

Mercer Privacy Notice

PRIVACY NOTICE

Mercer believes strongly in protecting the privacy of Internet users who visit our website ("site"). This Privacy Notice is intended to inform you of the ways in which this site collects personal information, the utilization of this information, and the ways in which we protect it. Generally, personal information is information that can identify you or your activities on the site or through services offered on the site.

This Privacy Notice applies solely to data collected via the site; there may be additional personal (and other) information we have or collect about you pursuant to other relationships.

Mercer operates this site, and collects your personal information, pursuant to the Terms of Use. By using this site, you acknowledge that you have read, understand and accept these Terms of Use. If you use this site as an employee or member of an organization, this site is also operated pursuant to any agreements we may have with your employer, association sponsor, or benefit program sponsor.

Please take a moment to familiarize yourself with our privacy practices. Let us know if you have any questions by using the "Contact Us" feature of this Website. You may also contact the following for assistance with any question you may have: privacycoordinator@mercer.com.

WHICH DATA DO WE COLLECT?

Generally, we may collect the following information about you and, if required for the services provided, about your dependents or beneficiaries:

- Contact information such as your name, address, email address, and phone number;
- Demographic information such as your date of birth, marital status, and gender;
- Financial information such as your Social Security number, financial account numbers, credit/debit card numbers, benefits information, and salary;
- Health information such as a health insurance claim number, information submitted on a health insurance enrollment application, or information relating to health or mental condition or care thereof, insurance claims, or payment for health care; and
- Decisions you may make with respect to the benefits administered

HOW DO WE COLLECT DATA?

Information provided by you, your representatives or third parties

We collect information from you; your representative; your employer, association sponsor, or benefit program sponsor; and third parties that have roles in delivering services to you, our employer, association sponsor, or benefit program sponsor. These include insurance companies, plan

administrators and vendors, brokers or agents, credit agencies, and financial institutions. You might provide this information when you visit this site; apply for insurance coverage; enroll in a benefits program; communicate with us through email, chat, and instant messenger; when you speak to a representative in our call center; or when you send mail/faxes to our office. In addition, your employer, association sponsor, or benefit program sponsor or someone acting on their behalf may provide us with information about you.

If you supply us with personal information about other people, you represent that you have the authority to provide this information on their behalf. In these instances, you further represent that the individuals to whom this information relates have been informed of and understand the reason(s) for obtaining the information, the manner in which this information will be used and disclosed, and have consented to such use and disclosure.

Information Collected by Automated Means:

To understand how we may use cookies on our Site, please see our [Cookie Notice](#).

In addition, in the course of ensuring network security and consistent service for all users, software programs may be employed to monitor network traffic, identify unauthorized access or access to nonpublic information, detect computer viruses and other software that might damage our computers or the network, and monitor and fine-tune our network's performance. These programs may detect additional information from your computer such as your IP address, addresses from network packets, and other technical information. Such information is used only to maintain the security and performance of our networks and computer systems.

HOW DO WE USE THE DATA WE COLLECT?

We use your personal information to:

- Verify your identity
- Process a transaction, enrollment, or service requested by you, directly or through a third party;
- Allow you to manage your benefits program;
- Contact you when necessary and respond to your requests and inquiries;
- Market products and services to you, including ours, those of our affiliates, and those of other third parties;
- If the information is a credit/debit card number, process such card payments directly or through third-party payment processing, clearing, or settlement system;
- Fulfill legal and regulatory requirements;
- Updated information with credit bureaus;
- Detect and prevent fraud, suspicious claims, and other illegal activities; and
- Analyze and improve products and services, enhance this site, and evaluate the effectiveness of our marketing activities and overall services.

WITH WHOM DO WE SHARE YOUR DATA?

We share your information to assist with managing and running this site, administer your benefits, or provide other products or services requested by you, your employer, association sponsor, or benefit program sponsor. We may share this information with:

- Your employer, association sponsor or benefit program sponsor;
- Our affiliates, to enable them to provide services to you and to contact you regarding additional products and services that may be of interest to you; and
- Third-party service providers that have been retained to perform services on our behalf or on behalf of your employer, association sponsor, or other benefit program sponsor, or as authorized by your employer, association sponsor, or other benefit program sponsor, and
- Third party service providers identified by Mercer to offer services to you as you may select. These service offerings relate to your insurance coverage and may be required by law in certain states.

Third parties to whom we disclose information are required by law and/or contractual requirements to keep your personal information confidential and secure. These parties may not use or disclose it except as reasonably necessary to provide services on our behalf, on behalf of your employer, association sponsor, or other benefit program sponsor, or to comply with or as permitted by applicable law.

We do not rent, sell, or otherwise disclose your information to unaffiliated third parties for their own marketing, unless so authorized by your employer, association sponsor, or benefit program sponsor.

We may disclose your personal information without obtaining your prior permission, as permitted by law, including instances when we believe it is necessary to: (a) prevent physical or financial harm; (b) enforce the Terms of Use; (c) respond to claims of suspected or actual illegal activity; (d) respond to an audit or investigate a complaint or security threat; or (e) comply with law or legal process.

WHAT STEPS DO WE TAKE TO PROTECT YOUR INFORMATION?

This Site and all information submitted by you or on behalf of you through this site may be collected, stored, and processed in countries other than the one in which you reside, including, but not limited to, the United States.

We restrict access to your personal information to those employees of ours, our affiliates, and third-party service providers who reasonably need to use it to provide products and/or services. We have implemented physical, administrative, and technical safeguards to protect your personal information from unauthorized access. However, as effective as our security measures are, no security system is impenetrable. We cannot guarantee the security of our systems, nor can we guarantee that information supplied by you or on your behalf cannot be intercepted while being transmitted over the Internet.

WHAT RIGHTS AND OBLIGATIONS DO YOU HAVE WITH RESPECT TO YOUR DATA?

Accessing and correcting your information

Keeping your information accurate and up-to-date is very important. Inaccurate or incomplete information could impair our ability to deliver relevant services to you. Please let us know about any necessary changes to your personal information by using the "Contact Us" feature of this Site.

Securing your own information

By using this site, you represent that you will likewise take measures to protect this information, including the maintenance of any username and password in a confidential manner, and restricting system access to those who may need such access on your behalf.

SOME OTHER MATTERS

External Links:

This site includes links to other websites that are operated by other organizations. If you access another organization's website using a link provided, that organization may collect information from you. We are not responsible for the content or privacy practices of linked websites or their use. Once you have left this site via such a link (you can tell where you are by checking the URL in the location bar on your browser), you should refer to those websites' privacy policies, terms of use, and practices to determine how they will handle any information they collect from you.

Does this privacy notice apply to international users?

This Privacy Notice is provided in accordance with and subject to the laws of the United States. If you access this site from a location outside of the U.S., you agree that your use of this site is subject to the terms of this Privacy Notice and the Terms of Use.

Business Transactions

In the event we sell some or all of our assets, it is possible your personal information could be one of the assets transferred to the purchaser. We may disclose and/or transfer your personal information to a third-party purchaser in these circumstances

Children:

This Site is not intended for children, and we do not knowingly collect, use, or disclose information of children under the age of thirteen (13) without the consent of their parents or legal guardians. In an instance where such information was collected, it would be purely accidental and unintentional.

Changes to this Privacy Notice

This Privacy Notice and any document to which it refers are subject to change at any time. It was last changed on October 20, 2021. If we make material updates to this Privacy Notice, we will update the date it was last changed. Any changes we make to this Privacy Notice will become effective immediately when we post the revised Privacy Notice on this site. We recommend that you review this Privacy Notice regularly for changes.

Questions or Concerns

If you have any questions, requests, concerns, or complaints about this Privacy Notice, or our privacy practices in general, please contact us using the "Contact Us" feature of this site.

California Resident Privacy Notice

Effective: October 20, 2021

Scope of this Privacy Notice

Mercer (“We”) strive to protect the privacy and confidentiality of the personal information with which we are entrusted. This California Resident Privacy Notice explains the personal information we collect or process about California residents in connection with the site, application, product, or service that links to this Privacy Notice (the “Service”), how we use, share, and protect that personal information, and what your rights are with respect to your personal information that we gather and process.

In this California Resident Privacy Notice, “personal information” has the same meaning as under the California Consumer Protection Act (“CCPA”): information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonable be linked, directly or indirectly, with a particular consumer or household, Personal information does not include information that has been de-identified or aggregated.

Please also note that in certain cases, we may collect your personal information for the Service pursuant to a contract we have with a commercial client (out “Client”). In such circumstances, we may be acting as a “service provider” and are obligated to process the personal information we collect or are provided in connection with the Service in accordance with instructions from or the contract with our Client, which is the business ultimately responsible for determining how your personal information will be handled.

Accordingly, if you are using the Service in connection with your role as an employee of our Client, or by virtue of some other relationship with, our Client, we encourage you to review that Client’s privacy notice to understand the full scope of how your personal information will be handled. Further, in any case where we are acting as a service provide to a Client, if you or your authorized agent (together referred to hereinafter, where applicable, as “you”) wish to exercise any rights that may be available to you under certain data privacy laws (for example, the right to access or deletion under the California Consumer Privacy Act if you are a resident of California as described below), you should direct your request to our Client, who is the party responsible for receiving, assessing, and responding to your requests, as we do not have any obligation, and, notwithstanding anything in this Privacy Notice to the contrary, may elect not, to respond to your requests. If you are not certain whether we are acting as a service provider to a Client in your particular circumstance, please contact us through one of the methods described at the end of this Privacy Notice.

What Personal Information Do We Collect and Share, and For What Purpose?

In the past 12 months, we have collected and shared the following types of personal information from users of the Service:

Categories of PI	Examples/ Description	Categories of Sources of PI	Business or Commercial Purpose for Collection of PI	Categories of third parties with whom we share the PI
Government-issued identifiers	<ul style="list-style-type: none"> • Social security number • Driver's license number • State identification card number 	<ul style="list-style-type: none"> • Directly from you (or from a current or former plan member who named you as a beneficiary) • Your employer, plan sponsor or their administrator • Third Party Suppliers • Insurance carriers and/or agents and brokers 	<ul style="list-style-type: none"> • Quotation/Inception of service • Policy Administration/ Claims Processing • Providing the service(s) to the client • Marketing analytics and direct marketing • Communicate with individuals 	<ul style="list-style-type: none"> • Client/Employer • Non-client business partners (i.e. received from TPA/MGA/ Agent/Broker) • Vendor/service providers
Other Unique Identifiers	<ul style="list-style-type: none"> • Employee ID • Account name/number • Insurance policy number 	<ul style="list-style-type: none"> • Directly from you (or from a current or former plan member who named you as a beneficiary) • Your employer, plan sponsor or their administrator • Third Party Suppliers • Insurance carriers and/or agents and brokers 	<ul style="list-style-type: none"> • Quotation/Inception of service • Policy Administration/ Claims Processing • Providing the service(s) to the client • Marketing analytics and direct marketing • Communicate with individuals 	<ul style="list-style-type: none"> • Client/Employer • Non-client business partners (i.e. received from TPA/MGA/Agent/ Broker) • Vendor/service providers

<p style="text-align: center;">Contact Information</p>	<ul style="list-style-type: none"> • Honorifics • Company or school name • Title • Alias • Mailing address • Email address • Telephone and fax numbers • Contact information for related individuals (household or job) 	<ul style="list-style-type: none"> • Directly from you (or from a current or former plan member who named you as a beneficiary) • Your employer, plan sponsor or their administrator • Third Party Suppliers • Insurance carriers and/or agents and brokers 	<ul style="list-style-type: none"> • Quotation/Inception of service • Policy Administration/ Claims Processing • Providing the service(s) to the client • Marketing analytics and direct marketing • Communicate with individuals 	<ul style="list-style-type: none"> • Client/Employer • Non-client business partners (i.e. received from TPA/MGA/Agent/ Broker) • Vendor/service providers
<p style="text-align: center;">Individual Attributes</p>	<ul style="list-style-type: none"> • Marital status • Race • Religion • National origin • Veteran status • Gender • Age • Physical or mental disability • Sexual orientation • Beneficiaries /Dependents 	<ul style="list-style-type: none"> • Directly from you (or from a current or former plan member who named you as a beneficiary) • Your employer, plan sponsor or their administrator • Third Party Suppliers • Insurance carriers and/or agents and brokers 	<ul style="list-style-type: none"> • Quotation/Inception of service • Policy Administration/ Claims Processing • Providing the service(s) to the client • Marketing analytics and direct marketing • Communicate with individuals 	<ul style="list-style-type: none"> • Client/Employer • Non-client business partners (i.e. received from TPA/MGA/ Agent/Broker) • Vendor/service providers

<p style="text-align: center;">Financial Information</p>	<ul style="list-style-type: none"> • Financial account numbers • Insurance account numbers • Payment card data • Consumer reporting data, 	<ul style="list-style-type: none"> • Directly from you (or from a current or former plan member who named you as a beneficiary) • Your employer, plan sponsor or their administrator • Third Party Suppliers • Insurance carriers and/or agents and brokers 	<ul style="list-style-type: none"> • Quotation/Inception of service • Policy Administration/ Claims Processing • Providing the service(s) to the client • Marketing analytics and direct marketing • Communicate with individuals 	<ul style="list-style-type: none"> • Client/Employer • Non-client business partners (i.e. received from TPA/MGA/ Agent/Broker) • Vendor/service providers
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<p style="text-align: center;">Health Information</p>	<ul style="list-style-type: none"> • Patient records, clinical trial records • Information about a consumer's diagnosis or treatment for health conditions • Information about payment for healthcare services • Data collected by a healthcare provider or health insurance company subject to HIPAA or CMIA • Disability status d • Medical fitness for work records • Inferred data (health) 	<ul style="list-style-type: none"> • Directly from you (or from a current or former plan member who named you as a beneficiary) • Your employer, plan sponsor or their administrator • Third Party Suppliers • Insurance carriers and/or agents and brokers 	<ul style="list-style-type: none"> • Quotation/Inception of service • Policy Administration/ Claims Processing • Providing the service(s) to the client • Marketing analytics and direct marketing • Communicate with individuals 	<ul style="list-style-type: none"> • Client/Employer • Non-client business partners (i.e. received from TPA/MGA/ Agent/Broker) • Vendor/service providers
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<p>Policy Information</p>	<ul style="list-style-type: none"> Any policy documentation or information submitted in order to obtain quotes 	<ul style="list-style-type: none"> Directly from you (or from a current or former plan member who named you as a beneficiary) Your employer, plan sponsor or their administrator Third Party Suppliers Insurance carriers and/or agents and brokers 	<ul style="list-style-type: none"> Quotation/Inception of service Policy Administration/ Claims Processing Providing the service(s) to the client Marketing analytics and direct marketing Communicate with individuals 	<ul style="list-style-type: none"> Client/Employer Non-client business partners (i.e. received from TPA/MGA/ Agent/Broker) Vendor/service providers
<p>Professional or Employment-related records</p>	<ul style="list-style-type: none"> Titles CV/work history 	<ul style="list-style-type: none"> Directly from you (or from a current or former plan member who named you as a beneficiary) Your employer, plan sponsor or their administrator Third Party Suppliers Insurance carriers and/or agents and brokers 	<ul style="list-style-type: none"> Quotation/Inception of service Policy Administration/ Claims Processing Providing the service(s) to the client Marketing analytics and direct marketing Communicate with individuals 	<ul style="list-style-type: none"> Client/Employer Non-client business partners (i.e. received from TPA/MGA/ Agent/Broker) Vendor/service providers

Commercial Information	<ul style="list-style-type: none"> • Purchase history • Service records • Personal property • Customer service records • Communication preferences • Shopping preferences 	<ul style="list-style-type: none"> • Directly from you (or from a current or former plan member who named you as a beneficiary) • Your employer, plan sponsor or their administrator • Third Party Suppliers • Insurance carriers and/or agents and brokers 	<ul style="list-style-type: none"> • Quotation/Inception of service • Policy Administration/Claims Processing • Providing the service(s) to the client • Marketing analytics and direct marketing • Communicate with individuals 	<ul style="list-style-type: none"> • Client/Employer • Non-client business partners (i.e. received from TPA/MGA/Agent/Broker) • Vendor/service providers
Audio, video, or visual information	<ul style="list-style-type: none"> • Call center recordings • Voicemails 	<ul style="list-style-type: none"> • Directly from you (or from a current or former plan member who named you as a beneficiary) • Your employer, plan sponsor or their administrator • Third Party Suppliers • Insurance carriers and/or agents and brokers 	<ul style="list-style-type: none"> • Quotation/Inception of service • Policy Administration/Claims Processing • Providing the service(s) to the client • Marketing analytics and direct marketing • Communicate with individuals 	<ul style="list-style-type: none"> • Client/Employer • Non-client business partners (i.e. received from TPA/MGA/Agent/Broker) • Vendor/service providers

We may also use or share de-identified information that is not reasonably likely to identify you for commercially legitimate business purposes.

We do not sell personal information. We and our third-party partners use cookies and other tracking technologies to analyze website traffic and facilitate marketing or advertising. You can learn more about the cookies utilized on this Site and opt out of our and our third-party partners' use of certain cookies using our "[Manage Cookies](#)" link at the bottom of the Site.

Your Rights as a California Resident

Under California law, some California residents have specific rights regarding their personal information. These rights are subject to certain exceptions as described below. Further, if we have collected or processed your personal information in connection with a product or service we are providing to our Client that is a company, partnership, sole proprietorship, nonprofit or government agency, and you are an employee, owner, director, officer, or contractor of that entity, rights 1-3 below are not available to you until at least January 1, 2021.

When required, we will respond to most requests within 45 days, unless it is reasonably necessary for us to extend our response time.

1. – Right To Disclosure of Information

You have the right to request that we disclose certain information regarding our practices with respect to personal information. If you submit a valid and verifiable request and we confirm your identity and/or authority to make the request, we will disclose to you any of the following at your direction:

- The categories of personal information we have collected about you in the last 12 months.
- The categories of sources for the personal information we have collected about you in the last 12 months.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.
- If we sold your personal information for a business purpose, a list of the personal information types that each category of recipient purchased.
- If we disclosed your personal information to a third party for a business purpose, a list of the personal information types that each category of recipient received.

2.- Right to Delete Personal Information

You have the rights to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. If you submit a valid and verifiable request and we can confirm your identity and/or authority to make the request, we will determine if retaining the information is necessary for us or our service providers to:

- Complete a transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonable anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;

- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code 1546 seq.);
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- Enable solely internal uses that are reasonable aligned with consumer expectations based on your relationship with us;
- Comply with a legal obligation; and/or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

If none of the above retention conditions apply, we will delete your personal information from our records and direct our service providers to do the same.

How to exercise the above rights

To exercise your rights to disclosure or deletion described above, please click on the link <her> to submit an individual rights request. Alternatively, you may call us at 855-518-4620.

Please note that, as described above, in certain cases we may collect your personal information as a service provider pursuant to a contract we have with a commercial Client to provide the Service. In any case where we are acting as a service provider to a Client, you should direct your requests to exercise your rights available under data privacy laws to our Client, who is the party responsible for receiving, assessing, and responding to your requests. As a service provider, we do not have any obligation, and, notwithstanding anything in this Privacy Notice to the contrary, may elect not, to respond to your requests.

Only you or a person legally authorized to act on your behalf may make a verifiable consumer request related to your personal information.

You may make a verifiable consumer request for access or deletion no more than twice within a 12-month period. The verifiable request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. Depending on the nature of your request and the sensitivity of the information we hold about you, we may ask you to confirm various data elements we already have on file such as your mailing address and phone number, or, in case of sensitive personal information, we may require you to submit a copy of a government issued identification. And
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

You will not be required to create an account with us in order to submit a verifiable request, though we may communicate with you about your request via a pre-established account if applicable. However, in order to safeguard the personal information in our possession, if we cannot verify your identity or authority to act on another's behalf, we will be unable to comply with your request. We will only use

personal information you provide when submitting a verifiable request to confirm your identity or authority, or to fulfill your request.

3.- Right to Opt Out of Sales of Your Personal Information

As a California resident, you have the right to direct a business that sells your personal information to third parties not to sell your personal information. This right is referred to as "the right to opt-out".

Because we do not sell your personal information, we do not provide any mechanism for you to exercise the right to opt out.

4.- Right to Non-Discrimination

You may exercise your rights under the CCPA without discrimination. For example, unless the CCPA provides an exception, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services

We may offer you financial incentives to provide us with personal information that is reasonably related to the information's value. This could result in different prices, rates, or quality levels for our products or services. Any financial incentive we offer will be described in written terms that explain the material aspects of the financial incentive program. You must opt-in to any financial incentive program and may revoke your consent at any time by contacting us as indicated below.

5.- Direct Marketing and Do Not Track Signals

Under California's "Shine the Light" law, California residents may request and obtain a notice once a year about the personal information we shared with other businesses for their own direct marketing purposes. Such a notice will include a list of the categories of personal information that were shared (if any) and the names and addresses of all third parties with which the personal information was shared (if any). The notice will cover the preceding calendar year. To obtain such a notice, please contact us as described below. In addition, under this law you are entitled to be advised how we handle "Do Not Track" browser signals. Because there currently is not an industry or legal standard for recognizing or honoring DNT signals, we do not honor Do Not Track requests at this time.

Minors

We do not knowingly collect personal information from children under 13. If we learn that we have collected information from a child under the age of 13 without verifiable parental consent, we will delete that information from our files as quickly as possible. If you believe that we may have collected information from a child under 13, please contact us at the email address provided below.

We never sell the personal information of minors under 16 years of age, and would not do so in the future without affirmative authorization of the consumer if between 13 to 16 years of age, or the parent or guardian of a consumer less than 13 years of age.

How Long Do We Keep Your Information?

We will retain your personal information as long as necessary for the processing purpose(s) for which it was collected and other permitted purpose(s), including retention of personal information pursuant to any applicable contract, law or regulation. Our retention periods vary based on business, legal and regulatory needs.

What Steps Do We Take to Protect Your Information?

This site and all information submitted by or on behalf of you through this site may be collected, stored, and processed in countries other than the one in which you reside, including, but not limited to, the United States.

We restrict access to your personal information to only those employees of ours, our affiliates, and third-party service providers who reasonably need it to provide products and/or services. We have implemented physical, administrative, and technical safeguards to protect your personal information from unauthorized access. However, as effective as our security measures are, no security system is impenetrable. We cannot guarantee the security of these systems, nor can we guarantee that information supplied by you or on your behalf cannot be intercepted while being transmitted over the Internet.

Links to Third Party Sites

Our website may contain links to other third party websites. If you follow a link to any of those third party websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for their policies or processing of your personal information. Please check those third party privacy policies before you submit any personal information to such third party websites.

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use of the Service after the posting of the updated Privacy Notice constitutes your acceptance of the updated terms.

Questions, Requests or Complaints

To submit general questions or requests regarding this Privacy Notice or our privacy practices, please contact us at privacycoordinator@mercer.com or alternatively, you may call us at 855-518-4620.