

# Privacy Policy

Last Revised: 4/3/2023

## 1. Introduction

This website is administered by AMWINS Rx and its affiliates (“AMWINS Rx”, “Company”, “we”, “us” or “our”). AMWINS Rx respects your privacy and is committed to protecting it through our compliance with this Privacy Policy. This policy describes the types of information we may collect from you or that you may provide when you visit the AMWINS Rx website (our “Website” or “Site”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- On this Website.
- In email, text, and other electronic messages between you and this Website.
- Through any mobile and/or desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and this Website.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Company or any third party (including our affiliates and subsidiaries); or
- Any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our website. By accessing or using this Website, you agree to this Privacy Policy. This policy may change from time to time at the sole discretion of AMWINS Rx. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates. This policy is applicable only to the AMWINS Rx website.

## 2. Children Under the Age of 13

Our website is not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website or on or through any of its features/register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website or

provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please send an email to [rxcompliance.abgi@amwins.com](mailto:rxcompliance.abgi@amwins.com) or write to us at:

AMWINS Rx  
Attn: Privacy Officer  
50 Whitecap Drive  
North Kingstown, RI 02852

### 3. User Consent

You are deemed to have consented to the terms contained in this Privacy Policy when you use the Website and/or when you submit Personal Information (as defined below) through the Website. You agree to the terms of this Privacy Policy and expressly consent to the processing of your Personal Information in accordance with this Privacy Policy each time you access the Website and/or submit Personal Information through the Website. If you do not agree to the terms of this Privacy Policy, please do not use the Website. The terms contained in this Privacy Policy are subject to and may be superseded by applicable Federal and State laws.

### 4. Information We Collect

AMWINS Rx collects Personal Information, Protected Health Information and other anonymous information from you when you use the Website. **AMWINS Rx is firmly committed to protecting the confidentiality and security of your Personal Information and Protected Health Information.**

#### 4.1 Personal Information and Protected Health Information

(a) Personal Information and Protected Health Information. "Personal Information" means data that is personally identifiable to you, including your name, address, telephone number, e-mail address and Website login credentials, as well as any other non-public information about you that is associated with, or linked to, such information. Your Personal Information may include "protected health information" ("PHI") subject to privacy and security protections under the Health Insurance Portability and Accountability Act ("HIPAA"). For example, your member identification number and medication information, if applicable, would constitute PHI. For more information about how AMWINS Rx safeguards PHI in compliance with HIPAA, please see our Privacy Notice for AMWINS Rx, as applicable. To the extent any terms in this Privacy Policy conflict with any terms in the Notice of Privacy Practices, the conflicting terms in the Notice of Privacy Practices will control and override the corresponding terms in this Privacy Policy.

We collect Personal Information such as the following in connection with the Website:

(i) When you create an account with us, we will collect your first and last name, middle initial, e-mail address, password, address, and telephone number.

(b) Transactions. In addition to providing Personal Information during the registration process, you may provide us with Personal Information and PHI to fulfill transactions that you may have requested through the Website.

(c) Contacting Us. After you register for our Website, you may contact us through the Website to provide feedback and testimonials about your use of the Website. You may provide Personal Information to us when you provide feedback on and testimonials about our Site.

(d) Analytics. We may use certain in-house or third-party functionality to analyze your communications with us and interactions with the Website. The analysis enables us to monitor the services that we provide so that we can improve the services provided to you through the Website. These third parties will be required to protect any Personal Information and PHI in accordance with this Privacy Policy. Other analytics capabilities are reflected below in the description of Non-Personal Information.

## **4.2 Non-Personal Information and Other Types of Data**

(a) Non-Personal Information. When you use the Website, and during your interactions with the Website, we may collect Non-Personal Information from you (“Non-Personal Information”). Non-Personal Information means a data element or collection of data elements that by itself cannot ordinarily be associated with a specific individual. Non-Personal Information includes by way of example but not limitation, the Internet browser or computer operating system you are using, your navigation of the Website including the pages of the Website that you access, the amount of time spent on various portions of the Site, the length and dates of your use of the Site, and certain Website data captured through your interactions with the Site. Non-Personal Information may include information provided by you through the Website or otherwise (e.g., through a third-party website) that is not Personal Information or PHI. Certain Non-Personal Information may be collected on an aggregated, anonymous basis through web server logs, cookies, ad servers, tracking pixels, web beacons, and similar Internet tracking devices (collectively “Tracking Mechanisms”). Based on certain interactions with the Website, third-party websites, mailings, other communications with us, and/or our system configurations, certain Non-Personal Information may be associated with your Personal Information such that your Non-Personal Information is identifiable with you. You may be able to opt-out of certain third-party associations by following customization and/or opt-out options as described below.

(b) Cookies (or browser cookies); Flash Cookies; and Web Beacons. A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website. Additionally, certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for

browser cookies. For information about managing your privacy and security settings for Flash cookies, see the ***Your Choices Regarding Your Personal Information and Protected Health Information*** Section within this Privacy Policy. Pages of the Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

(c) IP Addresses, Phone Serial Numbers, Phone Numbers and Aggregate Data. Internet Protocol (“IP”) addresses, phone serial numbers and phone numbers are used by your computer every time you are connected to the Internet. Your IP address is a number used by computers on the network to identify your specific computer device. IP addresses are automatically collected by our web server as part of demographic and profile data (“Traffic Data”) so that certain information (such as the web pages you request) may be sent to you. We may combine, separate, aggregate, or otherwise parse and process Non-Personal Information. The parsing and processing of such information may generate Aggregate Data (“Aggregate Data”). Aggregate Data is summary level data, such as a number of Website visitors in a specific geographic area. Aggregate Data does not contain information that can be used to identify or contact you, such as your name, address, telephone number or e-mail address, and does not reflect the original form of the Non-Personal Information collected from you.

(d) Referer. A “Referer” is the information transmitted by a web browser or application that references the Web URL you linked from, and is automatically collected by our web server as Traffic Data. We reserve the right to use this information to identify broad demographic trends that may be used to provide information tailored to your interests. You will not be personally identified from this information.

(e) System Information. System information that we collect as part of Traffic Data includes time, the type of web browser or phone being used, the operating system/platform, phone network and CPU Speed (“System Information”). System Information is sent automatically by your web browser when you are connected to a website or mobile application. We reserve the right to use System Information for purposes of identifying broad demographic trends. System Information may also be used to provide information appropriate for your specific computer device. You will not be personally identified from this information.

### **4.3 Third-Party Information Collection**

We may disclose Non-Personal Information to third parties as follows: (i) we may share Non-Personal Information with our affiliated companies, third parties who provide services to us, and other parties that you have authorized; and (ii) we may disclose products and services developed using the Non-Personal Information, including products and services that disclose anonymous and/or de-identified Website data for any legitimate business purpose. However, we will not sell your Non-Personal Information to other companies or organizations.

## **5. Use of Information We Collect**

## 5.1 Non-Personal Information

(a) Use of Non-Personal Information. The collected Non-Personal Information may be used by us and our affiliated companies for a variety of analytic and developmental purposes including to improve and enhance the Website and our products and services, to create new products and services, to customize your experience on the Website and other websites and/or mobile applications you use, to identify and/or offer products, services and mobile application and/or website functionality that may be of interest to you, and other legitimate business purposes.

(b) Use of Cookies; Flash Cookies; and Web Beacons. We may use different kinds of cookies including session ID cookies and persistent cookies. Session ID cookies are used to personalize your user experience, to determine ways to improve the Site, Site Content, and the services offered through the Site. These cookies are deleted from your hard drive and/or mobile device when you close your Website session. Persistent cookies are used to collect non-personally identifiable information such as IP addresses, browser type, Internet Service Provider (ISP), referring/exit pages, platform type, date/time stamp and number of clicks.

You may set your browser and/or mobile device to accept cookies, warn you when a cookie is sent, or turn off all cookies (except Flash cookies). Check your web browser's help menu or your mobile device settings to find out how. Some mobile devices store cookies not only in areas connected to the web browsers but also in app-specific areas, so you may have to check your device's mobile application settings options to determine how to manage or delete cookies stored in these other areas. If you do not accept cookies, some features, services, or activities available through the Website may not function correctly and you may be unable to access certain content.

We may embed tracking pixels within various pages of the Website to enable use of Site analytics. The Site analytics enable us to determine the usage frequency of various areas of the Website and identify areas of the Website for enhancement. While you are using the Site and after you leave the Site, we may use web beacons to notify you of areas of the Website and other aspects of our organization and its affiliated companies in which you may be interested. Certain tracking pixels and web beacons may be cleared or reset through configuration of your web browser and/or mobile application settings such as by clearing your cache. We may use ad servers to provide you with offers of possible interest.

(c) Use of IP Addresses, Phone Serial Numbers, Phone Numbers and Aggregate Data. We use your IP address so that we can send data (such as the pages you request) to you and collect Non-Personal Information during the process. We aggregate this Non-Personal Information with similar Non-Personal Information collected from other users to track overall visitor traffic patterns and help us understand Website usage and preferred and most frequently used pages, products and services, to provide you with better service, to improve Site use and functionality, and to provide you with information on other products and services that may be of interest to you.

We may perform statistical analyses of the Traffic Data, Website usage, and behaviors associated with the Website. We may use these analyses to generate aggregate data from the original Non-Personal Information.

(d) Third-Party Usage. We work with third parties to (i) operate and maintain the server(s) on which the Website operates, (ii) enable login to the Website utilizing third party platform login credentials, (iii) provide Tracking Data that we embed in or use with the Website, (iv) provide advertisements and other information to you about the Website, products, and services through a third-party website or mobile application based on a prior visit to the Website, (v) analyze communication with us and interactions with the Website, (vi) de-identify data, and (vii) collect Non-Personal Information from you (e.g., on your interactions and/or experience with the Website and/or us). The third party may then share the Non-Personal Information, Aggregate Data, and/or other data with us.

## **5.2 Personal Information and Protected Health Information**

AMWINS Rx uses and stores your Personal Information and PHI in order to provide the Website to you, and to analyze and improve upon the operation of the Website. Personal Information and PHI may also be used for operational and administrative purposes of the Website. We may share your Personal Information and PHI with other AMWINS Rx companies (i.e., entities which are controlling, controlled by, or under common control with AMWINS Rx ) to provide you with more personalized and enhanced services. However, we will not use or disclose your Personal Information or your PHI in a manner inconsistent with applicable law, this Privacy Policy or the Notice of Privacy Practices. Additional examples of our uses and disclosures of your Personal Information and PHI may include the following:

(a) Requested Transactions. AMWINS Rx uses and stores Personal Information and PHI in order to fulfill transactions that you have requested through the Website. For instance, we may manage your prescription benefits and process your prescription drug claims. This process may involve sharing certain Personal Information and/or PHI with you and/or your doctor, pharmacists, health plan or administrator. These disclosures are made in accordance with the terms of your health plan or prescription benefit plan.

(b) Communications. If you register for the Website and provide your Personal Information for communications, we may communicate with you via e-mail and/or the Website, and similar mechanisms.

(c) Contacting Us. We value your feedback on, and appreciate any testimonials about, our Website. You may provide Personal Information to us when you provide feedback on and testimonials about our Website. This Personal information will not be used and/or disclosed in a manner inconsistent with applicable law, this Privacy Policy or the Notice of Privacy Practices. However, if you send us any feedback or testimonials, any information provided that is not Personal Information or PHI shall be deemed, and shall remain, the property of AMWINS Rx , and shall not be considered confidential.

(d) Analytics. We may use certain in-house or third-party functionality to analyze your communications with us and interactions with the Website. Any Personal Information or PHI analyzed for this purpose will not be used and/or disclosed in a manner inconsistent with applicable law, this Privacy Policy or the Notice of Privacy Practices. In addition, any third party



will be required to protect any Personal Information and PHI in accordance with this Privacy Policy.

## **6. Disclosure to Third Parties**

### **6.1 Disclosure to Third-Party Service Providers**

We may share your Personal Information with, or allow your Personal Information to be collected by, third-party service providers: (a) to provide you with the services that we offer you through our Website; (b) to conduct quality assurance testing; (c) to facilitate creation of accounts; (d) to provide technical support; or (e) to provide other services to us or you. These third-party service providers are not authorized by us to use your Personal Information other than to provide the services requested by AMWINS Rx and such service providers will be required to protect your Personal Information in accordance with this Privacy Policy. We may utilize select service providers to make targeted non-personal communications to an aggregated audience regarding our offerings and other potentially relevant benefit information of interest to you. However, these communications will not be based on your PHI. You expressly consent to the sharing of your Personal Information with our contractors and other service providers as described herein.

### **6.2 Legal Disclosures**

Regardless of any choices you make regarding your Personal Information or PHI (as described below), AMWINS Rx may disclose Personal Information or PHI if it believes in good faith that such disclosure is necessary to: (a) comply with relevant laws or to respond to subpoenas or warrants served on AMWINS Rx ; (b) protect or defend the rights or property of AMWINS Rx or users of the Website; (c) assist in the detection and investigation of fraud and other illegal activity; and/or (d) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy or our AMWINS Rx Website Terms of Use. Additionally, we may disclose your Personal Information to relevant third parties such as Federal and State regulatory agencies, site technicians, auditors, lawyers, or other professional advisors. Any such use or disclosure of your Personal Information or PHI will be done in a manner consistent with applicable law, this Privacy Policy or the Notice of Privacy Practices.

### **6.3 Acquisitions**

All Personal Information, PHI, and Non-Personal Information obtained through our Website are owned by us. Accordingly, if another company acquires our company or our assets, that company will thereafter possess the Personal Information, PHI, and Non-Personal Information collected by us, and will assume the rights and obligations regarding your Personal Information, PHI, and Non-Personal Information as described in this Privacy Policy.

## **7. Your Choices Regarding Your Personal Information and Protected Health Information**

## **7.1 Tracking Technologies and Advertising**

You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this Website may then be inaccessible or not function properly.

## **7.2 Changes to Personal Information or Protected Health Information**

You may change any of your Personal Information or PHI in your account by editing your profile. You may request deletion of your Personal Information or PHI by us, but please note that we may be required (by law or otherwise) to keep this information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). When we delete any information, it will be deleted from the active database, however, such information may continue to be retained on our backup and archival systems. Accordingly, when you request that we remove your information from our systems, copies may remain on our systems for a certain time. Please note that such requests are handled promptly, but it does require some time to complete the request. Until that time, your information may continue to be used in accordance with the terms of this Privacy Policy.

## **7.3 Sharing of Personal Information**

We will never sell, rent, or license Personal Information to a third party without your permission, except as otherwise provided in this Privacy Policy.

# **8. General**

## **8.1 Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards. The information you share in public areas may be viewed by any user of the Website.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.



## 8.2 Your California Privacy Rights

California Civil Code Section § 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [rxcompliance.abgi@amwins.com](mailto:rxcompliance.abgi@amwins.com) or write us at:

AMWINS Rx  
Attn: Privacy Officer  
50 Whitecap Drive  
North Kingstown, RI 02852

## 8.3 Links to Third Party Websites

The Website may contain advertisements and/or Linked Sites owned or operated by third parties. Such links are provided for your reference only, and AMWINS Rx has no responsibility or liability for the privacy practices or the content of those websites. Please note that once you click on an advertisement and/or Linked Sites that transfers you from our Website to a Linked Site, you have left our Website, and this Privacy Policy will immediately cease to apply to any subsequent activity on the Linked Site. We are under no obligation to notify you when you have left our Website and have accessed a Linked Site.

Additionally, if you make a purchase from a store or merchant listed on, or linked to, the Website, any information that you give, such as your credit card number or contact information, is provided to those merchants. These merchants have separate privacy and data collection practices, and AMWINS Rx has no responsibility or liability for these independent policies. Users are encouraged to review the privacy policies of each third-party website. This Privacy Policy applies solely to information collected by your use of the Website.

## 8.4 Amendments

AMWINS Rx may modify or amend this Privacy Policy from time to time. If we make any material changes, as determined by us in the way in which Personal Information or PHI is collected, used or transferred, we will notify you of these changes by modification of this Privacy Policy, which will be available for review by you on the Website. We will provide you with advance notice of a major change prior to your access of any portion of the Website for which registration is required. For example, we may (a) require that you reaccept the updated version of the Website policies, (b) send you an electronic notification advising of the update to the Website policies, and/or (c) include a notice on the Website viewable without login advising of the update to the Website policies. We do not ordinarily provide advance notice of a minor change. Accordingly, we recommend that you check the last revised date identified at the top of this Privacy Policy prior to using the Website, and that you review this Privacy Policy on a frequent basis. Your continued use of the Website and/or utilization of any Website benefits after this Privacy Policy has been updated (and after advance notice of a major change) indicates your agreement and acceptance of the updated version of the Privacy Policy.

## **8.5 General Inquiries and Concerns**

To submit a general inquiry or concern about this Privacy Policy and our privacy practices, please contact us at **800-580-4403** or:

AMWINS Rx

**Attn: Privacy Officer**

50 Whitecap Drive

North, Kingstown, RI 02852

## **8.6 Users from Outside the United States**

AMWINS Rx and its servers are located in the United States and are subject to the applicable Federal and State laws of the United States. If you choose to access or use the Website, you consent to the use and disclosure of information in accordance with this Privacy Policy and are thereby subject to such laws.