you provided the information, in any way we may describe when you provide the information, and for any other purpose with your consent.

Your provision of information about age, race, ethnicity, religion, disability, and gender, and military/veteran status, is optional, and, if disclosed by you, will only be used for lawful purposes, such as government reporting where required by us and our clients, compliance with applicable laws and regulations, supporting diversity goals, and evaluating the effectiveness of equal opportunity policies.

We may also use your information to contact you about goods and services that may be of interest to you. If you do not want us to use your information in this way, please adjust your user preferences in your account profile.

Who We Disclose Your Personal Information To

We may also disclose personal information that we collect or you provide as described in this Policy to:

- **Our Affiliates**.

- **Our Clients**.

- **Our Advisors** - such as lawyers, bankers, tax consultants, auditors, and insurers, where necessary in the course of the professional services that they render to us.

- **Regulatory and Government Entities** - including government, administrative, law enforcement and regulatory agencies; tax authorities; and other public agencies or authorities if we think we should in order to comply with any applicable law, regulation, legal process or other legal obligation. This includes cooperating with law enforcement when we think it is appropriate, obtaining legal remedies or limiting our damages, and to enforcing or protecting our contracts, legal rights or the rights of others, including by responding to claims asserted against us.

- **Service Providers** - contractors, vendors, suppliers, and third-party service providers who support the operation of our and our clients' services, website, and business, and who need access to such information to carry out their work for us (including, for example, cloud hosting, operating systems and platforms, identity verification service providers, social identify authentication and login service providers, identity and access management service providers for enabling social identity authentication and login services, and background check and compliance service providers. In some cases, such as background check and compliance service providers, the contractor, vendor, supplier, or other service provider may directly collect the information from you on our behalf.

- **Investors/Successors** - potential investors, purchasers, merger partners, and their advisors if we sell or transfer, or are considering selling or transferring, all or a portion of our business or assets, if we are considering or engaging in any reorganization, conversion, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of our ownership interest, business or operations, or if we are soliciting or accepting investments.

The categories of personal information we may disclose include account and contact information, account history information, assignment information, identifiers, characteristics of protected classifications, audio/visual data, device and related activities information, professional and employment-related information, non-public education information, medical information, accommodation information, sensitive personal information, and additional information you choose to provide.

Personal Information Retention

We will retain and use your personal information for as long as reasonably necessary to fulfill the purposes described in this Policy, or for as long as otherwise legally permitted or required, such as for maintaining the Services, operating our organization, complying with legal obligations, resolving disputes, and for safety, security, and fraud prevention. We use the following criteria to determine retention periods:

- The purposes described in this Policy;

- how long the information is needed to provide our Services and operate our business;

- the duration of your employment or work for us or our clients, and your potential for future employment or work for us or our

clients;

- whether we or our clients are subject to contractual or legal obligations that require us to retain the information for a specific period of time;
- whether any law, statute, or regulation provides for a specific retention period;
- whether an individual has agreed to a longer retention period;
- the extent, nature, and sensitivity of the information; and
- what the expectation for retention was at the time the data was provided to us.

Except as may be retained for legally permissible retention purposes, your personal information will be deleted upon request. Any such request must be sent to us via email at privacy@optimumhit.com or via physical delivery to 1300 Marsh Landing Parkway, Suite 111, Jacksonville Beach, Florida 32250, Attn: Privacy Office.

SMS Program

We send employment-related text messages to employees, employment candidates, consultants, and candidates for consultant roles who provide their mobile number to us, for onboarding and work communications. Examples include onboarding steps, scheduling updates, start-date details, timekeeping reminders, and urgent notifications.

Opt-in. You opt-in to the Company's SMS Program by providing your mobile number through the Services or in other communications with the Company, such as during offer acceptance or onboarding (e.g., DocuSign/HR portal), and you thereby agree to receive work-related texts from the Company. Message frequency varies based on your onboarding stage and assignment needs. Message and data rates may apply.

Opt-out. Reply STOP to any message to opt-out of the Company's SMS Program. Common opt-out synonyms (END, CANCEL, QUIT, UNSUBSCRIBE, REVOKE, OPTOUT) are also supported. After you send STOP (or a supported synonym), you'll receive one final message confirming your opt-out. To re-subscribe, reply START, YES, or UNSTOP. Reply HELP for assistance or contact helpdesk@optimumhit.com.

Eligibility & availability. U.S. carriers only; delivery not guaranteed. Carriers are not liable for delayed or undelivered messages.

Third-Party Sites

We may provide links to websites, applications, or services that we do not own or operate ("**Third-Party Sites**"). Third-Party Sites may collect personal information about you when you interact with their content or services. This Policy does not apply to data collected through any Third-Party Sites. We are not responsible for the privacy practices of Third-Party Sites. We encourage you to carefully review the privacy policies or statements applicable to any Third-Party Sites.

Children's and Minors' Data

Our Services are not intended for, and we do not knowingly collect any personal information from, children under the age of 16. If we learn we have collected or received personal information from a child under 16 years old without verification of parental consent, we will delete that information.

Your Rights and Choices About Your Personal Information

This section describes mechanisms you can use to control certain uses and disclosures of your information and rights you may have under state law, depending on where you live.

Advertising, marketing, and cookies choices:

- **Cookies** - You can set your browser to refuse all or some browser cookies, or to alert you when these cookies are being sent. If you disable or refuse cookies, some Services features may be inaccessible or not function properly.
- **Promotions by the Company** - If you do not wish us to use your information to promote our own or third parties' products or services, you can opt out by adjusting your preferences in your account profile.

Your State Privacy Rights

Depending on your state of residency, you may have certain rights related to your personal information.

For California Residents

"Shine the Light" and "Eraser" Laws – We do not disclose your personal information to third parties for their direct marketing purposes.

California Consumer Privacy Act (CCPA)/California Privacy Rights Act (CPRA) - The CCPA, as amended by the CPRA, provides California residents and/or their authorized agents with specific rights regarding the collection and processing of their personal information.

Right to Opt-Out of "Sale" or "Sharing" of Personal Information – We do not "sell" or "share" your personal information as defined by the CCPA.

Right to Limit Use of Sensitive Personal Information - California residents may have the right to request that businesses limit the use of any sensitive personal information to those uses which are necessary to perform the Services or for other specifically-enumerated business purposes under the CCPA, as amended by the CPRA.

Right to Delete - California residents have the right to request that we delete any of the personal information collected from you and retained by us, subject to certain exceptions. We may ask you to provide certain information to identify yourself so that we may compare it with our records in order to verify your request. Once your request is verified and we have determined that we are required to delete the requested personal information in accordance with the CCPA, we will delete your personal information from our records, and we will direct our service providers to delete your personal information from their records. Your request to delete personal information that we have collected may be denied if we conclude it is necessary for us to retain such personal information under one or more of the exceptions listed in the CCPA.

Right to Correct - Under the CCPA, as amended by the CPRA, California residents have the right to request that we correct any inaccurate personal information we maintain about you, taking into account the nature of the personal information and the purposes for which we are processing such personal information. We will use commercially reasonable efforts to correct such inaccurate personal information about you.

Non-Discrimination - You will not receive any discriminatory treatment by us for the exercise of your privacy rights conferred by the CCPA.

Preceding 12 Months - In the preceding 12 months, we collected, used, and disclosed personal information as set forth in the table below. We have not, in the preceding 12 months, "sold" or "shared" (as those terms are defined in the CCPA) any of your personal information. We do not knowingly sell or share the personal information of minors under the age of 16.

Category of Personal Information	**Categories of Sources of Personal Information**	**Business or Commercial Purpose for Collection, Use, & Disclosure**	**Categories of Third Parties To Whom Disclosed**
Account and Contact Information	You	Provision of Services Recruiting and Hiring Background Checks Credentialing Onboarding Time and Attendance Management Business Operations Analytical Purposes Educational Opportunities Account Updates Other Purposes	Clients Affiliates Regulatory and Government Entities Service providers Investors/Successors

Account History Information	You Automatically Through Our Services Clients Other Third Parties		
Assignment Information	You Automatically Through Our Services Clients Other Third Parties		
Identifiers	You Automatically Through Our Services Clients Other Third Parties		
Characteristics of Protected Classifications	You Clients Other Third Parties		
Audio/Visual Data	You Clients Other Third Parties		
Device and Related Activities Information	You Automatically Through Our Services Other Third Parties		
Professional and Employment-Related Information	You Clients Other Third Parties		
Education Information	You Clients Other Third Parties		
Medical Information	You Clients Other Third Parties		
Accommodation Information	You Clients Other Third Parties		

Sensitive Personal Information	You Clients Other Third Parties		
Additional Information You Choose To Provide	You		

Notice for Nevada Residents

Under Nevada law, certain Nevada residents may opt out of the sale of "personally identifiable information" for monetary consideration to a person for that person to license or sell such information to additional persons. "Personally identifiable information" includes first and last name, address, email address, phone number, Social Security Number, or an identifier that allows a specific person to be contacted either physically or online.

We do not engage in such activity; however, if you are a Nevada resident who has purchased or leased goods or services from us, you may submit a request to opt out of any potential future sales under Nevada law by emailing privacyrequests@upwork.com. Please note we will take reasonable steps to verify your identity and the authenticity of the request. Once verified, we will maintain your request in the event our practices change.

Residents of Certain Other States

The laws of your state of residence ("Applicable State Law") may provide you with certain rights, including the following:

Your Right to Confirm and Access: You have the right to confirm whether we are processing personal information about you and to access the personal information we process about you.

Your Right to Portability: You have the right to obtain a copy of the personal information we maintain and process about you in a portable and, to the extent technically feasible, readily-usable format.

Your Right to Delete: You have the right to request that we delete the personal information we maintain or process about you.

Your Right to Correct: You have the right to request that we correct inaccuracies in the personal information we maintain or process about you, taking into consideration the nature and purpose of such processing.

Your Rights to Opt-Out: You have the right to opt-out of certain types of processing of personal information, including:

- Opt-Out of the "sale" of personal information as defined by Applicable State Law – We do not sell your personal information;
- Opt-Out of sharing of personal information for targeted advertising by us – We do not share your personal information for targeted advertising;
- Opt-Out of automated profiling for the purposes of making decisions that produce legal or similarly significant effects – We do not use automated profiling for the purposes of making decisions that produce legal or similarly significant effects.

Important: The exact scope of these rights vary by state. There are also several exceptions where we may not have an obligation to fulfill your request.

Exercising Your Rights

To exercise any of your rights, please contact us via email at privacy@optimumhit.com or contact us at 1300 Marsh Landing Parkway, Suite 111, Jacksonville Beach, Florida 32250. For all requests, you must provide us with your name, email address, phone number, and mailing address. We will verify your identity by matching the information we have collected against the information you have provided. Failure to provide the foregoing information may prevent us from processing your request. In order to designate an authorized agent to act on your behalf, you must provide us with a signed, written authorization. If you have requested that we correct your personal information, we may contact you to request additional information about the personal information that you believe is inaccurate, including supporting documentation.

How We Protect Your Personal Data

We use commercially reasonable administrative, physical, and technical measures designed to protect your personal data from accidental loss or destruction and from unauthorized access, use, alteration, and disclosure. However, no website, application, system, electronic storage, or online service is completely secure, and we cannot guarantee the security of your personal data transmitted to us,

whether through, using, or in connection with the Services or otherwise.

Changes to This Policy

We may update this Policy from time to time, and we will provide notice of any such changes to this Policy as required by law. The date this Policy was last updated is identified at the top of this page. We will notify you of changes to this Policy by updating the “last updated” date and posting the updated version on the Services. By accessing or using the Services after we notify you of such changes to this Policy, you are deemed to have accepted such changes. You should check our Services periodically to see the current version of this Policy.

Contact Information

If you have questions or comments about this Policy or our privacy practices, please contact us at:

Optimum Healthcare IT, LLC
1300 Marsh Landing Pkwy Ste 111
Jacksonville Beach, FL 32250
Attn: Privacy Office

Or via email at privacy@optimumhit.com