SCAN Health Plan Web & Mobile Privacy Policy

Effective Date: April 2, 2025

Scope of this Policy

This privacy policy applies to:

- SCAN Health Plan and our affiliates ("SCAN," "we," "us," "our"), including SCAN Desert Health Plan, Inc. ("SDHP"), SCAN Health Plan New Mexico ("SHPNM"), SCAN Health Plan Nevada, Inc. ("SHPNV"), and SCAN Health Plan Texas, Inc. ("SHPTX").
- SCAN's online properties (including our websites and websites or mobile applications that link to it), our social media pages or handles, our products and services (the "Services").

This Policy applies when you interact with us through our Services. It also applies anywhere it is linked. It does not apply to third-party websites, mobile applications, or services that may link to the Services or be linked to or from the Services. Please review the privacy policies on those websites and applications directly to understand their privacy practices.

We may change this Policy from time to time. If we do, we will notify you by posting the updated version.

Sharing of Medical or Health Information

<u>SCAN's Notice of Privacy Practices</u> (NPP) applies to collected information that qualifies as Protected Health Information (PHI). Member information is typically considered PHI, including, for example, data collected when you enroll in a SCAN health plan or access Services related to your health plan. Our NPP outlines how we may use and disclose your PHI in accordance with applicable regulations.

Information We Collect

We collect information from you directly, from the devices you use to interact with us, and from third parties. We may combine information from the Services together and with other information we obtain from our business records. We may use and share information that we aggregate (compile to create statistics that cannot identify a particular individual) or de-identify (strip information of all unique identifiers such that it cannot be linked to a particular individual) at our discretion.

Information you give us

You may provide the following information to us directly:

- Contact and professional information, including name, email address, telephone number, and job title, as well as company name and size.
- Demographic information.
- Audiovisual information, including recordings of online events.
- Payment information, including credit card information.
- Content you may include in survey or online form responses.
- Signing up for an email newsletter through the Services;
- Registering/signing up for classes, seminars, meetings or other events
- Creating an online account on any of the Services.
- Placing an order or transacting business with SCAN or its service providers.

- Information contained in your communications to us, including call recordings of customer service calls.
- If you create an online account with SCAN and designate an adult caregiver as an authorized user of your online account or if you have a legal guardian (each, a "Caregiver"), we also may collect information provided to us regarding the Caregiver, such as the Caregiver's first and last name, and email address.
- Information you make available to us via a social media platform.
- Your use of our Services.
- Information you submit to inquire about or apply for a job with us.
- Any other information you submit to us.

Information we collect automatically

We and partners working on our behalf may use log files, cookies, or other digital tracking technologies to collect the following information from the device you use to interact with our Services. We also create records when you make purchases or otherwise interact with the Services.

- Device information, including IP address, device identifiers, and details about your web browser.
- Analytical information, including details about your interaction with our Services, website, app, and electronic newsletters.
- Diagnostic information, including web traffic logs.
- Advertising information, including special advertising and other unique identifiers that enable us or third
 parties working on our behalf to target advertisements to you. Please be aware that our advertising
 partners may collect information about you when you visit third-party websites or use third-party apps.
 They may use that information to better target advertisements to you on our behalf.
- Business record information, including records of your purchases of products and services and use of our Services.

The following is a list of our partners who collect the information described above. Please follow the links to find out more information about the partner's privacy practices.

Partner	Information Type Collected
<u>Calltrackingmetrics</u>	Device information, Analytical information, Diagnostic information, Advertising information
Google Analytics	Device information, Analytical information, Diagnostic information, Advertising information

Information we collect from other sources

We may collect the following information about you from third-party sources.

- Contact information, demographic information, and information about your interests and purchases, from consumer data providers.
- Information about your credit history from credit reporting agencies.
- Information about your interests, activities, and employment history from social networks and other places where you choose to share information publicly.
- Information about your interaction with advertisements on our Services, or ads that we place on third party websites, from online advertising companies.

How We Use Your Information

We may use any of the information we collect for the following purposes.

- **Service functionality**: To provide you with our products and services, including to take steps to enter a contract for sale or for services, bill or invoice for services, process payments, fulfill orders, send service communications (including renewal reminders), and conduct general business operations, such as accounting, recordkeeping, and audits.
- **Service improvement**: To improve and grow our Services, including to develop new products and services and understand how our Services are being used, our customer base and purchasing trends, and the effectiveness of our marketing.
- **Personalization**: To offer you recommendations and tailor the Services to your preferences.
- **Advertising and marketing**: To send you marketing communications, personalize the advertisements you see on our Services and third-party online properties, and measure the effectiveness of our advertising. We may share your information with business partners, online advertising partners, and social media platforms for this purpose.
- **Security**: To protect and secure our Services, assets, network, and business operations, and to detect, investigate, and prevent theft, unauthorized use, or abuse of the Services and other activities that may violate our policies or be fraudulent or illegal.
- **Legal compliance**: To comply with legal process, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests and to comply with applicable legal and regulatory requirements.

How We Share Your Information

We may share any of the information we collect with the following recipients.

- Affiliates: We may share information with other entities within the SCAN Group.
- **Service providers**: We engage vendors to perform specific business functions on our behalf, and they may receive information about you from us or collect it directly. These vendors are obligated by contract to use information that we share only for the purpose of providing these business functions, which include:
 - Supporting Service functionality, such as vendors that support event registration, customer service and customer relationship management, subscription fulfillment, freight services, application development, list cleansing, postal mailings, and communications (email, fax).
 - Auditing and accounting firms, such as firms that help us create our financial records.
 - Professional services consultants, such as firms that perform analytics, assist with improving our business, provide legal services, or supply project-based resources and assistance.
 - Analytics and marketing services, including entities that analyze traffic on our online properties and assist with identifying and communicating with potential customers.
 - Security vendors, such as entities that assist with security incident verification and response, service notifications, and fraud prevention.
 - o *Information technology vendors*, such as entities that assist with website design, hosting and maintenance, data and software storage, and network operation.
 - o Marketing vendors, such as entities that support distribution of marketing emails.
- **Business partners**: From time to time, we may share your contact information with other organizations for marketing purposes.
- Online advertising partners: We partner with companies that assist us in advertising our Services, including partners that use cookies and online tracking technologies to collect information to personalize, retarget, and measure the effectiveness of advertising.
- **Social media platforms**: If you interact with us on social media platforms, the platform may be able to collect information about you and your interaction with us. If you interact with social media objects on our Services (for example, by clicking on a Facebook "like" button), both the platform and your connections on

- the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform.
- Government entities/Law enforcement: We may share information when we believe in good faith that
 we are lawfully authorized or required to do so to respond to lawful subpoenas, warrants, court orders, or
 other regulatory or law enforcement requests, or where necessary to protect our property or rights or the
 health and safety of our employees, contractors, customers, or other individuals.

Security

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

Your Options and Rights Regarding Your Information

Your Account: Please visit the <u>Member portal</u> to update your account information. The <u>NPP</u> applies to information in the Member portal.

Permission for SCAN's Communications With You: You give SCAN permission to transmit email, texts, push notifications or postal mail to you or to telephone you. Unsubscribe instructions are included in each promotional email or text.

- If you receive an email from SCAN and want to unsubscribe, please let us know by following the applicable instructions that are included in the email you received. Please note that unsubscribe requests for promotional e-mails may take up to ten (10) business days to become effective.
- If you provide a phone number to SCAN, you agree that you are the authorized user of that number and that you may receive text messages and telephone calls from SCAN and its associates, including but not limited to artificial or pre-recorded messages, or via an automatic telephone dialing system, even if your phone number is on a Do Not Call Registry. Calls to SCAN may be recorded and monitored. You are not required to receive text messages or calls from SCAN as a condition (directly or indirectly) of membership with the health plan or to use the SCAN websites. Text messages sent by SCAN may be recurring and ongoing unless you select to opt out; message and data rates may apply (check with your carrier). You may withdraw consent for SCAN to send you text messages or unsubscribe at any time by texting STOP in response to a SCAN text message or calling SCAN at 1 (800) 599-3500. For Customer Service, you may text HELP in response to a SCAN text message or call SCAN at 1 (800) 599-3500.

You may not decline to receive or unsubscribe from communications regarding your transactions, dealings with SCAN or the Websites, or technical information about the Websites.

Ad Choices: You have options to limit the information that we and our partners collect for online advertising purposes.

- You may disable cookies in your browser or mobile device using their settings menus. Your mobile device
 may give you the option to disable advertising functionality. Because we use cookies to support Service
 functionality, disabling cookies may also disable some elements of our online properties.
- The following industry organizations offer opt-out choices for companies that participate in them: the
 <u>Network Advertising Initiative</u>, the <u>Digital Advertising Alliance</u>, and the <u>European Interactive Digital</u>
 <u>Advertising Initiative</u>.
- You may contact us directly.

If you exercise these options, please be aware that you may still see advertising, but it will not be personalized. Nor will exercising these options prevent other companies from displaying personalized ads to you.

If you delete your cookies, you may also delete your opt-out preferences.

Do Not Track: Your browser or device may include "Do Not Track" functionality. Our information collection and disclosure practices and the choices that we provide to you will continue to operate as described in this privacy policy regardless of whether a Do Not Track signal is received.

Special Information for Job Applicants

When you apply for a job with us, we may collect information from you, including:

- Information you provide in connection with your application.
- Information that you make available in your social media accounts.
- Information about you that is available publicly.
- Information that you authorize us to collect via third parties, including former employers or references.

In certain circumstances, you may submit your application for employment through a third-party service that displays our job posting. We do not control the privacy practices of these third-party services. Please review their privacy policies carefully prior to submitting your application materials.

Other Important Information

Data retention

We may store information about you for as long as we have a legitimate business need for it.

Cross-border data transfer

We may collect, process, and store your information in the United States and other countries. The laws in the United States regarding information may be different from the laws of your country. Any such transfers will comply with safeguards as required by relevant law.

Information about children

The Services are intended for users who are thirteen years old and older. We do not knowingly collect information from children. If we discover that we have inadvertently collected information from anyone younger than the age of 13, we will delete that information. Please contact us with any concerns.

Privacy Disclosures for Specific Jurisdictions

Nevada

Residents of the State of Nevada have the right to opt out of the sale of certain pieces of their information to third parties. If you are a Nevada resident and would like more information about our data sharing practices, please contact us.

Contact information, submitting requests, and our response procedures

Contact

Please contact us if you have questions or wish to take any action with respect to information to which this privacy policy applies.

Email: webmaster@scanhealthplan.com

Telephone: 1 (800) 599-3500 **Mail**: SCAN Health Plan

Attn: Member Services

3800 Kilroy Airport Way, Suite 100

Long Beach, CA 90806

Making a request to exercise your rights

Submitting requests: You may request to exercise your rights by making a request using the contact information above.

We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

Verification: We must verify your identity before responding to your request. We verify your identity by asking you to provide personal identifiers that we can match against information we may have collected from you previously. We may need to follow up with you to request more information to verify identity.

We will not use personal information we collect in connection with verifying or responding to your request for any purpose other than responding to your request.