

PRIVACY POLICY

PRIVACY POLICY OVERVIEW

Carebridge Corporation (“Carebridge”) is a leading provider of employee assistance programs, work-life and wellness services. Carebridge is committed to safeguarding your confidentiality and privacy. This Privacy Policy is designed to explain steps Carebridge is taking to meet that commitment.

This Privacy Policy is designed to provide information in the following areas:

- a) How your Personal Data that is transferred to Carebridge is processed, disclosed, or transferred
- b) Your choices with respect to how your Personal Data will be handled by Carebridge
- c) Your rights regarding this Personal Data.

DEFINITIONS

“Personal Data”: data that personally identifies or may be used to personally identify a person covered by Carebridge Services. Personal Data can include:

- a) Name
- b) Address
- c) Phone Number
- d) Email address
- e) User ID
- f) Password
- g) Marital status
- h) Terms of employment
- i) Job qualifications
- j) Can also include PHI

Personal Data does not include data that is encoded, or anonymized or publicly available information not combined with Personal Data.

“PHI” (Personal Health Information): Personal Data that includes information regarding an individual’s health or medical condition, ethnicity, political or religious affiliations, or sexual orientation.

“Third Party”: any individual or entity that is not Carebridge, a Carebridge employee, agent, contractor, or representative.

WHAT INFORMATION IS COLLECTED AND HOW IS IT USED?

Carebridge may receive Personal Data through the following means:

- a) Directly from you
- b) Third Parties
- c) Other means

Types and purpose of collecting information include:

- a) Contact Information: When you contact us to access services, Carebridge may collect your contact information to provide the requested service(s).
- b) Behavioral Health Information: To provide behavioral health services, Carebridge may need to collect behavioral health history, current behavioral health concerns, as well as certain other behavioral health information.
- c) Inquiry-related Information: Personal Information may be collected to respond to general inquiries and information requests regarding available Carebridge services.
- d) Eligibility Information: Employment related information (such as employer name, address, phone number) may be collected to determine what services you are entitled to, to pay providers for services, to bill for our services, or for other related purposes.
- e) Website Information: If you register for our website or submit an inquiry or request for services online on either of our websites (www.myliferesource.com or www.carebridge.com), we may ask for the Personal Data necessary to properly respond to the request. The uses of this data are described in the Internet Usage section of this Privacy Policy.
- f) Other Information: Conducting our business operations and legitimate business interests may lead to the incidental collection of Personal Data.

TRANSFERS OF PERSONAL INFORMATION TO THIRD PARTIES

Except as otherwise noted, Carebridge discloses Personal Data only to those Third Parties who reasonably need to know such information and only for the purpose for which they have been engaged by Carebridge. Such Third Parties must agree to abide by confidentiality or business associate agreements.

If Carebridge becomes aware that one of its Third Parties is using or disclosing Personal Data in opposition to this privacy policy, Carebridge will take the actions necessary to prevent or stop the use or disclosure. Carebridge acknowledges its potential liability in cases of its transfer of Personal Data to Third Parties that do not meet the criteria set forth in the preceding paragraph.

PHI

You have the right to disclose and allow collection of your own PHI. Carebridge does not process or disclose PHI to Third Parties without your direct consent. Carebridge will not use PHI for any purpose other than:

- a) For the purpose for which you originally provided it
- b) For a purpose you later expressly consent to

In addition to the above, Carebridge may use or disclose PHI as well as other Personal Data without prior consent where such disclosure or use:

- a) Is in the vital interests of you or another person
- b) Is necessary for the establishment of legal claims or defenses, to obtain legal advice, or for the purposes of establishing, exercising or defending Carebridge legal rights
- c) Is required to provide behavioral care and/or diagnosis
- d) Is necessary to carry out Carebridge obligations under applicable employment, workers' compensation, public health or other laws
- e) Is necessary for specified public health activities and purposes
- f) Is data that is manifestly made public by you
- g) Is required by law enforcement officials or public authorities in response to a lawful request made pursuant to national security interests or law enforcement requirements
- h) As otherwise required or permitted by law

CONFIDENTIALITY AND SECURITY

Carebridge maintains reasonable physical, administrative and technical safeguards designed to secure Personal Data and PHI and to prevent unauthorized access to such information. All customer communication and files in digital format are stored on a secure network accessible only by approved staff. All critical systems and servers are separately housed within Carebridge secure facilities and are accessible only by authorized personnel. Carebridge takes precautions to protect personal information from loss, misuse an unauthorized access, disclosure, alteration, and destruction. Carebridge periodically performs network backups. All backup files are stored offsite and are handled by authorized personnel only.

Despite these precautions, no data security safeguards are foolproof. Identity thieves, hackers, and other unauthorized individuals may find ways to obtain Personal Data. Although this is unlikely, if Carebridge learns that any Personal Data has been obtained without authorization and there is a risk of fraud or identity theft, Carebridge will notify the affected individual(s) and take steps to mitigate harm.



RIGHT TO ACCESS, CHANGE OR DELETE PERSONAL DATA

Carebridge will use reasonable efforts to maintain the accuracy and integrity of any Personal Data it receives and update it as appropriate.

Individuals may request that Carebridge correct, amend, or delete Personal Data where it is inaccurate. Carebridge will grant such requests, except where doing so would cause unreasonable burden or expense or pose a risk to such individual's privacy.

If you wish to access, change, or delete your Personal Data held by Carebridge, please send a request via mail or email to the Carebridge Privacy Officer at:

Carebridge Corporation
40 Lloyd Avenue, Suite 300
Malvern, PA 19355
Attn: Privacy Officer
Email: privacyofficer@carebridge.com

CHANGES TO THIS POLICY

Carebridge may amend this Privacy Policy from time to time. Carebridge will only make amendments in a manner consistent with applicable laws. The most recent Privacy Policy will be available on the Carebridge websites (www.myliferesource.com and www.carebridge.com). You should check one of the Carebridge websites regularly for any future modifications to this Privacy Policy.

QUESTIONS OR COMPLAINTS

Carebridge commits to resolve complaints related to your privacy and our collection or use of your Personal Information. Inquiries or complaints regarding this Privacy Policy should be directed to:

Privacy Officer
Carebridge Corporation
40 Lloyd Avenue, Suite 300
Malvern, PA 19355
privacyofficer@carebridge.com

ENFORCEMENT AND DISPUTE RESOLUTION

Carebridge periodically verifies that the Privacy Policy is accurate and comprehensive for the information intended to be covered and conforms to applicable data privacy and protection laws. We encourage interested persons to raise any concerns with us about this Privacy Policy.

If you have any questions, complaints, or concerns regarding the way Carebridge maintains or protects your Personal Data, please contact the Carebridge Privacy Officer (see "Questions or Complaints" section

of Privacy policy). Carebridge will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Data in accordance with the principles contained in this Privacy Policy.

Carebridge retains sole and absolute discretionary authority to resolve all questions relating to the administration, interpretation, and application of this Privacy Policy. This authority includes interpreting the terms of this Privacy Policy including any disputed or doubtful terms.

PRIVACY INFORMATION SPECIFIC TO INTERNET USAGE

Because the Internet is not a completely secure environment, it is important for you to read the sections below on use of your personal information. Carebridge and My Life Resource Online seek to deal with all communications in a confidential manner within the limitations the Internet presents.

On registering for service access, we may require you to give certain personal data. We use such information to enhance our ability to focus our services more effectively upon your personal issues and to enable us to communicate with you when you ask for information. This information also enables us to make you aware of new products and services as well as significant changes in existing ones.

We will not intentionally make available your personally identifiable information to third parties without your permission except when such personal data may be required by law or if it is necessary to bring legal action against an individual or group breaking the terms of use of our website.

We do our utmost to protect the privacy of personal information. However, since Internet data transmission is not completely secure, we cannot guarantee the security of information transmitted to us, which therefore must be done at your own risk.

The use of an individual, unique password is the best way to protect your account. We urge that you not reveal your password to any other person. The secrecy of your password is your responsibility. Your password will not be requested by us in an unsolicited email or phone call. It is important to be sure you have logged out and closed your browser when your use of the website is completed, thus much reducing the likelihood that someone may access your personal correspondence or information.

We may request certain anonymous information such as the age or age-range, gender, or family status of our users for purposes of service improvement or general utilization reporting. Such anonymous information accumulation will not result in the identification of any individual or user.

As a convenience to our visitors, our site may contain links to other (non-Carebridge) sites that we believe may offer useful resources. The Privacy Policy presented here does not apply to those sites. You should contact these sites directly for information on their privacy agreements, and data collection/distribution procedures.

PRIVACY POLICY UPDATES

This Privacy Policy updated: May 2018.