

Privacy Policy

This Privacy Policy is hereby incorporated by reference into the Towers Watson's OneExchange Terms of Service (<https://medicare.oneexchange.com/about/licensing-legal>), and applies to information collected by Towers Watson and its affiliates and subsidiaries including but not limited to Extend Health Inc. (collectively, "the Company") in connection with your use of the Company's websites (the "Sites") and our services, which include providing you with information about insurance options, assisting with the selection of and enrollment in an insurance plan, providing you with an opportunity to interact with other users, and other products and services that may be available to you (the "Services"). In this Privacy Policy, the words "you," "your," and "customer" are used to mean you, an individual user from whom the Company has collected personal information through the Sites, including for purposes of assisting in administration of an employer's plan or enrolling in an individual health plan by a Towers Watson's OneExchange benefit advisor. Other capitalized terms used but not defined in this Privacy Policy are defined in the Terms of Service. As a provider of services and products that involve compiling personal information, the Company takes your privacy very seriously. We may not collect all of the types of information described below, however, this policy explains how we handle and protect your personal information and protected health information. When you enroll in a particular health plan, it will have its own privacy policies that describe how your information will be treated. To obtain a copy of your health plan's HIPAA-mandated Notice of Privacy Practices, please contact the member services number on your health plan ID card.

Information we collect

The Company collects information that helps us to serve your needs, provide you with personalized customer service and fulfill our legal and regulatory obligations. Depending on the services that we provide to you and any services that you might request, we collect information such as

1. information provided by you or your current or former employer ("employer") or labor union, and if this information is not available from your employer or labor union, we may collect it from third party sources, including your contact information,
2. responses from you and others appointed by you regarding your health care providers and any medications you may take,
3. information about your relationship with us, such as products purchased through the Company and your transaction histories,
4. information necessary to provide customer service such as demographic information, gender, location and preferences when such information is linked to other information that identifies you,
5. information from health care providers such as hospitals, doctors, and laboratories, and
6. information about your health condition received from your health plan. Your personal information is also used to identify you and maintain the security and privacy of your benefits.

Registering with us; information you provide

We collect personal information from you when you register with us and when you voluntarily submit or post information about yourself using certain features of the Sites (such as comments to blogs or personal stories you submit). You may register with us through the Sites or through our customer service centers by providing or confirming certain personal or contact information (e.g., name, address, Social Security Number, e-mail address, phone number, gender, date of birth) to one of our benefit advisors. When you create an account on our Sites you are required to select your own username and password that you will need to use to access your account.

Applying for health insurance and other products

If you apply for health insurance or other products through our website, we may ask you to provide us with personal information and/or health information relating to you and any family member who will be included on your application. This information will be used by your chosen insurance company, agent or plan administrator to process your application. Additionally, we may ask you to provide us with credit card or bank account information, which will be used by your chosen insurance company or plan administrator to process your application and collect any fees associated with your application or insurance premiums upon approval of your application.

Surveys; user submissions

If you provide information or feedback to us through online surveys, various forms and features of the Services or other interactive forms, including posting comments to blogs, submitting retirement stories to us, or sending us comments, we use this information to operate and enhance the Sites and to better understand your health insurance needs and to provide quality products, services and other opportunities. We plan to use any information we obtain from you to help us continually improve our customers' experiences.

Technical information and cookies

When you use the Sites, we may automatically record certain information from your web browser and/or your computer or other device that you use to access the Sites, using different types of technology, including cookies, standard log files, "clear gifs" or "web beacons." These technologies

generally consist of a text file that is transferred to your computer's hard drive for record-keeping purposes and to enhance the quality of your visit to the Sites. This "automatically collected" information may include your Internet Protocol (IP) address, device model and/or type, device address or ID, web browser, operating system, the content you view on the Sites, actions you take using the Sites, and the dates and times that you use the Sites, as well as search queries you may have used to find the Sites.

We may use persistent cookies (that remain in place after you exit the Site to help us recognize you when you return) and temporary, session cookies that will be deleted when you exit the Sites. For example, we may use a persistent cookie to associate you with your plan or to remember your choices on the Sites, but this only works when cookies on our Sites are enabled.

We do not use technology that recognizes a "do-not-track" signal from your web browser.

We permit limited third parties to place cookies through the Sites to provide us with better insights into the use of the Sites or user demographics or to provide relevant advertising to you. These third parties may collect information about a consumer's online activities over time and across different websites when he or she uses our website. For example, we utilize Google Analytics and Quantcast to analyze usage patterns of the Site. Google Analytics generates a cookie to capture information about your use of the Site which Google uses to compile reports on website activity for us and to provide other related services. Google may use a portion of your IP address to identify their cookie, but this will not be associated with any other data held by Google.

We may also permit third party service providers to place cookies through our Sites, as indicated above, to perform analytic or marketing functions where you are notified of them and you have consented to the usage. We do not control the use of such third party cookies or the resulting information and we are not responsible for any actions or policies of such third parties.

Your use of our Site will be deemed to be your consent to the placement of cookies on your computer or other device. If you prefer not to receive cookies through our Site, you can set your browser to either reject all cookies, to allow only "trusted" websites to set them, or to accept only those cookies from those sites you are currently on. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log onto and use the Sites.

You can set your browser to refuse cookies, but doing so will limit system performance and may even cause certain features of the Sites to malfunction or not work at all.

Social Security Numbers, Health Insurance Claim Numbers and Taxpayer Identification Numbers

We may collect your Social Security Number and/or Health Insurance Claim Number from you or your employer or labor union in the course of our regular business functions. Also, in certain circumstances we receive Social Security Numbers or Taxpayer Identification Numbers in connection with an individual's prospective, current or former employment with the Company. It is the policy of the Company to protect the confidentiality of Social Security Numbers, Health Insurance Claim Numbers and Taxpayer Identification Numbers. We use these types of data to carry out our business needs and to comply with local, state and national governmental requirements. We do not use this information for internal identification purposes.

The Company has adopted administrative, physical and technical safeguards and procedures to restrict access to this information to those employees or agents who need to use it for our business purposes and to protect it from unauthorized access, use, disclosure, and destruction. We may disclose this information to third parties, such as a third party provider of contact information verification services, who agree to protect this information and to keep it confidential and secure. When we dispose of records containing personal information we will use a means, such as shredding, that renders the information unreadable. Our employees periodically undergo training regarding the safeguarding of personally identifiable information, including Social Security Numbers.

Information about children

Because of the nature of our business we do not solicit or intentionally receive information from children under the age of 13. Parents and legal guardians are permitted to provide us with information about their children.

Use of personal information

Any personally identifiable information you give us will be used for our general commercial purposes, including to provide, support, develop, and enhance the features of the Sites and the Services, and to provide any product, service or other information that you request. We may use your information to provide applications and services to you, and to display customized content. We may also use personal information for certain auditing, research and analysis activities to operate and improve the Company's technologies and services. Your personal information may also be used to set up, process, or contact you regarding your account. We may use your e-mail address to contact you to respond to your inquiries or to provide information on products or services to you. You can elect not to receive e-mails from us either by "unsubscribing" to an e-mail that you receive or by contacting us as indicated below. When we use your personal information, it may be processed on our servers in the United States

of America and in other countries, and your information may be processed on a server that lies outside your own country. When we use personal information in certain of our internal marketing efforts, we provide you with choices (see “Choices” below).

Sharing of your personal information

We are not in the business of directly selling your information. Nonetheless, we may disclose certain of your personal information to third parties in connection with the operation of our business in a variety of circumstances, including the following:

In general

We may disclose information about you to unaffiliated third parties if:

1. you request or authorize it,
2. the information is provided to help complete a transaction for you,
3. the information is provided to comply with the law, applicable regulations, court orders or subpoenas, to enforce our Terms of Service or other agreements, or to protect our rights, property or safety or the rights, property or safety of our users or others (e.g., to a consumer reporting agency for fraud protection etc.),
4. the disclosure is done as part of a purchase, transfer or sale of services or assets (e.g., in the event that some or all of our assets are acquired by another party, customer information may be one of the transferred assets),
5. the information is provided to our agents, outside vendors or service providers to perform functions on our behalf (e.g., analyzing data, providing marketing assistance, providing customer service, processing orders, etc.), or
6. to others as described in this Privacy Policy.

Insurance companies and authorized plan administrators

If you submit an application for an insurance product offered by us, we will disclose your personal information to your chosen insurance company to process your application. If you enroll in a health subsidy account (such as a Health Reimbursement Arrangement) or other similar account offered through an authorized plan administrator with whom we have associated, then we may disclose your personal information to that trustee or administrator in order to complete your enrollment in the account. These partners are only allowed to use your personal information to process your requested quote, application or enrollment and are contractually obligated to maintain strict confidentiality and security with respect to your personal information.

Service providers

We may disclose your personal information to other companies that help us process or service your insurance application or correspond with you. For example, we may provide your personal information to a service provider to verify your mailing address, phone number and e-mail address. The companies we hire to process or service your insurance application or to correspond with you are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality and security with respect to your personal information.

Marketing use

We do not disclose your personal information to third parties for their own marketing uses. We may use your information to provide you with information about third parties’ goods or services unless you tell us not to. (See “Choices” below)

Other users

By their nature, certain features of the Services enable you to post and communicate information that will be publicly available to other users in a variety of ways. For example, if you submit a comment to a blog posting, or a retirement story, it may be published on the Sites and elsewhere (as provided in the Terms of Service). Any personally identifiable information that you voluntarily choose to include in a public area of the Sites, such as a User Submissions that you post, will be made available to other users who access that content. Once you make your personally identifiable information available to others in any of these ways, it may be collected and used by the recipients without restriction. Note that if and to the extent that the Company provides you with tools to configure, restrict, or limit access to such postings, we cannot guarantee that use of these features will prevent access to information you post, whether surreptitiously or otherwise.

Legal obligations

For information that is considered “protected health information” under the federal Health Insurance Portability and Accountability Act of 1996, as amended (“HIPAA”), you have the right to see and copy that information, receive an accounting of disclosures of the information from your health plan and amend that information. If you believe your rights have been violated, you have the ability to file a complaint with your health plan or with the Secretary of the U.S. Department of Health and Human Services. Additionally, the use and disclosure of certain “non-public personal financial and health information” is regulated by the Gramm-Leach-Bliley Act of 1999 (“GLBA”), and your disclosure of such information to us and our business associates is governed by the terms of GLBA.

Aggregate information

The Company may disclose aggregated, non-personally-identifiable information to interested third parties to assist such parties in understanding the usage, viewing, and demographic patterns for certain programs, content, services, advertisements, promotions, and/or functionality on the Sites or in connection with providing the Services.

Security

The Company employs and maintains administrative, physical and technical safeguards to protect your personal information, and to restrict access to those employees and contractors who need to know your personal information to provide products and services to you. Any employee or contractor who violates our Privacy Policy may be subject to disciplinary action. Please note that this is not a guarantee that such information may not be accessed, disclosed, altered, or destroyed in connection with a breach of any of our administrative, physical, or technical safeguards. Our Sites utilize secure technology, such as SSL, to protect information that you provide us. You will see “https” in the URL address when this technology is in use on one of our pages. However, we cannot ensure or warrant the security of any information you transmit to the Company, and you do so at your own risk.

While we take steps to protect your personal information and to keep it secure, you also play a role in protecting your information. Please safeguard your user name and password and do not share them with others. You can help to maintain the security of your online transactions by not sharing your log-in information with anyone. If we receive instructions using your log-in information we will assume that the instructions have been authorized by you. You agree to notify us immediately of any unauthorized use of your account, if your log-in information is lost or stolen, or any other breach of security.

Contact us; updating your information

If you want to correct or update your personal information, you may log in to your user account on our website, or contact us by e-mail at support@towerswatson.com or by mail at:

Customer Service, Towers Watson, 10975 S. Sterling View Drive, Suite A1, South Jordan, UT 84095

We may ask you for identifying information when you call or write to us concerning your account. We will share your messages with those within our organization that are most capable of addressing the issues contained in your message. We preserve the content of your e-mail, your e-mail address and our response so that we can efficiently respond to any questions you might have. We also do this in an effort to meet legal and regulatory requirements. We will use reasonable efforts to respect your request not to be contacted by e-mail.

Choices

We may contact you to survey your satisfaction of our Services and/or to inform you of additional products and services that we offer directly to you or on behalf of a third party. You may opt out of receiving these surveys and/or notices from us. If you want to opt out of receiving these surveys and/or notices, you may use our e-mail opt-out page located at <https://medicare.oneexchange.com/preferences/opt-out>, or you may contact us by e-mail at support@towerswatson.com or by mail at:

Sales Support, Towers Watson, 10975 S. Sterling View Drive, Suite A1, South Jordan, UT 84095

Please note that you will still receive communications from us regarding your insurance quote, application or policy even if you opt out of receiving our surveys and/or notices of additional products and services.

Sites we link to

If you choose to use any of the links that we provide to our partner companies, sponsors, and other third party resources, you will leave our website and navigate to a new website. Protection of your privacy at websites other than ours will be governed by the privacy policy of those sites. Take the time to read the privacy policies on those sites. Because third party websites are not under our control, we cannot be responsible for the privacy practices of such websites or pages and we do not endorse any of third party websites or pages, the services or products described or offered on those sites or pages, or any of the content contained on those sites or pages.

Changes to this Policy

We may update this Privacy Policy at any time, without advance notice. In the event there are significant changes to this Privacy Policy, we will display a prominent notice in the privacy portion of the Company's Sites and let you know the effective date of the changes. In the event we make a material change to our information privacy practices that affect the personal information already stored in our database, we will post the revised privacy policy and new effective date in the privacy portion of the Company's Sites and may take other steps to advise you about the changes. If you have any questions or comments or receive any unwanted e-mail from this site, please contact our webmaster via e-mail at privacy@towerswatson.com.

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