

**Last modified and effective: September 27th, 2024**

This **Privacy Notice** applies to all visitors, users, and others of the ManageMy Benefits website and platform (“consumers” or “you”). We adopt this Notice to comply with Data Privacy regulations. Any terms defined in the regulations have the same meaning when used in this Notice.

## Information We Collect

Our Websites collect 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 device (“**personal information**”). In particular, our Websites will collect the following categories of personal information from its consumers:

### Category

### Collected

*Data is collected automatically includes Internet Protocol Address, browser, site navigation, site activity. This is data is not categorized as “personal information” and is used for statistical purposes only.*

*Personal information is provided by you in order to access and transact on the ManageMy Benefits platform. Your use of the ManageMy Benefits platform constitutes consent to sharing of data, where required, with third-parties identified below.*

Example of data collected are set out below.

**A. Identifiers.** Examples: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol Address, email address, Social Security number, driver’s license number, passport number, or similar identifiers.

**B. Personal information.** Examples: A name, signature, Social Security number, address, telephone number, driver’s license, insurance policy number, employer, bank account number, medical information, or health information. Some Personal Information included in this category may overlap with other categories.

**C. Protected classification characteristics.** Examples: Age, national origin, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions).

**D. Internet or other similar network activity.** Examples: Browsing history, search history, information on a consumer's interaction with a website, application or advertisement.

**E. Geolocation data.** Examples: Physical location by IP address for electronic signatures.

**F. Professional or employment-related information.** Examples: Current employer.

**G. Inferences drawn from other personal information.** Examples: Profiles reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Personal information does not include:

- ▶ Publicly available information from government records.
- ▶ Deidentified or aggregated consumer information.
- ▶ Information excluded from the data regulations' scope, like:
  - ▶ health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - ▶ personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

ManageMy Benefits obtains the categories of personal information listed above from the following categories of sources:

- ▶ Directly from you. For example, from forms you complete or products and services you purchase.
- ▶ Indirectly from you. For example, from your employer or insurance broker

## Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- ▶ To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.
- ▶ To provide, support, personalize, and develop our Websites, products, and services.
- ▶ To create, maintain, customize, and secure your account with us.
- ▶ To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- ▶ To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- ▶ To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Websites, third-party sites, and via email or text message (with your consent, where required by law).
- ▶ To help maintain the safety, security, and integrity of our Websites, products and services, databases and other technology assets, and business.
- ▶ For testing, research, analysis, and product development, including to develop and improve our Websites, products, and services.
- ▶ To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- ▶ As described to you when collecting your personal information or as otherwise set forth in regulations.
- ▶ To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of ManageMy Benefits' assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by ManageMy Benefits about our Website users is among the assets transferred.

ManageMy Benefits will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

## **Sharing Personal Information**

ManageMy Benefits may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information with the following categories of third parties:

- ▶ Service providers
- ▶ Insurance carriers

Our insurance carrier partners may seek to initiate contact direct with registered users of the ManageMy Benefits platform.

You may, at any time, delete your account on the ManageMy Benefits platform, which will revoke ManageMy Benefits' permission to disclose your information to partner, or third-party, companies.

## **Your Rights and Choices**

### *Access to Specific Information and Data Portability Rights*

You have the right to request that ManageMy Benefits disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see *Exercising Access, Data Portability, and Deletion Rights*), we will disclose to you:

- ▶ The categories of personal information we collected about you.
- ▶ The categories of sources for the personal information we collected about you.
- ▶ Our business or commercial purpose for collecting or selling that personal information.
- ▶ The categories of third parties with whom we share that personal information.
- ▶ If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - ▶ sales, identifying the personal information categories that each category of recipient purchased; and
  - ▶ disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

### ***Deletion Request Rights***

You have the right to request that ManageMy Benefits delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see *Exercising Access, Data Portability, and Deletion Rights*), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
6. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
7. Comply with a legal obligation.
8. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### ***Exercising Access, Data Portability, and Deletion Rights***

To exercise the access, data portability, and deletion rights described above, ManageMy Benefits submit a verifiable consumer request to us by either:

- ▶ Emailing us at [contactus@ManageMyGA.com](mailto:contactus@ManageMyGA.com)

Only you, or a person that you officially authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- ▶ Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- ▶ Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

### ***Response Timing and Format***

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

## Non-Discrimination

We will not discriminate against you for exercising any of your rights. We will not:

- ▶ Deny you goods or services.
- ▶ Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- ▶ Provide you a different level or quality of goods or services.
- ▶ Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

## Other Privacy Rights

Users of our Websites may request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, send an email to [contactus@ManageMyGA.com](mailto:contactus@ManageMyGA.com).

## Changes to Our Privacy Notice

ManageMy Benefits reserves the right to amend this privacy Notice at our discretion and at any time. When we make changes to this privacy Notice, we will post the updated Notice on the Websites and update the Notice's effective date. **Your continued use of our Websites following the posting of changes constitutes your acceptance of such changes.**

## Contact Information

If you have any questions or comments about this Notice, the ways in which ManageMy Benefits collects and uses your information described above, your choices and rights regarding such use, or wish to exercise your rights, do not hesitate to contact us at:

Email: [contactus@ManageMyGA.com](mailto:contactus@ManageMyGA.com)