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## **Privacy Policy**

### **Privacy Notice**

Welcome to the Benefit Communications Inc. (BCI) Internet web sites (BCI Sites). It is important for users to understand what information BCI collects and maintains about users when visiting the BCI Sites.

As part of the day-to-day business operations of BCI, a Tennessee corporation, we receive and maintain certain information regarding our clients and our clients' employees. BCI limits the collection of personal information to what is required for benefit administration or for underwriting purposes. Information received from the BCI Sites depends, in part, on what users do when transacting business on the BCI Sites. BCI respects the privacy of every individual who visits the BCI Sites. Therefore, BCI would like to define the types of information received and describe how it is maintained in this privacy policy ("Privacy Policy"). This policy refers only to the information collected and maintained from the BCI Sites.

Using the BCI Sites confirms a user's consent and agreement to this privacy policy, including collection, use, and disclosure of information by BCI to authorized parties, as described herein. A user's visit to the BCI Sites and communication with BCI via the BCI Sites is subject to this Privacy Policy, as well as our User Agreement or Terms of Service. If a user does not agree with this privacy policy, the user can choose to stop using the BCI Sites.

### **Disclosure of Non-Public Personal Information:**

BCI defines "personal information" as data that is unique to an individual, such as that individual's name, address, age, Social Security Number (or other identifier, such as driver's license or state identification number or employee identification number), e-mail address, or telephone number. We may request personal information from users to deliver requested materials to individuals, respond to user questions, or deliver a product or service. Any personal information that users may provide via the BCI Sites will be used solely for the purpose specified by a user's employer.

BCI restricts access to nonpublic personal information unless it is needed to complete a transaction that is authorized by users or a user's employer. Certain information may be shared with a user's employer, providers, and vendors (such as carriers, brokers, and wellness providers) that are authorized by a user's employer to assist in supplying products and services to users. Information is provided to nonaffiliated third parties as required by federal and state law. BCI maintains physical, electronic, and procedural safeguards that comply with federal regulations to guard users' nonpublic personal information.

### **Other Information Collected:**

BCI may ask for personal information (such as date of birth, social security number, name, address with zip code, telephone number and e-mail address) to verify appropriate BCI Sites usage. This information is collected from a user's employer (BCI's client). BCI may also use information provided by the client or collected on the enrollment site for electronic communications with the client employees via SMS, email, and voice calls. All communication channels are secure and protected.

Through use of the website, BCI may collect information about user diagnosis and/or medical conditions, treatment/medical history (including prescription medications), health insurance information, and/or



financial or other relevant information, as necessary to submit coverage determination requests. The information BCI collects may include “Protected Health Information,” as defined by HIPAA.

As a normal course of business, BCI records phone conversations regarding a user’s benefit enrollment choices. These voice recordings act as the user’s electronic signature and are subject to quality checking by our internal staff. A transcript of the recording may be requested and provided to a vendor authorized by the employer, or by the employer’s human resources or benefits department to verify a benefit election.

The BCI Sites may write and read “cookies” to a user’s web browser. A cookie is an element of data that is stored temporarily or permanently on the user’s computer and can communicate between the BCI Sites and the user’s browser. A cookie is not a computer program and has no ability to read data residing on a computer or instruct it to perform any function. We do not use cookies to store personal information about users.

We may also use “client-side page tagging” which uses code on each page of the BCI Sites to write certain information about the page and the visitor to a log when a page is rendered to a browser. This technique is commonly used on commercial websites. “Tagging” does result in JavaScript or other client-side code to be run on a user’s computer, but it is limited to providing information about the page from the BCI Sites that a user is requesting, and the configuration of the user’s browser. It will not read any of the data files on a computer or execute other functions. It does not extract any personal information about users. A user can prevent tagging by disabling JavaScript in the browser, but that may prevent the user from utilizing any or all the BCI Sites features.

#### **Children under 13:**

The BCI Sites are designed and directed to adults; it is not directed to children under the age of 13. We do not knowingly collect personal information from children, although we use and disclose children’s personal information that we have obtained voluntarily from users, a user employer, or other third parties about the administration of a user’s benefit programs. If users are under the age of 13, they are not permitted to submit information to the BCI Sites.

#### **Use of Artificial Intelligence:**

BCI leverages advanced Artificial Intelligence (AI) technologies to enhance services, analyze anonymized information, automate processes, and provide a better experience for our customers. We ensure that all AI interactions comply with relevant privacy laws and regulations. We do not share personal information with any third parties without explicit consent.

#### **Users Emails to BCI:**

Please note that user’s email, like most non-encrypted Internet communications, may be accessed and viewed by others without the user’s knowledge and permission while in transit to us. Therefore, please do not send an e-mail to us with personal information. BCI has no way to secure personal information sent by the user via e-mail. If users send us e-mail to ask a question, we will only use the information provided to answer a user’s request. Personal information will not be provided to a non-affiliated third party without a user’s prior consent, except as permitted by federal and state law.

#### **Retention of Information Collected:**

The non-public personal information collected and maintained from the BCI Sites will be retained for seven years from the date of its creation or the date when it was last in effect, whichever is later; or longer, as



required by law. Personal information is disposed of in a secure manner when no longer needed for the purpose for which it was obtained and used.

**Direct Access to Other Websites:**

BCI offers direct links to other separate and individual web sites that offer information, which could be beneficial to client employees. Since these direct links are separate web sites independent of the BCI Sites, they may have different privacy guidelines. If users have questions about those websites, we suggest they contact the appropriate controlling authorities of these sites or review their privacy policy.

**Correction/Updating Personal Information:**

If the personally identifiable information of a user of our services changes or an employer's information changes, or if the user or employer no longer desires to use the services on the BCI Sites, BCI will endeavor to provide a way to correct, update or remove that user's personal data. It is the user's responsibility to verify that their personal information is accurate. To correct or update personal information, it may be necessary to contact the user's human resources, benefits department, or third-party agent authorized by the employer. Upon request and verification of identity, BCI will provide personal information collected during the benefits enrollment process.

**Inquiries, Complaints, or Disputes:**

For inquiries, complaints, or to dispute any information on this website, please contact the user's human resources, benefits department, or third-party agent designated by the employer. Upon request by the human resources, benefits department, or third-party agent designated by the employer, BCI will investigate and document any inquiries, complaints, or dispute of information. A report will be provided to the user's human resources, benefits department, or third-party agent designated by the employer. Any release of information in the report will be at the discretion of the human resources, benefits department, or third-party agent designated by the employer.

**Security:**

BCI takes precautions to protect its users' personal non-public information. We implement various security measures in accordance with industry standards to protect the security of personal information both on the BCI Sites, and off-line.

**Technical Security:** BCI uses SSL (Secured Socket Layer) encryption to protect sensitive information online. When the registration/login form asks users to enter sensitive information, the information is encrypted and is protected with the encryption software. While on a secure page (such as the login page) using a modern web browser (such as Microsoft Edge or Chrome), the lock icon on the bottom of web browsers or to the left of the web address bar, becomes locked, as opposed to unlocked, or open, when users are just browsing the Internet. Note that browser choices are personal, and a user's browser may display the security status differently. Please check the browser's website for more information on secure web pages.

**Administrative Security:** BCI protects user-information off-line and data at rest. Only BCI employees who need the information to perform their jobs are granted access to personally identifiable information. Furthermore, all BCI employees are kept up to date on BCI security and privacy practices.

**Physical Security:** The computers and servers that store personally identifiable information are kept in a secure environment.



If users have any questions about security at the BCI Sites, please submit questions in writing to us at:

*Benefit Communications Inc.  
Attn: Security Policy Administrator  
2977 Sidco Drive  
Nashville, Tennessee, 37212*

**Notification of Changes to Privacy Policy**

BCI reserves the right to change or update this Privacy Policy at any time. If we revise our Privacy Policy, we will post the revised policy on the BCI Sites. As we may make changes at any time without notifying users, we suggest that users periodically consult this Privacy Policy. Please note that our rights to utilize a user's personal information will be based on the privacy policy in effect at the time the user submits the personal information to us. This Privacy Policy is not intended to and does not create any contractual or other legal right or obligation on behalf of any party.