

# **PRIVACY POLICY**

## **American Health and Life Insurance Company and Triton Insurance Company**

### **Your Privacy is important to us**

This American Health and Life Insurance Company and Triton Insurance Company privacy policy ("Privacy Policy") describes our practices regarding information collected about you during visits to the Site.

"Site" means ([www.memberlifeevents.com](http://www.memberlifeevents.com)) and includes any and all interactive features, widgets, plug-ins, applications, content, downloads and/or other services maintained by American Health and Life Insurance Company and Triton Insurance Company.

The terms "we," "us," "our," or "Companies," as used on this Site, mean American Health and Life Insurance Company and Triton Insurance Company. The terms "you" or "your" mean and include you as an individual person and, if you are an employee or representative of another person or entity, such person or entity.

In addition, please review the Terms of Use, which governs your use of the Site. By continuing to use the Site, you agree to this Privacy Policy and the Terms of Use and our collection, use, disclosure and storage of your information as described by this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not provide us with any Personal Information and do not use this Site.

This Privacy Policy does not apply to:

- Data we receive from third parties, unless we combine such data with Personal Information (defined below) that we have ourselves collected under this Privacy Policy;
- Our data collection activities offline or otherwise outside of our Site (unless otherwise stated below); or
- The data practices of third parties that may interact with our Site, such as social media sites and websites where we advertise.

### **Nonpersonal Information**

We and our third-party service providers may use a variety of tracking technologies that automatically (or passively) store or collect certain nonpersonal information whenever you visit or interact with the Site ("Usage Information"). This Usage Information may be stored or accessed using a variety of technologies that may be downloaded to your personal computer, browser, laptop, tablet, mobile phone or other device (a "Device") whenever you visit or interact with our Site. This Usage Information may include:

- Your IP address, UDID or other unique identifier ("Device Identifier"). A Device Identifier is a number that is automatically assigned to your Device used to access the Site, and our systems identify your Device by its Device Identifier;
- Your Device functionality (including browser, operating system, hardware, and mobile network information);
- The areas within our Site that you visit and your activities there, including remembering you and your preferences, and the pages, screens, or other displays of information looked at by you;
- Your Device location;

- Your Device characteristics;
- Certain other Device data, including the time of day, date, length of your visit(s), frequency of your visits, and patterns of use among other information;
- Domain name you use to access the Internet and other information obtained from Web page headers (i.e., type of Device and type and version of web browser);
- Internet address from which you linked to the Site; and
- Information contained in or relating to any communication that you send to us or sent through the Site, including the content of the communication and metadata associated with it.

## **Personal Information**

Please see our [Privacy Notice](#), which we provide to all our customers, for a comprehensive explanation of how we collect, use and share Personal Information and what you can do to limit the use and sharing of your Personal Information.

## **How Do We Use Collected Information?**

We and our service providers may use your information that is subject to this Privacy Policy:

- To send you electronic newsletters or to provide you with information such as special offers or promotional and marketing materials on behalf of us or third parties, including information about new products, services or upcoming events, as well as to verify your identity and to prevent fraud;
- To communicate with you about your transactions, such as to provide customer support;
- To send billing statements, service and collect amounts you owe;
- To customize your experience on the Site or to serve you with specific content or ads that are relevant to you;
- To improve the Site, our marketing and our Site offerings;
- For internal business purposes;
- For other purposes that are disclosed at the time you provide your information or otherwise set forth in this Privacy Policy; and
- To the extent necessary to enforce the Terms of Use.

## **What about Cookies, Web Beacons and other Tracking Technologies?**

The Companies use tracking technologies, such as Cookies and Web Beacons, on our Site to collect and store Usage Information whenever you visit or interact with the Service. A “Cookie” is a small file containing alphanumeric characters that stores information about the user or records the user’s browsing activity. Cookies are stored on your Device’s hard drive. A “Web Beacon” is an electronic image (1x1 .gif) located within a certain web page that allows the Site to record the simple actions of the user opening the page. Cookies, Web Beacons, and other tracking technologies (e.g., HTML5 and Flash local storage, embedded scripts, and e-tags/cache browsers) may be active on our Site. There may be other tracking technologies now and later devised and used by us in connection with the Site.

The Companies may send one or more tracking technologies to your Device when you visit the Site:

- To allow you to use and access the Site’s functionality;
- To monitor your experience on the Site;
- To allow us to improve the Site to better serve our customers and other users;
- To improve security on the Site;
- For identity verification and fraud prevention;

- To analyze traffic and transactions on this Site;
- Keeping track of your specified preferences, including in terms of the presentation of content on our Site, and
- To market our products and services, including to deliver content, including content relevant to your interests on our Site and third-party services based on how you interact with our content.

In addition to the list above, we may also work with data providers who may collect web log data from you, such as your IP address and information about your browser or operating system. We may place a data provider's cookie which will be used to recognize your browser and enable you to receive customized ads or content. These cookies contain no personally identifiable information; they may contain or reflect demographic or other interest-based data in a de-identified form. The information in these cookies may be linked to data you voluntarily have submitted to us, such as your name, postal address or email, which we may share with a data provider in hashed or encrypted form. To opt-out of these data provider cookies, please go to the Digital Advertising Alliance ("DAA") website at <http://www.aboutads.info/choices>.

The Companies also use depersonalized aggregated Usage Information to assess and maximize the performance of the Site. This depersonalized Usage Information may be provided to other companies to assist us with these objectives, including, but not limited to, third party advertisers, analytics providers, and other service providers. Depersonalized Usage Information does not include any Personal Information that can be used to identify individuals.

Your browser should allow you to manage tracking technologies. However, if your browser's settings are too restrictive you may not be able to use all of the features of this Site.

In cases where you may enter this Site from a third-party site, such as a search engine or referral site, those sites may use tracking technologies to monitor their own site performance, traffic, etc. You must review the privacy policy of each third-party site in order to determine what information about you is collected and how that information is used.

### **How About Interactions with Third-Party Services?**

The Site may include functionality that allows certain kinds of interactions between the Site and a third-party web site or application. The use of this functionality may involve the third-party providing certain information, including Personal Information, to us. For example, if you click on social media icons on the Site (such as for Facebook, Twitter or Instagram), those actions may be associated with, and we may have access to, your Personal Information you provided on those third-party sites or applications. If so, we will then treat it as Personal Information under this Privacy Policy, since we are collecting it as a result of your accessing of and interaction on our Site. In addition, we may provide third-party sites' interfaces or links on the Site to facilitate your sending a communication from the Site. For example, we may use third parties to facilitate emails, tweets or Facebook postings. These third parties may retain any information used or provided in any such communications or other activities and these third parties' practices are not subject to our Privacy Policy. We may not control or have access to your communications through these third parties. Further, when you use third-party sites or services, you are using their services and not our services and they, not we, are responsible for their practices. You should review the applicable third-party privacy policies before using such third-party tools on our Site.

### **How do the Companies share information?**

Please see our [Privacy Notice](#), which we provide to all our customers, for a comprehensive explanation of how we collect, use and share Personal Information and what you can do to limit the use and sharing of your Personal Information.

## **How is information collected on this Site protected?**

The Companies endeavor to incorporate commercially reasonable physical, electronic, and procedural safeguards to help protect and secure your Personal Information. We maintain Personal Information in secure computer systems and we limit the employees' access to those with a business reason to see it. More specifically, employees may access information about you when needed to maintain your accounts or otherwise meet your needs. Our employees are trained to understand and comply with the Companies' security safeguards. However, no data transmission over the Internet, mobile networks, wireless transmission or electronic storage of information can be guaranteed to be 100% secure.

## **Am I protected when linking from the Site to other sites?**

This Privacy Policy is for customers and visitors, and only applies to this Site. This Site only includes its home page and pages hereunder operated by the Companies. This Privacy Policy does not apply to any linked site or any site provided by a third party. You must consult the privacy policy of such third party sites, in order to determine what information about you is collected and how that information is used.

## **Online Tracking and Do Not Track Disclosures**

Third parties use tracking technologies in connection with our Site which may include the collection of information about your online activities over time and across third-party websites or online services. We may not control those tracking technologies and we are not responsible for them. However, you consent to potentially encountering third-party tracking technologies in connection with use of our Site and accept that our statements under this Privacy Policy do not apply to the tracking technologies or practices of such third parties.

Third parties that have content embedded on our Site may set Cookies on a user's browser and/or obtain information about the fact that a web browser visited a specific Company website from a certain IP address.

Various third parties are developing or have developed signals or other mechanisms for the expression of consumer choice regarding the collection of information about an individual consumer's online activities over time and across third-party websites or online services (e.g., browser Do Not Track (DNT) signals). Currently, we do not monitor or take any action with respect to these signals or other mechanisms. We do not allow third parties to collect Personal Information about a user's online activities, over time and across different sites, services, and applications, when that user uses our Site, service or applications.

## **What About Information I Disclose Publicly or to Others?**

*User Content and Public Information.* The Site may permit you to submit ideas, photographs, video, pictures, data, information about your location, questions, comments, suggestions or other content, including Personal Information (collectively, "User Content"). We or others may store, display, reproduce, publish, distribute or otherwise use User Content online or offline in any media or format (currently existing or hereafter developed) and may or may not attribute it to you. Others may have access to this User Content and may have the ability to share it with third parties. Please think carefully before deciding what information you share, including Personal Information, in connection with your User Content. Please note that we do not control who will have access to the information that you choose to make public, and cannot ensure that parties who have access to such publicly available information will respect your privacy or keep it secure. We are not responsible for the privacy or security of any information that you make publicly available on the Site or what others do with information you share with them on the Site. We are not responsible for the accuracy, use or misuse of any User Content that you disclose or receive from third parties through the Site.

*Name and Likeness.* We may also publish your name, voice, likeness and other Personal Information that is part of your User Content, and we may use the content, or any portion of the content, for advertising,

marketing, publicity and promotional activities. For full terms and conditions regarding User Content you submit to the Site, please review our Site's Terms of Use.

### **Do We Collect Information about Children?**

We are a general audience site and we do not knowingly collect, maintain, or use Personal Information on our Site about children under the age of 13 that requires parental notice and consent under the Children's Online Privacy Protection Act ("COPPA"). If you are a child under 13 years of age, you are not permitted to use the Site and should not send any information about yourself to us through the Site.

If we become aware that we have collected personal information from any child, we will dispose of that information in accordance with COPPA and other applicable laws and regulations. If you are a parent or guardian and you believe that your child under the age of 13 has provided us with Personal Information without COPPA-required consent, please contact us using the "Contact Us" link provided below, by phone at 1-844-859-5323 or mail us at either American Health and Life Insurance Company or Triton Insurance Company, P.O. Box 2548, Fort Worth, TX 76113.

### **What About Transfer of Information to the United States?**

Our Site is operated in the United States and intended for users located in the United States. If you are located outside of the United States, please be aware that information we collect, including Personal Information, will be transferred to, and processed, stored and used in the United States. The data protection laws in the United States may differ from those of the country in which you are located, and your personal information may be subject to access requests from governments, courts, or law enforcement in the United States according to laws of the United States. By using the Site or providing us with any information, you consent to the transfer to, and processing, usage, sharing and storage of your information, including Personal Information, in the United States as set forth in this Privacy Policy.

### **What About Changes to the Privacy Policy?**

From time to time, we may change this Privacy Policy. If we do, we will post the changed Privacy Policy on the Site. The effective date of this Privacy Policy, as stated below, indicates the last time this Privacy Policy was revised or materially changed. Checking the effective date below allows you to determine whether there have been changes since the last time you reviewed this Privacy Policy.

**This Privacy Policy is effective as of: August 1, 2020.**

**This Privacy Policy is provided to you for informational purposes only. You do not need to call or take any action in response to this notice. We recommend that you read and retain this notice for your personal files.**

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