

MilliCare Privacy Notice

Last Updated: July 23, 2024

Our Privacy Notice Has Recently Changed.

Your privacy is important to MilliCare (“**our**,” “**us**,” or “**we**”) [and our subsidiaries and affiliates, together MilliCare. This Privacy Notice (the “**Notice**”) explains the types of information we may collect from you or that you may provide when you visit the website www.millicare.com (our “**Website**”) and our practices for collecting, using, maintaining, protecting, and disclosing that information. This Notice does not apply to information collected through any other means, including on any other website operated by a third party.

Please read this Notice carefully. If any term in this Notice is unacceptable to you, please do not use our Website or provide us with any personal information.

In this Notice, when we talk about “**Personal Information**,” we mean any information that is related to an identified or identifiable natural person.

This Notice does not apply to any products, services, websites, mobile applications, or content (including advertising) offered by third parties or that may be linked to or from the Website. Data collected by these third parties is covered by their own privacy notices.

1. Your Information We Collect¹

Depending on your relationship with us, we may collect the following categories of Personal Information from you:

- **Personal details:** Name, email address, telephone number, company name, job title, and other professional and employment information;
- **Device and other automatic information:** IP address, browsing history, search history, and information regarding your interactions with a website, application, or advertisement. For more information, see “Information We Collect Automatically About You” below;
- **Views and opinions:** Feedback, survey responses, and other information included within your interactions with us or otherwise provided via the Website; and
- **Employee and Job Applicant Information:** If you are an employee or have applied for a job or other position with us, we may also collect employment information such as your name, resume/CV, educational background, language and other skills, work experiences, and job references. [The collection, use, and disclosure of your Personal Information is governed by our Employee and Job Applicant Privacy Notices.]

- **Communications:** We may record our communications including chat messages, phone, or video calls, such as when you utilize our chat-bot or provide us with feedback.

2. How We Collect Your Information

Information We Collect Directly From You

We may collect Personal Information that you provide to us when you use our Website or interact with us. For example, we may collect information when you browse through the Website, register or create an account, make an information request, or when you otherwise interact with us and provide your information via our Website.

Information We Automatically Collect About You

As with many websites, when you interact with our Website, we may use automatic data collection technologies to collect and log certain information about your equipment, browsing actions, and patterns, including details of your visits to our Website (e.g., traffic data, logs, other communication data, and resources that you access and use on our Website), information about your computer, mobile device, and internet connection (including your IP address, operating system, and browser type), and location data, which we collect to ensure you reside in a jurisdiction in which you are eligible for using our Website, to comply with relevant laws, and for fraud prevention purposes.

Cookies

The technologies we use for automatic data collection include cookies (i.e., browser cookies), flash cookies, and web beacons. We may store cookies (e.g., locally stored objects) on your device when you use our Website. These technologies help us speed up your future activities and improve your experience by remembering the information that you have already provided to us. Third parties operating on our behalf may also use these technologies to provide us with anonymous data and information regarding the use of our Website. You may block or delete these technologies from your device. However, by disabling such technologies, you may not have access to the entire set of features of our Website. For more information about cookies, including links to web browser instructions for disabling and managing such technologies, visit <https://optout.networkadvertising.org/>.

[We use Google Analytics to collect information on your use of our Website. Google Analytics collects information such as how often users visit our Website, what pages they visit, and other websites visited prior to or after coming to this Website. The data collected through these tools is not tied to other Personal Information that we collect about you. To know more about data collected by Google Analytics, visit <https://www.google.com/policies/privacy/>.

You may prevent the use of Google Analytics by disabling cookies as described above. You may also prevent Google Analytics from recording the data generated by the cookie and pertaining to your use of our Website (including your IP address), or processing this data, by downloading and

installing the following browser plug-in available through Google at the following link: [https://tools.google.com/dlpage/gaoptout.](https://tools.google.com/dlpage/gaoptout)]

Information We Collect From Other Sources.

We may collect Personal Information about you from our affiliates and our partners and their service providers and contractors. For example, this may include your current job position, business address, company name, and position title provided by your employer. We also may obtain information you have made publicly available, including from websites and online services you use, consumer research platforms, and/or business contact databases.

3. How We Use Your Information

We may collect Personal Information for the following purposes:

- Provide our Website and its contents to you;
- Provide or improve the services requested by you, including in the context of your business relationship with us, and perform our contractual obligations;
- Fulfill or meet the reason you provided the information (e.g., to respond to your email or request for information);
- Communicate with you about our Website or to provide you with information or marketing materials, including promotional offers, that may be of interest to you;
- Send you transactional or relationship messages, such as receipts, account notifications, customer service responses, and other administrative messages;
- Monitor and analyze trends, usage, and activities in connection with the Website;
- Comply with the law, protect or defend our interests or the interests of our customers or users of our Website if permitted by law or required to do so by law, court order, or government regulations or where we believe such action is necessary;
- Help maintain the safety, security, and integrity of our Website, products and services, databases, other technology assets, and business;
- System administration and to monitor the use of our Website;
- Any other purpose disclosed by us when you provide the information or with your consent; and
- Disclose to third parties for the performance of services provided to us, including third-party providers of services related to the operation and management of our Website, or in connection with the administration and support of the activities noted above.

4. With Whom Do We Disclose Your Information

We may disclose information about you as follows and as otherwise described in this Notice or at the time of collection:

- With companies and vendors that perform services for us, including email service providers, payment processors, fraud prevention vendors, analytics providers, advertising partners, and other service providers;
- To accountants, auditors, lawyers, and other outside professional advisors to the Company, subject to appropriate contractual obligations of confidentiality;
- Where required by law, court order, or subpoena if we believe disclosure is in accordance with, or required by, applicable law or legal process or where necessary to prevent, detect, or prosecute criminal offenses or to protect the rights, property, and safety of the Company or others;
- In connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company;
- Between and among the Company and our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership; and
- With your consent or at your direction.

We may also process and disclose information to third parties if the information has been de-identified or aggregated in a way so it cannot be used to identify you.

5. How We Protect Your Information

We use reasonable security measures to protect your Personal Information. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the information you supply will not be intercepted while being transmitted to and from us over the Internet.

6. Children

The Website is not directed towards children. We do not knowingly collect Personal Information from children under the age of 13 (or 16 where applicable by law) through the Website. If you are under 13, please do not give us any Personal Information. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Notice by instructing their children to never provide Personal Information through the Website without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Information to us, please contact us using the methods described in Section 9 "How to Contact Us," and we will endeavor to delete that information from our databases.

7. Links

The Website may contain content, services, advertising, and other materials that link to external websites. We do not endorse and are not responsible for the content of any such external website. Please refer to the terms of use and privacy notices of the external website for more information.

8. Changes to This Notice

This Notice is effective as of the date stated at the top of this Notice. We may change this Notice from time to time. Your access of the Website after such change will be deemed acceptance of the new Notice.

9. How to Contact Us

If you have any questions or concerns about our privacy practices or about exercising your rights, you may send an email to marketing@millicare.com. You may also write to us at: 6700 Forum Dr, Suite 150, Orlando, FL 32821

10. Other Choices

Promotional Emails. You may opt out of receiving promotional emails from us by following the instructions in those emails or by logging into your account and managing your contact preferences. If you opt out, we may still send you non-promotional emails, such as those about your account or our ongoing business relations.

Marketing Phone Calls/Text Messages. With your consent, we may engage in marketing and other automated communications, which may include phone calls and text messages made using an automatic telephone dialing system or artificial prerecorded voice. You are not required to consent to such communications as a condition of purchasing products or services, and you may revoke consent at any time by contacting us via the methods in Section 9 “How to Contact Us.”

Push Notifications to Mobile Devices. With your consent, we may send promotional and other push notifications to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

11. Additional Information for Residents Of California

The California Consumer Privacy Act, as amended by the California Privacy Rights Act (Civil Code Section 1798.100, et seq.) (“**California Law**”), provides eligible California residents with specific rights with respect to our collection, retention, disclosing, selling, sharing, and use of Personal Information. This section on Additional Information for Residents of California supplements this Notice and applies solely to eligible residents of the State of California. Any terms used but not defined in this section have the same meaning as defined in California Law.

Collection of Personal Information

In the preceding twelve (12) months, we have collected categories of Personal Information as discussed in Section 1 “Your Information We Collect” from the sources of Personal Information as discussed in Section 2 “How We Collect Your Information.” The business or commercial purpose for collecting that information is disclosed in Section 3 “How We Use Your Information.”

Disclosure of Personal Information

In the preceding twelve (12) months, we may have disclosed your Personal Information for a business or commercial purpose described in Section 3 “How We Use Your Information” to the categories of third parties described in Section 4 “With Whom Do We Disclose Your Information.”

Sales and Shares of Personal Information

We do not sell your Personal Information for monetary profit. However, we engage in certain information disclosure activities that may be considered “sales” or “sharing” under California Law. In the last twelve (12) months, we have sold or shared the following Personal Information:

Category	Business or Commercial Purpose	Categories of Third Parties to Whom Personal Information was Disclosed That May be Considered a “Sale/Sharing” Under California Law
Identifiers.	<ul style="list-style-type: none"> • To provide you with personal advertising and content 	<ul style="list-style-type: none"> • Advertisers and advertising networks
Internet or other similar network activity.	<ul style="list-style-type: none"> • To provide you with personal advertising and content 	<ul style="list-style-type: none"> • Advertisers and advertising networks

We do not knowingly sell or share the Personal Information of consumers under 16 years of age.

California Privacy Rights

California Law provides consumers with specific rights regarding their Personal Information. The following section describes your California Law rights and explains how to exercise those rights. Your California Law rights include the:

- **Right to Know or Access:** Request that we disclose to you your Personal Information that we collected, used, disclosed, shared, and sold.
- **Right to Delete:** Request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and

confirm your verifiable consumer request (see “Identity Verification”), we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

- **Right to Correct Inaccurate Personal Information:** Request that we correct any of your Personal Information that we maintain about you that is inaccurate.
- **[Right to Opt Out of Sales or Sharing of Personal Information:** We do not sell your Personal Information for monetary profit. However, we may engage in certain information disclosure activities that may be considered “sales” or “sharing” under California Law. If we sell your Personal Information to or share such information with third parties, you may have the right to opt-out of the sale or sharing of such information. To exercise the right to opt out, you (or your authorized representative) may submit a request to us by visiting the **Do Not Sell or Share My Personal Information** link on the homepage.

If you have an opt out preference signal enabled (e.g., the Global Privacy Control), you will automatically be opted out of the sale or sharing of your information, but we may ask you to confirm your preference if you have previously consented to the sale or sharing of your Personal Information. To download and use a browser supporting the opt-out preference signal, please visit <https://globalprivacycontrol.org/orgs>. If you choose to you the opt-out preference signal, you will need to enable it for each supported browser or browser extension you use.]

- **[Right to Limit the Use and Disclosure of Sensitive Personal Information:** Limit how we use and disclose your Sensitive Personal Information. To exercise the right to limit, you (or your authorized representative) may submit a request to us by visiting the **Limit the Use and Disclosure of My Sensitive Personal Information** link on the homepage.

If a transaction requires the use or disclosure of your Sensitive Personal Information in order to complete the transaction, we will notify you and provide instructions on how you can reauthorize such use or disclosure.]

- **Right to Non-Discrimination:** We will not discriminate against you for choosing to exercise any of your rights. If you exercise certain rights, understand that you may be unable to use or access certain features of the Website.

Exercising Your Rights

To exercise your California privacy rights, please submit a request by contacting us via the methods in Section 9 “How to Contact Us.”

Identify Verification

We may require you to prove your identity to exercise certain rights. Depending on your request, we will ask for information such as your name, your telephone number, email address, and/or

date of last communication with us. We may also ask you to provide a signed declaration confirming your identity. We will only use Personal Information provided in your consumer request to verify your identity or authority to make the request.

Only you, your parent, guardian (if you are under 13 years or age), conservator, a person to whom you have given power of attorney, or an authorized agent may make a verifiable consumer request related to your Personal Information. You may, however, make a verifiable consumer request on behalf of your minor child if necessary. Your verifiable consumer request must provide sufficient information that allows us to reasonably verify that you are the person about whom we collected Personal Information or an authorized representative. We cannot respond to your request if we cannot verify your identity or authority to make the request. You may only make a verifiable consumer request for your right to access twice within a 12-month period.

Data Retention

We retain your Personal Information so long as necessary for the purposes for which it was collected or otherwise processed. When determining the retention period, we take into account criteria, such as the type of services requested by or provided to you, the nature and length of our relationship with you, use of our Website, and the impact on the Website functionality if we delete your Personal Information.

Your Rights Under “Shine the Light”

In addition to your rights under California Law, California Civil Code Section 1798.83 permits California residents to request information regarding our disclosure, if any, of their Personal Information to third parties for their direct marketing purposes. If this applies, you may obtain the categories of Personal Information disclosed and the names and addresses of all third parties that received Personal Information for their direct marketing purposes during the immediately prior calendar year (*e.g.*, requests made in 2024 will receive information about 2023 sharing activities). To make such a request, please provide sufficient information for us to determine if this applies to you, attest to the fact that you are a California resident and provide a current California address for our response. You may make this request in writing by contacting us via the methods in Section 9 “How to Contact Us.”

12. Additional Information for Residents of Other States

For eligible residents of Colorado, Connecticut, [Montana, Oregon, Texas,] Utah and Virginia, you also have rights with respect to the Personal Information, also known as personal data, that we collect about you. This section supplements this Notice and applies solely to eligible residents of Colorado, Connecticut, [Montana, Oregon, Texas,] Utah and Virginia. Any terms not defined in this section have the same meaning as defined under applicable Colorado, Connecticut, [Montana, Oregon, Texas,] Utah and Virginia privacy law, including the Colorado Privacy Act, Connecticut Data Privacy Act, [Montana Consumer Data Privacy Act, Oregon Consumer Privacy Act, Texas Data Privacy and Security Act,] Utah Consumer Privacy Act, and Virginia Consumer Data Protection Act. Subject to certain exceptions, if you are an eligible

resident of one of these states, you have certain privacy rights which may include, depending on your state of residency:

- **Right to Know/Access.** You have the right to confirm whether we process your Personal Information and access such Personal Information. You also have the right to obtain your Personal Information in a portable, and to the extent reasonably feasible, readily usable format that you can transmit without hindrance. [In addition, eligible Oregon residents have the right to confirm the categories of Personal Information we process or have processed, as well as a list of specific third parties to which we have disclosed any Personal Information.]
- **Right to Delete.** You have the right to request that we delete the Personal Information you have provided to us or that we have otherwise obtained about you.
- **Right to Correct.** You have the right to request that we correct inaccuracies in your Personal Information, taking into account the nature of the Personal Information and the purposes of the processing of your Personal Information.
- **Right to Opt Out.** You have the right to opt out of the processing of your Personal Information for the purposes of (i) targeted advertising, (ii) the sale of your Personal Information and (iii) profiling in furtherance of decisions that produce legal or similarly significant effects. [Please note that we do not engage in such profiling as defined under applicable law.]

[NOTICE TO TEXAS CONSUMERS: We may sell your sensitive personal data.]

- **Right to Appeal.** You have the right to appeal our decision with regard to your request to exercise any rights described herein.

You do not need to create an account with us to exercise your Colorado, Connecticut, [Montana, Oregon, Texas,] Utah and Virginia privacy law rights. To exercise the rights described in this section, including your opt-out rights, please submit a consumer request to us by contacting us via the methods in Section 9 “How to Contact Us.”