

## **SIMPRA ADVANTAGE (PPO SNP) WEB SITE PRIVACY STATEMENT**

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"), you may access a copy [here](#).

### **Website Privacy Policy**

#### ***Introduction***

We recognize the privacy of your personal information is important. The purpose of this policy is to let you know how we handle the information collected through the use of this website. Portions of this website may describe privacy practices applicable to specific types of information or to information provided on specific web pages.

This 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 policy, terms such as "we" or "our" and "Company" refer to Simpra Advantage (PPO SNP) and its current and future affiliated entities. Any information you provide, including any personal information, will be transferred to and processed by a computer server located within the United States.

#### ***Cookies and Tracking***

The Company may use various technologies, including cookies, tokens, tags, web logs, web beacons, scripts and web server logs to gather automatically-collected information and may aggregate this information from our website visitors or to enable certain features of our website. This information may include demographic data, technical information about the technology (e.g., phone, computer) used to connect to the Website, web browser information, your IP address, and browsing behavior such as pages visited and how often they are visited ("Activity Information"). We may also use third party analytics companies to provide these services.

We use analytics tools and other third-party technologies, such as Google Analytics and Cookies, to collect non-personal information regarding you in the form of various usage and user metrics when you use our websites and/or services. These tools and technologies collect and analyze certain types of information, including cookies, IP addresses, device and software identifiers, referring and exit URLs, onsite behavior and usage information, feature use metrics and statistics, usage and purchase history, MAC Address, mobile unique device ID, geo-location, demographic and interest data, and other similar information.

The third-party analytics companies who collect information on our websites and/or services and other online products and/or services may combine the information collected with other information they have independently collected from other websites and/or other online or mobile products and services relating to your activities across their network of websites as well

as online and/or mobile products and services. Many of these companies collect and use information under their own privacy policies.

You may [opt out of Google Analytics](#) by visiting the Google Analytics opt-out page. Google has additional information available about their [Remarketing Privacy Guidelines](#) and [Restrictions](#).

Activity Information is captured using various technologies and may include cookies. "Cookies" are small text files that may be placed on your computer when you visit an Online Service or click on a URL. Cookies may include "single-session cookies" which generally record information during only a single visit to a website and then are erased, and "persistent" cookies which are generally stored on a computer unless or until they are deleted or are set to expire. You may disable cookies and similar items by adjusting your browser preferences at any time; however, this may limit your ability to take advantage of all the features on our Website.

Please note that we do not currently respond to web browser "Do Not Track" signals that provide a method to opt-out of the collection of information about online activities over time and across third party websites or website because, among other reasons, there is no common definition of such signals and no industry-accepted standards for how such signals should be interpreted.

When you access our website, we gather activity information about you in order to improve the quality of our services, such as the best method and time to contact you. Without limiting the other ways in which we may use Information as described herein, we may otherwise use and disclose such activity information unless restricted by this Policy or by law. Some examples of the ways we use your Activity Information include:

- Customizing your experiences, including managing and recording your preferences;
- Authenticating your account information;
- Marketing, product development, and research purposes;
- Tracking resources and data accessed on the Website;
- Developing reports regarding Online Service usage, activity, and statistics;
- Assisting users experiencing problems with our services;
- Updating and servicing our Website;
- Enabling certain functions and tools on the Website; and
- Tracking paths of visitors to the Website and within the Website.

As described above, we may use tracking technologies that allow us to recognize your device when you return to our Website within a period of time, as determined by us, and to support automatic login to your Website. To maintain your privacy, you should affirmatively log out of your account prior to your session ending (whether you end your session, or we end your session, for example if our Website has "timed out" – i.e. we have ended your session automatically after a period of inactivity as determined by us in our sole discretion). Unless you affirmatively log out of your account, you may be automatically logged back in the next time you, or any user of your devices visits the Website.

## **Your Personal Information**

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 use personal information for a number of purposes such as:

- To respond to an email or particular request from you.
- To personalize the website for you.
- To process an application as requested by you.
- To administer surveys and promotions.
- 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 process.
- 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 Terms of Use.
- To keep a record of our transactions and communications.
- As otherwise necessary or useful for us to conduct our business, so long as such use is permitted by law.

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. Please see the section below titled, "Our Online Communications Practices."

We may share personal information within the Company, and we may combine personal information that you provide us through this website with other information we have received from you, whether online or offline, or from other sources such as from our 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.

## **Sharing Personal Information**

We will only share your personal information with third parties as outlined in this policy and as otherwise permitted by law.

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 activities that are illegal, violate our rules, or may be harmful to other visitors.

If you submit information or a posting to a chat room, bulletin board, or similar "chat" related portion of this website, the information you submit along with your screen name will be visible to all visitors, and such visitors may share with others. Therefore, please be thoughtful in what you write and understand that this information may become public.

We may share personal information with other third-party companies that we collaborate with or hire to perform services on our behalf. For example, we may hire a company to help us send and manage email, and we might provide the company with your email address and certain other information in order for them to send you an email message on our behalf. Similarly, we may hire companies to host or operate some of our websites and related computers and software applications.

This website may permit you to view your visitor profile and related personal information and to request changes to such 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.

### **Website and Information Security**

We maintain reasonable administrative, technical and physical safeguards designed to protect the information that you provide on this website. However, no security system is impenetrable, and we cannot guarantee the security of our website, nor can we guarantee that the information you supply will not be intercepted while being transmitted to us over the Internet, and we are not liable for the illegal acts of third parties such as criminal hackers.

### **Our Online Communication Practices**

We may send electronic newsletters, notification of account status, and other communications, such as marketing communications, on a periodic basis to various individuals and organizations. We may also send email communications regarding topics such as general health benefits, website updates, health conditions, and general health topics. We offer you appropriate consent mechanisms, such as opt-out, for marketing and certain other communications. As examples, you may opt-out as provided for in a specific email communication or contact us as described below in the section "Contact Us." Please be aware that opt-outs may not apply to certain types of communications, such as account status, website updates, or other communications.

### **Information for Children Under 13**

We will not intentionally collect any personal information from children under the age of 13 through this website without receiving parental consent. If you think that we have collected personal information from a child under the age of 13 through this website, please contact us.

### **Contact Us**

To contact us regarding this policy and our related privacy practices, please contact Simpra Advantage (PPO SNP) Medicare Compliance Officer at [compliance@simpra.com](mailto:compliance@simpra.com) if you believe

we or any company associated with us has misused any of your information please contact us immediately and report such misuse.

**Effective Date**

The effective date of this policy is 10/1/2018.

**Changes to this Privacy Policy**

We may change this policy. If we do so, such change will appear on this page of our website. We will also provide appropriate notice and choices to you, on this website and in other appropriate locations, based on the scope and extent of changes. You may always visit this policy to learn of any updates.

**Social Security Number Protection Policy**

Protecting personal information is important to Simpra Advantage (PPO SNP). It is our policy to protect the confidentiality of Social Security numbers ("SSNs") that we may receive or may collect in the course of business. We secure the confidentiality of SSNs through various means, including physical, technical, and administrative safeguards that are designed to protect against unauthorized access. It is our policy to limit access to SSNs to that which is lawful, and to prohibit unlawful disclosure of SSNs.