



Privacy Policy Statement

Revised April 2021

This Privacy Policy Statement outlines the use, disclosure and safeguarding of personally identifiable information collected through this website. By using this site, you as an individual or on behalf of your company agree to the collection and use of your personal information in accordance with this Policy Statement. Your use of our services is at all times subject to our **Terms of Service**, which incorporates this Privacy Policy.

If you are using this website to enroll in or access information or services related to your health plan, you should also review the Notice of Privacy Practices, which discusses your rights and our obligations with respect to Protected Health Information.

The Amalgamated Family of Companies

This website is owned and operated by the Amalgamated Family of Companies, which consists of Amalgamated Life Insurance Company, Amalgamated Employee Benefits Administrators, Inc., Amalgamated Medical Care Management, Inc., and Amalgamated Agency, all companies domiciled in the State of New York. These companies shall be collectively referred to throughout this Policy as “Amalgamated”.

This Privacy Policy applies to information that is collected by Amalgamated at any of the following websites on which this policy is posted.

- www.amalgamatedbenefits.com
- www.aligraphics.com
- www.aebrx.com
- www.nurse2doconnect.com

The websites listed above shall be referred to individually or collectively as the “Amalgamated website”. This policy does not apply to information collected by third-party websites, which Amalgamated neither owns nor controls, even where links to such third-party websites are provided on the Amalgamated website.

Information That We Collect

Amalgamated is committed to providing the highest level of security and privacy regarding the collection and use of personally identifiable information (“personal information”) which is any information collected or maintained about an individual by Amalgamated that can be used to distinguish or trace that individual’s identity. The information that we collect depends on your relationship or interaction with us, and may include the following:



- your name, address, social security number and birthdate
- information about your family members and dependents
- contact information including telephone number, cell phone number, and e-mail address
- professional industry, job title, personal blog or website addresses
- employment history, union affiliation, areas of interest
- member ID, financial account numbers, and other identifiers that you submit to us

Amalgamated collects personal information about you that you provide when you register with and access our website, purchase or request information about products or services, sign up for newsletters or our e-mail list, apply for employment, submit inquiries or request quotes, participate in an online survey or promotion, participate in blogs and discussion forums, or otherwise contact us. Amalgamated receives information about you that is provided by your employer, health plan, health insurer or health care provider or other such entity pursuant to a contract for the purchase or administration of insurance or other benefits by Amalgamated. We may also obtain information about you from other sources, including the Medical Information Bureau, data aggregators, consumer reporting agencies, marketing firms and public databases.

Non-Identifying information is information that does not directly identify you. Amalgamated may use cookies, web beacons, pixel tags, log files, or other technologies to collect certain non-identifying information (such as the type of web browser and operating system you use, the name of your Internet Service Provider, Internet Protocol (“IP”) address, software version) about visitors to and users of our websites, products and services for the purposes described in the next section. You are always free to block, delete or disable these technologies if your browser, application or device allows. However, if you decline cookies or other similar technologies, you may not be able to take advantage of certain website product or services features or tools.

How We Use Your Information

All personal information collected through this site is used as necessary for specific business purposes including:

- Performing enrollment, claims processing, and other routine administrative business functions;
- Servicing, maintaining or administering your policy or benefits and responding to your inquiries and complaints;
- Creating accounts and providing you with access to our websites, products and services;
- Communicating with you regarding our products and services (for example, newsletters and product updates);
- Responding to your inquiries and requests for quotes and other information concerning products, services or coverage;
- Improving and maintaining our websites, products and services;
- Considering you for employment and communicating with you regarding employment and contracting opportunities;



- Performing fraud and abuse monitoring activities with respect to our products, services and business operations
- Protecting the confidentiality and integrity of our records and maintaining the security and availability of our websites;
- Displaying comments and other information you choose to share through blogs and discussion forums, as well as reviews of our products and services;

We may use your personal information to communicate with you regarding products and services that may be of interest to you by various means, including postal mail, email, and telephone. You have the right to opt-out of marketing communications. You can also request limitations with respect to how we contact you.

We may use non-identifying information for internal purposes and to help us interact with visitors to this site. Non-personal information gathered through cookies and other tracking technology is used to monitor interactions with our websites, products, services and emails, identify and maintain your user preferences, tailor web content to match your browser capability, analyze usage trends, administer and improve our websites, products, and services, identify irregular website behavior, to prevent fraudulent activity and to improve security.

How We Share Your Personal Information

Amalgamated does not sell or otherwise disclose personally identifiable information about you, except as described here.

Sharing Among our Affiliates: Amalgamated may share your personal information with our affiliated entities in order to support our business operations, to provide products and services to you, and for any other purpose described in this Privacy statement. Amalgamated and its affiliates may share your personal information with one another to enhance and personalize your experience on our websites, to conduct research and analyze the use of our products and services, and to develop new products or services.

Sharing with Third Parties: Personal information is shared with non-affiliated third parties in the following circumstances:

- We share information with your insurance agent or broker, benefit plan, plan sponsor, or plan administrator for purposes relating to our administration of a plan or product under which you are insured, such as conducting enrollment and claims processing.
- We contract with service providers and individuals that perform a variety of functions on our behalf including customer service, case management, data analysis, billing and payment processing, benefits administration, auditing, actuarial, tax, information technology, website hosting, and other similar services for us. We may share your personal information with these service providers to the extent necessary for them to provide these services, but require that these providers agree to maintain the information in confidence and safeguard it from unauthorized access or disclosure.



- We may de-identify your personal information, which means removing identifiers that would permit someone to link the information to you as an individual, and provide that information to persons or organizations that conduct actuarial or research studies. We may also provide aggregated information (consisting of combined information elements of a number of individuals) to third parties, who may use such information to analyze patterns or statistics regarding use of our products and services.
- We may share your information with insurance support organizations or another insurer to properly underwrite a risk prevent, or to prosecute fraud or detect criminal activity.
- During the normal course of our business, Amalgamated may sell or purchase assets. We may share information in connection with a proposed or actual sale, merger, transfer, or exchange of all or a portion of a business unit. If another entity acquires, or seeks to acquire, us or any of our assets, information we have collected about you may be transferred to such entity.
- We may in some instances share certain non-sensitive personal information with third parties in order to permit them to market products and services that may be of benefit you. However, we will only share your information for marketing purposes where you have agreed to us sharing the information. You have the right to opt out of these communications.
- We will never sell your personally identifiable information to a third party without your permission.

Sharing as Required by Law

- We may be required to share your information in order to comply with Federal, State, or local laws, rules, or other applicable legal requirements.
- We may disclose your information when required by a properly authorized civil, criminal or regulatory investigation or subpoena or summons by Federal, State or local authorities
- We may be required to share information in order to respond to judicial process or government regulatory authorities having jurisdiction for examination, compliance, or other purposes as required by law.
- We may share information with law enforcement agencies where we believe it is necessary to investigate or prevent actual or suspected criminal activity or injury to you or someone else ourselves or others.
- If any bankruptcy or reorganization proceeding is brought by or against us, personal information may be considered an asset of ours and may be sold or transferred to third parties. Should a sale or transfer occur, we will use reasonable efforts to try to require that the transferee use personally identifiable information provided through our websites, products and services in a manner that is consistent with this privacy statement

Non-Identifying Information

Because non-personal information does not identify you, we reserve the right to use and disclose it for any purpose. Amalgamated may use cookies, web beacons, pixel tags, log files, or other technologies to collect certain non-identifying information (usage data) about you as a user of our websites, products



and services. For example, we may automatically collect certain information about the type of web browser and operating system you use, the name of your Internet Service Provider, Internet Protocol (“IP”) address, software version, and course geolocation information. We may also collect information about your browsing behavior, such as the date and time you visit our websites, the amount of time you spend viewing or using our websites, the number of times you return to our websites, and other click-stream or site usage data.

How We Protect Your Personal Information

Protecting your personal information is important to us. Amalgamated restricts access to your personal information to those employees who need to access the information to provide products or services to you. We educate all employees about the importance of confidentiality and customer privacy. Employees who violate our privacy rules are subject to our normal disciplinary procedures. Amalgamated requires all third parties with a business need to access your personal information to adhere to stringent privacy policies and to agree to maintain the information in confidence and safeguard it from unauthorized access or disclosure.

We maintain commercially reasonable administrative, technical, and physical safeguards to help protect your personal information against unauthorized access, use, disclosure, alteration, or destruction. We periodically review our data security practices and consider appropriate new technology and methods to ensure compliance with federal and state privacy and security regulations. We also periodically subject our applications and systems to simulated intrusion tests and have developed a disaster response and recovery plan. However, no method of transmitting or storing electronic data is ever completely secure or impenetrable. The information that you submit to us is provided at your own risk. In the event that your information is disclosed in an unauthorized manner, we will notify you of the breach as required by applicable law.

Choice & Control Over Your Information

The following information describes how you can request limitations on the sharing of your information.

- **Emails:** All of our commercial emails provide you with the ability to “opt out” or unsubscribe from receiving future commercial emails from us.
- **Cookies and Electronic Data Tracking:** Cookies can be disabled or removed by tools that are available in most commercial browsers. The preferences for each browser you use will need to be set separately and different browsers offer different functionality and options. For more information on how you can block, delete, or disable cookies and similar technologies, please review your browser or device settings. However, please note that our websites do not recognize browser “do-not-track” signals or similar mechanisms.
- **Additional Permissions:** In the event that we wish to use your information in a manner different from that stated at the time it was collected, we will notify in advance and ask for your permission to use your personal information in this new manner. If we do not receive



permission, we will use the information in accordance with the privacy statement under which the information was collected.

Updates to Our Privacy Statement

We reserve the right to make changes or updates to our Privacy Policy. If we decide to change our Privacy Statement in a material way, we will post a notification highlighting those changes on our website. You should review the website periodically to see if the notice has been updated.

How to Contact Us

If you have any questions or concerns regarding this Privacy Statement, please email ComplianceOfficer@AmalgamatedBenefits.com. You can also write to us at: Amalgamated Family of Companies, 333 Westchester Ave., White Plains, NY 10604, Attn: Privacy Officer, or call us at 1(914) 367-5941.