



## Privacy Policy

*The following links lead to machine-readable files that are available in response to the Transparency in Coverage Rule. These files include negotiated service rates and out-of-network allowed amounts between health plans and healthcare providers; they are formatted to allow researchers, regulators, and application developers easy access to analyze data.*

[https://Health1.Meritain.com/app/public/#/one/insurerCode=MERITAIN\\_I&brandCode=MERITAINOVER/machine-readable-transparency-in-coverage?searchTerm=16182&lock=true](https://Health1.Meritain.com/app/public/#/one/insurerCode=MERITAIN_I&brandCode=MERITAINOVER/machine-readable-transparency-in-coverage?searchTerm=16182&lock=true)

<https://transparency-in-coverage.uhc.com/>

### Alera Privacy Notice

Alera Group, Inc. and its subsidiaries ("Alera") respects your privacy and is committed to handling your information in accordance with this Privacy Notice ("Notice").

This Notice lets you know the types of information we collect about you or that you may provide to us, including when you visit Alera's websites (i.e., <https://aleragroup.com/>, or see a full list of our websites [here](#)), our "Website" or "Websites", and our practices for using, disclosing, protecting, and sharing that information.

This Notice was last updated on October 6, 2020.

## Introduction

This Notice applies to information we collect on our Websites, in emails, other electronic messages between you and Alera, information you provide to us, and information we collect when you use an online service through our Website.

This Notice does not apply to information collected by any third party or affiliate, including through any application or content, including advertising, which may link to or be accessible from our Website. Alera is not responsible for the privacy practices or the content of those other websites. This Notice also does not apply to information collected via Alera's products and software.

Please read this Notice carefully to understand our practices regarding your information and how we will treat it. This Notice may change from time to time (see Changes to Our Privacy Notice) so please check the Notice periodically for updates. If there are any material changes to this Notice, we will notify you as required by applicable law.

**Children Under the Age of 16.** Our Website is not intended for children under the age of 16. We do not knowingly collect personal information from children under 16. If you are under the age of 16, do not use or provide any information on our Website, including providing any information about yourself to us. If we learn we have collected or received personal information from a child under the age of 16 without parental consent, we will delete that information. If you believe we have any information from a child under the age of 16, please contact us (see Help below).

## Information We Collect About You And How We Collect It

We collect information about you in many ways and some of the information we collect may include personal information that can be used to identify you. Personal information does not include publicly available information from government records or deidentified or aggregated consumer information.

In particular, we collect, and have collected within the last twelve months, the following categories of information:

Category	Example	Collected? (Y/N)	
A	Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.	Y
B	Consumer Records	A name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some PI in this category may overlap with other categories.	Y
C	Protected Classification	Characteristics of protected classifications under California or federal law (i.e., age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	N
D	Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	N
E	Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	N
F	Internet or other similar activity	Browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	Y
G	Geolocation Data	Physical location or movements.	N <sup>1</sup>
H	Sensory Data	Audio, electronic, visual, thermal, olfactory, or similar information	N

I	Professional or employment related information	Current or past job history or performance evaluations.	N <sup>2</sup>
J	Non-public education information	Education information including the name or address of a student or family members, student number, date or place of birth, mother's maiden name, handwriting, or other information that could identify a student with reasonable certainty (see 34 C.F.R. 99.3 (definitions of "personally identifiable information" and "biometric record") and records directly related to a student maintained by an educational agency/institution, such as, grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	N <sup>3</sup>
K	Inferences drawn from other PI	Profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	N

<sup>1</sup>We do not use any process or technique to derive from a device information regarding the physical location or movements of a consumer. We do, however, collect an individual's address as an identifier of the consumer's residence.

<sup>2</sup>We do not track employment related information from consumers, however, some of our forms may ask a consumer to enter their job title and current employer.

<sup>3</sup>Some of our forms may ask a consumer to enter the name of the school they are attending.

We obtain this information from the following sources:

**Information you provide to us voluntarily.** In general, you can visit our Website without providing any information other than the information we collect automatically. There are times, however, when we may need information from you. You may choose to give us personal information in a variety of situations. For example, we may collect your name, address, email address, telephone number, billing and financial information, or other information you may provide when you contact us about our services, engage with our Website to register to use or use any of our services, when you submit a form to contact us, when you register for an event, or request a paper or other information from us.

If you choose not to provide us with certain information, you may not be able to take advantage of certain features of our services, participate in our events, or receive information from us.

We may also ask for your personal information when you express an interest in employment opportunities by submitting an application to us. The information we collect will be apparent at the time you are submitting your application and we will use this information to evaluate your candidacy for employment.

**Information we collect automatically.** As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about you. For example, we use cookies (a tiny file stored on your computer's browser) to tell us about your device, browsing actions, and patterns including details of your visits to our Website, including whether you have or have not opened an email from us, and information about your device and internet connection, including your IP address or device identifier, operating system, and browser type. Alera may use this information to understand how our users navigate our site and to determine common traffic patterns, including what site the user came from. We may use this information to simplify site navigation, to make product recommendations to you and to help design our site in order to make your experience more efficient.

**Information from third parties.** We may collect information from a third party that we may use to market our product and services to you. We do not share information obtained from such third parties outside of Alera.

**Third Party Use of Cookies or Other Tracking Technologies.** We may use cookies to store and help us track information about you. Cookies are small pieces of data that are sent to your browser from a web server and stored on your computer's hard drive. We use cookies to help us know who you are and to help you navigate our sites during your visits. We also use cookies to measure traffic patterns and to understand how users navigate our site. For example, we use Google Analytics to help us analyze website traffic. For information on how Google Analytics collects and processes data, see [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

**How you can control cookies.** Most browsers are initially set up to accept cookies. However, if you prefer not to store cookies on your device, you can set your browser to notify you when you receive a cookie, set your browser to refuse cookies by activating the appropriate setting on your browser, delete cookies after visiting our site, or browse our site using your browser's anonymous usage setting. However, if you don't accept cookies, this may prevent our Website or services from working properly.

### [How Do We Use This Information](#)

Alera may use information that we collect about you or that you provide to us for the following purposes:

- To present our Website and its content to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it, including when you fill out a form requesting information from us.
- Through our use of cookies, to understand how our websites are being used and to measure the effectiveness of our website
- To improve our Website and our products and services.
- To personalize your Website experience and to deliver content and product and service information and offerings relevant to your interests or location, including providing such information or offer via email.
- To register you to attend an event or webinar, which may include helping us to plan, coordinate, and host such events, and analyzing your interests in and interactions with the event.
- If you visit our offices, we may register you as a visitor.
- Alera may receive information about you from other sources, including from third parties. We may combine this information with other information provided by you which helps us to update and expand our records, identify new customers, and tailor our advertising and marketing communications.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To help maintain the safety, security and integrity of our Website, products and services, and databases.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.

- To fulfill any other purpose for which you provide it or for which you consent.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets ("transaction"), whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Website users or customers is among the assets being transferred, which may occur prior to consummation of such transaction.

If you are submitting information on behalf of a third party (for example, registering a fellow employee for a webinar or conference), Alera expects that you have received appropriate consent, according to applicable privacy laws, before transferring any personal information to Alera.

We will not collect additional categories of information or use the information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### Your California Privacy Rights

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, [click here](#).

### Information We Share

We may disclose aggregated information about users, and information that does not identify an individual, without restriction. We share your personal information with the following categories of parties:

- To our service providers.
- To a third party, for example, when you sign up for an event, we may provide the information submitted on the registration form to the speaker(s) or host of the event.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- For Corporate Transactions. Alera may also disclose your information to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization,

dissolution, or other sale or transfer of some or all of Alera's assets, where personal information held by Alera about our Website users is among the assets transferred.

- Other Reasons. To: (a) satisfy applicable law, regulations, legal process or valid governmental request; (b) enforce the terms of use applicable to our services, (c) detect, prevent or mitigate fraud or security or technical issues; or (d) protect against imminent harm to the rights, property or safety of our company, our customers or the public as required or permitted by law.

## Your Choices

You can tell us how we can use your personal information by using the following:

- Tracking Technologies. As noted above under "How you can control cookies," you can, for example, set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, some parts of our Websites may be inaccessible or not function properly.
- Disclosure to Third-Parties. If you do not want us to share your information with third parties, you can choose not to submit your information on the form giving us permission to share your information.
- If you are on our email mailing list , you may remove yourself from the mailing list at any time by unsubscribing [here](#).

We do not control third parties' collection or use of your information to service interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way.

## Security

Alera respects your personal information and takes steps to protect it from loss, misuse, or alteration. Where appropriate, these steps can include technical measures like firewalls, intrusion detection and prevention systems, unique and complex passwords, and encryption. We also use organizational and physical measures such as training staff on data processing obligations, identification of data incidents and risks, restricting staff access to your personal information, and ensuring physical security including appropriately securing information when not being used.

## Changes to the Privacy Notice

Alera reserves the right to change this Notice. If we decide to make changes, we will post the updated notice on our website so you are always aware of what information we



collect, how we use it, and the circumstances, if any, we disclose it. The date this Notice was last revised is identified at the top of the page. You are responsible for ensuring that we have an up-to-date active and deliverable email address for you, and for periodically visiting our website and the Notice to check for any changes. **Your continued use of our Website following the posting of changes constitutes acceptance of such changes.** Where required by applicable data protection laws, we will also seek your consent to any material changes that affect how we use your information.

## Help

If you need help with unsubscribing or have questions regarding this Notice, please visit our [Contact Us Page](#), email us at [privacy@aleragroup.com](mailto:privacy@aleragroup.com), call (866) 226-8343, or contact us by regular mail addressed to:

3 Parkway North  
Suite 500  
Deerfield, IL 60015  
Attn: Privacy Request

## Privacy Notice for California Residents

Effective Date: January 1, 2020

This Privacy Notice for California Residents ("California Notice") supplements the information contained in our Notice above and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA") and any terms defined in the CCPA have the same meaning when used in this California Notice.

This Notice does not apply to employment-related personal information collected from California-based employees, job-applicants, contractors, or similar individuals. Our privacy practices for these individuals will be separately provided as applicable.

Where noted herein, the CCPA temporarily exempts personal information reflecting a written or verbal business-to-business communication ("business-to-business personal information") from some requirements.

## Information We Share

We may disclose your personal information to a third party for a business purpose or share your personal information with a third party subject to your right not to provide your information in those circumstances (see Sales Opt-Out and Opt-In Rights below). When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information with the following categories of parties:

- To our service providers.
- To a third party, for example, when you sign up for an event, we may provide the information submitted on the registration form to the speaker(s) or host of the event.

## Disclosures of Information for a Business Purpose

In the preceding twelve months, Alera has disclosed the following categories of personal information for a business purpose:

Identifiers, such as name, postal address, IP address, email address, phone number.

We disclose your personal information for a business purpose to the following categories of parties:

- Service providers.

## Sales of Personal Information

In the preceding twelve (12) months, Alera has shared the following categories of personal information:

- Identifiers, such as name, postal address, IP address, email address, phone number.
- Consumer Records, such as name, postal address, telephone number, name of school attending, job title, employer name.

- Professional or employment related information, such as job title and employer name.
- Non-public education information, such as school attending.

We share your personal information to the following categories of third parties:

- To a third party, for example, when you sign up for an event, we may provide the information submitted on the registration form to the speaker(s) or host of the event.

## Your Rights and Choices

If you are a California resident, the CCPA provides you with specific rights regarding your personal information. This section describes your CCPA rights and explains how to exercise those rights.

### Accessing Your Information and Data Portability Rights

You have the right to request that Alera disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling 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 (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose,
- Sales, identifying the personal information categories that each category of recipient purchased; and
- Disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

We do not provide these access and data portability rights for business-to-business personal information.

## Requesting Deletion of Information

You have the right to request that Alera delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service that you requested, take actions reasonably 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 et seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in 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 reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We do not provide these deletion rights for business-to-business personal information.

## Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling (866) 224-8343
- Email: [privacy@aleragroup.com](mailto:privacy@aleragroup.com)

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. If you submit a request on behalf of another person, we may require proof of authorization and verification of identity directly from the person for whom you are submitting a request.

You may only make a verifiable consumer request for access or data portability 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, which may include your name and email address;
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

## **Response Timing**

We endeavor to respond to a verifiable consumer within 45 days of its receipt. If we require more time (up to 45 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, which may include either a screen shot of the information or a pdf.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### **Personal Information Sales Opt-Out and Opt-In Rights**

We do not share your information with a third party unless you complete a form. The form will be self-evident regarding the information collected, the purpose for the collection, and how the information will be shared. If you do not agree to the sharing of such information, you should not complete and submit the form as the form's submission will act as an "opt-in" for the sharing of such information.

Under the CCPA, if you are 16 years of age or older, you have the right to direct us not to sell your personal information at any time (the "right to opt-out"). To exercise the right to opt-out, you, or your authorized representative, may submit a request to us by visiting [Do Not Sell My Personal Information](#).

Once you make an opt-out request, we will wait at least 12 months before asking you to reauthorize personal information sales. However, you may change your mind and opt

back in to sharing personal information by filling out a form with the requested information and submitting that form.

You do not need to create an account with us to exercise your opt-out rights. We will only use your personal information provided in an opt-out request to review and comply with the request.

## **Non-Discrimination**

We will not discriminate against you for exercising any of your rights under the California Consumer Privacy Act ("CCPA"). Unless permitted by the CCPA, 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 with a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

## **Changes to the Privacy Notice**

Alera reserves the right to change this Notice. If we decide to make changes, we will post the updated notice on our website so you are always aware of what information we collect, how we use it, and the circumstances, if any, we disclose it. The date this Notice was last revised is identified at the top of the page. You are responsible for ensuring that we have an up-to-date active and deliverable email address for you, and for periodically visiting our website and the Notice to check for any changes. **Your continued use of our Website following the posting of changes constitutes acceptance of such changes.** Where required by applicable data protection laws, we will also seek your consent to any material changes that affect how we use your information.

## **Help**

If you need help with unsubscribing or have questions regarding this Notice, the ways in which Alera collects and uses your information as described in this Notice, your choices and rights regarding such use, or wish to exercise your rights under California law, please

unsubscribe [here](#), email us at [privacy@aleraigroup.com](mailto:privacy@aleraigroup.com), call (866) 226-8343, or you can contact us by regular mail addressed to:

3 Parkway North  
Suite 500  
Deerfield, IL 60015  
Attn: Privacy Request

### [Alera Group Websites](#)

Please click on [Locations](#) for a page of updated Alera Group websites, firms, and locations.