MILLIMAN, INC. MEDICARE SUGGEST – PRIVACY POLICY

1. WHEN THIS PRIVACY POLICY APPLIES.

This Privacy Policy ("Policy") applies to your access and use of MedicareSuggest.com and related services ("Medicare Suggest" or the "Services") as owned and operated by Milliman, Inc., its subsidiaries and/or affiliates ("Milliman" or "us/we/our". Milliman is the responsible entity for all Personal Information subject to this Policy for our Services targeted to US customers.

2. WHAT WE DO WITH YOUR INFORMATION.

information to you.

We want to be clear about what information we collect and how we use it to deliver our Services to you, improve your financial life, operate our business, and help make our Services useful, more intelligent, and work better for you. We do not sell or share your Personal Information with third parties for their own commercial uses without your consent.

- a) Types of Information We Collect. In connection with accessing our Services, we may collect information from you which can be used to identify you ("Personal Information"), such as your name, email address, phone, username and password. We collect information when you register or open an account, sign in, use the Services, call us for support, or give us feedback. We may also get information from other companies or third parties, such as when you sync a third party account or service with our Services. Finally, we also collect content or other information that you may provide or create when you interact with our Services. We may also automatically collect certain usage information when you access our Services ("Usage Data"), such as Internet Protocol ("IP") addresses, log files, unique device identifiers, pages viewed, browser type, any links you click on to leave or interact with our Services, and other usage information collected from cookies and other tracking technologies. For example, we collect IP addresses to track and aggregate non-personal information, such as using IP addresses to monitor the regions from which users navigate to our Services. We also collect IP addresses from users when they log into the Services as part of our log-in and security features. Our Services may change over time and we may introduce new features that may collect new or different types of information.
- b) <u>How We Use Your Information</u>. Unless prohibited by law, regulation, or a contractual obligation, we may use your information, including your Personal Information, for the following purposes:

 Account Registration and use of the Services. We may use your name, address, phone number, and email address to register your account for use of the Services we provide and to communicate important

Communicate with You and Tell You About Other Services. We may use your information to communicate with you about our Services and to give you offers for third party products and services that we think may be of use to you. Please see below under "What You Can Do to Manage Your Privacy" for the choices you have regarding these communications.

To Improve Services and Develop New Services. We will use your information to personalize or customize your experience and the Service, develop new features or services, and to improve the overall quality of our Services.

To Provide Our Services and Operate Our Business. We may use your information to operate our business, including providing Services you requested, provide you with support related to our Services, and to help us protect our Services, including to combat fraud and protect your information.

Customer Service and Technical Support. We may use your name, address, phone number, email address, how you interact with our Services, and information about your computer configuration

to resolve questions you may have about our Services and to follow up with you about your experience.

Risk Adjustment. Our third party service providers may use your information, including Personal Information and Usage Data, to perform risk adjustment functions in order to improve the quality of your care, increase your provider engagement and increase accuracy and completeness of data submissions related to your care in an effort to improve accurate risk adjustment factor scores. Feedback. We may use any information you volunteer in surveys you answer for us and combine them with answers from other customers in order to better understand our Services and how we may improve them. Answering any survey is optional.

Research, Including Publishing or Sharing Combined Information from Many Users, But Only in a Way that Would Not Allow You or Any Other Person to be Identified. Only in a way that would not allow you or any other person to be identified, we may prepare and share information about our customers with third parties, such as other clients, advertisers, or partners, for research, academic, marketing and/or promotional purposes. For example, we may share demographic data that describes the percentage of our customers who use mobile services or who use a particular operating system. We or our third party partners may publicly report the aggregated findings of the research or analysis, but only in a way that would not allow you or any other person to be identified.

- c) <u>How We Share Your Personal Information</u>. From time to time, we may need to share your Personal Information with others. Third Party Service Providers. We may share your information, including Personal Information and Usage Data, with third party service providers who perform various functions to enable us to provide our Services and help us operate our business, such as website design, sending email communications, fraud detection and prevention, customer care, or performing analytics. Additionally, we may share your information, including Personal Information and Usage Data, with third party service providers who perform risk adjustment functions. Our contracts with these third parties require them to maintain the confidentiality of the Personal Information we provide to them, only act on our behalf and under our instructions, and not use Personal Information for purposes other than the product or service they're providing to us or on our behalf. Response to Subpoenas and Other Legal Requests. We may share your information with courts, law enforcement agencies, or other government bodies when we have a good faith belief we're required or permitted to do so by law, including to meet national security or law enforcement requirements, to protect our company, or to respond to a court order, subpoena, search warrant, or other law enforcement request.
- d) <u>Protection of Milliman and Others</u>. We may share account information, Personal Information and Usage Data when we believe it is appropriate to enforce or apply our products' Terms of Service and other agreements; or protect the rights, property, or safety of Milliman, our Services, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction. This does not include selling, renting, sharing, or otherwise disclosing Personal Information of our customers for commercial purposes in violation of the commitments set forth in this Policy.
- e) Other Reporting. We may share your information with other companies, lawyers, agents, and government agencies in connection with issues related to fraud.
- f) <u>Information Sharing Between Milliman Entities</u>. We share your information, including your Personal Information, with and among our affiliates and subsidiaries, except where prohibited by law, regulation, or a contractual obligation. The protections provided in this Policy apply across all Milliman entities. Affiliates and subsidiaries means companies related by common ownership or control. The reasons why

we share your information include for our everyday business purposes, such as to: process your transactions, maintain your accounts, operate our business, etc.

- g) <u>Sale of Our Business</u>. If we sell, merge, or transfer any part of our business, we may be required to share your information. After the completion of such sale, merger, or transfer of our business, when you log into the Medicare Suggest account, you will be given an opportunity to re-authorize the sharing of your Personal Information with such new entity.
- h) <u>With your Consent</u>. Other than as set out above, we will provide you with notice and the opportunity to choose when your Personal Information may be shared with other third parties.
- i) Syncing, Linking, Connecting Your Account or Other Third Party Services with Your Milliman Service. You may choose to sync the Services with information from other accounts, including healthcare providers and insurers. To sync your account information, we must access your online account with your healthcare providers and insurers. We will request your user name, password, and any other login data that you have set up with your healthcare providers and insurers to enable access. We use this information to update and maintain the account information you download, to assist with the download process, and to enhance the Services we may provide in the future.

3. WHAT YOU CAN DO TO MANAGE YOUR PRIVACY. You can view and edit information that identifies you online through our Service.

- a) <u>Updating Your Personal Information</u>. In connection with your right to manage your Personal Information you provide to us, you may access, update, change, correct or request deletion of your information either through the Service or through our customer support. You can reach our customer support by using the contact information provided in the "How to Contact Us" section of this Policy.
- b) <u>Cookies and Similar Tracking Technologies</u>. The following is a high-level summary of our practices and your controls for cookies and other tracking technologies. For more information, please see our Cookies Policy. In accordance with applicable law, Milliman and our service providers may use commonly-used tools to recognize your visit and track your interactions with our Services such as cookies, web beacons, pixels, local shared objects, and similar technologies (collectively, "Cookies"). Sometimes this tracking is necessary in order for us to provide you the Services. Other times, we combine Usage Data collected from Cookies with that of other customers to improve your and other customers' experience. You have control over some of the Usage Data we collect from Cookies and how we use it. Information on changing your browser settings to opt out of Cookies can be found in your browser settings.
- c) <u>Do Not Track</u>. Like most other companies, our Services are not currently configured to respond to browsers' "Do Not Track" signals because at this time no formal "Do Not Track" standard has been adopted. Click here for more information on "Do Not Track."

4. DATA RETENTION AND YOUR ACCESS RIGHTS.

a) Milliman retains Personal Information only as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or not prohibited by law. If you have consented to the processing of your Personal Information ("opt-in"), Milliman will retain and process your Personal Information until you withdraw your consent ("opt-out"), unless the Personal Information must be kept for administrative, legal or regulatory purposes, as for the management of the right to object, in which case Milliman will keep the minimum amount of Personal Information necessary and only for the time

necessary to comply with such purposes. If Milliman has not received your opt-in, Milliman will delete your Personal Information once the purpose of the collection and processing of such Personal Information has been fulfilled and the adequate duration for documentation and backup storage of such Personal Information has lapsed. If you want to opt-out from a specific electronic communication service or marketing offer, you can unsubscribe at any time by using the opt-out link on such communication e-mail or send us an e-mail at: data.protection@milliman.com. Unsubscribing from a special service or product information may not automatically end the processing of your Personal Information by us unless we receive a specific e-mail request from you in this respect. Any complaints about un-solicited marketing communication can be sent by e-mail to Milliman at the same e-mail address.

b) As allowed or required by law and consistent with our applicable agreements, you may contact Milliman at any time at data.protection@milliman.com to request a copy of any Personal Information that Milliman has about you, to request that certain Personal Information be corrected, updated, or deleted, or to express any complaints or concerns about Milliman's use of your Personal Information. It is not technologically possible to change or delete each and every instance of the data Milliman holds on its systems, and some Personal Information may remain in non-erasable forms.

5. SECURITY OF YOUR INFORMATION.

Milliman stores Personal Information on a secure server that is password protected and shielded from unauthorized access by a firewall. Milliman has in place security policies that are intended to ensure the security and integrity of all Personal Information. Milliman has appropriate technical and organizational measures in place to protect against unauthorized or unlawful processing of Personal Information and against accidental loss or destruction of, or damage to, Personal Information held or processed by Milliman. If Milliman forwards Personal Information to any third party, Milliman requires that those third parties have appropriate technical and organizational measures in place to comply with this Privacy Policy and applicable laws.

6. OTHER DISCLOSURES.

Milliman may also disclose Personal Information and other related information in response to subpoenas, court orders, or other lawful requests by public authorities, and to meet national security or law enforcement requirements. Milliman may collect and share Personal Information in order to investigate or take action regarding illegal activities, suspected fraud, violations of Milliman's Terms of Use, or as otherwise required by law or regulation.

7. EU-US PRIVACY SHIELD.

- a) Milliman is committed to handling Personal Data in accordance with this Privacy Policy and the EU-U.S. Privacy Shield Framework (or the Swiss-U.S. Privacy Shield Framework, as the case may be), as administered by the U.S. Department of Commerce. If there is any conflict between the terms of this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks, and to view Milliman's certification, please visit https://www.privacyshield.gov/list.
- b) Milliman's accountability for Personal Data that it receives under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, Milliman remains responsible and liable under the Privacy Shield Principles if third parties engaged by Milliman process the Personal Data in a manner inconsistent with the Principles, unless Milliman proves that it is not responsible for the event giving rise to any damage. Additionally, Milliman, Inc. has put in place data

protection agreements with its affiliates located in the European Economic Area based on the EU Standard Contractual Clauses issued by the European Commission (the "EU Standard Contractual Clauses").

c) As further explained in the "How to Contact Us" section below, Milliman encourages any individual to contact us should they have a Privacy Shield-related (or general privacy-related) complaint. Any right of access, rectification, erasure, restriction of the processing as well as the right to data portability of individuals domiciled in the European Economic Area or Switzerland may be exercised under the conditions set forth in the GDPR by contacting Milliman at: data.protection@milliman.com. Furthermore, these individuals will have the right to lodge a complaint with a competent supervisory authority at any time.

8. HOW TO CONTACT US.

If you have questions or comments about this Policy, please contact us. We want your feedback and comments.

- a) Via Email. If you have questions or complaints regarding our Policy or practices, please contact us by email at data.protection@milliman.com.
- b) Via Direct Mail. Milliman, Inc., Attention: Chief Compliance Officer, 1301 Fifth Avenue, Suite 3800, Seattle, WA 98101-2646.

9. CHANGES TO OUR PRIVACY POLICY.

From time to time we may change or update our Policy. We reserve the right to make changes or updates at any time. More information about how we will notify you is below. If we make material changes to the way we process your Personal Information, we will provide you notice via our Service or by other communication channels, such as by email or community post. Please review any changes carefully. If you object to any of the changes and no longer wish to use our Services, you may close your account(s). All changes are effective immediately upon posting and your use of our Service after a notice of material change or posting of an updated Policy shall constitute your consent to all changes.

10. COLLECTION AND USE OF CHILDREN'S PERSONAL INFORMATION.

Milliman's websites, products, and services are not directed to children, and Milliman does not knowingly collect Personal Information from children. If a parent or legal guardian becomes aware that his or her child has provided Milliman with Personal Information without their consent, the parent or legal guardian should contact Milliman at data.protection@milliman.com, and Milliman will take steps to delete any such Personal Information.

11. YOUR CALIFORNIA PRIVACY RIGHTS.

We do not share your Personal Information with third parties for their marketing purposes without your consent.