

Holmes Murphy Website and Mobile Application Privacy Notice

EXECUTIVE SUMMARY

This Privacy Notice applies to any personal information you provide to us and any personal information we collect when you contact us, visit or use our websites or applications, visit one of our office locations, attend an event or seminar we are hosting, whether in person or virtual, or utilize our services ("Services") which are provided by HMA Group Holdings, LLC or any of our affiliated companies (collectively, "Holmes Murphy", "we", or "us"). By using any of our Services, you are agreeing to being governed by this Privacy Notice and our Terms of Use, which will govern any dispute concerning these Services.

POLICY

Information We Collect

When you use our Services, we may automatically collect information about your Internet service provider, your operating system, browser, type, domain name, Internet protocol (IP) address, your access times, the website that referred you to us, the pages and aspects of the Services you requested, and the date and time of those requests.

Additionally, we may collect the following information in order to provide our Services, which, in addition to the above, is considered personal information:

Contact information: may include name, email, physical address, social media handle or phone number.

Unique identifiers: may include passport number, driver's license number, or any other identifying documentation issued by a federal, state, or local agency.



Demographic details: may include your date of birth, age, gender, race, image, marital status, background information, or insurance requirements.

Employment information: may include job title, employee number, employment status, salary, background information, or health and wellness benefits.

Health information: may include medical records, health status, medical outcomes, claim summaries, and other information which may or may not be regulated under the Health Insurance Portability and Accountability Act of 1996 (HIPAA).

Benefits information: may include benefit elections, claims made under your applicable benefit programs or insurance policies, retirement information, employment information, contribution summaries, and other voluntary information relating to your health and wellness benefits.

Financial information: may include credit history, salary, tax information, deductions, benefits data, and insurance contribution or payout information.

Claims information: may include claim summaries, background information, driving records, credit reports, medical files, or other necessary documentation.

Finally, we may also collect certain marketing information you provide in connection with any marketing campaigns, events, or seminars hosted by us. Such information may include an indication of your interest in our Services, comments, feedback, or other forms of interaction that may occur through said marketing campaigns, events, or seminars. We will also make note of your communication preferences.

Information Provided by You or Third Parties to Us

In general, you can visit our website and utilize some of our Services without telling us who you are or revealing any personal information. In some instances, you may be prompted to provide some information, such as an email address, name, address, or zip code in order to receive additional information regarding our Services. We will only use the personal information you have shared with us for the purposes as stated in this Privacy Notice.



Depending on the Services being provided, we may obtain your personal information from your employer, your health plan, or applicable insurance carriers. The provision of such information by a third party shall be governed by this Privacy Notice and any other agreements entered into between us and the provider or insurance carrier relating to the confidentiality, use, disclosure, and retention of such personal information.

Cookies and Automatic Collection

Cookies are pieces of information that a website transfers to the hard drive on your computer for record-keeping purposes. We use cookies for our services to remember important information that will make your use more convenient. Some of the information collected may be linked to a specific IP address, but we do not try to identify the person using that IP address. You may set your browser to accept or reject most cookies or notify you when a cookie is set. It is up to you to allow us to set cookies, but if cookies is blocked you may not be able to view or access some of the features of our services.

How We Use the Information

If you provide personal information, we may use that information to contact you or to provide our Services. Additionally, we may use personal information to improve our marketing and promotional efforts, to analyze site usage, and to improve our content, layout, and Services. Information collected automatically through cookies may be combined with your previously submitted personal information.

We may process your information we have collected in connection with the Services which may include: brokerage services, insurance consulting, ancillary benefit services and consulting, wellness consulting, benchmarking, marketing, research, and other similar offerings. In addition to the performance of our Services, we may process your information to meet our legal and regulatory obligations, prevent and detect fraud, with the consent of the provider, or for other legitimate interests.

How We Share Your Data

We will not sell, exchange, or otherwise distribute your personal information without your consent, except to the extent required by law, required in order to provide our Services, or as identified in this Privacy Notice. Your information may be shared with



our affiliates, agents or service providers, in a business transfer, or in certain legal matters which require such disclosure.

Additionally, we may disclose your information to insurance carriers, risk management agencies, legal advisers, accountants, auditors, insurance adjusters, claim investigators, third party administrators, medical professionals, law enforcement bodies, or regulators and government bodies.

Links to Other Websites

Our services may have links to other websites that are not operated by us. If you visit one of these linked websites, you are then subject to the policies of the owner of the linked website and will no longer be protected by our Privacy Policy or Terms of Use. We are not responsible for the contents of those websites and have no control over what information they may or may not collect from you.

Data Security and Retention

We take reasonable steps to maintain physical, technical, and administrative security of any information you provide to use in order to protect the confidentiality, integrity, and availability of the information and ensure that such information is processed in accordance with applicable privacy laws.

We will retain your personal information only as long as necessary in connection with your use of our Services or as required by law. We may also retain some data for internal analysis purposes only. Such data will be retained for a short period of time, unless used to strengthen our security or improve functionality.

Your Information Rights

Per applicable privacy laws, you have the following rights as it relates to your information: right to access, right to correct, right to erase, right to object to processing, right to object to direct marketing, right to restrict processing, right to portability, right to object to automated decision making, and a right to lodge a complaint to a regulator. In order to exercise your rights or contact us with any concerns, please send an email to Privacy@holmesmurphy.com or call (800) 247-7756.

Use by Children



We will not knowingly allow anyone under the age of thirteen (13) to provide us any personal information online. Holmes Murphy cares about protecting the privacy of children and believes children should always have the permission of their parents before transmitting any personal information over the internet.

Compensation Disclosure

Holmes Murphy and its affiliates receive compensation from insurance carriers and other third-party vendors for services provided through the receipt of commissions and profit-sharing arrangements. Profit-sharing payments from insurance carriers are based on the profitability and/or premium growth of all the business Holmes Murphy or its affiliates has with an insurance carrier and is not determined solely by the profitability of your account.

International Users

This Privacy Notice is provided in accordance with and is subject to United States of America law. If you access this site from outside the United States of America, you agree that your use of the site is subject to this Privacy Notice and the Terms of Use.

Terms and Changes

In using our services, you agree to the terms of this Privacy Notice. To view further terms governing the use of our services, please visit our Terms of Use page. As our Privacy Notice changes due to the evolution of digital technology, we will post changes here and indicate at the top the last date of update. Unless otherwise noted, all changes will be effective when posted.

Questions or Concerns

If you have any questions, concerns, or complaints about this Privacy Notice, they should be directed to Holmes Murphy at Privacy@holmesmurphy.com or call (800) 247-7756.



APPROVAL AND OWNERSHIP

Approved By	Title	Date
Chris Nelson	Legal	March 2019
Bryan Thompson	Information Security	August 2023

