

SPH, LLC Privacy Policy

Effective February 22, 2019

This privacy policy applies to your use of websites, interactive services, or email programs (“Services”) provided by HMA Group Holdings, LLC and our affiliated companies (collectively, “SPH, LLC”, “we”, or “us”). By using any of our Services, you are agreeing to being governed by this Privacy Policy and our Terms of Use, which will govern any dispute concerning these Services.

Information We Collect

When you use our Services, we may automatically collect information about your Internet service provider, your operating system, browser, type, domain name, Internet protocol (IP) address, your access times, the website that referred you to us, the pages and aspects of the Services you requested, the date and time of those requests. This information is only used to improve the Services, you will remain anonymous unless you provide identifying information (“Personal Information”).

Information Provided by You

When using our Services, you will not be required to provide any Personal Information. In general, you can visit our website and utilize our Services without telling us who you are or revealing any Personal Information. In some instances, you may be prompted to provide some information, such as an email address, name, address, or zip code in order to receive additional information regarding our Services. We will only use the Personal Information you have shared with us for the purposes as stated in this Privacy Policy.

How We Use the Information

If you provide Personal Information, we may use that information to contact you. Additionally, we may use Personal Information to improve our marketing and promotional efforts, to analyze site usage, and to improve our content, layout, and Services. Information collected automatically through Cookies may be combined with your previously submitted Personal Information.

Cookies and Automatic Collection

Cookies are pieces of information that a website transfers to the hard drive on your computer for record-keeping purposes. We use Cookies for our Services to remember important information that will make your use more convenient. Some of the information collected may be linked to a specific IP address, but we do not try to identify the person using that IP address. You may set your browser to accept or reject most Cookies or notify you when a Cookie is set. It is up to you to allow us to set

Cookies, but if Cookies is blocked you may not be able to view or access some of the features of our Services.

How We Share Your Data

We will not sell, exchange, or otherwise distribute your personal information without your consent, except to the extent required by law or as identified in this Privacy Policy. Your information may be shared with our affiliates, agents or service providers, in a business transfer, or in certain legal matters which require such disclosure.

Links to Other Websites

Our Services may have links to other websites that are not operated by us. If you visit one of these linked websites, you are then subject to the policies of the owner of the linked website and will no longer be protected by our Privacy Policy or Terms of Use. We are not responsible for the contents of those websites and have no control over what information they may or may not collect from you.

Data Security and Retention

We take reasonable steps to maintain physical, technical, and administrative security of any information you provide to use. However, transmission of information via the internet is not completely secure. While we will do our best to protect your information, we cannot guarantee the security of information you provide during the use of our Services. Any transmission of information, including Personal Information, is at your own risk.

We may retain your Personal Information in connection with your use of our Services or as may be required by law. We may also retain some data for internal analysis purposes.

California Privacy Rights

Pursuant to California Civil Code Section 1798.83, California residents have the right to request a list of third parties to whom we have disclosed certain types of Personal Information for their direct marketing purposes. This request can be made once a year and is free of charge. To receive this information, please send your request to the below address.

Use by Children

We will not knowingly allow anyone under the age of thirteen (13) to provide us any Personal Information online. SPH, LLC cares about protecting the privacy of children and believe children should always have the permission of their parents before transmitting any Personal Information over the internet. If you are under 13, please do not engage with our Services or provide any Personal Information.

Compensation Disclosure

SPH, LLC and its affiliates receive compensation from insurance carriers for services provided through the receipt of commissions and profit-sharing arrangements with insurance carriers. Profit-sharing payments from insurance carriers are based on the profitability and/or premium growth of all the business SPH, LLC or its affiliates has with an insurance carrier and is not determined solely by the profitability of your account.

International Users

This Privacy Policy is provided in accordance with and is subject to United States of America law. If you access this site from outside the United States of America, you agree that your use of the site is subject to this Privacy Policy and the Terms of Use.

Terms and Changes

In using our Services, you agree to the terms of this Privacy Policy. To view further terms governing the use of our Services, please visit our [Terms of Use](#) page.

As our Privacy Policy changes due to the evolution of digital technology, we will post changes here and indicate at the top the last date of update. Unless otherwise noted, all changes will be effective when posted.

SMS TERMS AND CONDITIONS

SimplePay Health offers the option for members to receive SMS communications to help them stay informed of important account or benefit-related information, as well as remind members about gaps in care. Message frequency varies. Message and data rates may apply. Replying STOP will stop all SMS

communications. Replying HELP will direct you to a web page with various resources. Carriers are not liable for delayed or undelivered messages Please be assured that we will not take retaliatory action against you if you file a complaint about our privacy practices either with us or HHS. No mobile information will be shared with or sold to third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with or sold to any third parties.