

## Community Medicare Privacy Policy

**PLEASE READ THIS PRIVACY POLICY CAREFULLY BY SIGNING UP FOR COMMUNITY MEDICARE ACCOUNT AND/OR USING ITS PRODUCTS, SERVICES, WEBSITES AND MOBILE APPLICATIONS, YOU ARE AGREEING TO BE BOUND BY THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY AND ALL TERMS AND CONDITIONS INCORPORATED BY REFERENCE IN THIS PRIVACY POLICY. ANY USER'S USE OR CONTINUED USE OF COMMUNITY MEDICARE'S PRODUCTS, SERVICES, WEBSITES OR MOBILE APPLICATIONS CONSTITUTES ACCEPTANCE OF THIS PRIVACY POLICY.**

### **1. Privacy Policy ("Policy"):**

Community Medicare cares about your privacy. For this reason, Community Medicare collects and uses personal data only as it might be needed for Community Medicare to deliver products, services, websites and/or mobile applications (collectively, the "Services"). Your personal data includes information such as:

1. Name
2. Address
3. Billing and delivery information
4. Telephone number
5. Email address
6. Financial account information
7. IP Address
8. Other data collected that could directly or indirectly identify you

This Policy explains how and what data Community Medicare collects and how Community Medicare uses your personal data. This Policy also describes options Community Medicare provides for you to access, update or otherwise take control of your personal data that Community Medicare processes. If at any time you have questions about Community Medicare's practices or any of your rights described below, you may reach Community Medicare directly at [jlee@communitymedicare.com](mailto:jlee@communitymedicare.com). This inbox is actively monitored and managed so that Community Medicare can deliver an experience that you can confidently trust.

### **2. Changes to the Privacy Policy:**

As the Services may change from time to time, this Policy is expected to change as well. Community Medicare reserves the right, in its sole discretion, to amend this Policy at any time, for any reason, which amendment(s) will be effective upon posting to our website. The date of the last revision to this Policy will be indicated by the "Last Updated" date located at the end of this Policy. Your use of the Services after such changes or modifications have been made shall constitute your acceptance of this Policy as last revised. If you do not agree to be bound by this Policy as last revised, do not use (or continue to use) the Services. In addition, Community Medicare may occasionally notify you of changes or modifications to this Policy by e-mail. It is therefore important that you keep your account information accurate. Community Medicare assumes no liability or responsibility for

your failure to receive an e-mail notification if such failure results from an inaccurate e-mail address.

### **3. Information That Community Medicare Collects:**

- 1. Personally Identifiable Information:** Community Medicare may collect information (online, by phone or paper) that identifies you (“Personally Identifiable Information”) when you provide such information on Community Medicare website(s) or social media website(s) or otherwise interact with Community Medicare. The types of Personally Identifiable Information collected may include, but not limited to, Internet Protocol (IP) address, your name, address, phone number, birth date, billing and delivery information, e-mail address, information about you or your business, credit card, or other financial account information.
- 2. Non-Personal Data:** As you interact with Community Medicare through our online resources, Community Medicare may also collect information about your browsing history or certain other information that is not considered Personally Identifiable Information through your use of and visits to these resources through a variety of technologies, including, but not limited to, cookies, tags, beacons, Internet Protocol (IP) address, and other tools. “Cookies” are pieces of code or text placed on your computer when you browse a website. Cookies may be placed by Community Medicare or our web analytics third party vendors or partners. “Tags” and web beacons refer to code scripts that are primarily used to track visitor activities by web analytics software. The types of non-personal data collected on Community Medicare website(s) through the use of these, and other tools may include the search terms you used, new or returning user, browser information, computer type, operating system, internet service providers, website usage, referring/exit pages, platform type, date/time stamp, number of clicks, ads viewed, among other non-personal data (collectively, all of the foregoing data is considered “Non-Personal Data”). Additionally, Cookies, Tags and other tools placed by our web analytics third party vendors or partners may collect other information about you and your visits to websites and elsewhere on the Internet including, but not limited to, your industry, company size, among other Non-Personal Data.

### **4. How Community Medicare Uses and Shares Personally Identifiable Information:**

Community Medicare strongly believes in both minimizing the data we collect and limiting its use and purpose to only that (1) for which Community Medicare has been given permission, (2) as necessary to deliver the Services, or (3) as Community Medicare might be required or permitted for legal compliance or other lawful purposes.

- 1. Use of Your Personally Identifiable Information.** Once collected, Community Medicare may use your Personally Identifiable Information in a variety of ways including, but not limited to:

- Provide service communications such as bill reminders, order confirmations, program registrations, and customer service messages
  - Respond to your e-mails or online requests for products, services, or information
  - Deliver and process surveys
  - Processing your job application
  - Personalize and improve the usability of Community Medicare website(s)
  - Fulfill and/or deliver the Services
  - Share with certain other companies to offer you products and services that may be of interest to you as described below
  - Tailor content, advertising and marketing to you
  - Share with third parties as required by law or to protect Community Medicare as described below
  - Share your e-mail address as permitted under this Policy as described below in this Section
  - Communicate with you
  - Improve and optimize the operation and performance of the Services
  - Diagnose problems with and identify any security risks, errors, or needed enhancements to the Services
  - Detect and prevent fraud and abuse of our Services and systems
  - Collecting aggregate statistics about use of the Services
  - Understand and analyze how you use the Services and what products and services are most relevant to you
2. **Transfer of personal data abroad.** If you utilize the Services from a country other than United States where the servers are located, your communications with Community Medicare may result in transferring your personal data across international borders. Also, when you Community Medicare, Community Medicare may provide you with support from our locations which may be outside of your country of origin. In these cases, your personal data is handled according to this Policy.
  3. **Sharing Your Personally Identifiable Information to Fulfill Service Requests and Perform Business Functions.** When fulfilling service requests initiated by you, we may share your Personally Identifiable Information with certain third parties to fulfill the requests. We may also share such information with service providers that perform business functions for us. In such cases, Community Medicare may share your Personally Identifiable Information.
  4. **Sharing Your Personally Identifiable Information with Certain Other Companies.** Community Medicare may share Personally Identifiable Information, except for e-mail addresses, with certain other companies as part of Community Medicare benefits offerings.
  5. **Sharing Your Personally Identifiable Information When Legally Necessary or to Protect Community Medicare's Interests.**

Community Medicare may disclose your Personally Identifiable Information if required to do so by law or in the good-faith belief that such action is necessary to: (a) conform to legal requirements or comply with legal process served on Community Medicare, including, but not limited to, compliance with legal, regulatory and law enforcement requests. In such instances, Community Medicare cooperates with government and law enforcement officials and private parties to enforce and comply with the law. Community Medicare will disclose any information about you to government or law enforcement officials or private parties as Community Medicare, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (such as subpoena requests), to protect our property and rights or the property and rights of a third party, to protect the safety of the public or any person, or to prevent or stop activity Community Medicare considers to be illegal or unethical. To the extent Community Medicare is legally permitted to do so, Community Medicare will take reasonable steps to notify you in the event that Community Medicare is required to provide your Personally Identifiable Information to third parties as part of legal process; (b) protect and/or defend the rights or property of Community Medicare; (c) protect the personal safety of Community Medicare personnel or users of the public in appropriate circumstances; or (d) if Community Medicare and/or its assets (or a portion of its assets) are sold, assigned, transferred, or merged or if Community Medicare undergoes some other change including a change to its corporate form as part of a bankruptcy proceeding or otherwise, information may be transferred as part of that transaction or change.

**6. Sharing Your E-mail Address Pursuant to Community Medicare Policy.**

We do not sell or rent e-mail addresses to anyone outside of Community Medicare. Community Medicare will also not share e-mail addresses to unrelated third-parties or affiliates.

**5. How to Manage the Sharing of Your Personally Identifiable Information:**

To request that your information be deleted, please email [jlee@communitymedicare.com](mailto:jlee@communitymedicare.com). If you make a request to delete your personal data and that data is necessary for the products or services you have purchased, the request will be honored only to the extent it is no longer necessary for any Services purchased or required for our legitimate business purposes or legal or contractual record keeping requirements.

**6. How Community Medicare May Use and Share Non-Personal Data:**

Through the use of various technological tools, Community Medicare may collect Non-Personal Data to improve the usability of Community Medicare website(s) and the Services and for other business reasons. Community Medicare may share the Non-Personal Data collected with third parties or permit third parties to place tools like Cookies, Tags and web beacons, to collect additional Non-Personal Data when you browse Community Medicare websites. Community Medicare does not share Personally Identifiable Information with third parties with whom it shares your Non-Personal Data. Please note that you may be subject to the privacy policies of

non-Community Medicare companies when you select an advertising link or other link that takes you to sites not operated by Community Medicare.

**7. Data Retention:**

We may retain your Personally Identifiable Information (as well as your Users-of-Users' Information) for as long as your account is active, as indicated in this Privacy Policy or as otherwise needed to provide you with our Services. We may continue to retain such Personally Identifiable Information even after you deactivate your account and/or cease to use any particular Services, as reasonably necessary to comply with our legal obligations, to resolve disputes regarding our Users or their Users-of-Users, prevent fraud and abuse, enforce our agreements and/or protect our legitimate interests. We maintain a data retention policy which we apply to information in our care. Where your Personally Identifiable Information is no longer required we will ensure it is securely deleted.

**8. Age Restrictions:**

Our Services are not permitted to children under 18 years of age. No one under age 18 should provide any Personal Information to us through any of our Services. We do not knowingly collect Personal Information from children under 18. Parents and guardians should supervise their children's activities at all times. If you know of or have reason to believe anyone under the age of 18 has provided Community Medicare with any personal data, please contact us at [jlee@communitymedicare.com](mailto:jlee@communitymedicare.com) .

**9. Information Security:**

Community Medicare implements commercially reasonable security measures to help protect against unauthorized access to or unauthorized alteration, disclosure, or destruction of data. Community Medicare restricts access to personal information to certain companies who may need to know that information in order to operate, develop, or improve the Services. These individuals or partner organizations are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. Accordingly, Community Medicare cannot guarantee or warrant the security of any information you transmit to the Society, or to or from Community Medicare online products or services. If you have questions about this Policy, please contact us.

**10. User ID and Password:**

Certain areas of Community Medicare's website(s) may require the use of a user ID, e-mail address or password, as an additional security measure that helps protect your information. To help you protect your privacy, Community Medicare website(s) has tools to help you log in and log out.

**11. Linking to Other Internet Sites:**

You should be aware that other Internet sites that are linked from Community Medicare websites or from Community Medicare e-mail message may contain privacy provisions that differ from the provisions of this Policy. To ensure your privacy is protected, we recommend that you review the privacy statements of these other linked sites, applications, or other digital platforms.

## **12. Contact Us:**

If you have any questions, concerns or complaints about this Policy, our practices or our Services, you may contact us by email at [jlee@communitmedicare.com](mailto:jlee@communitmedicare.com). We will attempt to resolve any complaints regarding the use of your Personally Identifiable Information in accordance with this Privacy Policy. We will respond to all requests, inquiries or concerns within thirty (30) calendar days.

**Latest Revision: October 27, 2019**