

This Privacy Policy describes the collection, use, and disclosure practices with respect to Senior Choice Plans (the “Platform”). This Privacy Policy refers to visitors to and users of the Platform as “you.” The Platform is operated by Senior Choice Plans LLC (the “Company” or “we”). The Company separately maintains a privacy policy that covers all of its collection, use, and disclosure of information here. The purpose of the Platform is to serve as the one-stop resource about Medicare plans for individuals who are interested in Medicare insurance products.

This Privacy Policy uses the term “Personal Information” to describe information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

## **HIPAA**

Because we facilitate the sale of a diverse range of insurance products, our processing of some information on behalf of our agents may fall under the Health Insurance Portability and Accountability Act (“HIPAA”). Specifically, we act as a Business Associate (as defined by HIPAA) when we receive Protected Health Information (“PHI”) from you (including your name, contact information, date of birth, sex, street address, Medicare number, information about current Medicare policy, ethnicity and race, and other information) in the course of your application to a health plan carrier. For more information about how PHI is used and disclosed, please review the applicable health plan’s Notice of Privacy Practices.

This Privacy Policy applies to personal information that is not covered by HIPAA.

## **INFORMATION COLLECTED FOR TEXTING PROGRAM**

Any information that we collect when you opt into receiving SMS and MMS text messages from us is used solely for the management of such texting communications program. We do not disclose such information to any entities other than our subsidiaries. We also do not transfer your consent to be contacted via the texting program to any other entity. The applicable terms for your participation in the texting program are available here.

Contact information	When you fill out a form to be reached or apply for insurance enrollment, we gather your name, phone number, mailing address, and email address.
Health information	When you share details with us on the Platform about your health and healthcare preferences, like your medications, chosen pharmacy, and favored clinician, we gather this additional data. We utilize this information to pinpoint suitable Medicare plans for you.

Internet or other similar network activity	We automatically gather data about how you interact with the Platform. This can encompass your browsing trail (which includes the website you visited prior to ours and the one you navigated to afterward), the length of your browsing session, device ID, and IP address.
Audio, electronic, or visual information	We might obtain short video segments capturing users' online behaviors, including clicks and scrolling, which demonstrate how users agree to be communicated with or how they use our Platform. Additionally, we might keep audio captures of your dialogues with our customer support, sales, or other representatives from our organization concerning your questions related to the Platform.
Geolocation data	We gather geolocation* data from users to maintain the Platform's security and authenticity and to deliver our services.
Commercial information	We gather data regarding products and services that you might be interested in or that you have requested.
Professional or employment-related information	We collect information about your employment when you provide it to us in the course of submitting an application for enrollment in an insurance product.

Types of Personal Information marked with an asterisk (\*) may be considered “sensitive” personal information according to some state laws.

We do not collect biometric information.

We intend to keep the above categories of Personal Information for as long as reasonably necessary to achieve the business purposes for which they were collected.

**HOW WE USE YOUR PERSONAL INFORMATION:**

Your personal information is crucial for various reasons:

1. To manage and operate the Platform, like identifying suitable insurance plans and handling your enrollment requests.

2. To interact with you about the Platform.
3. To link you with a licensed representative upon your request.
4. To address any questions you have.
5. To complete transactions.
6. To customize the content and details we might share or present to you.
7. To review the usage of our offerings.
8. To innovate and develop new products or services.
9. To adhere to our legal responsibilities.
10. To safeguard our rights, assets, and safety, as well as those of others.
11. To consider or execute mergers, sell-offs, restructurings, reorganizations, dissolutions, or other transitions involving our assets. This could be during regular operations or during processes like bankruptcy or liquidation. In such events, the personal information we have about our clients could be among the transferred assets. By using our services, you agree to such transfers, and we might delegate or relocate any rights, benefits, responsibilities, and obligations of this Privacy Policy under these conditions.

Periodically, we might reach out to you through personal calls, emails, or mail for announcements, promotions, alerts, confirmations, surveys, or other general notifications. If you wish to cease receiving promotional or marketing messages via email or mail, you can opt out by getting in touch using the toll-free number or email provided below.

We may also contact you via text if you provide your consent to receive text communications on a texting consent page.

### **SHARING PERSONAL INFORMATION**

We may disclose all categories of Personal Information described above in “Personal Information We Collect” to the third parties listed below for the purpose of facilitating the sale of insurance products to individuals who are interested in purchasing such products.

- **With Our Service Providers.** We may share Personal Information about you with third parties who perform services for us or on our behalf. For example, this may include payment processors or other operating systems or platforms that help us run our services.
- **With Our Business Partners.** We may share Personal Information (but not Personal Information that you provide when opting into text messaging communications) with the independent licensed agents who are contracted to sell insurance policies with the same carriers as us, and business partners that assist us with analytics, marketing, and advertising.
- **With Law Enforcement, Government Agencies, or Parties to a Legal Proceeding.** We may share Personal Information with such entities to comply with the law or assist in law enforcement.
- **With Our Independent Agents and Advisors.** Agents and advisors have access to Personal Information that is provided by you when you request information regarding insurance products.

- **With Data Analytics Providers and Advertising Service Providers.** Third-party data analytics providers may collect Personal Information about users over time and across different websites, applications, and devices for the purposes of targeted advertising. These providers may collect Personal Information, specifically internet or other similar network activity information, social media information, and/or commercial information in this manner on our Platform. For more information on these third parties, please see the below “Cookie Policy.”

We partner with these third parties to tailor and customize our advertising to Users. The practice of targeted advertising may be considered a “sale” of Personal Information under some state laws. For more information about your choices related to this practice, please see “Rights Regarding Personal Information,” below.

## **COOKIE POLICY**

The website hosting our Platform might employ cookies, pixel tags, web beacons, and other related technologies to monitor and improve user interactions. These cookies are placed on users' hard drives by their web browsers for purposes like record-keeping and sometimes to gather data about them. By using cookies, we can identify and cater to our users' interests to provide a better experience on our site. Our cookies can be categorized into advertising, analytics, and social media.

Users have the option to configure their web browser to decline cookies or to notify them when a cookie is being sent. However, if they decide to do this, some features of the Platform might not work as intended. While our website doesn't respond to "Do Not Track" signals, it might recognize other opt-out preferences, such as the Global Privacy Control (“GPC”). This preference can be set via your browser or its extensions.

## **CHILDREN UNDER THE AGE OF 16**

The Platform is not intended for children under 16 years of age. We do not collect information about individuals under the age of 16. No one under age 16 may provide any information through the Platform. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information through the Platform. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us.

## **PERSONAL INFORMATION RIGHTS:**

Depending on where you reside, you may possess specific rights (“Data Subject Rights”) related to the Personal Information we gather and process about you. Although these rights can vary by location (like in California, Virginia, Colorado, Connecticut, and Utah), we aim to honor these

rights irrespective of your residence. However, it's essential to understand that we will uphold these rights in compliance with relevant laws.

**Right to Access:** Upon request, we will verify if we're handling your Personal Information. If affirmative, we'll grant you a copy of all the Personal Information you're rightfully entitled to, along with additional details. You can also inquire about third-party entities with which we've shared your Personal Information and the types of information shared.

**Right to Correction:** If you find inaccuracies or omissions in your Personal Information, you can ask for corrections or additions. If applicable and lawful, we'll also inform entities we've shared your details with, so you can approach them directly.

**Right to Erasure:** You hold the right to request the deletion of your Personal Information. If shared with others, we'll inform them about the deletion, adhering to legal guidelines.

**Right to Limit Processing:** In specific scenarios, such as when processing sensitive data under state laws or during automated decisions, you can request a restriction on processing your Personal Information.

**Right Against Targeted Ads:** Targeted advertising tailors ads to you based on the Personal Information collected across various platforms. You can choose to opt out of this.

**Right Against Information Sales:** In some regions, targeted advertising is deemed a "sale" of Personal Information. You can ask us not to "sell" your details.

**Right to Fair Treatment:** We won't treat you unfairly for asserting these rights. However, if there are excessive requests or specific circumstances, we may impose a permissible fee, like when multiple copies of your Personal Information are requested.

#### REQUESTING DATA SUBJECT RIGHTS:

Should you or your authorized representative wish to exercise any of these Data Subject Rights, please fill out this form. Before we act on your request, we might need further details to confirm your identity or clarify your requirements. We'll make every effort to accommodate your request promptly and in line with relevant laws. We might collaborate with third parties to achieve this. If we refuse any rights request, you can challenge our decision by reaching out via the contact details given below. Furthermore, you may have the option to discuss any concerns about the appeal's outcome with your state's attorney general.

#### SPECIFIC NOTICE FOR CALIFORNIA RESIDENTS:

Under the California Consumer Privacy Act (CCPA), we're disclosing the following information. In the previous year, we've gathered and disclosed to third parties the Personal Information

highlighted above, as categorized under “Sharing Personal Information”. According to the CCPA, this data includes:

- Identifiers
- Personal Information categories as outlined in California civil code section 1798.80(e)
- Protected class characteristics under California or federal law
- Business-related information
- Location data
- Digital activity data
- Employment-related data
- Sensitive personal data (health specifics, login credentials, exact location)

Due to our participation in targeted advertising, we might "sell" certain user data (excluding text campaign data) as per certain state legislations, including California's. In the past year, we could have "sold" or "shared" some of these categories with ad networks, data analytics providers, and insurance representatives. To opt out of this data usage, select: Do Not Sell or Share My Personal Information.

We commit not to use or disclose the aforementioned "sensitive" Personal Information for purposes beyond those mentioned in Cal. Code Regs. tit. 11, § 7027(m).

#### SPECIFIC NOTICE FOR NEVADA RESIDENTS:

Nevada laws allow its residents to request companies not to sell their personal data. We don't sell information as per Nevada's definition. If you're a Nevada inhabitant and wish for us not to sell your data in the future, follow the 'Contact Information' steps below.

#### HOW TO CONTACT US:

For inquiries or feedback on this notification or our data handling practices, feel free to reach out at:

PHONE: 800-830-7574

EMAIL: [INFO@SENIORCHOICEPLANS.COM](mailto:INFO@SENIORCHOICEPLANS.COM)

PHYSICAL ADDRESS: 3905 VINCENNES RD STE 405 INDIANAPOLIS IN 46368