

At BenefitMall we're dedicated to maintaining your privacy.

BenefitMall ("we," "us," "our") has created this Privacy Policy to let you know about how we collect, use, disclose and otherwise manage the information we may collect about you on BenefitMall websites and mobile applications (collectively, the "Sites"), as well as through our technology and business solutions, partners and service providers, events and in-person interactions, and any other circumstances where you are presented with this Privacy Policy (collectively, including the Sites, the "Services").

Please note that BenefitMall offers services to business customers that may include the processing of personal information on their behalf. For example, we offer our customers the ability to process their payroll within our secure online payroll websites. We also receive personal information about individuals in connection with generating insurance rate quotations. BenefitMall processes the data we receive from our business customers on behalf of those customers and therefore the collection, use, and processing of that information is subject to the relevant customer's privacy policy, not this Privacy Policy.

Information We Collect About You

We may collect information about you in the following circumstances:

Information You Provide to Us

We may collect information from you directly, including when you register with us as a broker or small business, become a BenefitMall client or customer, enter a contest, complete surveys or other online forms, request information, provide feedback, and/or communicate with our personnel in-person, over the phone, or via email or other channels. The information we may collect includes:

Direct Identifiers such as your name, address, email address, telephone number, social security number or other government identification.

Commercial Information, such as your brokerage identification, financial and insurance information. We do not, however, collect credit or other payment card information.

Employment Related Information, including your occupation or profession.

Other Information You Chose To Provide, such as your date of birth, gender, marital status, and health and disability status, which may be provided in connection with insurance rate selection and enrollment.

Photos, Videos, Audio Recordings and other Media to the extent you choose to send it to us and/or to participate in our recorded events, conferences, interviews, and other meetings.

Inferences: We create profiles based on information we collect from you and the devices you use to access the Services.

Information We Collect through Automated Data Collection Technologies

When you visit the Sites or use the Services, we may collect information about your computer or device, including your IP address, operating system, browser type, Internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks.

We may also use cookies (and similar mobile application technologies) to improve the overall function and efficiency of our Sites. A cookie is a small text file that is sent to or accessed from your web browser or your computer's hard drive that may contain information about your computer, browsing history, and activities performed while using the Services. A web beacon (also called a pixel tag or clear GIF) is a piece of computer code that enables us to monitor user activity and website traffic. To learn more about cookies, please visit www.allaboutcookies.org.

You have the ability to accept or decline cookies. Most browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, this may impact your experience using our website.

In addition to our own cookies, we use cookies in connection with our use of Google Analytics. Google Analytics is a web analytics tool that helps website owners understand how visitors engage with their websites. Google Analytics customers can view a variety of reports about how visitors interact with their websites so that they can improve it. For more information about how Google uses the information it collects through Google Analytics, review the information at this link: www.google.com/policies/privacy/partners/.

Use of Your Information

In the past 12 months, we may have used your information:

- To fulfill or meet the purpose you provided the information, such as registering your account and responding to inquiries.
- To communicate with you about the Services.
- To facilitate and improve the operation of our business, including to verify your identity and to maintain the safety, security, and integrity of our Services.
- To help us gain a better understanding of your preferences and interests so we can improve the Sites and our products, Services, and marketing to better serve you, your business, and/or our other customers.
- To register you for events and other meetings you sign up for.
- To host and run contests and sweepstakes.
- To comply with our legal obligations.
- In connection with a potential or actual corporate transaction such as a merger or sale of our assets.
- To provide the information to service providers and other third parties as described in the “With Whom We Share the Information” section below.
- We may aggregate the information we collect about users of our Services and use that information for marketing or analytic purposes.
- For other purposes consistent with the context of the collection of your information, or as otherwise disclosed to you prior to the use of your information.

With Whom We Share the Information

In the past 12 months, we may have shared your information with the following categories of third parties:

- **Our Corporate Family** including our parent, its affiliates, subsidiaries, operating companies and related entities, for internal business purposes such as complying with our legal obligations. Information we share with our Corporate Family includes Direct Identifiers, Commercial Information, Employment Related Information, Photos, Videos, and Inferences.
- **Insurance Carriers** and related companies as necessary for underwriting, insurance rate selection, and processing of enrollments. Information we share with Insurance Carriers includes Direct Identifiers, Commercial Information, Employment Related Information, and Other Media, and Inferences.
- **Service Providers.** We share information with trusted service providers who provide specific services and/or administer activities in the course of our Services. We may make information available on a confidential basis to third-party auditors, to data storage or cloud software firms, or to select measurement and analysis firms. We take steps designed to ensure that these parties do not use or otherwise disclose any information except for the purpose of providing the services or administering the activities on our behalf. Information we share with Service Providers includes Direct Identifiers, Commercial Information, Employment Related Information, and Other Media, and Inferences.

- **Other Third Parties** as necessary to:
 - sell or transfer all or a portion of our business or assets to a third party as part of a merger, acquisition, bankruptcy proceeding, or other restructuring;
 - comply with the law or to protect the interests or safety of BenefitMall, its guests, and others;
 - assist us in collecting a debt, or as necessary to exercise our legal rights or defend claims brought against us; or
 - enforce our terms & conditions.

Information we may share with Other Third Parties includes Direct Identifiers, Commercial Information, Employment Related Information, and Other Media, and Inferences.

- **Third Party Advertisers.** We may share aggregated user information, including Inferences, with prospective partners and advertisers.

Your Choices

Our Sites will not respond to Web browser “do not track” signals. If you would like information about online tracking and various opt-out mechanisms, please see <http://donottrack.us/>.

BenefitMall provides users the opportunity to opt-out of receiving communications from us. You can send an e-mail to unsubscribe@benefitmall.com in order to opt-out of future communications or follow the opt-out instructions contained at the end of every electronic communication. Please allow 48 business hours for your request to be processed.

BenefitMall offers users the ability to correct or change the information collected during registration. Users may change this information at any time and as often as necessary. To do so, contact us using the information below.

Security Measures

BenefitMall has implemented administrative, technical, and physical safeguards designed to protect the security of your information. However, there is no such thing as perfect security. While we strive to protect your information from unauthorized access, use, or disclosure, BenefitMall cannot and does not ensure or warrant the security of your information.

HIPAA Readiness

BenefitMall monitors the implementation of the HIPAA Administrative Simplification regulations, and is compliant with all applicable provisions of such law.

Links to Other Sites

The Sites may contain links to other websites or mobile applications (“Other Sites”). Please be aware that BenefitMall is not responsible for the privacy practices of Other Sites. We encourage you to read the privacy statements of Other Sites. This Privacy Policy applies solely to information collected by BenefitMall in connection with the Services, not by Other Sites.

Information about Children

Our Services are not intended for use by minors, and we do not knowingly collect, maintain, or process personal information submitted online by individuals under the age of 16. To the extent we collect information about individuals under the age of 16, that information is provided to us by an individual's parent, guardian or other individual over the age of 18 with the authority to provide the information to us in connection with our administration of the Services. We do not sell the personal information of children under the age of 16.

Note to International Users

BenefitMall's Services and Sites are intended for residents of the United States. If you use the Services or provide us your information from outside the United States, your information will be transferred to, stored and processed in the United States. By using the Services or providing us with your information, you understand that your information will be collected from and processed in the United States.

Nevada Residents

If you are a Nevada resident, you have the right to opt out of the sale of certain personal information. BenefitMall does not sell your personal information as defined under applicable Nevada law. If that were to change in the future, we will provide Nevada residents with a method to opt-out of those transactions.

California Residents

If you are a California resident, your information may be covered by the California Consumer Privacy Act (CCPA). The below disclosures apply to the extent the CCPA applies to your data, subject to any applicable exemptions.

"Personal Information" We Collect

The categories of "personal information," as defined in the CCPA, that we collect include:

- Identifiers
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- Characteristics of protected classifications under California or U.S. federal law
- Commercial information
- Internet or other electronic network activity information
- Audio, electronic, and visual information
- Professional or employment-related information
- Inferences drawn from other personal information

"Personal information" under the CCPA does not include aggregated or de-identified information. It also does not include protected health information governed by the Health Insurance Portability and Affordability Act (HIPAA).

BenefitMall may obtain, use, and share these data categories as detailed in the "Information We Collect About You," "Use of Your Information," and "With Whom We Share the Information" sections of this Privacy Policy, above.

"Sales" of Personal Information

We do not "sell" your personal information as that term is defined in the California Consumer Privacy Act (CCPA).

Your California Privacy Rights

You may have the following rights with respect to your personal information under the CCPA:

(i) Right to Know About Personal Information Collected, Disclosed, or Sold

You may have the right to request that we provide certain information to you about our collection and use of your personal information over the past twelve (12) months. Specifically, you may have the right to request disclosure of:

- The specific pieces of personal information we collected about you;
- The categories of personal information we collected about you;
- The categories of sources from which personal information was collected;
- Our business or commercial purpose for collecting or disclosing personal information; and
- The categories of third parties with whom we shared personal information.

(ii) Right to Request Deletion of Personal Information

You may also have the right to request that we delete any of your personal information that we collected or maintain about you, subject to certain exceptions.

(iii) Right to Correct Inaccurate Personal Information

You may also have the right to request that we correct inaccurate personal information we maintain.

(iv) Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

(v) Exercising Your California Privacy Rights

To request to exercise your CCPA rights described above, please submit a verifiable consumer request to us by using the information in the "Contact Us" section below. Only you or your "authorized agent," as defined in the CCPA, may make a verifiable consumer request related to your personal information.

Your verifiable consumer request must: (i) provide sufficient information that allows us to reasonably verify that you are the person about whom we collected personal information or an authorized representative; and (ii) describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request. Making a verifiable consumer request does not require you to create an account with us. We may, however, request you for additional information in order to verify your identity.

To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. If you request to access or delete your personal information, we may require you to provide information such as: physical address, date of birth, and phone number. In addition, if you ask us to provide you with specific pieces of personal information, we will require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request.

If you designate an authorized agent to make an access, deletion, or opt-out of sale request on your behalf, we may require you to provide the authorized agent written permission to do so, and, for access and deletion requests, we may also require you to verify your own identity directly with us (as described above).

If we need or are required to contact you concerning any event that involves your information, we may do so by email, telephone, or mail.

(vi) Response Timing and Format

We will make our best effort to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. Within ten (10) days of receiving the request, we will confirm receipt and provide information about its verification and processing of the request. We will maintain records of consumer requests made pursuant to the CCPA as well as our response to said requests for a period of at least twenty-four (24) months.

California's "Shine The Light" law.

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below. However, please be aware that we do not share non-aggregated information with third parties for marketing purposes.

Changes to BenefitMall's Privacy Policy

We reserve the right to make changes to this Privacy Policy at any time. If at any point we decide to use information in a manner inconsistent with that stated at the time it was collected, we would notify individuals and provide options where appropriate. We will use information in accordance with the privacy policy under which the information was collected, or as otherwise disclosed to individuals at or before the time of use.

Contact Us

If you have any questions about this Privacy Policy or our practices, or to submit requests to access, modify, or delete your personal information, you can contact:

BenefitMall Marketing
12404 Park Central Drive, Suite 400S
Dallas, Texas 75251
privacypolicy@benefitmall.com
(800) 446-4999

