

Privacy Policy

This Privacy Notice describes the principles and practices that apply to the use of personal identifiable information (defined below) that this site (“we,” “us”) collects online and offline from individuals and companies (“user” or “you”).

By visiting or registering on our Site — or by allowing a third party to use your Insurance Information (defined below) to obtain services for you or on your behalf, you consent to our processing of your information as set forth in this Privacy Notice.

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Definitions and background

For ease of use of this document, certain terms have been associated with the specific meaning provided below.

“Applicant” means an Individual who has provided contact information or filed out an application form, in order to receive a quote or other services from us.

“Browser Information” means information that is provided directly by your Internet browser, such as the IP or MAC address of your device, the type, and version of the Internet browser you use, the time and date of your access to our Site, the web pages URL that you were visiting before landing on our site. In some cases, this information may allow identifying the specific device being used to navigate the web.

“Business Partners” means the insurances companies, licensed agents, health care providers, government agencies, and other vendors or partners (such as HSA trustees and third party administrators), with whom we share Personal Information or Insurance Information.

“Device” means a computer, laptop, desktop, smart phone, tablet, and any other similar equipment that is used for online activities.

“Individual” means any consumer, applicant, qualified individual, or enrollee

“Insurance Information” means information (1) that we collect through the forms or

applications that are posted on our Site, and that you fill out when inquiring about, or applying for, quotes for health or other insurance, or when inquiring about your ability to receive government subsidies, or (2) that we collect in telephone or other communications, or (3) that we receive from insurance carriers in connection with an application for, or inquiry about insurance. For example: weight, height, age, birth date, or (4) other information that relates to the past, present or future physical or mental condition of an Individual. "Insurance Information" does not include an Individual's name, address, or other contact information.

"Personal Information" means information that identifies an Individual or that, when combined with other information available to the data holder may allow identifying an Individual with reasonable certainty.

"Personal information" includes, any information that is collected from the Site or from any communication between us and an Individual, such as contact information that a visitor might provide when asking for information about the service or browser information. It also includes an Individual's name, address, or contact information.

"Registered User" means an individual who has provided Personal Information and/or Insurance Information in order to receive content from us, such as a product, service, or feature.

"Site" means the websites and subsites under protectionpluslife.com domain names and/or affiliated microsites that we operate alone or with a Business Partner.

"User" is an Individual who uses our Site. A User can be a visitor of the Site (who merely explores the Site), an Applicant, or a Registered User.

Scope

This Privacy Notice applies to the Personal Information and Insurance Information that we collect or receive from Users of the Site, Applicants, any Individual with whom we interact through telephone, correspondence, or electronic communications, newsletters, interviews, surveys, etc., and Business Partners with which we have a written agreement.

Consent

By visiting our Site, or by filling out an application on our Site, you consent to our processing of your Personal Information and Insurance Information as set forth in this Privacy Notice. Your continued use of the Site, or continued interaction with us after we have notified you of a material change in our Privacy Notice in accordance with the updates will be deemed an acceptance of these new terms.

What information we collect and how

We collect Personal Information and Insurance Information in a variety of ways. We try to ensure that you are provided with a reasonable opportunity and the ability to make informed decisions about the creation, collection, disclosure, access, maintenance, storage, and use of your Personal Information or Insurance Information.

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 provide Insurance Information or Personal Information about, or on behalf of, a third party (e.g. a spouse, child, dependent), you must make sure that you have the right to do so. By providing the Personal Information or Insurance Information of a third party, you represent that you have all necessary authority and/or have obtained all necessary consents from such third party to enable us to collect, use, disclose his/her Personal Information and Insurance Information as set forth in this Privacy Notice.

– 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.

– If you visit our site – We collect information about your Device and Browser. This information is automatically provided by your browser. This may include Device information (type of device, operating system version, unique device identifier, browser type and version, and mobile network information) or log information (IP

address, MAC address, screen resolution, and referring domain).

We may 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. 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 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, for example, phone number, email address, title, or employer.

Our website analytics service provider may combine Site usage data regarding how Users use our Site (e.g. which page a User visits more frequently) with other data that it has collected independently and has associated to a User's Device. This other data may include demographics data (age range, gender), or data about interests (e.g. interest in automobile, or interest in athletic apparel). These service providers may combine Site usage data with this other data to produce reports regarding the use of our Site, such as how many users of a certain gender, or in a certain age range, visit specific pages or areas of our Site. These reports do not contain specific information regarding a specific User. They are produced by using only aggregated data, and only present statistical data. Each such report does not recognize a specific Individual. You may opt out from sending navigation information about your visit to the Site to Google Analytics by using the Google Analytics Opt-out page.

How we use Personal and Insurance Information

Our primary goal in collecting Personal Information or Insurance Information is to identify your specific 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 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 Insurance Information that you provide in order to give you access to the product, service, or feature that you requested. You can request a quote or ask to be connected with an insurance company 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 as applicable.

Registered Users – If you have registered on our Site, we will use the information that you provide in order to manage your registered User account and to give you access to the product, service, or feature that you requested. In addition, we will assume that you are interested in our products or services, and may send you periodically additional information and news. You have the right to opt-out from receiving any future communications. See our User's rights section.

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 our representatives 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 (other than your Applications for insurance services), 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, or to enforce other legal terms.

Analytics – We may aggregate (or have third parties 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 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 these 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.

– Third Party Administrators and Payment Processors – If you express interest in a health savings account (HSA) or healthcare reimbursement account (HRA) vendor that is one of our Business Partners, we may disclose Personal Information to that vendor, its trustee or administrator for follow-up and processing. These Business Partners are obligated to maintain the confidentiality of all information they receive and to only use such information for following-up on your application or request for information.

– 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.

– Lead Generation Partners – To the extent permitted by applicable laws and regulations, we may share your name, age, city, zip code, and choice of insurance plan with the lead generation partner that referred or otherwise directed you to our Site. When we intend to do so, we will inform you of our intent and our goals, and will request your prior consent to such disclosure as appropriate and consistent with applicable laws.

– Business Partners – If you have consented to allowing us to share your Personal Information and Insurance Information with our Business Partners, then we may share such information with our Business Partners so that they can send you promotional and marketing information regarding other products and services for your use or purchase.

– Workforce – our 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 and Insurance Information.

– Affiliated Entities – When this is allowed, our subsidiaries or affiliated entities may share a User's Personal Information or Insurance 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 or affiliated entities has access to your Personal Information or Insurance Information, it will be required to follow the practices described in this Privacy Notice and 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 contracts 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; to respond to a breach of our Website Terms and Conditions or other legal terms; when we believe it is appropriate to protect 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 or other third parties.

– If our company is sold or goes bankrupt – If any or all of our assets are acquired by, or if we merge with, another entity, or in the unlikely event of a bankruptcy, we may disclose, share or transfer some or all of our Users' Personal Information to or with this entity in preparation of the transaction, as part of the due diligence, or after the transaction has been consummated, and we may transfer Insurance Information after the transaction has been consummated, so that the successor entity can continue providing our services to our Users. If the recipient of the Personal Information or Insurance Information has practices regarding Personal Information or Insurance Information that do not substantially meet the substance of this Privacy Notice, you will be given the opportunity not to continue to use the Site and to have your Personal and Insurance Information deleted.

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 we have 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 Notice.

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 (for example, the size of the font, or the language you prefer) 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.

These cookies are not linked to any contact information or identifying information, thus cookies do not tell us who you are, but they may identify your Device.

If you have any other questions about cookies and other technologies, please

visit <http://www.allaboutcookies.org/> or <http://networkadvertising.org/> or contact us as indicated in the How to contact us section.

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, you can contact us at any time with your questions or requests for assistance, as indicated in the How to contact us section.

– Right to access your Insurance Information – You may access your Insurance Information, created, collected, disclosed, accessed, maintained, stored and used by us by contacting us as indicated in the How to contact us. In addition, you may obtain a copy (electronic or physical) of this information by requesting it in the same manner. If the requested Insurance Information is no longer available or cannot be produced using reasonably commercial means, or if the burden or expense of accessing 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 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. 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 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; or
- For which the related 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 Insurance Information, as indicated in the relevant form. You should know that much of the most valuable content that we have developed or compiled is available only to Users who have provided us with certain information, as indicated in the relevant form.

– Right to object to new uses or disclosures of your Insurance Information – If at any time we wish to disclose, or use your Insurance Information in a way, or for a purpose other than how was originally given, we will ask for your authorization.

– 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 contacting us as indicated in the How to contact us section.

– Right to request restrictions on our use or disclosure of Insurance Information – You may have the right to request that we restrict our use or disclosure of your Insurance Information to providing assistance in applying for services provided on the Site or fulfilling 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 cookies – You can choose to block cookies. To do so, please review the Cookies and other technologies section. Please note that if you refuse to accept cookies from this Site, you may not be able to access certain portions of the Site.

– Right to block marketing communications – If you no longer wish to receive marketing information or communications from us or our affiliates entities, you can unsubscribe from our distribution list by following the unsubscribe instructions provided in the communications that you receive from us or by contacting us as indicated in the How to contact us section.

California Disclosures

– Do Not Track – California law requires that website operators disclose how they respond to a “Do Not Track” signal. However, because there is not yet a common

understanding of how to interpret Do Not Track signals, we do not currently respond to Do Not Track signals, if any, that we might receive from browsers. We will continue to work with the online industry to define a common understanding of how to treat Do Not Track signals.

To learn more about online behavioral advertising, and/or to opt-out of this type of advertising, please visit the Network Advertising Initiative website or the Digital Advertising Alliance website. You can also contact us as indicated in the How to contact us section.

– Third Party Cookies – California law requires that website operators disclose whether third parties may collect personally identifiable information about an individual’s online activities. We allow third parties with which we have a separate agreement to use cookies or other technologies to collect information about Users’ visit to our Site. These third parties may include business partners, which may collect information when you view or interact with certain areas of this Site, and advertising networks, which may collect information about your interests or preferences, so that they can display promotional material tailored to your apparent interest on this Site or across the Internet.

We do not share with these third parties any information that would readily identify you, such as an email address, but these third parties may have access to information about your Device, such as an IP or MAC address. We do not have access to, or control over, the technologies that these third parties may use to collect information about your interests.

– Shine The Light – We do not share Personal Information or Insurance Information with third parties for their direct marketing purposes other than as described in this Privacy Notice. If our practices change, we will provide you with the relevant information as required by applicable law.

Security

We employ administrative, physical, and electronic measures designed to protect your Personal Information and Insurance 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 and Insurance 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 and Insurance 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 or Insurance Information that occurs through no fault of ours including, but not limited to, errors in transmission, uses of your data by a third party, your failure to comply with your security obligations, and the unauthorized acts of our employees.

Links to other websites

This Privacy Notice 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. They follow their own rules regarding the use or disclosure of the Personal Information you submit to them. 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 or Insurance Information without their consent, he or she should contact us as indicated in the How to contact us. If we become aware that a child under 13 has provided us with Personal Information, we will remove such information from our files as soon as reasonably possible.

Disputes

If you have any concerns or claims with respect to our Privacy Notice, please contact us as indicated in the How to contact us section. We will investigate and attempt to resolve any complaints and disputes regarding our use and disclosure of Personal Information or Insurance Information.

If the complaint or dispute cannot be resolved through our internal process, or we do not adequately respond to your question, please contact the Philadelphia office of the American Arbitration Association, which will serve as a liaison with us to resolve your concerns.

If arbitration is necessary, it will be conducted by telephone and email, and if it must be done in person, it will be conducted in Philadelphia, PA. The arbitration will be conducted by one arbitrator member of the American Arbitration Association, and under the rules of commercial arbitration of the American Arbitration Association. Both parties will bear equally the cost of arbitration (exclusive of legal fees and expenses). All decisions of the arbitrator will be final and binding on both parties and enforceable in any court of competent jurisdiction.

Updates

This Privacy Notice may be updated from time to time in order to reflect changes in our practices. We will notify you of any material changes by posting the new Privacy Notice on the Site, and will obtain the necessary consents as may be required under applicable law if we seek to collect, use or disclose personal data for purposes other than those for which consent has been obtained.

Except as stated above, all changes will apply to the Personal Information and Insurance Information that are already collected, and to Personal Information and Insurance Information that are collected after the effective date of the revised Notice. If any proposed change is unacceptable to you, you will have the right to ask for the deletion of your Personal Information. You are advised to consult this Privacy Notice regularly for any changes.

How to contact us

If you have any questions, comments, concerns, complaints or claims with respect to the Site, other users of the Site, if your account has been compromised by a hacker or scammer, if another user is abusing, harassing, or stalking you, if you find that certain content displayed on the Site is inappropriate or prohibited by these Terms,

or if you have any other concern, please contact us as indicated below. We will investigate and attempt to resolve the matter.

If you have any questions comments, concerns, complaints or claims regarding these Terms or the Site, please contact us by email at support@protectionpluslife.com, by phone at 800 478-9120, or by mail at: Customer Service, 630 Fairview Rd, Suite 201, Swarthmore PA 19081 (USA).