

## PRIVACY POLICY - COMMITMENT TO YOUR PRIVACY

The Effective Date of this Privacy Policy is January 1, 2019. This version of the policy replaces and supersedes any prior privacy policies applicable to this website.

### SUMMARY AND CONTACT INFORMATION

We at Group Benefit Associates (referred to as “*GBA*”) recognize the importance of protecting the privacy of individual-specific information (“*Information*”) collected about our customers and prospective customers (referred to as “*Customers*,” “*you*” or “*your*”). At GBA, it is our intention to give you as much control as possible over your privacy in regard to Information you provide to us while using our website(s), which is located at <http://www.groupba.com/> (referred to as “*Website*” or our “*Site*”).

This Privacy Policy describes how we handle information we learn about you from our Site. It describes the types of information we collect and explains what we do with that information. If you have questions about this policy or wish to contact us, we can be reached via any of the following:

Address:

Group Benefit Associates

1701 E. Lake Avenue, Suite 400

Glenview, IL 60025

Phone: (800) 450 1271

Email: [customerservice@groupba.com](mailto:customerservice@groupba.com)

### COLLECTION AND USE OF INFORMATION

GBA is the sole owner of the information we collect on our Site. We collect information from our users in a number of different ways, as detailed below. The information we collect depends on what you do when you visit or utilize the Site. ***Please note that we do not collect personally identifying Information about you when you visit our Site unless you voluntarily choose to provide us with such Information.*** The personally identifying Information we collect through the Site may include but is not limited to your name, gender, social security number, date of birth, telephone number, union membership information, postal address and email address. If at any time you *do* provide us with such Information, we will collect it.

#### ***Voluntary Submissions***

You may provide us Information through optional and voluntary submissions. These are voluntary submissions to access and use the GBA products and services.

#### ***Analytical Information and Anonymized Data***

For each visitor to our Site, we may automatically gather certain information and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp and/or clickstream data. We may collect and store this information on an individual basis and in aggregate, or combined, form. We may also collect both user-specific and aggregate information on what pages visitors access or visit. We may use this information to analyze trends, to administer the Site, and to track users’ movements around the Site, and to gather demographic information about our user base as a whole. We may also use this information to improve the content of our web pages, and to customize the content and layout of our pages. All of this is done with the intention of making our Site more useful to users. We do not correlate this information with data about individual users.

Except as described in this Privacy Policy, we do not divulge any Information about an individual user to a third party unless it is in connection with GBA products or services.

### ***Use of Personally Identifying Information by GBA***

We will use the Information you provide to communicate with you regarding certain benefits that you may be eligible for, to enable you to apply for certain benefits with insurance/benefits providers, and to facilitate the payment of fees between you and the insurance/benefits providers (collectively, the “Purpose”). These benefits include but are not limited to dental insurance, vision insurance, life insurance, and short term and long term disability insurance.

We may also use your Information to comply with any court order, law, or legal process, including responding to any government or regulatory request; or if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of GBA, our customers or others. This includes exchanging Information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

### ***Use of Personally Identifying Information by Third Parties***

We do not rent or sell email addresses to third parties or otherwise share with any third parties any non-anonymized personally identifying Information we collect except as set forth below.

GBA may disclose your Information to following the third parties to allow those third parties to use the Information in connection with the Purpose: (1) insurance/benefits providers who are offering you benefits, (2) your labor organization, (3) our affiliated companies, and (4) entities working on our behalf.

GBA may also disclose your Information to third parties when we have your permission.

GBA reserves the right to transfer personally identifying Information to a third party in conjunction with the sale or similar transfer of GBA and/or its assets.

GBA also reserves the right to transfer personally identifying Information to a third party as required by law or when we believe that disclosure is necessary to protect our rights, to comply with a court order or other legal process, or to otherwise cooperate with authorities in connection with investigations of crimes or other wrongdoing.

If we do share personally identifying Information with an entity working on our behalf, we will employ commercially-appropriate procedures to help ensure that the disclosed Information is used only for the Purpose, and that safeguards are in place to help maintain the security, integrity and privacy of the Information.

### **OPT OUT PROCEDURES AND INFORMATION ACCESS.**

As set forth below, you may opt out of having your Information shared with entities working on our behalf, or have your information removed from our records. However, should you do so, you should be aware that we may not thereafter be able to provide you with our full range of services. You may also access your information and correct any inaccuracies.

1. If you wish to have us remove your Information from our records, please send your request to either [customerservice@groupba.com](mailto:customerservice@groupba.com) or to Group Benefit Associates, 1701 E. Lake Avenue, Suite 400 Glenview, IL 60025.
2. If you do not wish for us to share your personally identifying Information with any third parties working on our behalf to serve our customers, please let us know by sending your request either to [customerservice@groupba.com](mailto:customerservice@groupba.com) or to Group Benefit Associates, 1701 E. Lake Avenue, Suite 400 Glenview, IL 60025.
3. Upon request we provide Site visitors with access to their own personally identifying contact Information (e.g., name, address, phone number) that we maintain about them. You can access this Information by sending your request to: [customerservice@groupba.com](mailto:customerservice@groupba.com) or to Group Benefit Associates, 1701 E. Lake Avenue, Suite 400 Glenview, IL 60025.
4. We also offer users the opportunity to have inaccuracies corrected in the Information we maintain about them. In some instances, you may update your Information online; in other instances you may contact us either at [customerservice@groupba.com](mailto:customerservice@groupba.com) or at Group Benefit Associates, 1701 E. Lake Avenue, Suite 400, Glenview, IL 60025. If you are unclear whether you can update your Information on line, please contact us at the above email address or mailing address.

If you request to have your Information removed from our records, to opt out of having us share your Information with third parties working on our behalf, or to access or correct your Information, please provide sufficient information to allow us to

identify you in our records. We reserve the right to ask for information verifying your identity before we begin complying with your request. Should we ask for verification, the information you provide to verify your identity will be used only for that purpose, and all copies of this information in our possession will be destroyed when the process is complete.

Please note that, although you can opt not to receive promotional messages, we reserve the right to send you informational email messages about any administrative notices regarding the Site, as permitted under the CAN-SPAM Act (15 U.S.C. §7701 et seq.).

## **SECURITY**

The security of your personal Information is important to us. We follow generally accepted industry standards to protect the personal Information submitted to us, both during transmission and once we receive it, and to guard that Information against loss, misuse or alteration. When you enter sensitive and/or personally identifying Information on our registration or order forms, we encrypt that Information using secure socket layer technology (SSL).

Please note, however, that no method of transmission over the internet, or method of electronic storage, is 100% secure. Therefore, while we use commercially-reasonable means to protect your personal Information, we cannot guarantee its absolute security.

## **CALIFORNIA PRIVACY RIGHTS**

Under California's "Shine the Light" law, California residents who provide personal Information in obtaining products or services for personal, family or household use are entitled to request and obtain from us, once per calendar year, information about the Customer Information we shared, if any, with other businesses for their own direct marketing uses. If applicable, this information would include the categories of Customer Information and the names and addresses of those businesses with which we shared Customer Information for the immediately prior calendar year (e.g. requests made in 2018 will receive information regarding 2017 sharing activities). To obtain this Information from us, please contact us at the following email address: [customerservice@groupba.com](mailto:customerservice@groupba.com) and write "Request for California Privacy Information" for the subject of your message. We will send you a reply e-mail within 30 days containing the requested Information once we confirm your request. Not all information sharing is covered by the "Shine the Light" requirements and only that information which is covered will be included in our response.

### ***California Do Not Track Disclosures***

Some web browsers may transmit "do-not-track" signals to websites with which the browser communicates. Our Site does not currently respond to these "do-not-track" signals.

## **CHANGES TO THIS POLICY**

From time to time, we may use Information for new, unanticipated uses not previously disclosed in our privacy notice. If our information practices change materially at some time in the future, we will post the policy changes to our Site. If we have collected personally identifying Information from you, we will notify you about the changes prior to making use of your information in new ways and will provide you with a reasonable opportunity to opt out of the new procedures before they are implemented. We will also honor opt out requests made following implementation of the new procedures, as discussed above.

## **QUESTIONS/CONCERNS**

If you believe that our Site is not following our stated information policy, you may contact us at either [customerservice@groupba.com](mailto:customerservice@groupba.com) or at Group Benefit Associates, 1701 E. Lake Avenue, Suite 400 Glenview, IL 60025

## **CONSENT**

By using our Site and submitting this Information to us, you consent to the collection and use of this information by GBA as set forth herein.