

Alliance of Well-Being Associations Privacy Policy

Introduction

This privacy policy (this “**Privacy Policy**” or “**Policy**”) governs the manner in which Alliance of Well-Being Associations (“**AllWell**”, “**we**”, “**our**,” “**us**” and similar terms) collects, uses, maintains and discloses information collected from users who register on or through its proprietary software or mobile applications and/or websites, including the AllWell application (collectively, the “**Service**”). AllWell respects the privacy of every individual and has taken extensive precautions to create a process that maintains individual privacy.

- We are committed to providing a secure environment for the Service.
- We use the information provided to us to enable your use of the Service, provide you with customer service, and authenticate your website visits and usage.
- All information you provide to us is encrypted in transit and at rest and is kept on a secure server.
- We do not sell, lease, or rent personal information to anyone under any circumstances.

This Privacy Policy is designed to inform AllWell users about how we gather and use personal information collected by us in connection with your use of the Service. We will take reasonable steps to protect user privacy consistent with the guidelines set forth in this Policy and with applicable U.S. state and federal laws. WE TAKE THESE PRECAUTIONS IN AN EFFORT TO PROTECT YOUR INFORMATION AGAINST SECURITY BREACHES. HOWEVER, THIS IS NOT A GUARANTEE THAT SUCH INFORMATION MAY NOT BE ACCESSED, DISCLOSED, ALTERED, OR DESTROYED BY BREACH OF SUCH FIREWALLS AND SECURE SERVER SOFTWARE. BY USING THE SERVICE, YOU ACKNOWLEDGE THAT YOU UNDERSTAND AND AGREE TO ASSUME THESE RISKS.

In this Policy, “**user**” or “**you**” means any individual using the Service. This Policy forms part of and is incorporated into our Terms of Service published at www.myallwell.org/AllWell_TermsOfService.pdf (the “**Terms of Service**”).

BY ACCESSING OR USING THE SERVICE, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTAND, AND AGREE TO BE BOUND BY THIS PRIVACY POLICY AND OUR TERMS OF SERVICE. IF YOU DO NOT AGREE TO THESE TERMS, DO NOT USE THE SERVICE.

What Information Do We Collect?

We collect the following information directly from you, from third parties, or through online tracking technologies:

Limited Personal Information: We may collect certain personal information about you in connection with the Service, including: (a) when you register to use the Service, we may collect the personal information through our online registration form, such as your first name, last name,

email address, phone number, photograph, age, gender, height, weight, username, password and other information detailed therein; (b) other personal information typically required by insurance providers for underwriting purposes, including information about your employer, family, income, assets, net worth and your existing life, automobile, health and other insurance coverages; (c) if you pay your fees by credit card, we (or a third party payment processor acting on our behalf) will collect the name, expiration date and credit card number for the relevant card; (d) if you apply for employment, we will collect your employment and work history, as well as other personal information related to your potential employment (such as education and employment history and demographic information); and (e) if you communicate with us by email but do not otherwise register to use the Service, we will collect your email address and the content of your email. You may also choose to provide us with photographs of you and/or your beneficiary. All of this information is referred to in this Policy as “**Personal Information**”. If you contact AllWell or another user and disclose additional personal information, we may store that Personal Information. We encrypt all Personal Information you provide to us, both in transit and at rest.

User Data. “**User Data**” means all data—other than Personal Information—that users provide us regarding or related to themselves or their use of or access to the Service. As described in the Terms of Service, we store User Data and correlate User Data with third party data in order to provide the Service. If User Data includes any personally identifiable information, we will collect, store, use and disclose that information in the same way that we collect, store and use any Personal Information.

Web Tracking Information: We, and our third party service providers, may use web tracking technologies such as cookies, pixel tags and clear GIFs in order to operate the Service efficiently and to collect data related to usage of the Service. Such collected data (“**Web Tracking Information**”) may include the address of the websites you visited before and after you visited the Service, the type of browser you are using, your Internet Protocol (IP) address, what pages in the Service you visit and what links you clicked on, whether you opened email communications we send to you, and your operating system. In order to collect Web Tracking Information and to make your use of the Service more efficient, we may store cookies on your computer. We may also use web tracking technologies that are placed in web pages on the Service or in email communications to collect information about actions that users take when they interact with the Service or such email communications, and AllWell’s Contractors (as hereinafter defined) may also do so. We do not correlate Web Tracking Information to individual user Personal Information. Some Web Tracking Information may include data, such as IP address data, that is unique to you. We use this information not to identify individual users, but to analyze trends, administer the Service, track users’ movements around the Service, and gather demographic information about our user base as a whole which provides us with the ability to determine aggregate information about our user base and usage patterns. You may be able to modify your browser settings to alter which web tracking technologies are permitted when you use the Service, but this may affect the performance of the Service.

Cookies: The AllWell website also uses cookies to enhance the browsing experience. A cookie is a small text file or record that is stored on a user’s computer when you visit our website, which collects information about your activities on the website. The cookies transmit this information back to the computers at AllWell or our third-party distributors of banners and newsletters; these

computers are, generally speaking, the only computers which are authorized to read such information. The information captured makes it possible for us to: (i) speed navigation, and provide you with custom tailored content; (ii) remember information you give to us, so you don't have to reenter it each time you visit the website; (iii) monitor the effectiveness of our marketing campaigns; and (iv) monitor total number of visitors, pages viewed, and the total number of banners served. You can choose to have your browser warn you every time a cookie is being sent to you or you can turn off cookie placement. Also, by not using cookies, your overall internet browsing experience will be affected.

How Do We Use the Information We Collect?

Personal Information, User Data, and Web Tracking Information: To the extent permitted by applicable law, we may use Personal information, User Data, and Web Tracking Information to:

- operate the Service and provide support to our business functions;
- fulfill customer requests, such as to create an account or complete customer purchases;
- protect against criminal activity, claims and other liabilities;
- send you information about our company, products, services, and promotions;
- respond to reviews, comments, or other feedback provided to us;
- support and personalize the Service and our advertising efforts;
- protect the security and integrity of the Service;
- provide customer support;
- the extent required for benchmarking, data analysis, audits, developing new products, enhancing the Service, facilitating product, software and applications development, improving the Service, conducting research, analysis, studies or surveys, identifying usage trends, as well as for other analytics purposes;
- meet our contractual requirements;
- comply with applicable legal or regulatory requirements and our policies;
- respond to inquiries related to employment opportunities;
- market, advertise, and provide the Service; and
- the extent necessary for any other lawful purpose for which the Personal Information, User Data, and Web Tracking Information is collected.

Aggregate and De-Identified Information: We will also create statistical, aggregated and/or de-identified data relating to our users and the Service for analytical and commercial purposes. Aggregated and/or de-identified data is derived from Personal Information and User Data but in its aggregated and/or de-identified form, it does not duplicate or reveal any User Data or relate to or identify any individual. This data is used to understand our customer base and to develop, improve and market our services.

Customer Testimonials: We may post user testimonials to the Service, including on our website, and may use testimonials in other formats consistent with consent received. Testimonials may contain personally identifiable information. We may use your Personal Information to contact you to obtain a testimonial and obtain your consent via email or agreement sent via fax, pdf or mail prior to using such testimonial and/or using your name along with your testimonial.

Account Closure: If any of your account information appears to be incorrect, please contact us and let us know. If you close your account, we will delete any Personal Information associated with your account, but other information you submitted that is not associated with you personally may not be deleted.

What Information Do We Disclose to Third Parties?

Personal Information and User Data: We will not disclose your Personal Information or User Data to any third parties under any circumstances, except as follows:

- (i) We may disclose to our insurance carrier (the “*Carrier*”) that underwrites the insurance policy made available to AllWell users (the “*Insurance Policy*”), your first name, last name, email address, phone number, photograph, age, gender, height, weight, and other information relevant to the Insurance Policy, including your employer, family information, income, assets, net worth and your existing life, automobile, health and other insurance coverages. The Carrier may use such Personal Information only to the extent necessary to provide the Insurance Policy to you.
- (ii) To third party contractors and service providers engaged to provide services on our behalf (“*Contractors*”), such as performing payment processing, marketing, analyzing data and usage of the Service, hosting and operating the Service or providing support and maintenance services for the Service, or providing customer service. We enter into agreements with all Contractors that require Contractors to use the Personal Information they receive only to perform services for us.
- (iii) We may share Personal Information and User Data with our trusted business partners. For example, we may share your Personal Information and User Data with a company when we co-sponsor a promotion or service. These partners and affiliates may use your Personal Information and User Data to, among other things, send you information or contact you about their services and products
- (iv) When we have your consent to share the information.

We will not sell, lease, or rent your Personal Information to anyone under any circumstances.

Web Tracking Information: We disclose Web Tracking Information to Contractors, in order to analyze the performance of the Service and the behavior of users, and to operate and improve the Service.

Aggregate and De-Identified Information: We may disclose aggregated and/or de-identified data that does not contain Personal Information or User Data to any third parties, such as Contractors, potential customers, business partners, marketers, and funding sources, in order to describe our business and operations or to notify you about products and services that may be relevant to you.

Network Operators: Use of the Service may involve use of the services of third party telecommunications carriers. Such carriers are not our contractors, and any information that a carrier collects in connection with your use of the Service is not “Personal Information” and is

not subject to this Privacy Policy. We are not responsible for the acts or omissions of telecommunications carriers.

Additional Disclosures: We reserve the right to disclose any information we collect in connection with the Service, including Personal Information, to: (a) any successor to our business as a result of any merger, acquisition, asset sale or similar transaction; and (b) any law enforcement, judicial authority, or governmental or regulatory authority, to the extent required by law or if in our reasonable discretion disclosure is necessary to enforce or protect our legal rights or to protect third parties.

Privacy Settings/Opt Out

Depending on where you live, you have the right to exercise certain controls and choices regarding our collection, use, and sharing of your Personal Information and User Data. To opt-out of marketing communications please email us at hello@myallwell.org or by following the instructions included in the email or text correspondence.

Please note that, even if you unsubscribe from certain correspondence, we may still need to contact you with important transactional or administrative information, as permitted by law. Additionally, if you withdraw your consent or object to processing, or if you choose not to provide certain Personal Information, we may be unable to provide some or all of our services to you.

To exercise other rights with respect to your Personal Information or User Data, please contact at hello@myallwell.org. If you are a resident of California, please see the information below for more information regarding your rights.

General

Security: We use reasonable security precautions to protect the security and integrity of your Personal Information in accordance with this Policy and applicable law. Such precautions include encrypting any Personal Information you provide to us, both in transit and at rest. However, no Internet transmission is completely secure, and we cannot guarantee that security breaches will not occur.

Without limitation of the foregoing, we are not responsible for the actions of hackers and other unauthorized third parties that breach our reasonable security procedures.

Links and Third Party Services: The AllWell Service may contain links to other websites. AllWell is not responsible for the privacy practices or the content of those websites or any Third Party Services (as defined in the Terms of Service). Users should be aware of this when they leave our Service and review the privacy statements of each third party website or Third Party Service. This Privacy Policy applies solely to information collected by the Service. We encourage our users to read the privacy policies of these other websites and Third Party Services before proceeding to use them.

Amendments: AllWell may modify or amend this Policy from time to time. If we make any material changes, as determined by AllWell, in the way in which Personal Information is

collected, used or transferred, we will notify you of these changes by email. Notwithstanding any modifications we may make, any Personal Information collected by AllWell from you will be treated in accordance with the privacy policy in effect at the time information was collected, unless we obtain your consent otherwise.

Children: AllWell does not knowingly collect or maintain personally identifiable information from persons under 13 years of age, and no part of the Service is directed at persons under 18. If you are under 18 years of age, then please do not use the Service. If AllWell learns that personally identifiable information of persons less than 13 years of age has been collected without verifiable parental consent, then AllWell will take the appropriate steps to delete this information. To make such a request, please contact us at hello@myallwell.org.

Service Visitors from outside the United States: AllWell and its servers are located in the United States and are subject to the applicable state and federal laws of the United States. If you choose to access the Service, you consent to the use and disclosure of information in accordance with this Privacy Policy and subject to such laws.

Information for California Residents

To the extent you are a California resident and your “Personal Information” is subject to the CCPA, this Section applies to our collection and use of Personal Information, as required by the California Consumer Privacy Act of 2018 and its implementing regulations (the “CCPA”). This Section describes (1) the categories of Personal Information, collected and disclosed by us, subject to CCPA, (2) your privacy rights under CCPA, and (3) how to exercise your rights.

When we use the term “Personal Information” in the context of the CCPA, we mean information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer or household.

If you would like to receive a copy of this Section in an alternate format (e.g., printable) or language, please contact us at hello@myallwell.org.

Categories of Personal Information Collected, Used, and Shared

In accordance with California law, we may have collected and share the following categories of Personal Information within the past 12 months:

- Identifiers. A real name, Internet Protocol address, email address, and other types of online identifiers.
- Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). e.g., a name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some Personal Information included in this category may overlap with other categories.

- Internet or other similar network activity. Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
- Geolocation data. Physical location or movements.
- Commercial information. Products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Protected classification characteristics under California or federal law. Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
- Professional or employment-related information. Current or past job history or performance evaluations.

We share each of these categories of Personal Information with our service providers to the extent necessary for them to facilitate our business purposes. We also share this Personal Information for the purposes set forth in this Privacy Policy.

Your California privacy rights

If you are a resident of California and your “Personal Information” is subject to the CCPA, you may have the following rights:

Privacy Right	Description
Notice	The right to be notified of what categories of Personal Information will be collected at or before the point of collection and the purposes for which they will be used and shared.
Access	The right to request the categories of Personal Information that we collected in the previous twelve (12) months, the categories of sources from which the Personal Information was collected, the specific pieces of Personal Information we have collected about you, and the business purposes for which such Personal Information is collected and shared. You may also have the right to request the categories of Personal Information which were disclosed for business purposes, and the categories of third parties in the twelve (12) months preceding your request for your Personal Information.
Data Portability	The right to receive the Personal Information you previously have provided to us.
Erasure	The right to have your Personal Information deleted. However, please be aware that we may not fulfill your request for deletion if we (or our service provider(s)) are required or permitted to retain your Personal Information for one or more of the following categories of purposes: (1) to complete a transaction for which the Personal Information was collected, provide a good

	or service requested by you, or complete a contract between us and you; (2) to ensure our website integrity, security, and functionality; (3) to comply with applicable law or a legal obligation, or exercise rights under the law (including free speech rights); or (4) to otherwise use your Personal Information internally, in a lawful manner that is compatible with the context in which you provided it.
To Opt Out	The right to opt out of the sale of your Personal Information.

If you would like to exercise your rights listed above, please send (or have your authorized agent send) an email to hello@myallwell.org or call us toll-free at: **(800) 283-5917**

Please note: you will not be discriminated against in any way by virtue of your exercise of the rights listed below, which means we will not deny goods or services to you, provide a different prices or rates for goods or services to you, or provide a different level or quality of goods or services to you.

We must verify your identity before fulfilling your requests. If we cannot initially verify your identity, we may request additional information to complete the verification process. Any Personal Information you disclose to us for purposes of verifying your identity will solely be used for the purpose of verification. If you are an authorized agent making a request on behalf of a California consumer, we will also need to verify your identity, which may require proof of your written authorization or evidence of a power of attorney.

We may deny certain requests, or only fulfill some in part, as permitted or required by law. For example, if you request to delete Personal Information, we may retain Personal Information that we need to retain for legal purposes (*e.g.*, tax accounting). You have a right not to receive discriminatory treatment by any business when you exercise your California privacy rights.

We do not “sell” the personal information we collect.

Contact Us

If you have any questions about our privacy practices or this Privacy Policy, please contact us at hello@myallwell.org.