

# Brite Privacy Policy

**Brite Benefits, Inc.** (“Brite”, “we”, “us”, or “our”) is committed to protecting your privacy. This Privacy Policy describes and governs our collection, use and disclosure of certain personal information that may be collected from you in connection with your use of and access to our websites or services (collectively, the “**Services**”). By submitting personal information through our Services, you expressly consent to the processing of your personal information in accordance with this Privacy Policy. The use of personal information collected through our Services shall be limited to the purposes described in this Privacy Policy.

## 1. THE INFORMATION WE COLLECT

When you use the Services, we may receive and collect certain personal information. The information we receive and collect depends on what you do when you use the Services. Some information may be provided by you voluntarily. For example, you may share information with us when you submit comments or other content through the Services, when you register for an account through the Services, or when you interact with us on social media platforms.

### **Automatically Collected Information.**

Some information is automatically received and sometimes collected from you when you use the Services. This information may include some or all of the following items: the name of the domain and host from which you access the Internet, including the Internet protocol (IP) address of the device you are using and/or the IP address of your Internet Service Provider; the type and version of Internet browser software you use and your operating system; the type and version of your media player(s); the date and time you access the Services, the length of your stay, and the specific pages, images, video or forms that you access while using the Services; and demographic information concerning the country of origin of your device and the language(s) used by it. We use this information to monitor the usage of our Services, assess performance, ensure technological compatibility with your device, and understand the relative importance of the information provided through the Services. We may also use this data to conduct statistical analyses on visitors' usage patterns and other aggregated data.

“Cookies” are small pieces of information that a website sends to your computer's hard drive while you are viewing a website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Services.

“Web beacons,” are digital images we use to log information on our Services and in our emails. We use web beacons to manage cookies, count visits, and to learn what marketing works and what does not. We also use web beacons to tell if you open or act on our emails.

We may use analytics services to help analyze how users use the Services. These services use cookies and scripts to collect and store information such as how users interact with our Services,

errors users encounter when using our Services, device identifiers, how often users access the Services, what pages they visit, and what other sites they used prior to accessing the Services.

We use the information we get from Google Analytics only to improve our Services. Please see the following links for more information about Google Analytics:

### **Personal Information about Children**

We do not knowingly collect personal information from children under the age of 13. However, we advise all users of our Services under the age of 13 not to provide any information on the Services. In the event that we discover that a child under the age of 13 has provided information to us, in accordance with the Children's Online Privacy Protect Act (see the Federal Trade Commission's website at <http://www.ftc.gov/privacy/privacyinitiatives/childrens.html> for more information about this Act), we will delete the child's information from our files to the extent technologically possible.

### **Social Media Sites**

## **2. HOW WE USE AND SHARE PERSONAL INFORMATION**

In general, personal information you submit to us is used either to respond to requests that you make, or to aid us in serving you better. We use your information in the following ways: to identify you as a user on our Services; to operate, maintain, and improve our Services; to personalize and improve your experience; to send you email or other communications (e.g., we may send you an email to solicit feedback about our Services or for other administrative purposes); to respond to your comments or inquiries; and to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.

We will share your personal information with third parties only in the ways that are described in this Privacy Policy or with your consent.

We may share some or all of your personal information with our affiliates (parent company, subsidiaries, joint ventures or other companies under a common control), in which case we will require our affiliates to honor this Privacy Policy.

We may share your personal information with third-party service providers for the sole purpose of providing our Services to you. For example, we may share data with service providers who host our websites or provide email services on our behalf.

We may disclose information about you if we believe such disclosure is necessary to (a) comply with laws or to respond to lawful requests and legal process; or (b) protect or defend the rights, safety, or property of Brite, users of the Services, or any person including to enforce our agreements, policies, and terms of use or (c) in an emergency to protect the personal safety of any person.

We may also share information about you in connection with or during negotiation of any merger, financing, acquisition, bankruptcy, dissolution, transaction or proceeding involving sale, transfer, divestiture or disclosure of all or a portion of our business or assets to another company.

We may also share de-identified and/or aggregated data with others for their own uses.

**All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.**

If you are a California resident and have an established business relationship with us, California Civil Code Section 1798.93 permits you to request a notice disclosing the categories of personal information we have shared with third parties, for the third parties' direct marketing purposes, during the preceding calendar year. To request a notice, please submit your request by using the contact information provided herein.

### **Not Subject to HIPAA or Other Laws Governing Health Information**

We are not a healthcare provider and are not subject to compliance with the Health Insurance Portability and Accountability Act (HIPAA) or to other U.S. federal or state laws related to patient health information. Users are required under our Acceptable Use Policy to avoid providing individually identifiable health information (as defined by HIPAA) to the Services.

### **3. SECURITY**

We take commercially reasonable steps to help protect your personal information in an effort to prevent unauthorized access, use, or disclosure. Despite these measures, you should know that we cannot fully eliminate security risks associated with information. No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security. Any content you submit while using the Services is at your own risk. If you have any questions about security on our Services, you can contact us at the contact information provided herein.

### **4. LINKS TO THIRD-PARTY WEBSITES**

If you access links through the Services that take you to third-party websites, you will be subject to the third parties' privacy policies. While we support the protection of privacy on the Internet, we cannot be responsible for the actions of any third-party websites. We encourage you to read the posted Privacy Policy of any and every site you visit, whether you are linking from our Services or browsing on your own.

### **5. ACCESS TO AND MANAGING YOUR PERSONAL INFORMATION**

We believe it is important for you to be able to find out what personal information you have provided to us through our Services. If you have provided us with personal information, you can contact us to request that we provide you with the information we have in our records about you. We reserve the right to limit the number of times such a request can be made and to charge you for responding to such requests if this process is misused or abused. You may contact us using the contact information provided below to inquire about your information, and to correct, amend or delete such

information. We want the information we have on record about you to be as complete and accurate as possible. If you believe that any information we have in our records about you is inaccurate, incomplete or incompatible with the purposes for which it was provided or subsequently authorized by you, please notify us using the contact information provided below.

## **6. WHAT YOU NEED TO DO TO PROTECT YOUR PERSONAL INFORMATION**

You have several options when deciding how you can best protect your personal information. One option is simply not to volunteer it. As stated above, this approach may allow you to still access our Services, although it may prevent you, for example, from taking advantage of some of our Services' features. The Federal Trade Commission's Website, <http://www.ftc.gov>, also offers useful information about how to protect information that you provide to websites or applications.

## **7. WHAT TO DO ABOUT SUSPECTED VIOLATIONS OF THIS PRIVACY POLICY**

If at any time you believe that we or any third-party vendor who is providing a service on or through the Services has not adhered to the policies and principles set forth in this Privacy Policy, please notify us using the contact information provided below. We will make all commercially reasonable efforts to promptly address your concerns.

## **8. USE OF ELECTRONIC MAIL**

We may provide email or messaging links on the Services to further facilitate communication between us and you. Personal information collected through email and messaging may be shared with our customer service group, employees or other third parties that perform services on our behalf. Unless otherwise noted, email or messaging through our Services is not a completely secure and confidential means of communication. Non-encrypted email or messaging communications may be accessed and viewed by other Internet users without your knowledge and permission while in transit to us.

## **9. CHANGES TO PRIVACY POLICY**

This Privacy Policy was last modified on the effective date first written above. We reserve the right to amend this Privacy Policy from time to time in our sole discretion and will post and maintain the most recent version of the Privacy Policy on our website. We may not notify Services users of any such amendments and you are responsible for reviewing this Privacy Policy upon each visit or use of the Services, referring to the effective date at the top of this document to verify any changes since your last visit. YOU ARE HEREBY ADVISED THAT YOUR CONTINUED USE OF THE SERVICES CONSTITUTES YOUR ACCEPTANCE OF ANY AMENDMENTS TO AND THE MOST RECENT VERSION OF THIS PRIVACY POLICY. If you do not agree to the terms of this Privacy Policy, please do not use the Services.

## **10. QUESTIONS, COMMENTS AND CONTACT INFORMATION**

If you have any questions or comments concerning our Privacy Policy, please contact us at:

Brite Benefits, Inc.

Email: [info@britebenefits.com](mailto:info@britebenefits.com)