



## WEBSITE PRIVACY POLICY

### ***Introduction***

We are very sensitive to privacy issues. The purpose of this Website Privacy Policy is to let you know how we handle the information we receive from you through this website. Portions of this website may describe additional privacy practices applicable to specific types of information or to information provided on specific web pages.

This Website Privacy Policy does not apply to information collected through other means such as by telephone or in person, although that information may be protected by other privacy policies. As used in this Website Privacy Policy, terms such as “we” or “our” and “Company” refer to Solstice Benefits, Inc. and its current and future affiliated entities.

This website is intended for a United States audience. If you access this website from outside the U.S., you acknowledge, agree, and consent that any information you provide, including any personal information, will be transferred to and processed by a computer server located within the U.S. and subject to U.S. laws and regulations. Further, if you access this website from outside the U.S., you acknowledge and agree that you are responsible for compliance with any applicable local or national laws, rules, or regulations applicable to such use.

This Website Privacy Policy is a statement of our practices and of your rights regarding your personal information. This is not a contractual document, and it does not create any rights or obligations on either party, beyond those which already exist under data protection laws.

### ***Children’s Information***

This website is intended to be accessed and used only by adults and is not directed to minors. Solstice does not knowingly collect personally identifiable information by anyone under the age of thirteen (13). If you are under 13 years of age, please do not send or provide any information about yourself to us or on this website, including your name, address, telephone number, or e-mail address. In the event that we learn that we have collected personal information from a child, we will delete that information and otherwise comply with the requirements of the Children’s Online Privacy Protection Act and applicable law.

### ***Cookies and Non-Personal Information***

“Non-personal information” means information that does not permit us to specifically identify you by your full name or similar unique identifying information such as a social security number, member identification number, address, or telephone number. The Company uses “cookie” technology and similar technology to gather non-personal information from our website visitors such as which pages are used, how often they are used, and to enable certain features on this website.

You may disable these cookies and similar items by adjusting your browser preferences on your computer at any time; however, this may limit your ability to take advantage of all the features on this website. Keep in mind that cookies are not used to collect any personal information and do not tell us who you are. Some examples of the way we use cookies include:

- Tracking resources and data accessed on the website
- Recording general site statistics and activity
- Assisting users experiencing website problems
- Enabling certain functions and tools on this website, and
- Tracking paths of visitors to this website and within this website.

We may also collect other forms of non-personal information such as what web browsers are used to read our website and what websites are referring traffic or linking to our website. Aggregate and deidentified data regarding website users is also considered non-personal information.

### ***What information do we collect?***

#### *Information you provide to us*

When you request services, we ask that you provide accurate and necessary information that enables us to respond to your request. When a visitor provides personal information to us, we use it for the purposes for which it was provided to us as stated at the point of collection or as obvious from the context of collection, for example providing an insurance quote, or creating a profile on [name of your Mobile App] or an online application.

### *Information we collect from clients or third parties*

When we provide the services for our clients, we may collect personal information such as your name, contact details, date of birth, gender, marital status, financial details, employment details, and benefit coverage. We may also collect (in each case as strictly relevant to the services we provide) sensitive information about you, such as health information.

We will not collect any sensitive information through our website or {name of mobile app} unless this is required. Sensitive information includes a number of types of data relating to: race or ethnic origin; political opinions; religious or other similar beliefs; trade union membership; physical or mental health; sexual life or criminal record. We suggest that you do not provide sensitive information of this nature unless we specifically request this information.

If you provide us with sensitive personal information, you understand and give your explicit consent that we may collect, use and disclose this information to appropriate third parties for the purposes described in this Website Privacy Policy. If you provide personal information about other individuals such as dependents, you must obtain their consent prior to your disclosure to us.

### *Information we collect over our website, [mobile app], and social media*

We may ask you for some or all of the following types of information when you request services, manage accounts, access various content and features or directly visit our websites/applications. This includes, but is not limited to:

- Contact information, such as name, e-mail address, mailing address, phone number and mobile number
- Username, password, password reminder questions and password answers
- Communication preferences, such as which communications you would like to receive
- Search queries
- Information posted in community discussions and other interactive online features

In some instances, we automatically collect certain types of information when you visit our websites and through e-mails that we may exchange. Automated technologies may include the use of web server logs to collect IP addresses, "cookies" and web beacons.

### *Social Media:*

You can engage with us through social media websites or through features such as plug-ins, links or applications on our websites that integrate with social media sites. You may also choose to link your account with us to third party social media sites. When you link your account or engage with us on or through third party social media sites, plug-ins, or applications, you may allow us to have ongoing access to certain information from your social media account (e.g., name, e-mail address, photo, gender, birthday, the posts or the 'likes' you make).

If you post information when you interact with our websites through social media sites, plug-ins or other applications, depending on your privacy settings, this information may become public on the Internet. You can control what information you share through privacy settings available on some social media sites. For more information about how you can customize your privacy settings and how third party social media sites handle your personally identifiable information, please refer to their privacy help guides, privacy notices and terms of use.

### *Mobile Devices:*

If you access our websites on your mobile device, we may also collect your unique device identifier and mobile device IP address, as well as information about your device's operating system, mobile carrier and your location information. We may also ask you to consent to providing your mobile phone number (for example, so that we can send you push notifications).

### ***With Whom is Non-Personal Information Shared?***

Because non-personal information does not identify who you are, we do not limit the ways we may use or share non-personal information. For example, we may share non-personal information with our affiliates, suppliers, employees and agents, other businesses, and the government.

### ***Personal Information Provided by You***

"Personal information" means information that specifically identifies you as an individual, such as your full name, telephone number, e-mail address, postal address, or certain account numbers. As used in this Website Privacy Policy, personal information does not include any information protected under HIPAA, which would be protected as described in the HIPAA Notices of Privacy Practices of your health plans or physicians and other health care professionals.

This website may include web pages that give you the opportunity to provide us with personal information about yourself. You do not have to provide us with personal information if you do not want to; however, that may limit your ability to use certain functions of this website or to request certain services or information.

We may combine personal information that you provide us through this website with other personal information held by the Company, including with our affiliates or vendors. For example, if you have purchased a product or service from us, we may combine personal information you provide through this website with information regarding your receipt of the product or service.

The following is a summary of the purposes for which we may use personal information:

- To respond to an e-mail or particular request from you
- To personalize the website for you
- To process an application as requested by you
- To service and/or administer any products purchased from us by you
- To provide you with information that we believe may be useful to you, such as information about health products or services provided by us or other businesses
- To comply with applicable laws, regulations, and legal processes
- To protect someone's health, safety, or welfare
- To protect our rights, the rights of affiliates or related third parties, or take appropriate legal action, such as to enforce our User Agreement
- 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.

If we wish to use your personal information for a purpose which is not compatible with the purpose for which it was collected for, we will request your consent. In all cases, we balance our legal use of your personal information with your interests, rights, and freedoms in accordance with applicable laws and regulations to make sure that your personal information is not subject to unnecessary risk.

You understand and specifically agree that we may use personal information to contact you through any contact information you provide through this website, including any email address, telephone number, cell phone number, text message number, or fax number.

### ***Legal Basis***

All use of your personal information is justified by a "lawful basis" for processing. In the majority of cases, processing will be justified on the basis that:

- the processing is necessary for the performance of a contract to which you are a party, or to take steps (at your request) to enter into a contract
- the processing is necessary for us to comply with a relevant legal obligation (e.g. where we are required to collect certain information about our clients for tax or accounting purposes, or where we are required to make disclosures to courts or regulators)
- the processing is in our legitimate commercial interests, subject to your interests and fundamental rights (e.g. where we use personal information provided to us by our clients to deliver our services, and that processing is not necessary in relation to a contract to which you are a party)

In limited circumstances, we will use your consent as the basis for processing your personal information, for example, where we are required to obtain your prior consent in order to send you marketing communications.

Before collecting and/or using any special categories of data, or criminal record data, we will establish a lawful exemption which will allow us to use that information. This exemption will typically be:

- your explicit consent
- the establishment, exercise or defense by us or third parties of legal claims
- a context specific exemption provided for under local laws of EU Member States and other countries implementing the GDPR, such as in relation to the processing of special category data for insurance purposes, or for determining benefits under an occupational pension scheme.

### ***With Whom is Personal Information Shared?***

We will only share your personal information with third parties as outlined in this Website Privacy Policy (in its current or future form) and as otherwise permitted by law.

We share and give access to personal information to our employees and agents in the course of operating our businesses. For example, if you sent us an e-mail asking a question, we would provide your e-mail address to one of our employees or agents, along with your question, in order for that person to reply to your e-mail. We may share personal information with other affiliates or business units within the Company.

We may share and give access to personal information with other companies that we hire to perform services on our behalf or collaborate with. For example, we may hire an outside company to help us send and manage e-mail, and in that case we might provide the outside company with your e-mail address and certain other information in order for them to send you an e-mail message on our behalf. Similarly, we may hire outside companies to host or operate some of our websites and related computers and software applications. These service providers are contractually restricted from using or disclosing the information except as necessary to perform services on our behalf or to comply with legal requirements. These activities could include any of the processing activities that we carry out as described in the above section, 'How we use your personal information.' These third parties appropriately safeguard your data, and their activities are limited to the purposes for which your data was provided.

However, if we share or give access to personal information to outside companies, we require them to use the personal information only for limited purposes, such as for sending you the e-mail in the example above. If you believe we or any company associated with the Company has misused any of your information, please contact us immediately and report such misuse. We may share personal information if all or part of the Company is sold, merged, dissolved, acquired, or in a similar transaction. We may share personal information in response to a court order, subpoena, search warrant, law or regulation. We may cooperate with law enforcement authorities in investigating and prosecuting website visitors who violate our rules, or engage in behavior that is harmful to other visitors, or is illegal.

### ***Responsibility of Personal Information***

We are the controller for the purposes of data protection laws.

Some of the services which we provide to our customers are provided as a processor, which means that the controller remains primarily responsible for your information. In these circumstances, we may transfer a query about our use of your information to the controller.

If we use your personal information, you will have certain important rights which you can exercise. The rights you will be able to exercise will depend on how and why we use your information.

The primary point of contact at Solstice for questions regarding your personal information is XXXXXXXXXXXXXXXXXXXX.

### ***Reviewing My Information***

This website may permit you to view your visitor profile and related personal information. If this function is available, we will include a link on this website with a heading such as "My Profile" or similar words. Clicking on the link will take you to a page through which you may review your visitor profile and related personal information.

### ***Personal Information Retention***

Retention of your personal information depends on the purpose for which it was obtained and its nature. We will keep your personal information for the period necessary to fulfil the purposes described in this Website Privacy Policy unless a longer retention period is permitted or required by law, in accordance with our records retention policy.

In specific circumstances we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

### ***Website and Information Security***

We use a number of physical security (such as locks and alarm systems), electronic security (such as passwords and encryption methods), and procedural security methods (such as rules regarding the handling and use of information), designed to protect the security and integrity of information submitted through this website. Due to the nature of the Internet and online communications, however, we cannot guarantee that any information transmitted online will remain absolutely confidential, and we are not liable for the illegal acts of third parties such as criminal hackers.

## ***Other Rights Regarding Your Data***

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have certain rights in relation to your personal information.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal information requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by contacting us. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly or inform you if we require further information in order to fulfil your request. We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

### *Right to Access*

You have right to access personal information which we hold about you. If you have created a profile, you can access that information by visiting our website or by using [mobile app].

### *Right to Rectification*

You have a right to request us to correct your personal information where it is inaccurate or out of date.

### *Right to be Forgotten (Right to Erasure)*

You have the right under certain circumstances to have your personal information erased. Your information can only be erased if your data is no longer necessary for the purpose for which it was collected, and we have no other legal ground for processing the data.

### *Right to Restrict Processing*

You have the right to restrict the processing of your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

### *Right to Data Portability*

You have the right to data portability, which requires us to provide personal information to you or another controller in a commonly used, machine readable format, but only where the processing of that information is based on (i) consent; or (ii) the performance of a contract to which you are a party.

### *Right to Object to Processing*

You have the right to object the processing of your personal information at any time, but only where that processing has our legitimate interests as its legal basis. If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

### *Right to Decline Automated Decision Making*

You have the right to not be subject to decisions based solely on automated decision making, which produce legal or significant effects for you, except where these are (i) necessary for a contract to which you are a party; (ii) authorized by law; (iii) based on your explicit consent.

Even where such decisions are permitted, you can contest the decision and require us to exercise human intervention.

## **OUR ONLINE COMMUNICATION PRACTICES**

### ***General E-mail Communications***

Most e-mail, including any e-mail functionality on our website, does not provide a completely secure and confidential means of communication. It is possible that your e-mail communication may be accessed or viewed inappropriately by another Internet user while in transit to us. If you wish to keep your information completely private, you should not use e-mail. We may send e-mail communications to you regarding topics such as general health benefits, website updates, health conditions, and general health topics.

### ***Other Online Communications***

The Company may send electronic newsletters, notification of account status, and other communications such as information marketing other products or services offered by us, on a periodic basis to various individuals and organizations. When you provide us with personal details, if we intend to use those details for marketing purposes, we will provide you with the option of whether you wish to receive promotional e-mail, SMS messages, telephone calls and postal mail from us. At any time, you may opt out from receiving interest-based advertising from us by contacting us.

You may also choose not to receive marketing communications from us by clicking on the unsubscribe link or other instructions in our marketing e-mails, visiting our website, or contacting us as noted below.

### ***Contact Us***

To contact us regarding this Website Privacy Policy and our related privacy practices, please contact us at:

Solstice Benefits  
P.O. Box 19199  
Plantation, Florida 33318.

### ***Effective Date***

The Effective Date of this Privacy Policy is XXX, XXX, 2019.

### ***Changes to This Website Privacy Policy***

We may change this Website Privacy Policy. If we do so, such change will appear on this page of our website or in another location as indicated by us. It is your responsibility to review the Website Privacy Policy each time you use this website. By continuing to use this website, you consent to any changes to our Website Privacy Policy.

### ***HIPAA Notice of Privacy Practices***

To read more about our privacy practices regarding health and medical information under the Health Insurance Portability and Accountability Act ("HIPAA"), please access the links to our HIPAA Notice of Privacy Practices.