

## Privacy Policy

We at Centivo Corporation (“Centivo,” “we,” “us,” or “our”) have created this privacy policy (this “Privacy Policy”) because we know that you care about how information you provide to us is used and shared. This Privacy Policy relates to the information collection and use practices of Centivo in connection with our website located at <https://www.centivo.com> (the “Site”), and our Services, which are made available to you through a variety of platforms, including, but not limited to, our Centivo Pre-Enrollment sites (“Pre-Enrollment sites”), our employer portal which is made available through <https://employer.centivo.com> (“Employer Portal”), our provider portal which is made available through <https://provider.centivo.com> (“Provider Portal”), , and our member portal which is made available through <https://my.centivo.com> and our mobile app (“App”), which is accessible through tablets, smart phones, and other devices (collectively, the “Member Portal”). Member Portal, Employer Portal, and Provider Portal are collectively referred to herein as the “Centivo Portals.”

### Description of Users and Acceptance of Terms

This Privacy Policy applies to visitors to the Site, who view only publicly available content (the “Visitors”), Authorized Users (as defined below) of our Customers, and Members (as defined below).

“Customers” means employers who have signed up to access and use our Services made available through the Employer Portal.

“Authorized Users” means employees, contractors, providers, brokers, agents, or representatives of Customer who are authorized by Customer to access and use our Services made available through the Employer Portal or the Provider Portal.

“Members” means (i) employees of Customer, together with their dependents who are enrolled in a health plan administered by Centivo and who have signed up to access and use our Services made available through the Member Portal; or (ii) individuals who have signed up to access and use our Services made available through the Member Portal.

By accessing and/or using the Site, each Visitor is agreeing to the terms of this Privacy Policy and the Terms of Use at <https://centivo.com/terms>.

By clicking “I ACCEPT,” when signing up to access and use the Member Portal, each Member is agreeing to the terms of this Privacy Policy and the Centivo Portals Terms of Use at <https://centivo.com/terms>.

By signing up, accessing, and/or using the Services through the Provider Portal or the Employer Portal, each Authorized User is agreeing to the terms of this Privacy Policy and the Centivo Portals Terms of Use at <https://centivo.com/terms>.

Capitalized terms not defined in this Privacy Policy shall have the meaning set forth in our Terms of Use at <https://centivo.com/terms> (when such term concerns Visitors) or the Centivo Portals Terms of Use at <https://centivo.com/terms> (when such term concerns Customers, Members and Authorized Users).

## **1. The Information We Collect and/or Receive**

In the course of operating the Site, the Centivo Portals, the Centivo Pre-Enrollment sites and/or providing the Services, Centivo will collect, store, use, transmit, and/or receive the following types of information. You authorize us to collect and/or receive such information.

### *PERSONAL INFORMATION*

If you would like to sign up for an account, you will need to provide your name, date of birth, email address, phone number, zip code, and Member ID (if applicable). Centivo will use this information to verify that you are employed by an eligible employer in order to qualify for benefits.

In order for us to set up an account for you on the Employer Portal or the Provider Portal, as applicable, you will need to provide your name, email address, and Tax ID/NPI number (only for providers).

If you contact us via the Contact Us page on our Site, you will need to provide your name, email address, phone number and company name (if any).

If you sign up to receive emails from Centivo, you will need to provide your email address.

All information we collect and/or receive under this section is collectively called "Personal Information."

### *MEMBER INFORMATION*

We collect Member Information (as defined below) from the primary Member's employer who is our Customer, Member's healthcare providers, and other third-party vendors (e.g., pharmacy benefits manager) who provide services to Customer and/or Centivo. Member Information includes information about the Member and the Member's dependents, including but not limited to, name, e-mail address, date of birth, gender, and postal address ("Member Information"). Member Information is used to provide the Services, provide support, and to operate, maintain and improve the Services.

### *HEALTH RISK ASSESSMENT INFORMATION*

Members who sign up to use the Member Portal will also be asked to provide us with background health information that relates to their past, present, or future physical or mental health or condition, including but not limited to, their current health condition, how often they see a doctor, and whether they have any chronic health conditions (collectively, "Health Risk Assessment Information").

### *CUSTOMER DATA*

In the course of using our Services, Customers provide us data ("Customer Data"). We use Customer Data in accordance with the terms and conditions of that certain master services agreement between the applicable Customer and Centivo.

### *GEOLOCATIONAL INFORMATION*

In order to provide certain features and functionality of the App, we may, with your consent, automatically collect geolocational information from your mobile device, your wireless carrier, or

certain third-party service providers (“Geolocational Information”). Collection of such Geolocational Information occurs only when the App is running on your mobile device. You may decline to allow us to collect such Geolocational Information, in which case Centivo will not be able to provide certain features of the App to you.

#### *OTHER INFORMATION*

In addition to the information noted above, we may collect additional information (collectively, the “Other Information”). Such Other Information may include:

1. **From Your Activity.** Information that we automatically collect when you use the Site, the Centivo Portals or the Centivo Pre-Enrollment sites – including, without limitation:
  - IP addresses, browser type and language, referring and exit pages and URLs, date and time, amount of time spent on particular pages, what sections of the Site, Centivo Portals or Centivo Pre-Enrollment sites you visit, etc.;
  - Information about a mobile device, including universally unique ID (“UUID”), App type and version (e.g., iOS or Android), carrier and country location, hardware and processor information (storage, chip speed, camera resolution, NFC enabled, and network type (WiFi, 2G, 3G, 4G)); and
  - Activity and usage information occurring via the Site, Centivo Portals or Centivo Pre-Enrollment sites including tagging data, favorites, preferences, session lengths; and similar data.
  
2. **From Cookies.** Information that we collect using “cookie” and “non-cookie” technology. Cookies are small packets of data that a website stores on your computer’s or mobile device’s hard drive so that your computer will “remember” information about your visit. We may use session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) and third-party cookies to help us collect Other Information, to enhance your experience using the Site, the Centivo Portals and the Centivo Pre-Enrollment sites and to market to you. If you do not want us to place a cookie on your hard drive, you may be able to turn that feature off on your computer or mobile device. Please consult your Internet browser’s documentation for information on how to do this and how to delete persistent cookies. However, if you decide not to accept cookies from us, the Site, Centivo Portals and the Centivo Pre-Enrollment sites may not function properly.
  
3. **Third-Party Analytics.** We may use third-party analytics services (such as Google Analytics) to evaluate your use of the Site, the Centivo Portals and the Centivo Pre-Enrollment sites and compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to the Site, and the Centivo Portals and the Centivo Pre-Enrollment sites and mobile and Internet usage. These third parties use cookies and other technologies to help analyze and provide us the data. By accessing and/or using the Site, the Centivo Portals and/or the Centivo Pre-Enrollment site, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy.

For more information on these third parties, including how to opt out from certain data

collection, please visit the sites below. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Site and the Centivo Portals.

- For Google Analytics, please visit <https://www.google.com/analytics>
- For HubSpot, please visit [https://legal.hubspot.com/privacy-policy?\\_ga=2.47047975.1682543742.1559741131-867457408.1559741131](https://legal.hubspot.com/privacy-policy?_ga=2.47047975.1682543742.1559741131-867457408.1559741131)
- For NextRoll (aka RollWorks), please visit <https://www.nextroll.com/privacy>.

*Our partners may use non-cookie technologies that may not be impacted by browser settings that block cookies. Your browser may not permit you to block such technologies. For this reason, you can use the following third-party tools to decline the collection and use of information for the purpose of serving you interest based advertising.*

- The NAI's opt-out platform: <http://www.networkadvertising.org/choices/>
- The EDAA's opt-out platform: <http://www.youronlinechoices.com/>
- The DAA's opt-out platform: <http://optout.aboutads.info/?c=2&lang=EN>

## 2. Text Messages

You may opt-in to receive SMS text messages from us relating to the Centivo Portals and Services. By opting-in to receive SMS text messages from us, you acknowledge that messaging and data rates may apply depending on your phone service provider. You may opt-out of receiving SMS text messages at any time by texting STOP in response to the text messages you receive or by changing your notification and communication preferences in the App. However, by opting-out of receiving text messages, you may not be able to use full functionality of the Centivo Portals.

## 3. How We Use and Share Your Information

You authorize us to use the Personal Information, Member Information, Geolocational Information, Health Risk Assessment Information, and Other Information (collectively, the "Information") to provide the Site, the Centivo Portals, Centivo Pre-Enrollment Sites, and the Services to you, solicit your feedback, inform you about our products and services and those of our third-party marketing partners, and to improve the Site, the Centivo Portals, and the Services. Also, we may use and share the Information as described below.

- **Agents, Providers and Related Third Parties.** We may engage other companies and individuals to perform certain business-related functions on our behalf. Examples may include providing technical assistance, customer service, and marketing assistance. These other companies will have access to the Information only as necessary to perform their functions and to the extent permitted by law. We may also share your Information with any of our parent companies, subsidiaries, or other companies under common control with us.
- **Aggregated Information.** In an ongoing effort to better understand users of the Site, Centivo Portals, Centivo Pre-Enrollment sites and the Services, we may analyze the Information in aggregate form in order to operate, maintain, manage, and improve the Site, the Centivo Portals, the Centivo Pre-Enrollment Sites and the Services. This aggregate information does not identify you personally. We may use this aggregate information for marketing purposes. We may share this aggregate information with our affiliates, agents, business and business partners, and other third parties. We may also disclose aggregated user statistics in order to describe the Site, the Centivo Portals, the

Centivo Pre-Enrollment sites and the Services to current and prospective business partners and to other third parties for other lawful purposes.

- **Business Transfers.** As we develop our businesses, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, the Information may be part of the transferred assets.
- **Legal Requirements.** To the extent permitted by law, we may also disclose the Information: (i) when required by law, court order, or other government or law enforcement authority or regulatory agency; or (ii) whenever we believe that disclosing such Information is necessary or advisable, for example, to protect the rights, property, or safety of Centivo or others.

#### **4. Accessing and Modifying Personal Information and Communication Preferences**

If you have signed-up to use the Services, you may access, review, and make changes to your Personal Information by following the instructions found on the Centivo Portals. In addition, you may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located on the bottom of any Centivo marketing email. You cannot opt out of receiving transactional e-mails related to your account. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our subscription databases.

#### **5. How We Protect the Information**

We take commercially reasonable steps to protect the Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the Information that you supply will not be intercepted while being transmitted to and from us over the Internet. In particular, e-mail sent to or from the Site or the Centivo Portals or the Centivo Pre-Enrollment sites may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail.

#### **6. California Residents**

In addition, Centivo does not monitor, recognize, or honor any opt-out or do not track mechanisms, including general web browser “Do Not Track” settings and/or signals.

#### **7. How We Protect the Information**

The Site, the Centivo Portals, the Centivo Pre-Enrollment sites, the Services and their servers are operated in the United States. Please be aware that your Information, including your Personal Information, may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to use the Site, the Centivo Portals, Centivo Pre-Enrollment sites, and/or the Services, you do so at your own risk.

#### **8. Children**

We do not knowingly collect Personal Information from children under the age of 13 through the Site, the Centivo Portals, the Centivo Pre-Enrollment sites, and/or the Services. If you are under 13, please do not give us any Personal Information. We encourage parents and legal guardians

to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children to never provide Personal Information through the Site, the Centivo Portals, the Centivo Pre-Enrollment sites, and/or the Services without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Information to us, please contact us, and we will endeavor to delete that information from our databases.

## **9. External Websites**

The Site may contain links to third-party websites ("External Sites"). We do not endorse such External Sites and we are not responsible for the privacy practices of such External Sites. Please refer to the privacy policies of those External Sites for more information on how the operators of those sites collect and use your personal information.

## **10. Changes to This Privacy Policy**

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time, and will post any changes on the Site, the Centivo Portals or the Centivo Pre-Enrollment sites as soon as they go into effect. By accessing and/or using the Site, Centivo Portals or the Centivo Pre-Enrollment sites after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please refer back to this Privacy Policy on a regular basis.

## **11. How to Contact Us**

If you have questions about this Privacy Policy, please e-mail Centivo's Privacy Officer at [privacy@centivo.com](mailto:privacy@centivo.com), with "PRIVACY POLICY" in the subject line, or mail us at the following address:

Centivo Privacy Officer, 77 Goodell Street, Suite 510, Buffalo, NY 14203