

## **Privacy Policy for Provider Portal**

Effective Date: 11/18/19

### **1. General**

This Privacy Policy describes how SCAN Health Plan treats information that it collects and acquires through the websites it owns and operates. All references to “SCAN,” “we” or “our” in this Privacy Policy includes SCAN Health Plan and/or any other entities that may be affiliated with it, as appropriate based on context, unless otherwise stated.

Each time you access, use and/or browse the Websites, you signify your acceptance of the then-current Privacy Policy. If you do not accept this Privacy Policy, you are not authorized to access, use and/or browse the Websites and you must immediately discontinue use of the Websites.

This Privacy Policy does not apply to the practices of companies that SCAN does not own or control, or to people whom SCAN does not employ or manage.

### **2. Changes to This Privacy Policy**

The Privacy Policy may be revised from time to time as we add new features and services, as laws change, and as industry privacy and security practices evolve. You can determine when this Privacy Policy was last revised by referring to the Effective Date at the top of this page. You should check the Privacy Policy on a regular basis for the most current privacy practices. Each time you access, use or browse the Websites, you signify your acceptance of the then-current changes to the Privacy Policy applicable to information collected by us on and from the effective date of such changes. Any changes in the Privacy Policy will take effect upon posting, but material changes will not apply to information collected from you before the Effective Date, unless we have other communications with you.

### **3. Types of Information We Collect**

SCAN collects personally identifiable and non-personally identifiable information through your interactions with SCAN and the Websites.

The personally identifiable information that SCAN may collect about you may include, without limitation, username, tax identification number, national provider identification number, email address, password, and geolocation.

The non-personally identifiable information that SCAN collects about you is aggregated or otherwise does not link to personal contact information, and may include, without limitation, your Internet Protocol ("IP") address, the domain name of your internet service provider, Collection Technology information (as described below), the type of device you use, the operating system you use (e.g., Microsoft Windows, Mac OS or Google Chrome OS), the type and version of browser you use (e.g., Firefox, Chrome, Internet Explorer or Safari), your browsing history and your activities while visiting the Websites and the content you access or view when using same, the time of your visit, the pages you visit and the time spent, your general geographic location such as the city from which your device is connecting to the Internet, information regarding the Websites you visit prior to and after visiting the Website, and aggregated information regarding your precise or approximate geolocation.

#### **4. How We Collect Information**

SCAN and/or its Service Providers (defined below) may collect personally identifiable information that you provide to SCAN through your interactions with the Websites

SCAN and/or its Service Providers may collect non-personally identifiable information through your accessing, using and browsing of the Websites, and other online or mobile interactions with SCAN and the Websites, in a variety of ways, such as:

- server log files, which automatically record certain non-personally identifiable information on server logs;
- cookies, web beacons, pixels, gifs, tags and other technologies that collect information in similar ways ("Collection Technology"), which may store a piece of data on your browser or device, or may identify, compile, aggregate and/or collect information through other means;
- other information that you voluntarily provide, if the portion of such information that personally identifies you or any other user is removed and/or if the information is aggregated ("De-Identified Data"); and
- Google Analytics, a web analytics service provided by Google, Inc., as described below.

When you visit the Websites, your browser or device may be exposed to Collection Technology which may be stored on your browser or device. You may delete and/or refuse the use of certain Collection Technology by selecting the appropriate settings on your browser or device. You may use the Websites even if you choose to refuse or delete such Collection Technology;

however, please note that this may affect your ability to use the full functionality of the Websites.

The Websites may use Google Analytics, which uses Collection Technology to collect and store anonymous information about you, which may include the non-personally identifiable information described above. You can read Google's privacy policy at <https://policies.google.com/technologies/partner-sites> and Google Analytics' Terms of Service <https://www.google.com/analytics/terms/us.html>. You can read more about how Google uses this information at <https://policies.google.com/technologies/partner-sites>. The Websites may use the "Demographics and Interest Reporting" feature of Google Analytics to analyze information regarding the interests and demographics of users of the Websites, which information may be obtained from inferences based upon the websites you visit, third party data, information you share on other websites, social media platforms and applications, or demographics derived from profiles or accounts that you create, to the extent permitted in their privacy policies. You can opt-out from being tracked by Google Analytics in the future by downloading and installing Google Analytics Opt-out Browser Add-on for your current web browser at <http://tools.google.com/dlpage/gaoptout?hl=en>. SCAN may combine or verify information collected or acquired through the Websites with information you provide in your offline interactions with SCAN, or share with other sites or social media pages; or with information about you in third party data. If the combined or verified information permits us to contact you online or offline, we will treat the combined information as personal information.

### **5. Do Not Track Setting**

SCAN does not alter the practices detailed herein based upon your selection of the "Do Not Track" setting or other "opt out" settings or features that may be offered by your browser; however, SCAN reserves the right to do so in the future.

### **6. How We Use Information We Collect**

SCAN may use your personally identifiable information to provide you with access to your account; improve your web experience, and/or to monitor and improve SCAN's services.

SCAN may use your non-personally identifiable information in any way it wishes, including, without limitation, to administer and improve the Websites; analyze website trends and how the Websites are used; improve navigation of

the Websites; analyze the performance of the Websites and diagnose problems.

## **7. Disclosures to Third Parties**

SCAN does not share, sell or rent any of your personally identifiable information that we collect, except with your consent or as described in this Privacy Policy. We do not share, sell or rent personally identifiable information to third parties for their direct marketing purposes independent of SCAN. We may share personally identifiable information with our affiliates and third parties who work on behalf of or with us, under confidentiality or similar agreements including, without limitation, benefit administrators, shippers, vendors, agents, consultants and affiliates (“Service Providers”). These Service Providers may use your personally identifiable information to provide certain services directly to you or to help SCAN administer its business or the Websites, including, without limitation, hosting the Websites, communicating with you about offers or other information relevant to SCAN, and/or to perform the other tasks that SCAN may use personally identifiable information for under this Privacy Policy.

SCAN may share personally identifiable information about you in response to or to cooperate with law enforcement, government requests, subpoenas, court orders or legal process; for fraud prevention; to respond to your requests for customer service or other information; to enforce the Websites' Terms of Use or any other applicable terms; to establish or exercise our legal rights or defend against legal claims; or to protect the safety or property of SCAN or others. SCAN also may share information about you if SCAN believes it is necessary to share information to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or as otherwise required or permitted by law. SCAN also reserves the right to transfer personally identifiable information to any SCAN affiliate or a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of our business or operations (including, without limitation, in connection with bankruptcy or any similar proceedings).

In addition to the uses discussed above, SCAN may use non-personally identifiable information in any manner so long as SCAN uses such information in its de-identified form. For example, SCAN may share non-personally identifiable information with third parties and Service Providers that SCAN reasonably believes need such information or to perform the other tasks that SCAN may use non-personally identifiable information for under this Privacy

Policy, as well as under the circumstances described in the preceding paragraph. If De-Identified Data is shared, we will ask our contracting parties to agree to keep such data in its de-identified and/or aggregated form.

### **8. Protection of Personally Identifiable Information**

SCAN cannot guarantee the security of the information on and sent from the Websites or by email. SCAN uses reasonable physical, technical and administrative safeguards against foreseeable risks, such as unauthorized access. No transmission of data over the internet is guaranteed to be completely secure. It may be possible for third parties not under the control of SCAN to intercept or access transmissions or servers unlawfully. While we strive to protect personally identifiable information, neither SCAN nor our service providers can ensure or warrant the security of any information you transmit to us over the internet. Any such transmission is at your own risk. SCAN is not responsible for the acts and omissions of any third parties.

### **9. Links**

On the Websites, you may have the opportunity to follow a link to other websites that may be of interest to you. SCAN endeavors to link only to reputable organizations. Because these other websites may not be hosted or controlled by SCAN, we are not responsible for the privacy practices of those websites or the content provided thereon, which may be different from the Websites. Collection Technology also may be used by some of those other websites. We encourage you to review the privacy policies of each of those other websites. This Privacy Policy only applies to information collected and maintained by or on behalf of SCAN.

### **10. Governing Law**

This Privacy Policy shall be governed by, and will be construed under, the laws of the State of California, U.S.A., without regard to choice of law principles. The Websites are directed to individuals residing in the United States. Those who choose to access the Websites from locations outside of the United States do so on their own initiative, and are responsible for compliance with local laws if and to the extent local laws are applicable, including without limitation, all applicable laws, rules and regulations regarding the transmission of data exported from the United States or the country in which you reside. SCAN may limit the Websites' availability, in whole or in part, to any person, geographic area or jurisdiction, at any time in its sole discretion.

Personally identifiable information collected through the Websites and other aspects of SCAN's business may be stored and processed in the United States or any other country in which SCAN or its affiliates, subsidiaries or Service Providers maintain facilities. By using the Websites, you expressly consent to any such transfer of information outside of your country.

## **11. Contact Us**

If you have any questions about this Privacy Policy or the Websites, please contact us at [webmaster@scanhealthplan.com](mailto:webmaster@scanhealthplan.com). Please note that email communications may not be secure. Accordingly, you should consider this if you include personal or other sensitive information in your email correspondence to the Websites or SCAN.