

Privacy Policy

Effective Date: 1/1/2020

MyDoctorPlan (MDP) and its subsidiaries and affiliates (collectively "MDP," "we," "us," "our") work hard to build and maintain a relationship of trust with you. This Privacy Policy (the "Privacy Policy") governs our collection, use, and disclosure of your Personal Information (as defined below) in connection with your use of our website(s), microsite(s), mobile website(s) and mobile applications (collectively, "Sites"), and information we collect from you or third parties through any other means to provide our services or perform other business activities (collectively, "Services").

This Privacy Policy explains what information we collect about you, how we use or disclose that information, how to exercise any rights you may have with respect to your Personal Information (defined below) and the safeguards we have in place to reduce the risk of unauthorized access and use.

Please carefully read this Privacy Policy before using our Sites and/or Services. By Accessing or using our Sites and/or Services you agree to our use of your information consistent with this Privacy Policy, subject to your rights described below.

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ABOUT THIS PRIVACY POLICY

Privacy Policy Changes

This Privacy Policy is subject to change. We encourage you to review this Privacy Policy frequently for any revisions or amendments.

Unless otherwise stated, changes will be effective immediately upon posting. You will be deemed to have been made aware of and have accepted the changes by your continued use of our Sites or Services. If we determine that a change to this Privacy Policy will result in using your Personal Information acquired before the change in a materially new way, we will provide you notice before using your Personal Information in the new way.

Conflict Between This Policy and Local Laws and Regulations

When federal, state, and local laws and regulations require a higher level of protection for your Personal Information, they take precedence over this Privacy Policy. In addition, the specific requirements of this Privacy Policy will apply unless disallowed by local laws and regulations.

INFORMATION WE COLLECT

Personal Information

We may collect information that personally identifies, relates to, describes or is capable of being associated with you ("Personal Information"), including:

- *Personal identifiers and contact information* such as name, Social Security number, driver's license number, mailing address, service address, email addresses, phone numbers, fax numbers, account password, signatures;
- *Sensitive personal identifiers* such as gender, age, ethnicity, country of origin, religion;
- *Other demographic information* such as marital status, the number and ages of children, what language(s) you speak;
- *Banking/financial information* such as credit/debit card numbers and expiration date, checking account and routing numbers, check or credit/debit card images;
- *Commercial information* such as your account information and status, member benefits, purchase history, health insurance information;
- *Internet & network information* such as browsing/search history, IP address, data collected by cookies and similar technologies;
- *Geolocation data* such as geographic location indicators from websites or mobile devices;
- *Audio/visual information* such as call recordings, chat transcripts;
- *Professional/employment information* such as employer; and
- *Inferences drawn from other Personal Information or data* that relate to your preferences, interests, characteristics, etc.

The types of Personal Information we collect about you may vary based on how you use our Sites and/or Services, and your relationship with us.

Business Information

We also collect information about businesses and their representatives that engage with us such as EIN, TIN, address, phone number, email address, bank account information (collectively, "Business Information"). This information is generally not considered Personal Information because it relates to a business or a business contact.

Usage Data and Sites Activity

We automatically collect information in connection with the actions you take on our Sites ("Usage Data"). For example, each time you use our Sites, we automatically collect the type of web browser you use, the type of device you use, your operating system, your Internet Service Provider, the pages you view, referring and exit pages, the date and time of your visit, the number of clicks to, from and within our Sites and the duration of your visits to our Sites. If this information is capable of being associated with you, directly or indirectly, we treat it as Personal Information. If this information is not capable of being individually associated with you, we treat it as Usage Data.

Communication Recordings

We may record calls and retain the content of text messages or other written/electronic communications between you and us. By communicating with us, you consent to our recording and retention of communications.

HOW WE COLLECT INFORMATION

Voluntary Disclosure

We may ask you to provide us with Personal Information when you communicate with us online or offline, including events, surveys, and marketing or promotional programs. You are not required to provide us your Personal Information. However, if you choose not to provide the requested information, you may not be able to use some or all of the features of the Site or Services or we may not be able to fulfill your requested interaction.

Third-Party Data Sources

We may collect Personal Information from third-party data sources such as data brokers, consumer reporting agencies, marketing partners, analytics firms, dental plans, discount plans, dental or healthcare providers, insurers, and government agencies.

Cookies and Other Automated Tools

We use cookies (a small text file placed on your computer to identify your computer and browser) and other automated tools such as tracking pixels to improve the experience of the site and Services, such as saving your preferences from visit to visit to present you with a customized version of the Website. Many web browsers are initially set up to accept cookies. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. Instructions for

how to manage cookies in popular browsers are available at: Internet Explorer, Firefox, Chrome, Safari (iOS), Safari (Mac) and Opera. However, certain features of our Sites may not work if you delete or disable cookies.

We use the following types of cookies:

- *Session Cookies:* Session cookies keep track of you or your information as you move from page to page within our Sites and are typically deleted once you close your browser.
- *Persistent Cookies:* Persistent cookies reside on your system and allow us to customize your experience if you leave and later return to our Sites. For example, persistent cookies may allow us to remember your preferences.
- *Advertising Cookies:* Advertising cookies are used to learn more about you and advertise products/services that might interest you.
- *Analytics Cookies:* Analytics cookies help us understand how our Sites are working and who is visiting our Sites. Google Analytics is one tool we use, and you can learn more by reviewing Google's Privacy Policy.

We employ software technology that enables us to track certain aspects of a user's visit to our Sites. This technology helps us better manage content on our Sites by informing us what content is effective, how consumers engage with our Sites and how consumers arrive at and/or depart from our Sites. The software typically uses two methods to track user activity: (1) "tracking pixels" and (2) "clear gifs." Tracking pixels are pieces of executable code that are embedded in a web page that track usage activity, including which pages are viewed, when they are viewed and how long the pages are viewed. Clear gifs are tiny graphics with unique identifiers which are embedded in web pages and email messages that track whether a user views a web page or email message. User activity information may be associated with additional information about a user's session and Personal Information, if provided by the user.

If you arrive at our Sites by "clicking through" from another website, then certain information about you that you provided to that other website, such as the terms you searched that led you to our Sites, may be transmitted to us and we may use it. You should review the Privacy Policy of any website from which you reached our Sites to determine what information the operator collects and how it uses such information. We may retain information about you provided to us by other websites and will use it in accordance with this Privacy Policy. Such information may be associated with other Usage Data or Personal Information.

Interest-Based Advertising

We may work with third-party advertisers, search providers and ad networks ("Advertisers") to learn more about you and show you ads or other content that we believe would be relevant to you. Advertisers may collect and use information about your use of our Sites or Services as well as other websites and services. These companies may use cookies and other online tracking technologies to collect and use your information. We and/or Advertisers may also append other data to the data collected by Advertisers to create an interest profile of individual users. Our Privacy Policy does not cover any use of information that an Advertiser may collect from you. Advertisements may be shown via our Sites or on third-party websites. If you do not want to

receive interest-based advertising, please visit the [Digital Advertising Alliance \(DAA\) Consumer Choice Page](#). The DAA website allows you to opt-out of one or more interest-based advertising networks. Opt-outs are device and browser specific; therefore, you will need to set your opt-out preferences for each device and browser. Deleting browser cookies can remove your opt-out preferences. The DAA offers browser extensions that help preserve the opt-out preferences you set on the DAA's Consumer Choice Page. Please note that opt-outs only apply to interest-based advertising. You may still receive other types of online advertising.

Information from Advertisements

If you arrive at our Sites via an advertisement (*e.g.*, banner ad), we may collect information regarding the advertisement with which you interacted and your interactions (*e.g.*, item clicked, date and time).

Social Media Widgets

The Sites may include social media features, such as the Facebook, YouTube, Pinterest, LinkedIn, Instagram and Twitter widgets. These features may collect information about your IP address and the pages you visit on our site as well as other Personal Information. A cookie may be set to ensure that a feature properly functions. Your interactions with features are governed by the privacy policies of the companies that provide them.

Mobile App

When you use our Mobile App, we may collect your geolocation data and other information. This is so that we can provide you with a list of participating providers nearest to you. We do not share geolocation data with any third parties. If you do not want to use the App's geolocation feature, you can turn off the location services for the App by changing the permissions on your mobile device. If you wish to stop all collection of information by the App, you can uninstall it. If you wish for us to permanently delete your geolocation data, you can contact us at admin@mydoctorplan.com.

THIRD PARTIES THAT COLLECT INFORMATION ON OUR SITES

Third parties, including Advertisers, collect Personal Information and/or Usage Data from users of our Sites using automatic information collection tools such as cookies and tracking pixels. These third parties' collection, use, and disclosure of Personal Information and/or Usage Data is governed by their data policies.

HOW WE USE AND SHARE INFORMATION

Generally

We may use Personal Information for business purposes, such as:

- *Account creation, fulfillment, servicing and customer support:* to process applications, create customer accounts, allow customers to create online accounts and profiles, provide goods or services, keep customers informed about the status of their services, respond to questions and addressing customers concerns, deliver updates, upgrades and product improvement information;
- *Marketing and market research:* to send communications and offers for our or third parties' products and services, including offers based on consumers' interests, personal and business characteristics and location; perform analytics for market and consumer research, trend analysis, financial analysis, and anonymization of personal information;
- *Surveys, promotional events, contests:* to administer surveys, polls, sweepstakes, contests, loyalty programs and other promotional events and contests;
- *Other company communications:* to provide consumers with information that may be of interest such as company newsletters, announcements, reminders and technical service bulletins;
- *Website use and analytics:* to provide you with access to and use of our Sites and Services; analyze consumers' use of our websites, including the use of third-party web analytics services, which may utilize automated technologies to collect data (such as email and IP addresses);
- *Eligibility and pricing:* to determine if consumers are eligible for certain products, services or offers and the pricing related to such offers;
- *Product research:* to conduct research and analysis for maintaining, protecting and developing services, increase and maintain the safety of our products and services, and prevent misuse;
- *Business operations:* to evaluate, develop and improve business operations, products and services offered; business administration and other normal business activities;
- *Compliance:* to comply with applicable legal requirements, industry standards, contractual obligations, our policies and take actions that we deem necessary to preserve and enforce our rights and the rights of others; and
- *Information security and fraud prevention:* to operate information security and anti-fraud programs.

Reviews and Testimonials

If you provide a review or testimonial, we may post it publicly on our Sites or in other advertising material. By providing a testimonial, you give us permission to use it in any manner and for any purpose, including in marketing and advertising communications.

Service Providers

We may provide your Personal Information to other businesses ("Service Providers") to provide services to us or on our behalf. Categories of service providers we use include:

- *Fulfillment and account servicing vendors*, which help us provide products, services and information to you, service your account or benefits, and perform payment processing services;
- *Payment processors*, which help us to accept and process the payments for our products/services to you;
- *Marketing and communications vendors*, which help us market our products/services to you, conduct promotions, surveys and other outreach campaigns;
- *Research and development vendors*, which help us develop and improve our products and services;
- *Data and business analytics vendors*, which help us collect, analyze and improve the accuracy of our data (including Personal Information);
- *IT and network administration vendors*, which provide services such as data storage and management, website hosting and data security;
- *Professional service firms*, which provide accounting, legal and other professional services; and
- *General service providers*, which help us with day-to-day business operations such as office support services, courier services, facilities management and document destruction.

Each Service Provider is expected to use reasonable security measures appropriate to the nature of the information involved to protect your Personal Information from unauthorized access, use or disclosure. Service Providers are prohibited from using Personal Information that we provide to them other than as specified by us.

Third-Party Sharing

We may share or sell your Personal Information with other companies who do not provide services to us ("Third Parties"), such as insurance companies, health care providers, benefit providers or marketing partners. Categories of Personal Information that we sell may include personal identifiers and contact information, demographic information, commercial information, internet and network information and inferences drawn from other Personal Information.

SECURITY

We recognize the importance of safeguarding the confidentiality of Personal Information from loss, misuse or alteration. Accordingly, we employ commercially reasonable administrative, technical and physical safeguards to protect Personal Information from unauthorized access, disclosure and use. Even with these safeguards, no data transmission over the internet or other network can be guaranteed 100% secure. As a result, while we strive to protect information transmitted on or through our Sites or Services, you do so at your own risk.

COMPLIANCE WITH LAWS AND LAW ENFORCEMENT

We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We may disclose Personal Information and any other information about

you to government or law enforcement officials or private parties if, in our discretion, we believe it is necessary or appropriate to: respond to legal requests (including court orders, investigative demands and subpoenas); protect the safety, property or rights of ourselves, consumers or any other third party; prevent or stop any illegal, unethical or legally actionable activity; or comply with laws.

LINKS

The Sites may contain links to third party websites including social media platforms. Please be aware that if you access these links, you will be leaving our site. We encourage users to read the privacy policies of those sites, as we are not responsible for their content, links or privacy procedures.

OTHER TRANSFERS

We may share Personal Information and Usage Data with businesses controlling, controlled by or under common control with us. If we are merged, acquired or sold or in the event of a transfer of some or all of our assets, we may disclose or transfer Personal Information and Usage Data in connection with such transaction.

CHILDREN'S PRIVACY

The Sites and Services are not intended for children under the age of 16, and we do not knowingly collect Personal Information from children under the age of 16. If we become aware that we have inadvertently received Personal Information from a child under the age of 16, we will delete such information from our records.

PRIVACY PRACTICES RELATED TO JOB APPLICANTS

If you apply for employment or sign-up to become a broker, we may collect:

- *Personal identifiers and contact information* such as name, address, Social Security number, driver's license number, alien registration number, passport number;
- *Educational information* such as educational institutions attended, degrees received, college transcripts;
- *Professional/employment information* such as resumes, CVs, positions held, tenure, references, skill assessments;
- *Internet & network information* browsing/search history, data collected by cookies;
- *Characteristics of protected classifications* such as age, race, disabilities, citizenship;
- *Medical information* such as drug test results;
- *Geolocation information* from mobile applications;

- *Inferences drawn from the above categories of Personal Information* that relate to your characteristics, behavior, attitudes, intelligence, abilities and aptitudes, including criminal background information and driving history.

We may use this information to evaluate candidates for employment; conduct background checks and drug screening; check references; communicate with you and respond to your requests or application; enable your use of the Sites; maintain company security; facilitate company policies; comply with legal and contractual obligations; and otherwise operate our business.

ADDITIONAL CALIFORNIA CONSUMER RIGHTS

If you are a resident of California, you have additional rights to access and control your Personal Information, including a right to request that we disclose the Personal Information we collect, use, disclose, and sell, under the California Consumer Privacy Act (CCPA).

Right to Know

You have the right to request twice per 12-month period that we provide you (i) the categories or specific pieces of Personal Information we collected about you, (ii) the categories of sources from which your Personal Information was collected, (iii) the business or commercial purpose for which we collected your Personal Information, (iv) the categories of Third Parties with whom we shared your Personal Information and (v) the categories of Third Parties to whom we sold your Personal Information. We are not permitted to provide access to specific pieces of Personal Information if the Personal Information is sensitive or creates a high risk of potential harm from disclosure to an unauthorized person such as financial information, Social Security numbers and driver's license numbers. To protect your Personal Information, you must provide required information and/or documentation to verify your identity. We will process verified requests within 45 days, subject to any applicable exceptions and extensions permitted by law.

Right to Deletion

You have the right to request that we delete any Personal Information we have collected about you. Please understand that we are not required to honor a deletion request if a legal exemption applies such as if we need the information to complete a requested or reasonably anticipated transaction, prevent security incidents or fraud, enable internal uses that are reasonably aligned with your expectations, or comply with legal obligations. To prevent unauthorized individuals from making deletion requests, you must provide required information and/or documentation to verify your identity.

Right to Opt-Out from the Sale of Personal Information

As a California resident, you have the right to direct us not to sell your Personal Information to Third Parties. We will process verified requests within 15 days, subject to any applicable exceptions and extensions permitted by law.

The DAA also allows you to use its CCPA opt-out tool to request for your browser to opt-out of the sale of Personal Information by some or all participants of its CCPA opt-out program.

Non-Discrimination Notice

We will not discriminate against any consumer for exercising their privacy rights under law or this Privacy Policy.

California "Do Not Track" Disclosure

Do Not Track is a web browser privacy preference that causes the web browser to broadcast a signal to websites requesting that a user's activity not be tracked. Currently, our Sites and Services do not respond to do not track signals. You may, however, opt-out of interest-based advertising using the DAA website linked above or make a browser-specific CCPA opt-out request using the CCPA opt-out tool linked [here](#).

Submitting a Request

If you are a California resident and would like to exercise your rights, you may submit a request through our online [California Consumer Privacy Act Request Form](#) or calling us at (833) 640-3425.

Authorized Agent

If you are an authorized agent submitting a request for another California resident, you must provide a copy of a lawful power of attorney or written authorization from the Consumer (along with proof of your identity). You may provide this documentation via email at admin@mydoctorplan.com after submitting the request. We may contact you or the Consumer on whose behalf you claim to act to verify your authorization.

CONTACT US

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