

Privacy Policy

AGIA Privacy Policy

AGIA Affinity (“AGIA”), believes protecting privacy of internet users visiting our website, www.agia.com (the “Site”), is of the utmost importance to ensure your trust in the programs we offer. AGIA’s Privacy Policy will inform you of the ways in which the Site collects personal information, the uses to which that information will be put, and the ways in which AGIA will protect any personal information you choose to provide us. For the purposes of this Policy, personal information that can be used to identify you or your activities on the Site of information about you which you provide to AGIA through services offered on the Site.

In many cases, AGIA will collect personal information on behalf of our commercial clients in accordance to a contract. In these circumstances, we act as a “Service Provider” or “Processor” to our clients under applicable privacy laws and are obligated to process personal information in accordance with clients’ instructions. In any case where AGIA is acting as a Service Provider or processor to our client, if you wish to exercise any of the rights outlined in this Policy, you should direct your request to our client, who is the party responsible for receiving, assessing, and responding to your requests. If a request is submitted directly to AGIA in a scenario where we only process your information in the role of Service Provider or Processor, AGIA may deny your request. If unsure, clarification of AGIA’s role regarding your personal information can be requested at anytime by contacting AGIA directly using the contact information described in this notice.

AGIA’s Privacy Policy applies solely to data collected via the Site. There may be additional personal information that we have or collect about you or your company pursuant to other relationships which is subject to other agreements and rules.

We take the privacy of your personal information very seriously and we will use your personally identifiable information only in accordance with the terms of this Privacy Policy. Personally Identifiable Information (“Personal Information”) means any information that could reasonably be used to identify you, including your name, address, birth dates, financial information, telephone number, social media contact information, or any combination of information that could be used to identify you. We will not sell or rent your personally identifiable information or a list of our customers to third parties. However, as described in more detail below, there are limited circumstances in which some of your information will be shared with third parties under strict restrictions, so it is important for you to review this Policy. This Privacy Policy applies to all services that are offered through the Site.

By accepting this Privacy Policy, you expressly consent to our use and disclosure of your personal information in the manner described in this Privacy Policy. By consent, you are acknowledging that you have read and understood this Privacy Policy and agree to be bound by it. If you do not agree with the terms of the Privacy Policy, please do not access our website. This Privacy Policy is incorporated into and subject to the terms of the website Terms of Service. The following discloses our website information gathering and use practices and is limited to the protection and use of personal information collected by us in the online environment. Your access to and use of our website are subject to this Privacy Policy and any other terms of use or policies posted by us.

Please review this privacy statement carefully to understand what information we collect on the website, how it is used, and how you can work with us if you have a concern about your privacy.

Personal Information We Collect

There is an opportunity on our website for you to voluntarily provide us with personal information for inquiring about AGIA's business. For example, we will need personal information from you when you submit a question online, or request product information. This information includes your name and e-mail address. We use your voluntarily provided personal information to provide you exceptional service and to create a more meaningful visit for you at this website. You may also choose to apply for a job with AGIA and submit a job application via our career site at <https://www.agia.com/careers>. Any personal information you send AGIA will be used only for the purpose indicated on the careers site or in this statement.

By providing us with personal information so we may assist you on this website, you are "opting-in" to receive future communication from the website concerning information on products, promotions, or other services that we believe would be of interest to you. If, at any time, you receive a communication from the website that is unrelated to a transaction you have initiated, and you would like not be contacted again, please contact us using the procedures outlined below under "Questions About Your Information" to "opt-out" from future communications.

We reserve the right to use your personal information for market research purposes to better serve you but we will not sell your voluntarily provided information and will not share it with unauthorized persons or organizations.

When you visit this website, we collect and store non-identifying information about your visit. The information we collect may include the time and length of your visit, the pages you look at on our site, and the site you visited just before coming to ours. We may also record the name of your Internet Service Provider (ISP) or your Internet Protocol (IP) Address. We use this aggregate information to measure site activity as well as to generate ideas for enhancing our website to serve you. This information is not specific to any individual and is anonymized to prevent personal identification.

How We Use Your Personal Information

Internal Uses

We collect, store and process your personal information on servers located in the United States. We use the information we collect about you in order to provide our services, process your transactions, and provide customer service. We provide access to personal information about our customers only to those employees who require it to provide our services, process customer payments and provide customer service.

- **Cookies:** We may utilize website cookies to collect information for the purposes of Site functionality, analytics, advertising, IP addresses only where strictly necessary. A cookie is a small amount of data, which often includes an anonymous unique identifier, which is sent to your browser from a website's computer and stored on your computer's hard drive but cannot read data from your hard drive. Cookies can be used to provide you with relevant content and to make it easier for you to use a website upon a future visit. We may include cookies on our website and use them to recognize you when you return to our website. You may set your browser so that it does not accept cookies; however, certain features of our sites may not function properly or be available if your browser is configured to disable cookies.

- **Web Beacons:** Some pages on our site, as well as pages where our banner ads appear, and certain emails we send, may contain electronic images known as Web beacons, or single-pixel GIFs. These Web beacons collect certain types of non-personally identifiable information, such as a visitor's cookie number, time and date of a page view, and a description of the page where the Web beacon is placed. The Web beacons are used to compile and aggregate statistics that help us improve the effectiveness of our advertising and make our site easier to use. The information collected using these Web beacons does not identify individual users to our site.

AGIA Personal Information Processing

Because AGIA offers various insurance and non-insurance products and services, it should be noted that the information below may not be applicable in all circumstances, data elements are dependent on the individual customer relationship.

Personal Information Category

Description

Source Categories

Business Purpose for Collection

Third Parties With Whom we May Share Personal Information

Government-Issued Identifiers

- SSN
- State ID Card
- Passport
- Driver's License
- Directly from you (or a member who named you as beneficiary)
- Employer, Plan Sponsor, or their Administrator
- Third Parties Insurance Carriers and/or Agents and Brokers
- Quotes for products and services
- Policy Administration and/or Claims processing
- AGIA services to the client
- Marketing/Analytics
- Direct Marketing
- Communication with Individuals
- Insurance Underwriter
- Vendors
- Service Providers
- Employer

Contact Information

- Company or School Name
 - Title
 - Alias
 - Mailing Address
 - E-Mail Address
 - Telephone Numbers
-
- Directly from you (or a former member who named you as beneficiary)
 - Employer, Plan Sponsor, or their Administrator
 - Third Parties Insurance Carriers and/or Agents and Brokers
-
- Quotes for products and services
 - Policy Administration and/or Claims processing
 - AGIA services to the client
 - Marketing/Analytics
 - Direct Marketing
 - Communication with Individuals
-
- Vendors
 - Service Providers
 - Employer/Client

Individual Identifiers

- Age
 - Gender
 - Race
 - Sexual Orientation
 - Marital Status
 - Veteran Status
 - Beneficiaries/Dependents
 - Physical or Mental Disability
-
- Directly from you (or a former member who named you as beneficiary)
 - Employer, Plan Sponsor, or their Administrator
 - Third Parties Insurance Carriers and/or Agents and Brokers
-
- Quotes for products and services
 - Policy Administration and/or Claims processing
 - AGIA services to the client
 - Marketing/Analytics
 - Direct Marketing
 - Communication with Individuals

- Vendors
- Service Providers
- Employer/Client

Other Identifiers

- Client/Member
- Account
- Name/Number
- Policy Number
- Employee/member ID Number
- Directly from you
- Employer, Plan Sponsor, or their TPA
- Third Parties
- Insurance Carriers and/or Agents and Brokers
- Quotes for products and services
- Policy Administration and/or Claims processing
- AGIA services to the client
- Marketing/Analytics
- Direct Marketing
- Communication with Individuals
- Insurance Underwriter
- Vendors
- Service Providers
- Employer/Client

Financial Information

- Financial Account Numbers
- Credit Card Numbers (Payment Card Data)
- Consumer Reporting Data
- Insurance Account Numbers
- Directly from you
- Employer, Plan Sponsor, or their TPA
- Policy Administration
- Vendors
- Service Providers

Health Information

- Inferred Data (Health)
- Status of Disability
- Data collected by a Healthcare Provider or Health Insurance Company Subject to HIPAA or CMIA
- Payment Information for Healthcare Services
- Information About a Consumer's Diagnosis or Treatment for Health Conditions
- Patient records, clinical trial records
- Directly from you
- Employer, Plan Sponsor, or their TPA
- Third Parties
- Insurance Carriers, Agents or Brokers
- Policy Administration and/or Claims processing
- AGIA services to the client
- Communication with Individuals
- Vendors
- Service Providers
- Employer

Policy Information

- Any Policy or Documentation or Subsequent Information Submitted to AGIA in Order to Obtain Quotes for a Product or Service
- Directly from you (or from a current or former plan member who named you as a beneficiary)
- Employer, Plan Sponsor, or their TPA
- Third Parties
- Insurance Carriers, Agents or Brokers
- Quotes for products and services
- Policy Administration and/or Claims processing
- AGIA services to the client
- Marketing/Analytics
- Direct Marketing
- Communication with Individuals
- Vendors
- Service Providers
- Employer/Client

Employment-Related Information

- Job/Role Titles
- Resume with Work History
- Directly from you
- Employer, Plan Sponsor, or their TPA
- Policy Administration and/or Claims processing
- Vendors
- Service Providers
- Employer

Commercial Information

- Service Records
- Personal Property
- Customer Service Records
- Communication Preferences
- Other Preferences
- Directly from you (or from a current or former plan member who named you as a beneficiary)
- Employer, Plan Sponsor, or their TPA
- Third Parties
- Insurance Carriers, Agents, or Brokers
- Quotes for products and services
- Policy Administration and/or Claims processing
- AGIA services to the client
- Marketing/Analytics
- Direct Marketing
- Communication with Individuals
- Vendors
- Service Providers
- Employer/Client
- Non-Client Business Partners

Audio, Video, or Other Media

- Customer Service Call Center Recordings
- Voicemails
- Directly From You

- Quotes for products and services
 - Policy Administration and/or Claims processing
 - AGIA services to the client
 - Marketing/Analytics
 - Direct Marketing
 - Communication with Individuals
-
- Vendors
 - Service Providers

Disclosure to Third Parties

This website does not sell or rent any of your personal information to affiliates or unaffiliated third parties. We will not share any of your personal information with third parties except in the circumstances described below or with your permission.

- We disclose personal information with third parties or affiliates that we in good faith believe are appropriate to enable them to provide services to you and to contact you regarding additional products and/or services that you have expressed an interest.
- Cooperation in investigations of suspected fraud or other illegal activity, situations involving potential threats to the physical safety of any person, or to conduct investigations of violations of the -site's Terms of Use or the Terms of Service Agreement, or as otherwise required by law. This may also include protecting and defending the rights, property, or safety of AGIA, other users of this Site or responding to claims that any content violates the rights of third parties.
- Certain federal, state and local laws or government regulations may require us to disclose non-public personal information about you. In these circumstances, we will use reasonable efforts to disclose only the information required by law, subpoena or court order to be disclosed.
- We disclose information to your agent or legal representative (such as the holder of a power of attorney that you grant, or a guardian appointed for you).
- As with any other business, it is possible that in the future we could merge with or be acquired by another company. If such an acquisition occurs, the successor company would have access to personal information maintained by us, including customer account information, but would continue to be bound by this Privacy Policy unless and until it is amended.
- As otherwise permitted by federal or state law.

Do Not Track

- Some internet browsers offer the user a "Do Not Track" technology. The Do Not Track (DNT) header is the HTTP header field DNT that requests that a web application disable either its tracking or cross-site user tracking of an individual user. At the current time, this Site does not have the capability of recognizing a "Do Not Track" request.

Email

- The website does not automatically recognize your e-mail address. You only receive e-mail from us if you check a box indicating an interest in a particular e-list or if you provide an e-mail address for a customer service inquiry and need an answer via e-mail. We collect the e-mail addresses of those who communicate with us via e-mail and online forms, including those who specifically check a box to subscribe on our online forms (for example, request for information on this website). Any user who signs up for e-mails can unsubscribe or manage his/her subscription by linking to the personal URL e-mailed to all subscribers. Every e-mail sent also includes information about how to stop receiving e-mails from us.

- We do not share the e-mail addresses we collect with similar benefits organizations.

Links to Other Sites

- For the convenience of our visitors and customers, this website may contain links to other sites. While we generally try to link only to sites that share similar high standards and respect for privacy, we are not responsible for the content, products or services offered or the privacy and security practices employed by these other sites.

- AGIA is not responsible for the content or privacy practices of linked websites or their use. Once you leave the Site using an external link, you should refer to those websites' privacy policies, terms of use, and practices in order to evaluate how they will handle any information they collect from you.

Questions About Your Information

If you have any questions, concerns, or complaints about this Privacy Policy in general or questions related to your personal information, please contact AGIA customer service at (800) 424-5181, via e-mail at compliance@agia.com, or, if you would prefer to communicate with us by regular mail, please use the following address:

AGIA Affinity
Office of Administration
P.O. Box 26450
Phoenix, AZ 85068

To protect your privacy, any personal information we obtain from you is protected using the best available technology. Your product information requests are encrypted when sent to our customer service center for fulfillment; we use a secure server to safeguard the information you provide to us when asking a customer service question and when you enroll online; and all online enrollment information fulfilled by our customer service center is protected by Secure Socket Layer (SSL) technology to ensure your data is encrypted and safe from view by unauthorized parties.

In order to ensure secure web pages in your browser using SSL, we've acquired a security certificate from one of the Internet's leaders in secure web technology verification. The Security Certificate SecureSite seal ensures that we are handling all of your transaction information securely and with the utmost care.

California Consumer Privacy Act and California Privacy Rights Act: Privacy Policy for California Residents

- This section of the Privacy Policy describes the rights of California residents under the California Consumer Privacy Act of 2018 (“CCPA”) and the California Privacy Rights Act of 2020 (“CPRA”). The CCPA and CPRA requires that we provide privacy information to California residents and we use this separate section to ensure compliance with the CCPA and CPRA requirements. This section applies solely to natural persons residing in California (“Consumers”), and does not apply to individuals living elsewhere, businesses or other corporate entities.

Sale of Personal Information

- Personal Information is information that identifies, relates to or could reasonably be linked with a particular California resident or household. We do not sell your personal information. The CCPA and CPRA requires disclosure of this fact.

Your Rights Under the California Consumer Privacy Act and California Privacy Rights Act

Right to Confirm or Access Information

- You may have the right to confirm whether we process certain information or what information we process, and to obtain a copy of that information in a format that allows you to transmit the information to another business without difficulty.
- Once we receive and confirm your identity and verifiable consumer request, we will disclose to you the following at your direction (with various exceptions):
 - a) The categories of personal information we collected about you in the last 12 months;
 - b) The categories of sources for the personal information we collected about you in the last 12 months;
 - c) Our business or commercial purpose for collecting or selling that personal information;
 - d) The categories of third parties with whom we share that personal information;
 - e) The specific pieces of personal information we collected about you;
 - f) If we sold or disclosed your personal information for a business purpose a list of the personal information types that each category of recipient purchased; and
 - g) If we disclosed your personal information to a third party for a business purpose, a list of the personal information types that each category of recipient received.

Right to Delete Personal Information

- You have the right to request that AGIA delete any of your personal information we collected from you and retained, with certain exceptions. You will need to submit a valid and verifiable request so AGIA can confirm your identity and/or authorization to make such a request. AGIA will determine if

retaining the information is permitted or required under the law. If no retention conditions apply, we will delete your personal information from our records and direct any Service Providers to do the same.

Right to Correct Personal Information

- Taking into consideration the nature of the personal information and the purposes of the processing of your personal information, you may have the right to correct inaccuracies in such information. Upon submission to AGIA of a valid and verifiable request where your identity and authorization can be confirmed, AGIA will use all reasonable efforts to correct the inaccurate information.

Right to Limit Processing of Sensitive Personal Information

- AGIA processes sensitive personal information only as necessary in performance of our services to ensure the security and integrity of your information or as otherwise specified under regulation. Because AGIA does not process your sensitive personal information for other purposes, there is not a mechanism for you to limit the processing of this information.

Right to Opt-Out of Profiling

- AGIA does not engage in automated processing of personal information to make decisions that yield legal or other material consequence. Because we do not engage in this processing, AGIA does not provide a mechanism for you to limit our processing of personal information in this manner.

Right to Opt-Out

- AGIA does not sell your personal information; therefore we do not provide a mechanism for you to limit our processing of personal information in such a manner.

Right to Non-Discrimination

- AGIA will not discriminate against you for exercising any of your rights under the CCPA or CPRA. Examples of discrimination could be charging you inflated rates by imposing penalties or granting discounts or other benefits, denying you goods or services or providing you a different level of quality of goods or services.
- Any acts of discrimination are prohibited by the CCPA and CPRA and AGIA will not engage in them.

Personal Information We Collect, Sources and How We Use It

- In our Privacy Policy, sections titled, “Personal Information We Collect”, “How We Use Your Personal Information”, and “AGIA Personal Information Processing” outline the personal information we collect, its sources and how we use it for all consumers we interact with, including California

residents. In effect, it is used to provide and manage products and services we provide and support our everyday operations, including risk management, legal and compliance requirements.

Exercising Your Rights as a California Consumer

- You, or a person authorized by you to act on your behalf, or an entity registered with the California Secretary of State and authorized by you to act on your behalf, can make a request regarding your personal information under the CCPA and CPRA. You may also make a request on behalf of your minor child.
- If you would like to exercise your right to request a copy of your personal information or your right to delete your personal information, please contact AGIA customer service by calling (800) 424-5181, by email at compliance@agia.com, or utilize regular mail by using the following address:

AGIA Affinity
Office of Administration
P.O. Box 26450
Phoenix, AZ 85068

Revisions and Notification of Changes

- We reserve the right to change or supplement this Privacy Policy at any time by posting the changes on this Site. Any changes AGIA makes to this Privacy Policy become effective immediately when the revised Policy is posted on this Site. By using this Site, you accept the terms and conditions of this Privacy Policy and you agree to review this Privacy Policy from time to time to stay informed of changes that may occur. This Privacy Policy also applies to personal information that we maintain on former customers. If we make any changes regarding disclosure of personal information to third parties, we will attempt to contact you prior to the date the modified policy is scheduled to take effect. We will post notice of the new Privacy Policy from the privacy links on our Site. Your use of the Site following such change constitutes your agreement to follow and be bound by the Privacy Policy as changed.

Children

AGIA does not knowingly collect, use or disclose information of children under the age of thirteen (13) without the consent of their parents or legal guardians. Further, if you are sixteen (16) years of age or older, you have the right to direct us to not sell your personal information at any time. However, AGIA will never knowingly sell or share personal information of children if between 13 to 16 years of age or the parent or guardian of a consumer less than 13 years of age. This Site is not intended for children and any instance where such information was collected would be unintentional.