

## **PRIVACY POLICY**

The State of Rhode Island (“we”) and its affiliates are committed to protecting and preserving your privacy. This policy, together with our Terms of Use and Conditions, and any other underlying agreements or terms, sets out the basis on which any data we collect from you, or that you provide to us, will be processed by us. By using our HealthyRhode mobile application (“Application”), you are accepting the practices described in this Privacy Policy. This Privacy Policy also describes the manner in which we process, use and disclose information that you provide to us when you use our Application.

By using this Application, you consent to the use of the information that you provide to us in accordance with this Privacy Policy. We do update this Privacy Policy from time to time, so please review this Privacy Policy regularly. Your continued use of the Application will be deemed your agreement that your information may be used in accordance with the new policy. If you do not agree with the changes, then you should stop using the Application, and you should notify us that you do not want your information used in accordance with the changes.

### **Mobile Application Privacy Notice**

Please read this Policy carefully to fully understand how we collect, share and protect information about you. This Policy is incorporated into and is a part of the Terms of Use and Conditions for this Application. To access the Terms of Use and Conditions, navigate to the terms and conditions link in the app from the menu.

By accessing and using the Application, you agree that you have read and understand this Privacy Policy and that you accept and consent to the privacy practices and uses and disclosures of your information as described herein.

In order to deliver personalized and relevant information to you through our Application, we collect certain information from users.

### **Information We Collect**

In operating our Application, we may collect and process the following data about you:

- i. Details of your visits to our Application and the resources that you access, including, but not limited to, news posts, location data, the date and time you accessed or left the Application, or received notifications.
- ii. Information that you provide directly to us when downloading or using our Application or our website [healthyrhodes.ri.gov](http://healthyrhodes.ri.gov), including file information. Depending on the website you are using, the file information collected, whether or not personally identifiable, may include audio, video, and other graphic formats you send us.

### **Use of Your Information**

The information that we collect and store relating to you is primarily used to enable us to provide our products and/or services to you in the best possible manner. In addition, we may use the information for the following purposes:

- i. To provide you with information relating to our services and/or products
- ii. To analyze statistical information about the users of our Application;
- iii. To monitor and conduct an analysis of our Application traffic and usage patterns; To analyze trends.

### **Sharing of Your Information Sharing**

We do not sell, trade or give away your personal information to anyone. Additionally, we use industry-leading technologies to ensure the security and confidentiality of the personal information you provide us.

Throughout this policy, we refer to information that can identify you as a specific individual, such as your name, phone number, email address, Social Security number or credit card number, as "personal information." Further, personal information includes any information involving your health or medical status or history, or other information obtained through the application process.

1. We do not disclose your personal information to third parties except as specified in this Privacy Policy. We may disclose your personal information if one of the following limited exceptions applies.

- **Insurance Companies, Licensed Agents/Brokers and Navigators, state and federal government (as required by law and specified below) or Administrators.**

If you submit an application for an insurance product offered by us or for a benefit program including but not limited to but not limited to SNAP (food stamps), Child Care Assistance, RI Works (TANF), LTSS, GPA, and SSP, then we will disclose your personal information to your chosen insurance company to process your application. If you submit an application for an insurance product offered through an insurance agent or agency, or through a navigator or other application assistor with a relationship with us, then we may share your personal information with that party for the purposes of processing your application or enrollment. Please be assured that these partners are only allowed to use your personal information to process your requested quote, application, or enrollment form and are contractually obligated to maintain confidentiality.

- **Service Providers.**

We may disclose your personal information to other companies that help us process or service your insurance application or correspond with you. For example, we may provide your personal information to a service provider to send you monthly bills and process payments received. Please be assured that the companies we hire to process or service your insurance application or correspond with you are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality.

- **Legal Obligations.**

We may disclose or report your personal information when we believe, in good faith, that the disclosure is necessary to meet a legal obligation, for example, to cooperate with regulators or law enforcement authorities, to resolve consumer disputes, or for litigation.

**2. For Other Purposes with Your Written Consent.**

We may disclose or report your personal information to third parties with your written consent. For example, we may disclose your personal information to a friend or relative helping with your coverage, but only with your written permission. Except as specified in this Privacy Policy, we will not share your personal information with third parties.

**3. We collect personal information in the normal course of business in order to process your insurance application and to serve you better.**

- **Registering With Us.**

We begin collecting personal information from you when you register with us. You may register with us through our website by entering your email address and, if you are creating an account, choosing your password. You may also register with us through our Contact Center by providing certain personal or contact information (e.g., email address, phone number, gender, date of birth) to one of our Contact Center specialists.

- **Applying for Health Insurance and Other Products.**

If you apply for a health insurance or other products through our website, we may ask you to provide us with personal information and/or health information relating to you and any family member who will be included on your application. This information will be used by your chosen insurance company to process your application. Additionally, we may ask you to provide us with credit card or bank information, which will be used to process your application or collect any fees associated with your application or insurance premiums upon approval of your application.

- **Providing you with a Quote or Processing your Application.**

We may use your personal information to get in touch with you when necessary to process your application or to provide you with a quote. For example, emails will be sent to you throughout the application process to inform you of the status of your application and to seek additional information that is requested as part of the application.

- **Customer Satisfaction, Referrals and Other Products.**

We or service providers may contact you to survey your satisfaction of our service, refer our products and services to other people, and/or to inform you of additional products and services. You may opt out of receiving these additional communications from us by following the opt-out procedures below.

- **Oversight and Financial Integrity**

We may use and disclose your personal information to perform our required functions and for oversight, financial integrity, and quality activities.

4. We gather anonymous information about you for our internal purposes, and we may share this anonymous information with third parties.
  - Anonymous information is any information that does not personally identify you, including aggregate demographic information such as the number of visitors to our website from a particular state.
  - We use anonymous information primarily for marketing purposes and to improve the services we offer you

We may use "Cookies", "Clear Gifs", "Internet Protocol" addresses and other monitoring technologies to gather anonymous information. For a more detailed discussion on cookies and clear gifs, please see below.

### **Security Practices**

1. We protect the confidentiality and security of your personal information.
  - We maintain physical, electronic and procedural safeguards to protect your personal information. For a more detailed discussion of the electronic safeguards on our website, please see below.
2. We continue to evaluate our efforts to protect your personal information and make every effort to keep your personal information accurate and up to date.
  - If your personally identifiable information changes, or if you want to correct or update your contact information, you may do so through your Customer Portal account at [healthyrhode.ri.gov](http://healthyrhode.ri.gov).
  - We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.
  - Please note that once your application has been submitted to your chosen health insurance company, you may have to contact the insurance company directly to update your application.
3. We will provide notice of changes in our information privacy practices.

Changes to the Terms and Conditions of Use for the Application may occur from time to time, at our discretion. The modified Terms and Conditions of Use will be effective immediately upon posting. You agree to the new posted Terms and Conditions of Use by continuing your use of the HealthyRhode website or Application. You agree to review the Terms and Conditions of Use periodically and your continued use of the HealthyRhode website or mobile application following such modification will indicate your acceptance of these modified Terms and Conditions of Use and

our Privacy Policy. If you do not agree with the modified Terms and Conditions of Use and our Privacy Policy, your only remedy is to discontinue using the HealthyRhode website or mobile application.

### **"Cookies" and "Clear Gifs"**

"Cookies" are small files that are stored by your web browser to help a particular system recognize you and the pages you visited in a website. Our website uses cookies to make your online experience more convenient. For example, we may use a cookie to store your account information between sessions and to maintain information about the quotes you've requested during your session. Additionally, we may use data from cookies for a variety of internal purposes, such as studying how users navigate our website. We do not collect any personal information from cookies. Further, no other information we collect from cookies can be linked back to your personal information. Most browsers automatically accept cookies, but if you prefer, you can set yours to refuse cookies. Even without a cookie, you can still use most of the features on our website, including obtaining quotes and applying for an insurance policy.

"Clear gifs" are tiny graphics with a unique identifier, similar in function to cookies that are used to track the online movements of website users. The main difference between the two is that clear gifs are invisible on the page and are much smaller than cookies. We do not collect any personal information from clear gifs. Further, no information we collect from clear gifs can be linked back to your personal information. We use third party web analytics services to track and analyze anonymous usage and volume statistical information from visitors to help us administer our website, analyze trends, improve our websites performance and to report website traffic. These web analytics services use cookies, clear gifs, log files and other web monitoring technologies to help track visitor behavior on our behalf. These services do not use these technologies to collect any personally identifiable information from website visitors.

### **Security**

To secure your information, we have put in place commercially suitable physical, electronic, managerial and biometric (facial recognition and fingerprint authentication) procedures to safeguard and secure the information we collect on our Application.

Nonetheless, the transmission of information via the internet is not completely secure and therefore we cannot guarantee the security of data sent to us electronically on our Application, and transmission of such data is therefore entirely at your own risk.

### **Third Party Websites and Mobile Applications**

By accessing third party websites or mobile applications through our Application, you are consenting to the terms and privacy policies of those websites and mobile applications. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

Effective Date: June 26, 2023