

Online Services Privacy Policy

We recognize that the privacy of your information is important. This Online Services Privacy Policy ("Privacy Policy" or "Policy") describes our practices in connection with information RBCConnex Inc. collects through the online and mobile websites, platforms, services, and applications that are own or operate and that contain a link to this Privacy Policy (collectively, "Online Services").

As used in this Policy, terms such as "we," "us," "our," and "Company" refer to current and future affiliated entities, subsidiaries, agents, contractors, or vendors of RBCConnex Inc. Our Online Services are intended for a United States audience. Any information you provide, including any personal information, will be transferred to and processed RBCConnex staff or our affiliates located in the United States.

By using the Online Services, you consent to our collection, use, disclosure, and storage of information as described in this Privacy Policy.

Our Privacy Policy explains:

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When This Privacy Policy Applies

Our Policy applies to Online Services that we own or operate and that contain a link to this Privacy Policy. Our Policy does not apply to information collected through other means such as by telephone, via Online Services that do not link to this Privacy Policy, or in person, although that information may be protected by other privacy policies.

Our Policy does not apply to the practices of other companies or other websites or software applications that may be linked from or made available through our Online Services.

The inclusion of a link on our Online Services or the ability to utilize a third-party website or software application through our Online Services does not imply that we endorse, or otherwise monitor the privacy or security practices of that third-party website or software application or the accuracy of its content, and your use of the third-party website or software application is governed by the third-party's privacy policy.

Some of our products and services are regulated by certain state and federal laws, including the [Health Insurance Portability and Accountability Act \("HIPAA"\)](#) and the [Gramm-Leach-Bliley Act](#) and may have specific privacy practices ("Product Privacy Notices") such as a [HIPAA Notice of Privacy Practices](#) or other specific privacy practices that we want you to be aware. This information can be found in

the [Specific Product Privacy Notices](#) section of this Privacy Policy. When a Product Privacy Notice exists, the content of the Product Privacy Notice applies to your use of the product and service.

This Privacy Policy is not intended to and does not create any contractual or other legal rights in or on behalf of any party.

What Information We Collect About You

We may collect two basic types of information through the Online Services: (1) information you provide directly to us, and (2) information that is automatically provided to us or collected through your use of our Online Services (collectively, "Information").

Such Information may include information that identifies you such as your full name, telephone number, email address, postal address, certain account numbers, your User ID that you create or is assigned to you, health and medical information, including Protected Health Information, financial information and other information described in this Privacy Policy.

When you use the Online Services, you may provide certain Information directly to us. For example, you may input a telephone number or email address into a webform or enter information into a chat functionality. We also may make certain information available to you on the Online Services that we collect from other sources. For example, we may pre-populate certain demographic information in an online form or make health or medical information viewable on the Online Services that you have provided to us on paper forms or maintained in other information systems.

We also may obtain Information that is automatically collected through the Online Services. The automatically collected Information may include demographic, de-identified, aggregated, or certain information from your device such as technical information about your device, web-browser information, and server log files collected by us or provided by you. See [Cookies and Tracking](#) for more information on automatically collected information.

You may limit the Information you provide or make available to us if you want to; however, that may limit your ability to access or use certain functions of the Online Services or to request certain services or information.

Mobile Devices and Applications

In addition to the Information identified above, we may collect the following Information:

Information that Identifies You

- Health, medical, therapy, or financial information;
- Information created by the Company;
- Location data such as GPS, Wi-Fi, or carrier network location (see below for more details); and
- User files stored on your device like calendars, photos, and videos, if you grant permission through your device settings.

What You Do on Your Device

- Local storage;
- Phone dialer;
- Use of screen, e.g., what points are touched, frequency, etc.; and
- Patterns of app usage.

Device or System Data

- Mobile Device Identifier, e.g., UDID, Android ID; and
- Technical information about your device and system and application software, e.g., type of phone, Operating System (OS), and IP address.

We may obtain location data from your device to provide location-related services (e.g., driving directions or distance calculation, via the mobile application). You may withdraw consent to use precise, real-time, or network location data at any time by turning off the location-based feature on your mobile device or by not using any location-based features. If you withdraw your consent, functionality associated with precise, real-time, or network location (e.g., navigation) will no longer work.

How We Use Your Information

We may use your Information:

- To respond to an email, chat or other instant message or particular request from you;
- To communicate with you;
- To provide you with content, services, and functionality through our Online Services or other services that we may offer;
- To process an application for a product or service as requested by you;
- To authenticate you on any portion of our Online Services and with vendors acting on our behalf;
- To administer surveys and promotions;
- To personalize your experience on our Online Services;
- To provide you with informational or promotional offers, as permitted by law, that we believe may be useful to you, such as information about products or services provided by us or other businesses;
- To perform analytics and to improve our products, Online Services, and advertising;
- To facilitate the provision of software updates and product support;
- To improve products and other services related to the Online Services or to provide services or technologies to you;
- To comply with applicable laws, regulations, and legal process;
- To protect someone's health, safety, or welfare;
- To protect our rights, the rights of affiliates or related third parties, or to take appropriate legal action, such as to enforce our Terms of Use;
- To keep a record of our transactions and communications; and
- As otherwise necessary or useful for us to conduct our business, so long as such use is permitted by law or for any other purpose with your consent.

We may use Information to contact you through any contact information you provide through our Online Services, including any email address, telephone number, cell phone number, or fax number. We may communicate, electronically or via telephone with you about your benefit plan, programs, products, or services that are or may be available to you in connection with your transactions with us including, but not limited to, Online Services updates, account information, general wellness, prescription or appointment reminders, general health information, newsletters, and surveys. These electronic communications may contain protected health information. You acknowledge and accept that such communications may be sent unencrypted and there is some risk of disclosure or interception of the contents of these communications. To learn more about our communications practices, please visit our [Consumer Communications Notice](#).

We may, when permitted, combine your Information with other information, whether online or offline, maintained or available to us from you or from other sources, such as from our vendors, and we may use

and disclose combined data for the purpose described in this Section or for internal business purposes. We may, when permitted, use and disclose de-identified and aggregated data for any purpose, which may include, without limitation, disclosures to third parties for analytics purposes such as evaluating the Online Services and providing additional benefits, programs, and services.

How We Share Your Information

We will only share your Information with third parties as outlined in this Policy and as otherwise permitted by law or as permitted with your consent.

We may share Information if all or part of the Company is sold, merged, dissolved, acquired, or disbanded to any extent in a similar transaction, or in connection with steps that may need to be taken in anticipation of such events.

We may share Information in response to a court order, subpoena, search warrant, or to comply with law or regulation. We may cooperate with law enforcement authorities in investigating and prosecuting activities that are illegal, violate our rules, or may be harmful to other visitors.

We may also share Information within the Company, including among affiliates, or with our parent company, or subsidiaries.

We may also share Information with other third-party companies with which we have a business relationship or hire to perform services on our behalf. For example, we may hire a third-party company to help us send and manage email, and we might provide that third-party company with your email address and certain other Information for them to send you an email message on our behalf. Similarly, we may hire third-party companies to host or operate some of our Online Services and related computers and software applications.

Communication Preference Management

Our Online Services may permit you to select how you would like to receive certain communications. You can view and update your communication preferences in your Account/Profile settings after logging into the Online Services.

We may offer mobile applications that enable us to communicate with you through push notifications. Where mobile applications are offered, you may be able to manage push notifications in your mobile phone or tablet settings. You may also be able to control preview settings in your email applications.

If you need additional assistance in opting-out of a communication, please [Contact Us](#) for assistance. Please be aware that opt-outs may not apply to certain types of communications, such as account status, Online Service updates, or other communications.

Informational Calls and Texts

When you provide us a telephone number, whether landline or mobile, we may contact you, using automated, pre-recorded, or non-automated means, to provide you information about existing benefits, programs, products, services, or tools.

Personal Information collected through our texting programs will not be shared, sold, or disclosed to third parties for their own marketing purposes.

We reserve the right to modify this section at any time. The modified section will be effective immediately upon posting. Your continued receipt of Informational Electronic Communications and Informational Calls and Texts will constitute your acceptance of the modified section.

Retention of Data

We will retain your personally identifiable information (PII) and Activity Information for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your PII to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Posting Messages, Comments and Content

Our Online Services may have voluntary collaboration areas, including but not limited to "blogs," "bulletin boards," "leader boards," and "health games," that permit users to have collaborative discussions and/or share Information. Some of our Online Services may permit you to select a display name or image that will be your "nickname" on the Online Service. Please note, any Information you submit or post to these collaboration areas, including your display name or image, may be visible by other users of the Online Service, and such users may be able to identify you and make information public. Out of respect for the privacy of others, please avoid referring to the full names of others in your response and refrain from sharing other participants' identities or comments outside of these discussions.

Also see our [Social Media Disclaimer](#) to learn about our practices related to posting on our social media accounts.

Protecting Your Information

We maintain administrative, technical, and physical safeguards designed to protect the Information that you provide on our Online Services. These safeguards vary based on the sensitivity of the Information that is being collected, used, and stored. We cannot guarantee the security of our Online Services, nor can we guarantee the security of the Information you transmit to us over the Internet, including your use of email. We are not liable for the illegal acts of third parties such as criminal hackers.

It is your responsibility to safeguard the devices you use to access our Online Services (such as laptops, tablets and mobile devices), and to use appropriate security settings on those devices. If those devices are lost, stolen or misplaced, others may be able to access your account and your personal Information using those devices. You should affirmatively log out of your account (i) prior to ending your session, or (ii) if you will be inactive on the Online Services for more than a few minutes; otherwise, the next user of that computer or device, particularly a public one or one not owned by you, may be able to access your account and the Information in your account if your session has not ended.

You agree that we are not responsible for any harm that may result from someone accessing your account or personal Information on any computer or device where you do not, for any reason, take the necessary steps to log out of your account prior to ending a session on such device or computer.

We retain Information for as long as necessary for the purpose for which it is collected, subject to a longer period if the Information is relevant to a legal challenge.

Children Under 13

We will not intentionally collect any personal information (as that term is defined in the Children's Online Privacy Protection Act) from children under the age of 13 through our Online Services without receiving parental consent. If you think that we have collected such personal information from a child under the age of 13 through our Online Services, please [Contact Us](#) immediately.

Additional Rights for California Residents

California "Shine the Light" Privacy Rights

California law permits our customers who are California residents to request certain information regarding the disclosure of certain personal information to third parties for their direct marketing purposes.

If we have disclosed any personal information to third parties for direct marketing purposes, we will provide a list of the categories of personal information, along with the names and addresses of these third parties to you at your request. To make such a request, write us at the postal or email address found in the [Contact Us](#) section of this Policy.

This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted other than to the specified email or postal address. You should put "California Privacy Rights-Direct Marketing" in the email subject line and in the body of your request. You must provide us with specific information regarding yourself so that we can accurately respond to the request.

California Minors Under 18

If you are a California resident under the age of 18 and are a registered user of our Online Services, you may request that we remove from our Online Services any content you post to our Online Services that can be accessed by any other user (whether registered or not). Please note that any content that is removed from visibility on our Online Services may still remain on our servers and in our systems. To request removal of content under this provision, please write or email us at the postal or email address found in the [Contact Us](#) section of this Policy. When you write to us, please provide us with a description of the content and the location of the content on our Online Services, along with any other information that we may require to consider your request. Please note that removal of content under this provision does not ensure complete or comprehensive removal of the content or information posted on the Online Services by you.

How to Learn about Health and Financial Privacy Practices

Some of our products and services are regulated by certain laws, including the Health Insurance Portability and Accountability Act ("HIPAA") and the Gramm-Leach-Bliley Act.

Health Information Privacy Practices

If you receive healthcare products or services, visit the applicable HIPAA Notice of Privacy Practices, available in the [Specific Product Privacy Notices](#) section of this Policy, to learn about how we protect, use, and share Protected Health Information (PHI) for your medical treatment, payment for services, our operations, or as permitted by law. The HIPAA Notice of Privacy Practices also describes your right to:

- See and obtain a copy of certain PHI, including your medical, billing, claims, and case management records;
- Request confidential communications;
- Request certain restrictions on the use and disclosure of your PHI;
- Request a correction to your PHI; and
- Request a paper copy of the HIPAA Notice of Privacy Practices.

Please note, we do not use PHI for activities or secondary purposes not permitted by HIPAA.

You may notify us of a personal representative permitted to act on your behalf by contacting the toll-free member phone number on your health plan ID or other membership card.

Financial Information Privacy Practices

If you receive financial products or services, visit the applicable Financial Information Privacy Notice, available in the [Specific Product Privacy Notices](#) section of this Policy, to learn about how we protect,

use, and share your personal information, and how you can contact us to ask questions about that activity.

Specific Product Privacy Notices

The following Product Privacy Notices supplement this Policy and explain specific privacy notices with respect to certain products and services that you may use, including access to more information about health or financial privacy notices.

English

- [HIPAA Notice of Privacy Practices - Medical for Employers and Individual Plans \(pdf\)](#)
- [HIPAA Notice of Privacy Practices – AARP Medicare Plans \(pdf\)](#)
- [HIPAA Notice of Privacy Practices – Individual and Family Plans \(ACA Marketplace Plans\) \(pdf\)](#)
- [HIPAA Notice of Privacy Practices – Medical for Community and State Plans \(English\) \(pdf\)](#)
- [HIPAA Notice of Privacy Practices – UnitedHealthcare FlexWork Plans \(pdf\)](#)
- [Provider Notice of Privacy Practices - Optum HouseCalls \(pdf\)](#)

Español

- [Notificación sobre las Prácticas de Privacidad de la HIPAA - Información médica \(pdf\)](#)
- [Notificación sobre las Prácticas de Privacidad de la HIPAA - Información médica para el Plan comunitario \(pdf\)](#)
- [Notificación sobre las Prácticas de Privacidad de la HIPAA - Información Médica \(Planes Individuales del Mercado de Seguros de Salud de UnitedHealthcare\) \(pdf\)](#)
- [Aviso de Prácticas de Privacidad Para Proveedores – Optum HouseCalls](#)

Social Media Disclaimer

Are you using social media? So are we! We encourage you to read, share, follow us and provide commentary on Facebook®, Twitter®, Pinterest®, Instagram® and other social media sites ("Social Media Site"). Before you post on our pages or accounts, please make sure you read our social media disclaimer:

We are under no obligation to screen or monitor your posts or any other user content; however, we reserve the right to monitor participation to ensure that you stay on topic, are courteous and avoid making offensive comments. Your posts and user content must adhere to the following requirements and cannot:

- Contain any third-party material including logos, drawings, tattoos, photographs, pictures, sculptures, paintings and other images or works of art, phrases, trademarks, trade secrets, or other items without explicit, prior, written permission to use such materials;
- Contain sexually explicit, graphic, gratuitous or unnecessarily violent content or defamatory or derogatory content against any ethnic, racial, gender, religious, sexual orientation, professional or age group, or contain any pornographic or nude material;
- Contain any private information about yourself or any other individual, including without limitation, information related to the health of the individual, financial information about the individual, or any identification or account numbers related to the individual, with or without their permission or consent;
- Contain any software viruses or any other computer code, files or programs designed to interrupt, destroy or limit the functionality of any computer software, hardware, or telecommunications equipment; and

- Contain any advertising, promotional materials, "junk mail," "spam," "chain letters," "pyramid schemes," or promote illegal activity and/or illegal contests, sweepstakes, gambling, including any online casino, sports books, bingo, poker, or any other form of solicitation.

We reserve the right to edit comments for content, remove off-topic contributions, delete offensive comments or remarks, block offensive contributors, and delete actual or suspected spam content from any Social Media Site. Please be aware that once you post something online, there is the potential for numerous individuals to read your words, even years from now. Therefore, we suggest that you exercise caution when posting on any Social Media Sites and that you not disclose Information like your location, medical record number, personal medical information, financial information, etc. We are not responsible for the content of any comments or responses posted by others to any Online Service or Social Media Site we manage or monitor. We do not control the placement of any marketing or advertising displayed on our pages by social media or third-party organizations.

Please remember that content posted on any of our social media profiles or platforms is for general informational purposes only and should not be considered medical advice and should not replace a consultation with your health care or financial professional. Always consult an appropriate health care or financial professional for your specific needs. If you are experiencing a medical emergency, call 9-1-1 or your local emergency number. Some treatments mentioned on social media formats may not be covered by your health plan. Please refer to your benefit plan documents for information about coverage.

We reserve the right to respond to any post or user content and may occasionally privately request your contact information to assist you offline, with your consent, by routing the matter to the appropriate persons or department for further handling. Any further questions about your account, claims or benefits or request for additional information can be addressed by visiting your member or patient website or calling the toll-free member phone number on your health plan or member ID.

All trademarks are the property of their respective owners.

Social Security Number Protection Policy

It is our policy to protect the confidentiality of Social Security numbers ("SSNs") that we receive or collect in the course of business. We secure the confidentiality of SSNs through various means, including physical, technical, and administrative safeguards that are designed to protect against unauthorized access. It is our policy to limit access to SSNs to that which is lawful and to prohibit unlawful disclosure of SSNs.

Changes to This Policy

We may change this Policy at any time. If we do so, such change will appear on this page. You may always visit this Policy to learn of any updates. Your continued access to or use of the Online Services constitutes your consent to these changes to this Policy.

Contact Us

Contact us regarding this Policy or related privacy practices. If you believe we or any company associated with us has misused your Information, please contact us immediately.

For Employer and Individual Plans:

Effective Date

2/1/2025

