

## PRIVACY POLICY

This Privacy Policy explains the practices of Student Medcover CO. LLC regarding the collection, use and disclosure of information that we receive in order to place health insurance and other insurance products and services (collectively “Services”), whether through our website located at <https://smcovered.com/>, other websites we may own or control (collectively “Website”), or through contacting us by telephone or other form of communication. This Privacy Policy applies only to the Services and does not apply to any third-party websites, services or applications, even if they are accessible through our Services or Website.

### INFORMATION WE MAY COLLECT

Personal data means any information about an individual person from which that person can be identified. It does not include data where the identity has been removed (e.g. de-identified data).

The personal data we may collect, use, store, and transfer include the following:

**Identifying Data:** Name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender, age(s) or date(s) of birth, passport number, nationality, and country and/or state of residency.

**Contact Data:** Billing address, physical address, mailing address, email address and telephone numbers.

**Financial Data:** Bank account and payment card details.

**Technical Data:** Internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Website.

**Profile Data:** Purchases made by you, preferences, feedback and survey responses.

**Usage Data:** Information about how you use our Website and Services.

**Marketing and Communications Data:** Your preferences in receiving marketing from us and our affiliates, and communication preferences.

**Aggregated Data:** Statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity.

### HOW WE COLLECT YOUR DATA

We collect different information about you as follows:

#### Information you give us

When you receive a policy quote or purchase a policy, sign up for our marketing communications, contact us to ask questions or provide feedback, we will store the personal data information you give to us.

#### Automated technologies or interactions

As you interact with our Website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

### **Information from third parties**

We may receive information about you from third parties as set out below:

- Analytics providers such as Google Analytics
- Advertising networks such as Facebook
- Search information advertising providers such as Google AdWords

### **HOW WE MAY USE YOUR INFORMATION**

We do not sell your personal information. We will only use your personal data when the law allows us to, such as:

- Fulfill a transaction you requested or service your policy
- Market our products and Services
- Where we need to comply with a legal or regulatory obligation.
- Prevent fraud

### **Purposes for which we will use your personal information**

The persons or organizations with whom we may share your personal information may include, among others:

- Our affiliated companies
- Companies that perform services, such as marketing, credit/debit card processing, and communication services on our behalf
- Business partners that assist us with tracking how visitors use our website
- Other financial institutions with whom we have a joint marketing agreement
- Institutions providing financial products and services we sell, such as insurance companies
- Businesses that conduct actuarial or research studies
- Those who request information pursuant to a subpoena or court order
- Others, at your direction or with your consent

We will share your personal information with third parties only in the ways that are described in this privacy statement.

### **INTERNET, MOBILE APPLICATIONS AND SOCIAL MEDIA USERS**

We may use at our Website common online tracking technologies like web browser cookies, analytical tools, or other technologies to customize our Website, mobile applications, and social

media interactions to enhance your overall customer experience. Our mobile and social media applications may also collect non-personally identifiable demographic information (such as age, sex, and city/state location) about the users of each application. When you visit our Website, a message called a cookie is sent from our web server to your computer, which you can disable in your web browser if you decline to accept cookies. This cookie resides on your computer until your Internet browser is turned off and is used to make it easier for you to navigate among different pages at our Website. This cookie does not collect any personally identifiable information about you. Our Website contains hyperlinks to other websites on the Internet which we do not control, are not governed by our privacy practices and policies and for which we are not responsible. Before you provide information to any of these other websites, you should review their terms of service (or similar legal terms) and their privacy policies so that you know what information is collected by the website and what use or disclosure may be made of information you provide to the website. Our Website does not engage in collecting personally identifiable information about your online activities over time and across third-party websites or online services. We have not authorized any third party to collect personally identifiable information about your online activities over time and across different websites when you visit our Website. Thus, our website does not respond to web browser "do not track" track signals or other similar mechanisms.

## **CHILDREN**

We are in compliance with the requirements of COPPA (Children's Online Privacy Protection Act). We do not knowingly collect or process any information from anyone under 13 years of age (16 in the EU). Our Website and Service is directed to people who are at least 13 years old or older (16 in the EU). However, we will collect and process personal data about children under 13 years of age (16 in the EU) when submitted by a parent, guardian or other appropriate adult for the purposes of obtaining a quote for, or purchasing, an insurance policy covering such children.

## **INTERNATIONAL TRANSFER**

Your personal data may be transferred to, and maintained on, computers located outside of your state, province, country or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to provide your personally identifiable information to us, we may transfer your personal data to the United States and process it there.

## **SECURITY**

If you use your credit or debit card to purchase a policy through us, the payment information is transmitted directly to the insurance company providing the policy. We do not receive that information. The insurance companies we work with process payment information securely and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS). You can find more information about this standard here: [https://www.pcisecuritystandards.org/pci\\_security/](https://www.pcisecuritystandards.org/pci_security/).

We implement a variety of security measures to maintain the safety of personal data when a user enters, submits, or accesses their personal data, when we retain that information, and when we transmit that information to third parties as permitted under this privacy policy.

We offer the use of a secure server for <https://smcovered.com/>. All personally identifiable information supplied by you to us via <https://smcovered.com/> is transmitted via Secure Socket

Layer (SSL) or similarly secure technology. We allow personally identifiable information to be accessed only by persons with specified rights to do so.

You should be aware that if you voluntarily disclose information in visible forum online personal or otherwise, that information could be collected and used by others. For example, if you use chat forums, bulletin boards, and you post your e-mail or identification, you may receive unsolicited messages from others. We have no control over this use of your personal data.

Due to the open nature of communication through the Internet, we cannot guarantee that communications between us and you or with insurance carriers to which you ask us to submit your information, will be free from unauthorized access by third parties, nor that third parties will not be able to circumvent the safeguards we have put in place.

## **DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **YOUR RIGHTS AND CONTROLLING YOUR PERSONAL DATA**

### **Your Rights**

Under the applicable laws of various countries, you may have certain rights concerning your personal data, such as under EU law, the right to access to, rectification or erasure of, and/or suspension or restriction of, or objection to, processing of your personal data, and the right to data portability. If you have any questions or want to exercise any of your rights with respect to your personal data, please contact us by the methods indicated at the end of this section.

### **Exercising Your Rights**

Before we process any request, we may request personal data to verify your identity where allowed by law, and to verify any new or corrected information you may provide. You will not usually have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

You have the right to ask us to correct, amend or delete any information about you that you believe to be incorrect, and we will respond to your request within 30 days. If we concur with your request, we will amend or delete your information in question. We will also send the correction to anyone identified by you who received the incorrect information from us in the last 2 years, any insurance-support organization whose primary source of your nonpublic personal information is us if an insurance-support organization has systematically received your nonpublic personal information from us during the last 7 years and any insurance-support organization that furnished your nonpublic personal information to us. If we do not agree that the information is incorrect, you have the right to give us a statement of what you believe to be correct. We will place your statement in our records, and we will send your statement to anyone described above that is entitled to receive a correction of your nonpublic personal information in our records. We will also send your

statement to anyone who later receives the information from us. To request access to or to amend or delete about information you that we have, please contact us at:

[admin@smcovered.com](mailto:admin@smcovered.com) or

Student Medcover CO. LLC  
Attn: Privacy Manager  
111 Anza Blvd., Suite 201  
Burlingame, CA 90401

### **CHANGES TO NOTICE OF PRIVACY POLICY AND INFORMATION PRACTICES**

We may change our Privacy Policy from time to time. If we do, we will post our revised notice in place of this Notice. The effective date this Privacy 08/01/2016.

**Policy last updated: 07/26/2021**