

Palmetto HealthPro

Privacy Policy

Protecting your private information is our priority. This statement of Privacy applies to the <http://www.palmettohealthpro.com> and Palmetto HealthPro and governs data collection and usage. We want you to be aware of our commitment to protect the information you share in the course of doing business with us. We value your business. For the purposes of this Privacy Policy, unless otherwise noted, all references to Palmetto HealthPro include <http://www.palmettohealthpro.com> and Palmetto HealthPro. By using the Palmetto HealthPro website, you consent to the data practices described in this statement.

Collection of your Personal Information

We may collect personally identifiable information from you.

The ways in which we collect this information include:

- **When you complete a form:** We receive and store insurance information that you enter on our site or provide to us otherwise. For example when you fill out a form to ask for information or an application for certain insurance related services, you may be requested to provide your first and last name, telephone number, postal and/or email addresses and other insurance information. You have the right not to provide this information. For more information, please see the User's rights section, below.
- **If you contact us:** We may keep a record of your contact information and correspondence, the purpose of your contacting us, and our interaction with you

if you contact us for any purpose. We may also collect information through cookies and other technologies, such as information about a user's online activity, the web pages visited, the search terms used, and any link on which the user clicks. For more information, please see the Cookies and other technologies section, below.

- **From a third party:** We may receive Insurance Information under an agreement with our Business Partners, such as the center for Medicaid and Medicare Services (CMS). In this case, you have previously provided the Insurance Information to that third party, and have allowed that third party to provide that information to us.
- **Other sources:** We also may obtain Personal Information from affiliated entities, publicly available databases, and other independent third-party sources, and add it to our contact database for marketing and sales purposes to combine it with other information that we have collected or obtained otherwise. This may include phone number, email address, title, or employer.

How we use Personal and Insurance Information

Our primary goal in collecting personal information is to identify specifically your needs and interests so that we can find more efficient and effective ways to respond to your questions and inquiries, and, when this is allowed, to market our products and services to you. The more we know about your goals and interests as they relate to our products and services, the better we can communicate with you, anticipate your needs and communicate with you in a productive and enjoyable manner.

This interaction may occur in several different ways:

- **All Users:** We use personal Information to provide our users with access to the public areas of our site and information about our products and services. We may also use personal information about our users to communicate with them,

respond to their questions, or as otherwise described at the point of collection of information.

- **Applicants:** If you have filled out an application or a questionnaire on our site, we will use the information that you provide in order to give you access to the product, service, or feature that you requested. You can request a quote through our website by providing your first and last name, email address and telephone. If you represent an organization or a company, Insurance Information about your employees is required in the event you request a quote. Any such information is held in the strictest confidence, and will only be shared only with our Business Partners.
- **Telephone Calls:** If you fill out an application, and provide us with a phone number, we may call you. By submitting the application with your phone number, you expressly authorize Palmetto HealthPro or its service provider to call you or send you recorded messages or texts about the insurance products described in the application or related products that may be of interest to you, using automated technology to the phone number that you will have provided. You are not required to give your consent.
- **Correspondence:** We may use your correspondence, contact information, email address, and any information that you provide in your messages to respond to you.
- **Marketing and Business Development:** When not precluded from doing so, we may use personal information that we have received from you or about you to solicit feedback from you, including through surveys or to send you marketing communications and promotional material about other products and services. If you demonstrate an interest in a particular product or service, such as by affirmatively clicking on a link about the product or service, and we have your contact information, we may follow-up and send you an email or initiate communication with you about this product or service, and may periodically send you additional information and news. We will not use Insurance Information for

any other purposes than to respond to your specific request made through an application for a particular service. In addition, at all times, you have the right to opt-out from receiving any communications from us. See our User's rights section.

- **Investigations:** We may use Personal Information to prevent or investigate potentially prohibited or illegal activities.
- **Analytics:** We may aggregate Personal Information and usage data in order to obtain statistical information, such as to calculate the percentage of Users who have a particular zip code or telephone area code. We also use aggregated Personal Information to understand how our Site is used, for research or product development, for example, to measure interest in, or monitor the use of any content, product, services or promotions that we provide through the Site, to improve this content, products, services or promotions, and for the technical administration of the site.

Sharing with third parties

Personal Information or Insurance Information is disclosed only under the following limited circumstances:

- **Insurance Companies and Licensed Agents:** Inquiries and applications for insurance products or requests for quotes may be transmitted to the insurance company or companies that you have chosen, or to their respective licensed agents for processing. These Business Partners are obligated to maintain the confidentiality of all information that they receive and to only use such information for following-up on your application or request for information or a quote.
- **Licensed Carriers and Insurance Brokers:** If you express interest in an insurance product from a particular insurance company that is not our Business Partner, we may send your Personal Information to licensed carriers or insurance brokers who may be able to further assist you. These licensed carriers or

insurance brokers are obligated to maintain the confidentiality of all information they receive and to only use such information for assist you on your application or request for information.

- **Government Agencies:** Under a relevant agreement executed with a Government Agency we may disclose Insurance Information in order to comply with the agreement, such as to assist Individuals in applying for Advanced Payments of the Premium Tax Credits (“APTCs”), Cost-sharing Reductions (“CSRs”) for Qualified Health Plans (“QHPs”) and/or in completing enrollment in QHPs offered in the individual market through the Federally-facilitated Exchange.
- **Workforce:** Palmetto HealthPro employees and independent contractors need to have access to Personal Information and Insurance Information to carry out their duties and obligations, such as to provide customer support, respond to inquiries, or correct an error. Only the minimum amount of Personal Information or Insurance Information will be made available to them as needed, and in accordance with their responsibilities. They are required to ensure at all times the confidentiality and security of your Personal Information.
- **Affiliated Entities:** When this is allowed, our subsidiaries or affiliated entities may share a User’s Personal Information with each other in connection with the performance of our services, or in connection with their sales and marketing process. To the extent that any of our subsidiaries has access to your Personal Information, it will follow the practices described in this Privacy Policy. It will also comply with the applicable laws and agreements in force.
- **Service Providers:** We may engage certain third parties to perform services including, without limitation, hosting and maintenance, customer relationship, storage, database management, collection, fraud prevention, business analytics, chat, website analytics, website optimization, lead scoring, retargeting, direct marketing campaign, or similar services. We will share your Personal Information or Insurance Information with these third parties, but only to the extent that this Personal Information or Insurance Information is necessary to perform these

functions and provide such services, and only pursuant to binding contractual obligations requiring such third parties to maintain the privacy and security of your Personal Information and Insurance Information.

- **To Defend or Enforce our Rights:** We may use or share personal information or Insurance Information to establish or exercise our legal rights; when we believe it is appropriate to protect the our Site, our property and rights or those of a third party; to protect ourselves and the security and safety of our company, our customers or others; to investigate, prevent, take action against, or stop any fraudulent, illegal, unethical, or legally actionable activity, in connection with our Site, our products or services, or those of our Business Partners other third parties.
- **Compliance with Laws and Third Party Requests:** Palmetto HealthPro cooperates with government and law enforcement officials or private parties to enforce and comply with the law. We may disclose any information about you to government or law enforcement officials or private parties as we, in our reasonable discretion, believe necessary or appropriate to respond to and defend against legal claims, respond to legal process (including a facially valid subpoena, warrant, court order or other legal process), or otherwise as required by law. Please note that we may not be able to notify you of a request for the disclosure of your information as described above, either because it might be prohibited by law, or because doing so would jeopardize an investigation of illegal or fraudulent activity, or because we do not have your contact information.
- **Aggregate information:** We may prepare reports, market analysis, and trend analysis that are based on compilation of data that Palmetto HealthPro has collected. These reports do not contain specific user information, but only aggregate information regarding a group of users. Data aggregation is a process in which data are gathered and expressed in a summary form for purposes such as statistical analysis, in order to obtain information about a particular group

based on specific variables. This aggregated information is used for industry analysis, demographic profiling, and other purposes.

Cookies and Other Technologies

We use cookies and other technologies as described below to gather information about the Users of our Site in order to know what information is or might be of interest to them. All information collected through cookies and other technologies is processed in accordance with this privacy policy.

Some cookies are managed by us and others by our service providers. These cookies are used for a variety of purposes. Some cookies enable services that you have specifically asked for. Other cookies are used to remember the choices you made in order to make it easier for you to use our Site when you return. Other cookies collect information about how Users use our Site, for example which pages they visit most often, or how long they stay on a particular page. Finally, other cookies are used to collect information about your perceived interest in our products or services so that we can arrange for advertisements regarding these products or services to display on other sites that you visit on the Internet. This way, when you visit other sites that display advertisements, the advertisements that you see are more relevant to you.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of our site.

These cookies are not linked to any contact information or identifying information, thus cookies do not tell us who you are.

User's Rights

We want our Users to enjoy their visit to our Site, and we respect their privacy. To this end, we provide numerous privacy choices.

While we have tried to provide all tools necessary so that Users can manage their interaction with us, as listed below, you may prefer to interact directly with us. In this case, be aware that you can contact us at any time with your questions or requests for assistance. Please refer to the 'How to contact us' section.

- **Right to amend, correct, substitute, or delete Information:** You may request that we amend, correct, substitute, or delete Insurance Information maintained and/or stored by us if you believe that it is not accurate, timely, complete, relevant, or necessary to accomplish our services. To do so, please let us know what you need, by contacting us as indicated in the 'How to contact us' section. If the requested Insurance Information is no longer available or cannot be modified or deleted using reasonably commercial means, or if the burden or expense of deleting it would be disproportionate to the risks to you, we may deny your request and we will provide you an explanation for this denial.
- **Right to obtain a list of the disclosures:** You may also request in writing a list of our disclosures of your Insurance Information made by us to third parties. We are not required, however, to inform you of disclosures:
 - Made to our Workforce
 - That are necessary to perform our services
 - Made more than 10 years prior to your request
 - For which the Personal Information record no longer exists
- **Right not to provide information:** You can choose not to provide us with any Insurance Information, or not to respond to certain questions. However, if you wish to obtain access to certain content, ask us a question, apply for products or services, or to take advantage of certain features of the Site, you may be required to provide certain Personal Information, as indicated in the relevant form. You should know that much of the most valuable content that Palmetto

HealthPro has developed or compiled is available only to users who have provided us with certain information, as indicated in the relevant form.

- **Right to revoke your authorization:** If you have given to us an authorization to use or disclose your insurance Information in a specific manner, you have the right to revoke that authorization, at any time, by requesting us as indicated in the 'How to contact us' section.
- **Right to request restrictions on our use or disclosure of Personal Information:** You may have the right to request restrictions on how we may use or disclose your Personal Information, to the sole purpose of obtaining the assistance in applying for services provided in the site or for fulfill our obligations specified in the relevant agreement. To do so, please contact us as indicated in the 'How to contact us' section.
- **Right to block marketing communications:** If you no longer wish to receive marketing information or communications from us or from our affiliates entities, you can unsubscribe from our distribution list by following the unsubscribe instructions provided in the communications that you receive from us.

Security

Palmetto HealthPro employs administrative, physical, and electronic measures designed to protect your personal information from unauthorized access, loss, misuse, disclosure, alteration, and destruction.

When we need to transfer information out of our firewall, we use industry-standard technological means to protect personal information while in transit through the internet. We use encryption and a comprehensive authentication protocol to provide reasonable security. However, please remember that no security system on the internet is perfect.

Limitation of Liability

We exercise reasonable efforts to safeguard the security and confidentiality of your personal information; however, transmissions protected by industry standard technology and administered by humans cannot be guaranteed to be secure. We will not be liable for unauthorized disclosure of personal information that occurs through no fault of Palmetto HealthPro including, but not limited to, errors in transmission, uses of your data by a third party and the unauthorized acts of Palmetto HealthPro's employees.

No Warranty

Palmetto HealthPro attempts to provide accurate information on this website, but it assumes no responsibility for accuracy. Palmetto HealthPro may change the information on the site, or the products or services mentioned, at any time without notice. Content on this site is provided "as is" and Palmetto HealthPro disclaims all warranties, express or implied. This includes but is not limited to implied warranties of merchantability, or fitness for a particular purpose. It also includes any express or implied warranties arising from any course of dealing, usage or trade practice.

Links to Other Websites

This Privacy Policy addresses only the use and disclosure of information that we collect from you through the Site, through our interaction with you or from interaction with our business partners. Our site may contain links to other websites. The fact that we link to a website is not an endorsement, authorization or representation of our affiliation with that third party. We do not exercise control over third party websites. These other websites may place their own cookies or other files on your computer, collect data, or solicit personal information from you. We recommend that you to read the privacy policies or statements of these other websites.

Our Policy Towards Children and Minors

The Site is not directed to persons under 18. If a parent or guardian becomes aware that his or her child has provided us with personal Information without their consent, he or she should contact us as indicated in the how to contact us section. If we become aware that a child under 13 has provided us with Personal Information, we will remove such information from our files.

Contact Us

If you have any questions, comments or concerns with respect to the site or if your account has been compromised, please contact us as indicated below. We will attempt to resolve the matter.

Contact us by email at info [a] palmettohealthpro.com, by phone at (855) 585-0507, or by mail at:

Palmetto HealthPro

1559 Laurens Rd

Greenville, SC 29607

USA

Effective as of September 27, 2017