

Luminare Health Privacy Center

Strong relationships are built on trust

At Luminare Health, we want to earn your trust by informing you of the personal information we collect from you, the purposes for which we collect that information, the types of parties we share it with, the measures we take to protect your information, and the rights and choices you have with respect to the information we process about you. We encourage you to read through the privacy notice ("Notice") to learn more about our privacy practices.

If you have any questions about our privacy practices, you may contact us at the following address:

Luminare Health

Attn: Privacy Office

6133 North River Road, Suite 900

Rosemont, IL 60018

Telephone: (888)666-1495

Email: Privacy@luminarehealth.com

Luminare Health Benefits, Inc. Privacy Policy

Revised: 08/20/2024

At Luminare Health Benefits, Inc. ("Luminare Health", "we", "our" "us") we value your privacy and want to earn your trust by letting you know the personal information we collect from or about you, the purposes for which we collect that information, the types of parties we share it with, the measures we take to protect your information, and the rights and choices you have with respect to your personal information. We encourage you to read through this policy to learn more about our privacy practices.

Luminare Health will only use your personal information for the purposes described within this policy. We do not sell your personal information to third parties, and we do not allow third parties to use the personal information we provide to them to offer you their products or services.

Depending on where you live, you may have additional rights afforded to you. Please review the State-Specific Privacy Rights section below for more information.

PERSONAL INFORMATION WE COLLECT

“Personal Information” is information that readily identifies you as an individual, as well as other pieces of information that, when combined with your name and other items, can be used to identify you.

The personal information we collect depends upon things such as the nature of our relationship, the method you use to communicate with us, and the type of products or services you have or use. Luminare Health may collect Personal Information from you, your agent, employers, insureds, medical providers, legal counsel, other individuals or service providers as necessary for a business purpose.

The information below sets out the categories of Personal Information Luminare Health may have collected from or about you for a business purpose, in the past 12 months:

From Consumers: There are certain instances where we collect information directly from or about you, such as when you file a claim or interact with customer service.

Categories of Information/Examples	Categories of Sources	Disclosed for a Business Purpose	Sold or Shared with a third Party for Marketing Purposes
Personal identifiers or records. <ul style="list-style-type: none"> Name, postal address, email address, telephone number, Social Security number, driver's license number, IP address, signature, employment history, financial information, medical information, and health insurance information. 	<ul style="list-style-type: none"> Directly from you. From third parties you authorize us to collect from. From the plan sponsor (e.g., your employer) of products we issue and service. From financial professionals associated with the products and services we provide to you. 	Yes	No
Protected classification characteristics. <ul style="list-style-type: none"> Age, marital status, medical conditions or disabilities, sex, or gender. 	<ul style="list-style-type: none"> Directly from you. From third parties you authorize us to collect from. From the plan sponsor (e.g., your employer) of products we issue and service. From financial professionals associated with the products and services we provide to you. 	Yes	No
Commercial information. <ul style="list-style-type: none"> Transaction history, payment history, account information, or voluntary questionnaires, survey responses or feedback. 	<ul style="list-style-type: none"> Directly from you. From third parties you authorize us to collect from such as consumer reporting agencies. 	Yes	No
Internet or other similar network activity.	<ul style="list-style-type: none"> Directly from you. 	Yes	No

<ul style="list-style-type: none"> Internet Protocol (IP) addresses, browser type, internet service provider (ISP), device identifier, device type, operating system versions, or clickstream data. 	<ul style="list-style-type: none"> Indirectly from you in accordance with our Online Platforms and Cookies Policy. 		
Geolocation data. <ul style="list-style-type: none"> Device location or location data when allowing the use of certain functionalities through applications. 	<ul style="list-style-type: none"> Directly from you. 	Yes	No
Sensory data. <ul style="list-style-type: none"> Voice recordings from voicemail or other recorded calls. 	<ul style="list-style-type: none"> Directly from you. 	Yes	No
Professional or employment-related information. <ul style="list-style-type: none"> Employment history, current or prior employer. 	<ul style="list-style-type: none"> Directly from you. From the plan sponsor (e.g., your employer) of products we issue and service. From financial professionals associated with the products and services we provide to you. 	Yes	No

From Business-to-Business contacts

We may collect certain information from individuals who have a business relationship with us, such as when you interact with us as a representative, employee, or contact person of one of our business customers, when you sell or market our products or services, or when you interact with us when providing your services to us as vendor.

Categories of Information/Examples	Categories of Sources	Disclosed for a Business Purpose	Sold or Shared with a third Party for Marketing Purposes
Personal identifiers or records. <ul style="list-style-type: none"> Name, postal address, email address, telephone number, government or taxpayer identification number, financial information, signature, or license number. 	<ul style="list-style-type: none"> Directly from you. From your employer. From publicly available sources. 	Yes	No
Commercial information. <ul style="list-style-type: none"> Transaction history, account information, survey responses or feedback, audits, assessments, voluntary questionnaires, data concerning related IT support and technology requests. 	<ul style="list-style-type: none"> Directly from you. From your employer. From third parties you authorize us to collect from. 	Yes	No
Internet or other similar network activity. <ul style="list-style-type: none"> Internet Protocol (IP) addresses, browser type, internet service provider (ISP), device identifier, device type, operating system versions, or clickstream data. 	<ul style="list-style-type: none"> Directly from you. Indirectly from you in accordance with our Online Platforms and Cookies Policy. 	Yes	No
Sensory data.	<ul style="list-style-type: none"> Directly from you. 	Yes	No

<ul style="list-style-type: none"> Information collected through call recordings, recorded meetings, or CCTV footage on company premises. 			
<p>Professional or employment-related information.</p> <ul style="list-style-type: none"> Job title, role, company name, occupation, licenses, business travel data, background screenings, or other related information. 	<ul style="list-style-type: none"> Directly from you. From your employer. From third parties you authorize us to collect from. From publicly available sources. 	Yes	No

USING PERSONAL INFORMATION

We may use personal information to:

- Operate, manage, and maintain our business including performing necessary and appropriate internal functions such as accounting, auditing, risk management, information technology and security, legal, compliance, and records maintenance.
- Comply with our legal and regulatory obligations, or to respond to a subpoena or court order.
- Fulfill our contractual obligations as a data processor.
- Resolve disputes.
- Maintain the safety, security, and integrity of our products and services, websites, databases and other technology assets, and business.
- Protect the rights, property, or safety of us, our clients, or others.
- Improve our existing websites, online platforms, applications, products, and services.
- Research and development of new products, services, and functionalities.
- Prepare for and complete corporate transactions, such as a merger, acquisition, reorganization, sale, joint venture, assignment, transfer or other reassignment of all or part of Luminare Health's business or assets.
- As otherwise allowed or required by law.

For consumers, we additionally process personal information for the following purposes:

- To determine eligibility for our products or services; to deliver and administer the products and services you requested directly or under an agreement established with your employer/plan sponsor, or reasonably anticipated within the context of our ongoing business relationship.
- To provide you with support and to respond to your inquiries or requests, including to investigate and address your concerns.
- To facilitate transactions and payments.
- To verify your identity for security purposes.
- To create, maintain, customize, and secure user accounts on our platforms or applications.

luminare health

- To tailor and improve our services to you, for analytics, and to improve functionalities.
- To provide you with alerts or other notices, including via electronic mail, concerning our products, services, payments, events, or news that may be of interest to you that you or your employer/plan sponsor has requested.
- For other purposes for which we obtain your consent.

For our Business-to-Business contacts, we may additionally process this personal information for the following purposes:

- For our client contacts, to fulfill our contractual obligations to your employer, communicate with you and your employer about our products and services, answer questions and other requests from you, provide customer support, and communicate with you and your employer about business opportunities, including new products or services and other information we think may be of interest to you.
- For producers or enrollers, to determine your eligibility and to onboard you to sell, market, or delivery our products or services, and to otherwise maintain our ongoing business relationship.
- For vendor contacts, to vet to manage our contracts with your employer, to ensure we are receiving products or services appropriately and on terms most beneficial to us, for vendor management purposes, including vendor risk management.
- To facilitate transactions and payments.
- To operate and expand our business activities and evaluate, develop, and improve the quality of our products and services.

Luminare Health retains Personal Information only for as long as is reasonably necessary for fulfillment of the purposes set forth above or for such other longer periods of time permitted or required by law.

DISCLOSURES OF PERSONAL INFORMATION

To the extent permitted or required by applicable law, we may share personal information with the following categories of data recipients in connection with performance of our services and for our business operations:

To employers/plan sponsors

We may share personal information through agreements with employers/plan sponsors who offer our products and services, provided the employer/plan sponsor agrees to certain limitations on the use of such data as required by law.

Service providers

We may share personal information with service providers that perform services on our behalf, and with whom we have a contractual relationship and are bound to keep your personal information confidential and use it only for the purposes for which we disclose it to them.

Financial professionals

We may share information with financial professionals (e.g., producers, enrollers) that help us deliver our products and services.

Authorized parties

We may share personal information with third parties that you affirmatively authorize, or direct us to share with, or as otherwise permitted by law.

Regulatory bodies

We may share personal information with regulators, licensing authorities, law enforcement authorities, or tax authorities.

Luminare Health Affiliates

We may share personal information with our affiliated entities.

Successor Companies

We may share personal information with another entity acquiring all, or a portion of, our business. The information shared will remain subject to this policy and the privacy preferences you have expressed to us. However, personal information submitted or collected after a transfer may be subject to a new privacy policy adopted by the successor entity.

STATE-SPECIFIC PRIVACY RIGHTS

Notice to California Residents

Consumers who reside in California have certain additional rights regarding their Personal Information. For the purpose of this section only, "consumer" includes individual consumers, as well as employees, job applicants, and individuals acting in their professional capacity. These rights relate to the use and collection of Personal Information by Luminare Health and may include one or more of the following rights:

- The right to know what information of yours is collected and how it is processed;
- The right to know who Luminare Health shares your information with;
- The right to access your Personal Information maintained by Luminare Health;
- The right to correct inaccuracies in your Personal Information;
- The right to request deletion of your Personal Information;
- The right to opt-out of the sale or sharing (for targeted advertising) of your Personal Information;
- The right to object to specific forms of processing of your data; and
- The right to request a manual review of an automated decision.

Notice to Colorado Residents

Consumers who reside in Colorado have certain additional rights regarding their Personal Information. These rights relate to the use and collection of Personal Information by Luminare Health, and may include one or more of the following rights:

- The right to know what information of yours is collected and how it is processed;
- The right to know who Luminare Health shares your information with;
- The right to access your Personal Information maintained by Luminare Health;
- To right to correct inaccuracies in your Personal Information;
- The right to request deletion of your Personal Information; and
- The right to opt-out of the sale, sharing (for targeted advertising) of your Personal Information or use of your Personal Information for profiling.

Notice to Connecticut Residents

Consumers who reside in Connecticut have certain additional rights regarding their Personal Information. These rights relate to the use and collection of Personal Information by Luminare Health, and may include one or more of the following rights:

- The right to know what information of yours is collected and how it is processed;
- The right to know who Luminare Health shares your information with;
- The right to access your Personal Information maintained by Luminare Health;
- To right to correct inaccuracies in your Personal Information;
- The right to request deletion of your Personal Information;
- The right to opt-out of the sale, sharing (for targeted advertising) of your Personal Information or use of your Personal Information for profiling;
- The right to object to specific forms of processing of your data; and
- If you provide us with Personal Information that we use in automated decision-making, you have the right to obtain a copy of that Personal Information in a convenient and shareable format.

Notice to Oregon Residents

Consumers who reside in Oregon have certain additional rights regarding their Personal Information. These rights relate to the use and collection of Personal Information by Luminare Health, and may include one or more of the following rights:

- The right to know what information of yours is collected and how it is processed;
- The right to know who Luminare Health shares your information with;
- The right to access your Personal Information maintained by Luminare Health;
- To right to correct inaccuracies in your Personal Information;
- The right to request deletion of your Personal Information;
- The right to opt-out of the sale, sharing (for targeted advertising) of your Personal Information or use of your Personal Information for profiling;
- The right to object to specific forms of processing of your data; and
- If you provide us with Personal Information that we use in automated decision-making, you have the right to obtain a copy of that Personal Information in a convenient and shareable format.

Notice to Texas Residents

Consumers who reside in Texas have certain additional rights regarding their Personal Information. These rights relate to the use and collection of Personal Information by Luminare Health, and may include one or more of the following rights:

- The right to know what information of yours is collected and how it is processed;
- The right to know who Luminare Health shares your information with;
- The right to access your Personal Information maintained by Luminare Health;
- To right to correct inaccuracies in your Personal Information;
- The right to request deletion of your Personal Information;
- The right to opt-out of the sale, sharing (for targeted advertising) of your Personal Information or use of your Personal Information for profiling;
- The right to object to specific forms of processing of your data; and
- If you provide us with Personal Information that we use in automated decision-making, you have the right to obtain a copy of that Personal Information in a convenient and shareable format.

Notice to Utah Residents

Consumers who reside in Utah have certain additional rights regarding their Personal Information. These rights relate to the use and collection of Personal Information by Luminare Health, and may include one or more of the following rights:

- The right to know what information of yours is processed and how it is processed;
- The right to know who Luminare Health shares your information with;
- The right to access your Personal Information maintained by Luminare Health;
- The right to request deletion of your Personal Information;
- The right to opt-out of the sale or sharing (for targeted advertising) of your Personal Information;
- The right to object to specific forms of processing of your data; and
- If you provide us with Personal Information that we use in automated decision-making, you have the right to obtain a copy of that Personal Information in a convenient and shareable format.

Notice to Virginia Residents

Consumers who reside in Virginia have certain additional rights regarding their Personal Information. These rights relate to the use and collection of Personal Information by Luminare Health, and may include one or more of the following rights:

- The right to know what information of yours is processed and how it is processed;
- The right to know who Luminare Health shares your information with;
- The right to access your Personal Information maintained by Luminare Health;
- To right to correct inaccuracies in your Personal Information;
- The right to request deletion of your Personal Information;
- The right to opt-out of the sale or sharing (for targeted advertising) of your Personal Information;

- The right to object to specific forms of processing of your data; and
- If you provide us with Personal Information that we use in automated decision-making, you have the right to obtain a copy of that Personal Information in a convenient and shareable format.

Sensitive Information

While Luminare Health may collect certain Sensitive Personal Information about consumers in the course of providing services, we limit the use of the consumer's sensitive personal information (as defined by applicable state law) for our business purposes.

How to submit a privacy rights request

If you live in one of the states identified above, you may initiate a privacy rights request by using this [form](#), by contacting us toll-free at (888) 666-1495, or by email at Privacy@luminarehealth.com.

When making a privacy rights request, you will need to provide certain identifying information to allow us to verify the request and locate your information. We will evaluate and process your request subject to exceptions as outlined by applicable law. Luminare Health will not discriminate or retaliate against you for exercising your privacy rights.

If allowable under applicable law, and subject to limitations, you may designate an authorized agent to submit a privacy rights request on your behalf. We may request that you provide evidence that establishes the agent's authority or may ask you and your agent to verify your identity directly with us. We will deny a request from an authorized agent that does not submit evidence that they are authorized to act on your behalf.

Response timing and process. We will confirm receipt of requests within ten (10) business days. We will respond to a verifiable request within forty-five (45) days of its receipt. We will contact you within forty-five (45) days of our receipt of your request if we need additional time or additional information to fully respond to your request. If we are unable to fulfill your request, or if we deny your request in whole or in part, we will provide you with an explanation.

Format of Requested Information. We may deliver the requested information by mail or electronically. If provided electronically, the information will be in a portable and, to the extent technically feasible, readily useable format that allows you to easily transmit this information to another entity.

Limitations on Requests. We may not be able to fulfill your request to delete your personal information if it falls within a legal exception, including, but not limited to retaining such information to:

- Comply with federal, state, or local laws, rules, or regulations.

luminare health

- Comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, local, or other governmental authorities.
- Investigate, establish, exercise, prepare for, or defend legal claims.
- Provide a product or service specifically requested by you; perform a contract to which you are a party, including fulfilling the terms of a written warranty, or take steps at the request of you prior to entering into a contract.
- Prevent, detect, protect against, or respond to security incidents, identity theft, fraud, harassment, malicious or deceptive activities or any illegal activity, preserve the integrity or security of systems or investigate, report, or prosecute those responsible for any such action.
- Identify and repair technical errors that impair existing or intended functionality.
- Perform internal operations that are reasonably aligned with your expectations based on your existing relationship with us.

Fees. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive or repetitive. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Reconsideration. If we deny a privacy rights request, in whole or in part, the notice of denial will contain information regarding your right to appeal, if your state affords such a right. In addition, if you are concerned that we might have violated your privacy rights, or you disagree with a decision we made about your individual rights, you may use the contact information listed at the end of this policy to ask us to reconsider your request. We will evaluate and process your reconsideration request in accordance with applicable law.

Online Platforms and Cookies Policy

This Policy applies to certain privacy practices while using our websites and mobile applications ("Online Platforms"). It includes the use of technologies such as cookies, beacons, tags, or similar tracking technologies (collectively, "cookies") to collect information from individuals when using Online Platforms.

What is a cookie? Cookies are small text files placed on your browser, device, or the page you are viewing, that enables the cookie owner to recognize the device when it visits websites or uses online services.

- **Session** cookies are temporary bits of information that are erased once you exit your web browser window, or otherwise turn your computer off. Session cookies are used to improve navigation on websites and to collect aggregate statistical information. Luminare Health websites use session cookies.
- **Persistent** cookies are more permanent bits of information that are placed on the hard drive of your computer and stay there unless you delete the cookie. Persistent cookies store information on your computer for several purposes, such as retrieving

certain information you have previously provided (for example, passwords), helping to determine what areas of the website visitors find most valuable, and customizing the website based on your preferences. Luminare Health websites use persistent cookies.

Most browsers allow you to control cookies through their settings preferences. However, if you limit the ability of websites to set cookies, you may worsen your overall user experience, since it will no longer be personalized to you. It may also stop you from saving customized settings like login information.

Why we use cookies. Luminare Health uses cookies in a range of ways to improve your experience on our website(s), including:

- keeping you signed in,
- to allow for single sign on,
- understanding how you use our website, and
- improving your experience when you use our website.

Cookie choices. If you visit our websites, you consent to our use third-party cookies such as Google Analytics, which uses cookies to collect non-personally identifiable information. Google Analytics uses cookies to track visitors, providing reports about website trends without identifying individual visitors.

If you use our mobile applications, you consent to our use of Azure Application Insights, which uses telemetry data, including IP addresses to track visitors, providing reports about mobile usage, and performance trends without identifying individual visitors.

We use information received from Google Analytics and Azure Application Insights as aggregate data to help us maintain and improve our websites and mobile applications. We do not send such information to other third parties. You can opt out of Google Analytics without affecting how you visit our websites. For more information on opting out of Google Analytics tracking across all websites you use, visit this Google page: <https://tools.google.com/dlpage/gaoptout>.

Do not track. Some web browsers and mobile operating systems offer a “Do Not Track” setting you can activate to signal your preference not to have data about your online browsing activities monitored and collected. Currently, our Online Platforms may not recognize “Do Not Track” signals.

Children’s Online Privacy. We do not knowingly collect personal information online or otherwise from any person under the age of 16, and we do not offer, otherwise market or direct our products or services to any person under the age of 16. If you suspect that we have collected personal information from a person under the age of 16, please contact us.

Privacy policies and notices of other sites. Our Online Platforms may link to and from third-party websites. If you click on a link to another website, that third party’s privacy



policy/notice will apply to your use of their website. We do not have control over the content or operation of these third-party sites. We recommend that you review all third parties' terms of use agreements and privacy policies before using their websites, goods, or services.

CHANGES TO THIS POLICY

We may change, update, or modify this policy from time to time. If we make changes to this policy, we will revise the Last Updated date identified at the top of the first page. Any changes will become effective upon our posting of the revised policy on our website.

CONTACT DETAILS

If you have any questions about our privacy practices or want to exercise a privacy right, you may contact us using one of the following methods of contact set forth below:

Luminare Health Benefits, Inc.
Attn: Privacy Office
6133 North River Road, Suite 900
Rosemont, IL 60018
Telephone: (888)666-1495
Email: Privacy@luminarehealth.com