

WEBSITE PRIVACY STATEMENT

Last Modified: 12/12/2024

Your privacy is important to us. SPH, LLC (“SimplePay Health”, “we”, “our”, “us” or “it”) maintains high standards for the protection of your privacy. This Privacy Statement is a binding agreement between SimplePay Health and you (“you” or “your”), as a visitor to our website and/or a user of our services and/or mobile application(s) available via the Apple App Store or Google Play.

This Privacy Statement explains (i) how we collect, use, and share information, including Personal Information (as defined next), that you provide to us; and (ii) how you can exercise applicable privacy rights. “Personal Information” refers to information that reasonably identifies, relates to, describes, or can be associated with your identity. “Personal Information” does not include information that has been de-identified in accordance with applicable law. Please read this Privacy Statement before using any SimplePay Health services, including any SimplePay Health website or mobile application (each, a “Site”), or submitting information, including Personal Information, to us. By accessing, visiting, browsing, using, submitting information through, or otherwise interacting with any Site, you agree to be bound by and to abide by the terms of this Privacy Statement. Whenever you submit information (including Personal Information) to us via any Site, you consent to the collection, use, and disclosure of that information in accordance with this Privacy Statement.

From time to time, we may, in our sole discretion, modify this Privacy Statement, as indicated by the “Last Modified” date at the top of the Privacy Statement. It is important that you check the Privacy Statement every time you use a Site. Your use of a Site after the Privacy Statement has been updated indicates your acceptance of such updated version.

SimplePay Health Sites are not intended for use outside of the United States of America.

Information Collection

The information we collect

Automatic Data Collection

Our Web servers automatically capture your domain name, the IP address of the Web page from which you enter our Site, the pages you visit on our Site and the amount of time you spend here. We do not collect any information that can reveal your personal identity unless you voluntarily provide it when you register to use interactive features of the Site or receive information from us.

When you visit our Site, we may place a cookie on your computer that will allow us to customize and enhance your experience on our Site, to make improvements, or to report Site activity. Our cookies will never be used to track your activity on any third-party websites or to send spam, nor will cookies provide us with any personally identifiable information about you, unless you voluntarily provide that information to use interactive features of our Site.

Our Site may also contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users to a particular page and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

Other Information

Some of our Sites may require you to register for an account. We ask you for Personal Information to create an account.

Any portion of a Site that is directed to children or teens will be protected by a screening mechanism to help ensure that parental consent is obtained before we collect or use Personal Information from children under

13. We do not knowingly collect or use Personal Information from children under 13 without the consent of a parent or guardian.

Our Use and Disclosure of Collected Personal Information

Use of Personal Information

Any Personal Information you give us will be used to provide the product, service or information you have requested or for which you registered. In addition, we may need to use or disclose your Personal Information for any of the following administrative items:

- To protect your safety or the safety of others, including the promotion of integrity and security on our Site(s).
- To prevent and detect harmful activity, including investigating privacy and/or security incidents, spam, fraud and abuse.
- To resolve any disputes and enforce our agreements with you, our customers or any third-party.
- To diagnose and troubleshoot problems or detect and protect against error.
- To enforce this Privacy Statement or the Terms of Use, and any other terms to which you may have agreed.

The non-personally identifiable information we gather may be used to improve our Site. Personal Information you voluntarily provide and the non-personally identifiable information we collect will not affect your coverage, eligibility, premiums or claims payment by SimplePay Health, except if such Personal Information is specifically provided as part of an application for coverage or other coverage-related inquiry.

We may use your Personal Information to create de-identified information.

Disclosure of Personal Information

In order to provide our services, we may share your information, including Personal Information, with our business partners who share our obligation to protect your Personal Information. We will not sell, rent or license your Personal Information to third-parties for marketing purposes without permission.

HIPAA Notice

SPH, LLC is an independent company that provides benefit design and other services. SimplePay Health provides services on behalf of health plans, which are “Covered Entities” under the Federal health information privacy law commonly known as “HIPAA.” Under HIPAA, SimplePay Health is a “Business Associate” of its health plan customers. As a Business Associate, we may collect “Protected Health Information” or “PHI” about you from and on behalf of our health plan customers in order to provide services to you. PHI includes all individually identifiable health information that we access, use or maintain when providing the services on behalf of a health plan. “Individually identifiable health information” is any information that can be used to identify an individual and that was created, used, or disclosed in the course of providing a health care service such as diagnosis or treatment, or in relation to payment for health care services.

Our use and disclosure of your PHI is protected by the terms of a formal agreement between us and the health plan and is also subject to the terms of the Notice of Privacy Practices given to you by your health plan. Please refer to your health plan’s Notice of Privacy Practices for additional information about uses and disclosures of PHI and your rights regarding your PHI.

Sites we link to

If you choose to use any of the links we provide to our affiliates and other third-party resources, you will be leaving our Site and going to a new website. Protection of your privacy at those other sites will be governed by

the privacy policies at those sites. We've taken special care selecting the companies that appear on our Site to try to ensure that they respect your privacy as we do, but please take the time to read the privacy policies at their sites.

Information Security

The security of your information is important to us, and we implement the appropriate technical, physical, and administrative security measures to secure all information collected and stored by SimplePay Health. While we actively follow industry accepted standards to protect your information, both during transmission and once we receive it, no security system is perfect, and methods of transmission over the Internet and electronic storage are never 100% secure. Therefore, we cannot guarantee absolute security; however, we rely on our implemented security measures and you to protect privacy and security. To do your part, we ask that you never share your username or password, and always ensure the security of personal devices (e.g., always log out of a Site as soon as you are finished using the Site, or ensure your phone uses a protected password to limit unauthorized access).

Your Rights

State consumer privacy laws may provide their residents with additional rights regarding our use of their Personal Information. For example, California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Minnesota, Montana, Oregon, Tennessee, Texas, Utah, and Virginia may provide (now or in the future) their state residents with rights to:

- Confirm whether we process their Personal Information.
- Access and delete certain Personal Information.
- Correct inaccuracies in their Personal Information, taking into account the information's nature and processing purpose.
- Data portability.
- Opt-out of personal data processing for:
 - targeted advertising;
 - sales; or
 - profiling in furtherance of decisions that produce legal or similarly significant effects.
- Either limit (opt-out of) or require consent to process sensitive personal data.

The exact scope of these rights and whether they apply to us (as a Business Associate under HIPAA) or to the information we collect about you (e.g., PHI) is different in each state. To ask about, or request to exercise, any of these rights, please contact us at:

Privacy Officer
Blue Cross and Blue Shield of Minnesota
3400 Yankee Drive P32
Eagan, MN 55121

How to Contact Us

If for some reason you believe that we have not adhered to the Privacy Policy, please notify us using the contact information below. We will do our best to respond to your concerns and, when appropriate, take steps to correct a problem. This Privacy Statement is a legal agreement between you and SimplePay Health. If you have questions or concerns regarding the terms of this Privacy Statement, please contact us by telephone at 800-936-0865 or write us at PO Box 64560, St. Paul, MN 55164-0560.