

Privacy Policy

Effective Date: September 2019

MEBA Benefit Plans respect your concerns about privacy and value the relationship we have with you. This Privacy Policy applies to personal information we collect on the MEBA Benefit Plans website (the “Site”). This Privacy Policy does not address personal information that you provide to us in other contexts (*e.g.*, through a business relationship not handled through the Site).

This Privacy Policy describes the types of personal information we collect on the Site, how we use the information, with whom we share it, and the choices available regarding our use of the information. We also describe the measures we take to protect the security of the information and how to contact us about our privacy practices.

Personal Data

We collect certain personally identifiable information that can be used to contact or identify you (“Personal Data”) through the Site when you choose to provide such information, such as when you:

- Submit information through the “Contact us” page of the Site;
- Submit information through the “Website Feedback” page of the Site;
- Submit certain forms electronically (certain online forms that are available on the Site, such as the MEBA Plans’ Travel Profile, can be submitted online or via email); or
- Submit information to email addresses provided on certain forms that are available on the Site (for example, certain forms, such as the MEBA Vacation Plan Direct Deposit form, direct the individual filling out the form to send inquiries regarding the form to a particular email address).

This information relating to you, your dependent or beneficiary can include:

- First and last name;
- Email addresses;
- Phone numbers;
- Physical addresses such as address, state, province, ZIP/postal code, and city;
- Date of birth;
- Social Security number;
- Your relationship with MEBA Benefit Plans (*i.e.*, whether you are an active participant in a plan, a retiree, a spouse or family member, etc.); and
- Content you may provide (for example, when you submit Website Feedback, or submit other electronic forms).

We also collect Cookies and Usage Data, including your Internet Protocol (“IP”) address, browser type, and web log data (see the section of this Privacy Policy on Usage Data below for more details).

If you choose to give us Personal Data, we may use that Personal Data to correspond with you, provide you with requested materials.

Usage Data

Each time you visit the Site, we collect some information to improve the overall quality of your online experience, including Usage Data, which may include information such as your computer's IP address, browser type, and browser version; the pages of the Site that you visit; the time and date of your visit; the time spent on those pages; unique device identifiers; and other diagnostic data.

Aggregated Data. We collect aggregate queries for internal reporting and also count, track, and aggregate a visitor's activity into our analysis of general traffic flow at the Site. To these ends, we may merge information about you into aggregated group data. In some cases, we may remove personal identifiers from Personal Data and maintain them in aggregate form that may later be combined with other information to generate anonymous, aggregated statistical information. Such anonymous group data may be shared on an aggregated basis with our affiliates, business partners, service providers and/or vendors; if such data is shared, we will not disclose your individual identity.

Web Server Logs and IP Addresses. An IP address is a number that automatically identifies the computer or device you have used to access the internet. The IP address enables our server to send you the web pages that you want to visit, and it may disclose the server owned by your internet service provider. We may use IP addresses to conduct website analyses and performance reviews and to administer the Site, though we will not combine traffic data with user accounts.

Cookies, Web Beacons, and Other Tracking Technologies. We use cookies and similar tracking technologies to track the activity on the Site and hold certain information.

Cookies are files with small amounts of data, which may include an anonymous, unique identifier. Cookies are sent to your browser from a website and stored on your device. Cookies in and of themselves do not personally identify users, although they do identify a user's computer. Many websites use cookies as a standard practice to provide useful features when a user visits the websites, and most web browsers are set up to accept cookies. We use cookies to improve your online experience when visiting the Site. For example, cookies may be used to prevent you from receiving multiple requests to participate in the same survey. Information collected via the use of cookies may be used for marketing and/or research purposes and may be shared by us with our affiliates and unaffiliated parties. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of the Site.

A "session cookie" is one that exists for the period that your browser is open. A "persistent cookie" is one that is saved on your device/computer even after the browser is closed. Like many websites, we may use both session cookies and persistent cookies. We also use security cookies for security purposes.

Some of the Site's web pages may use web beacons in conjunction with cookies to compile aggregate statistics about website usage. A web beacon is an electronic image (also referred to as an "action tag," "single-pixel," or "clear GIF") that is commonly used to track the traffic

patterns of users from one web page to another in order to maximize web traffic flow and to otherwise analyze the effectiveness of a website. Some web beacons may be unusable if you elect to reject their associated cookies. Tracking technologies also used are tags and scripts to collect and track information and to improve and analyze the Site.

Response to “Do-Not-Track” Signals

Some web browsers may transmit “do-not-track” signals to the websites with which the user communicates, although web browsers incorporate and activate this functionality in different ways and it is not always clear whether users intend for these signals to be transmitted. There currently is disagreement, including among participants in the leading internet standards-setting organization, concerning what, if anything, websites should do when they receive such signals. We currently do not take action in response to these signals, but, if and when a standard is established and accepted, we may reassess how to respond to these signals.

Use of Data

We will use your Personal Data only (i) to provide you with requested information; (ii) to operate the Site; (iii) to provide communications and information; (iv) to conduct research and analysis to maintain, protect, develop, and improve the Site; (v) for our everyday business purposes.

If you provide your email address, we may send you administrative emails.

Disclosure of Data

We share information about your Site experiences with our affiliates for our affiliates’ everyday business and marketing purposes. We will not sell, rent, license, or trade your Personal Data with nonaffiliate third parties for our own direct marketing use unless we receive your express consent to do so. Unless you give us permission to do so, we will not share your Personal Data with third parties other than as specified in this Privacy Policy. In particular, we may be required to share your Personal Data when we receive requests for data in the context of legal disputes, investigations, regulatory inquiries or similar requests.

Disclosures to Third Parties Assisting in Our Operations

We may share your Personal Data under confidentiality agreements and any legally required data-processing agreements with other companies that we work with, or that work on our behalf, to provide products and services such as those that are providing email solutions, providing cloud hosting services, providing payment processing, monitoring and analyzing data and usage of the Site, or providing support and maintenance services for the Site, as well as legal, regulatory, audit and other professional advisors. These companies may use your Personal Data to assist us in our operations or for our legitimate business interests. However, these companies do not have any independent right to share this information.

Disclosures Under Special Circumstances

We may disclose your Personal Data in the good-faith belief that such action is necessary to:

- Respond to subpoenas, court orders, search warrants, legal processes or governmental regulations or inquiries, or to otherwise comply with a legal obligation;
- Protect, establish, and/or defend our rights or property;
- Prevent or investigate possible wrongdoing in connection with the Site, including by cooperating with law enforcement authorities in investigating and prosecuting users who violate our rules or engage in behavior that is illegal or harmful to other users
- Protect the personal safety of users of the Site or the public;
- Investigate, prevent, or take action regarding illegal activities or suspected fraud, or as otherwise required by law; or
- Protect against legal liability.

Other Parties with Your Consent or at Your Direction

In addition to the disclosures described in this Privacy Policy, we may share information about you with third parties when you consent to or request such sharing.

Business Transfers

We may share your Personal Data with another business entity in connection with the assignment, merger or other transfer of all or a portion of our business to such entity. We will require any such successor business entity to honor the terms of this Privacy Policy.

How We Protect Personal Data

We understand that storing our data in a secure manner is essential. We maintain administrative, technical and physical safeguards designed to protect the Personal Data that you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. Please note, however, that while we have endeavored to create a secure and reliable Site for users, the confidentiality of any communication or material transmitted to/from the Site cannot be guaranteed. Details of these safeguards can be provided on request.

Protected Health Information Subject to HIPAA and Other Laws

When we provide the Site, we may be subject to federal healthcare privacy and security standards under the US Health Insurance Portability and Accountability Act (“HIPAA”) or equivalent provisions protecting sensitive/special categories of Personal Data under other applicable laws. To the extent that the Personal Data provided to us is “protected health information” subject to HIPAA or constitutes a sensitive or special category of Personal Data subject to other applicable laws, we will safeguard the privacy and security of that information in accordance with applicable legal requirements, including HIPAA.

Links to Other Websites

The Site may provide links to other websites for your convenience and information. These websites may operate independently from us. Linked websites may have their own privacy notices or policies, which we strongly suggest you review if you visit any linked websites. To the extent any linked websites you visit are not owned or controlled by us, we are not responsible for the websites’ content, any use of the websites, or the privacy practices of the websites.

Children's Privacy Protection

Under Age 13. We do not knowingly collect or retain Personal Data about persons under 13 years of age. Any person who provides his or her Personal Data to us via the Site represents that he or she is 13 years of age or older. Nevertheless, children are allowed to use our Site under parents' supervision and with their express consent. We encourage parents and legal guardians to monitor the activity of those under 13 years of age. If you have reason to believe that a child under the age of 13 has provided Personal Data to us without parental consent, please contact us and we will make every effort to delete that data from our databases. It is not our policy to intentionally collect or maintain information about anyone under the age of 13. No one under the age of 13 should submit any Personal Data to us or the Site.

Under Age 18. Minors under 18 years of age, but who are age 13 or above, may have the Personal Data that they have provided to us through the Site deleted by contacting us as specified in the Contact Us section of this Privacy Policy and requesting deletion. Please note that, while we make reasonable efforts to comply with such requests, deletion of your Personal Data does not ensure complete and comprehensive removal of that data from all our systems and backup systems.

Privacy Settings / Opt-out / Changes / Access

At certain locations on the Site where information about you may be requested, you are offered the opportunity to opt out of receiving communications from us. You may also review and request changes to your Personal Data that we have collected, including the removal of your Personal Data from our databases in order to prevent receipt of future communications, by contacting us at hipaacompliance@mebaplans.org.

Changes to This Privacy Policy

It is important that you check back often for updates to this Privacy Policy. This Privacy Policy may be revised from time to time as we add new features and services, as laws change, and as industry privacy and security best practices evolve. If we update this Policy, we will let you know about the changes that we consider material by placing a note on the relevant web page you use to access the Site, or you may receive an email with notification of the updated Privacy Policy. By accessing or using the Site after we have placed the updated Privacy Policy, you consent to the new practice(s) identified in the update. You can check the "effective date" posted at the top of the Privacy Policy to see when the Privacy Policy was last updated. Small changes or changes that do not significantly affect individual privacy interests may be made at any time and without prior notice.

Contact Us

If you have any questions about this Privacy Policy, please contact us at hipaacompliance@mebaplans.org.