



## IMG Online Privacy Statement

Effective Date: April 15, 2020

This statement (the "Privacy Policy") applies to IMG websites, services, products and applications that collect data and display these terms, owned and operated by International Medical Group®, Inc. and its subsidiaries and affiliates, including, but not limited to, a la carte Healthcare, Ltd., Global Response Ltd., IMG Europe, Ltd., iTravel Insured, Inc. and AkesoCare Management, Inc. (collectively "IMG", "IMG®", "we", "us", or "our"). It does not apply to other IMG products and services that are not affected by the IMG Privacy Statement.

At IMG, we are committed to earning your trust by respecting and protecting the privacy of the information you provide to us online. The following describes how IMG collects, uses, shares and secures the personal information you provide, as well as the human resources data of our employees. It also describes your choices regarding use, access and correction of your personal information.

### EU-U.S. & Swiss-U.S. Privacy Shield

The EU-U.S. and Swiss-U.S. Privacy Shield Frameworks were designed by the U.S. Department of Commerce, and the European Commission and Swiss Administration, respectively, to provide companies on both sides of the Atlantic with a mechanism to comply with data protection requirements when transferring personal data from the European Union, the United Kingdom and Switzerland to the United States in support of transatlantic commerce.

International Medical Group, Inc. and its subsidiaries and affiliates, such as iTravel Insured, and Akeso Care Management, Inc. and International Medical Administrators, Inc., participate in and have certified their compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework. We are committed to subjecting all personal data received from European Union (EU) member countries, the United Kingdom and Switzerland, respectively, in reliance on each Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Frameworks, and to view our certification, visit the U.S. Department of Commerce's Privacy Shield List. <https://www.privacyshield.gov>

IMG is responsible for the processing of personal data it receives, under each Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. IMG complies with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, IMG is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have an unresolved privacy or data use concerns that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Under certain conditions, more fully described on the Privacy Shield website <https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>, you may be entitled to invoke binding arbitration regarding your privacy concerns when other dispute resolution procedures have been exhausted.

IMG has further committed to cooperate with the EU data protection authorities (DPAs) for EU employees, and the Swiss Federal Data Protection and Information Commissioner for Swiss employees, with regard to unresolved Privacy Shield complaints concerning human resources data transferred from the EU or Switzerland, respectively, in the context of the employment relationship.

## General Data Protection Regulation (“GDPR”)

IMG collects and uses your information as follows and for the following reasons. Unless stated otherwise, where and when GDPR applies to the following information, IMG is the data controller. If you are a citizen or resident of the European Union and you are visiting a website affiliated with an IMG entity, or you are an insured person through IMG, or an IMG entity administers a health plan that covers you, IMG may send your personal data to the United States for use and processing as necessary to serve you or to provide you with the best products, services and experiences possible. If this occurs, your personal information will be transferred subject to the EU-U.S. & Swiss-U.S. Privacy Shield Framework.

## Lawfulness of Processing

If you are a citizen or resident of the European Union, for personal information we gather directly from you and for information we receive about you from third parties, if you are an insured, you have been asked, and do hereby, consent to process your personal information pursuant to Article 6(1)(a) of the GDPR. You may withdraw your consent at any time. If you are visiting our website and are not (or not yet) a customer or an insured, you have affirmatively agreed to allow us to process your information by accepting our cookie notice, which shall also qualify as consent under Article 6(1)(a). For insureds, customers and website visitors, we will: (i) process the personal information we collect from you or that we receive from third parties about you as necessary to further IMG’s legitimate interests, which shall not override any of your fundamental rights and freedoms; (ii) for all other purposes set forth below. We will only process such information in order to send you future marketing materials about products or services in which you may have interest subject only to your express consent. If you do not provide such express consent to receive marketing communications, IMG will not process your information for this purpose. If you do provide such consent, you may withdraw it at any time.

Time periods for storing personal information: If you are a person insured through IMG, a subsidiary, or one of its clients; or an IMG entity administers an insurance plan that covers you, IMG shall retain your personal information subject to its retention schedules, which are determined by the nature of the personal information, how IMG will use the information will be used to serve you, any regulatory controls and any applicable legal or tax considerations. We will retain the information collected about your interactions with our websites for up to one year, or until you request deletion or opt out.

If you are a European citizen or resident that has visited an IMG website, and for whom IMG has gathered personal information as described below, you have a right to request access to and rectification or erasure of personal data or restriction of processing concerning the data subject and to object to processing as well as the right to data portability. You can exercise this right by contacting our Data Protection Officer. You also have a right to lodge a complaint with the applicable EU supervisory authority.

## Collecting Your Information

IMG collects many kinds of information in order to operate effectively and provide you the best products, services and experiences we can. Regardless of the source, we believe it's important to treat that information with care and to help you maintain your privacy.

In correlation with your relationship with us (e.g. consumer insured or policyholder; producer or appointed representative; or other person relating to our business), we may collect the following personal information from you and your dependents:

Name; gender; marital status; citizenship; date of birth; physical attributes; activity records such as exercise routines; current or former medical condition and health status including other factors affecting insurability; relationship to the policy holder, insured, or claimant; contact information such as email, mailing, or alternate address, telephone, mobile, fax number; affiliated company or sponsoring organization; financial information such as payment card number and billing address; government issued ID's such as social security number; telephone recordings of calls to our representatives and call centers; unique identifiers such as certificate, group, insured or member ID, producer, and iTI number; education, qualifications, and previous experience for job applicants;

We may also collect from you, information about your contacts such as your beneficiaries; your medical practitioner's name, address, and contact information; to fulfill and/or process a claim. When you provide us with personal information about your contacts we will only use this information for the specific reason for which it is provided. If you believe that one of your contacts has provided us with your personal information and you would like to request that it be removed from our database, please contact [DPO@imglobal.com](mailto:DPO@imglobal.com).

We may receive information about you from third parties from whom we have obtained data, and combine this data with information we already have about you. For European citizens and residents who wish to discover the identity of the third parties from whom we have obtained data, please contact us. This information helps us to update, expand and analyze our records and provide products and services that may be of interest to you. If you provide us personal information about others, or if others give us your information, we will only use that information for the specific reason for which it was provided to us. Example of the type of personal information that may be obtained from third parties may include, purchased marketing data about our customers from third parties that is combined with information we already have about you, to create more tailored advertising and products.

As is true of most websites, we gather certain information automatically. This information may include Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data to analyze trends in the aggregate and administer the site.

IMG and its partners use cookies or similar technologies to analyze trends, administer the website, track users' interactions with the website, and to gather demographic information about our user base as a whole. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it will limit your use of certain features or functions on our website or service.

## Contact information for IMG's Data Protection Officer:

2960 North Meridian Street  
Indianapolis, IN USA 46208-4715  
1-800-628-4664  
[DPO@imglobal.com](mailto:DPO@imglobal.com)

## Browser Controls for “Do Not Track” and Tracking Protection

Some browsers have incorporated “Do Not Track” features. Most of these features, when turned on, send a signal or preference to the web sites you visit indicating that you do not wish to be tracked. Those sites may continue to engage in activities you might view as tracking even though you have expressed this preference, depending on the sites’ privacy practices.

Most web browsers have a feature related to tracking protection that helps prevent the web sites you go to from automatically sending details about your visit to third-party content providers. When you add a tracking protection list, the browser may block third-party content, including cookies, from any site that is listed as a site to be blocked. By limiting calls to these sites, the browser will limit the information these third-party sites can collect about you. And when you have a tracking protection list enabled, certain browsers may send a do not track signal or preference to the web sites you visit. For more information about Tracking Protection Lists and how to find them, please see your browser’s privacy statement or help.

## Our Use of Cookies and Similar Technologies

IMG uses cookies and similar technologies for several purposes, depending on the case, including:

**Storing your Preferences and Settings.** Settings that enable our websites to operate correctly or that maintain your preferences over time may be stored on your device. For example, if you enter your city or postal code, we may store that data in a cookie so that you will see the relevant local information when you return to the site. We also save preferences, such as language, browser and multimedia player settings, so those do not have to be reset each time you return to the site. If you opt out of interest-based advertising, we store your opt-out preference in a cookie on your device.

**Security.** We use cookies to detect fraud and abuse of our websites and services.

**Storing Information you Provide to our Websites.** When you provide information, or submit an insurance application, we store the data in a cookie to remember the product and information you have added.

**Social Media.** Some of our websites include social media cookies, including those that enable users who are logged in to the social media service to share content via that service.

**Feedback.** IMG uses cookies to enable you to provide feedback on a website.

**Interest-Based Advertising.** IMG uses cookies to collect data about your online activity and identify your interests so that we can provide advertising that is most relevant to you. You can opt out of receiving interest-based advertising at any time.

**Showing Advertising.** IMG uses cookies to record how many visitors have clicked on an advertisement and to record which advertisements you have seen so you don't see the same one repeatedly.

**Analytics.** In order to provide our websites, we use cookies and other identifiers to gather usage and performance data. For example, we use cookies to count the number of unique visitors to a web page and to develop other statistics about the operations of our web properties. This includes cookies from IMG and from third-party analytics providers like Google.

**Performance.** IMG uses cookies for load balancing to ensure that websites remain up and running. Some of the cookies we commonly use are listed below. This list is not exhaustive, but it is intended to illustrate the main reasons we typically set cookies. If you visit one of our websites, the site may set some or all of the following cookies:

## Strictly Necessary Cookies

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms.

You can set your browser to block or alert you about these cookies, but some parts of the site will not function properly.

Cookies Used:

- Sitefinity CMS
- Typekit
- Google Tag Manager

## Performance & Interaction Cookies

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site.

All information these cookies collect is aggregated and therefore does not directly identify an individual. If you do not allow these cookies we will not know when you have visited our site, and will not be able to monitor its performance.

Cookies Used:

- Google Analytics
- Google Translate
- LivePerson
- Optimizely

## Targeting & Advertising Cookies

These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and interactions. They do not store directly personal information, but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will not experience a loss of site functionality.

Cookies Used:

- DoubleClick
- Bing Ads
- Google AdWords
- Facebook Custom Audience

## More Information

In addition to the cookies IMG sets when you visit our websites, third parties may also set cookies when you visit our sites. In some cases, that is because we have hired the third party to provide services on our behalf, such as site analytics. Because your browser connects to those third parties' web servers to retrieve that content, those third parties are able to set or read their own cookies on your device and may collect information about your online activities across websites or online services.

## How to Control Cookies

Most web browsers automatically accept cookies but provide controls that allow you to block or delete them. For example, in Microsoft Edge, you can block or delete cookies by clicking **Settings > Privacy > Cookies**. Instructions for blocking or deleting cookies in other browsers may be available in each browser's privacy or help documentation.

Certain features of IMG sites depend on cookies. Please be aware that if you choose to block cookies, you may not be able to sign in or use those features, and preferences that are dependent on cookies may be lost. If you choose to delete cookies, settings and preferences controlled by those cookies, including advertising preferences, will be deleted and may need to be recreated.

## Other Similar Technologies

In addition to standard cookies and web beacons, our products can also use other similar technologies to store and read data files on your computer. This is typically done to maintain your preferences or to improve speed and performance by storing certain files locally. But, like standard cookies, these technologies can also be used to store a unique identifier for your computer, which can then be used to track behavior. These technologies include Silverlight Application Storage.



## How We Use Your Personal Information

IMG uses the information we collect to operate, improve and personalize the products and services we offer. Information collected through one IMG service may be combined with information collected through other IMG services to give you a more consistent and personalized experience in your interactions with us. We may also supplement this with information from other companies. For example, we may use services from other companies to help us derive a general geographic area based on your IP address in order to customize certain services to your geographic area.

For IMG services, we use this information to provide you with relevant search results. We also use the information we collect to maintain and improve the quality, security and integrity of our products and services. For example, we may use this information for research purposes and to improve the relevancy of search results. This information is also necessary in order to detect and protect against security threats such as botnet attacks, click fraud, worms, and other threats. We also may use the information to communicate with you, for example, informing you when an insurance contract is ending, letting you know when updates are available or letting you know when you need to take action to keep your account active.

We also may use this information to assist in the fulfillment of the insurance product you purchased or the processing and administration of any insurance claims that you may submit, including, but not limited to working with providers, handling appeals, and resolving complaints. This information may be securely transmitted to third party business partners we have engaged to adjudicate, reprice, fulfill and or pay claims or to healthcare providers. For a complete list of the third parties with whom we have or may in the future safely and securely share your personal information, please contact the Data Protection Officer.

IMG provides many of our sites and services free of charge because they may be supported by advertising. In order to make these services widely available, the information we collect may be used to help improve the advertisements you see by making them more relevant to you. For example, we may use search query data for the purpose of personalizing the ads we display to you as you use our services or those of our advertising partners. The search terms you enter are categorized and certain user segments are inferred based on those terms. For example, if you search on terms associated with sports, we may associate a "sports segment" with the unique identifier contained in your cookie, and you will then be more likely to see ads related to sports. IMG acknowledges that you have the right to access your personal information. IMG has no direct relationship with the individuals whose personal data it processes. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct their query to IMG's Data Protection Officer. If requested to remove data we will respond within a reasonable timeframe. In certain circumstances we may be required by law to retain your personal information or may need to retain your personal information in order to continue providing a service.

When you sign into a site or service using your IMG account, we collect certain information in order to verify your identity on behalf of the site or service, to protect you from malicious account usage, and to protect the efficiency and security of the IMG account service. If you received your account from a third party, like an employer, a producer, spouse, or the legal representative, that third party may have rights over your account, including the ability to reset your password, view your account usage or profile data, read or store content in your account, and suspend or cancel your account. In these cases, you are subject to the IMG terms of use and to any additional terms of use from that third party. If you are the administrator on behalf of an employer or producer and have provided your users with IMG accounts, you are responsible for all activity that takes place within such accounts.



All sites or services that offer or market IMG's products are required to have a posted privacy statement, but we do not control or monitor the privacy practices of external sites, and their privacy practices will vary. You should carefully review the privacy statement for each site you sign into in order to determine how each site or service will use the information it collects.

Creating an IMG Account - Some of our websites allow you to create an IMG account by providing an email address, a password and other "account proofs," such as an alternate email address, a phone number, and a question and secret answer. We will use your "account proofs" for security purposes only - for instance, to verify your identity in the event that you cannot access your IMG account and need assistance, or to reset your password if you cannot access the email address associated with your IMG account. Some services may require added security, and in those cases, you may be asked to create an additional security key. The email address and password that you use to sign up for your IMG account are your "credentials" that you will use to authenticate with our network.

You can use an email address provided by a third party (such as those ending in gmail.com or yahoo.com) when signing up for your IMG account. Upon creating an IMG account, we may send you an email asking you to verify that you are the owner of the email address associated with your IMG account. This is designed to verify the validity of the email address and help prevent email addresses from being used without the permission of their owners. Thereafter, we may use that email address to send you communications relating to your use of IMG products and services; we may also send you promotional emails about IMG products and services as permitted by local law. Refer to the Choice section below on how to opt-out of these communications.

## Accessing Your Personal Information and Search History

When using a web browser, you can access and manage your information, including Search History, through the preferences page. You may clear your search history from appearing on the site by following the steps provided in see your search history. Clearing your history removes it from the Search History and prevents that history from being displayed on the web browser, but does not delete information from our standard search logs, which are retained and pseudonymized.

Upon request IMG will provide you with information about whether we hold any of your personal information. You may access, correct, or request deletion of your personal information by logging into your account or by contacting [DPO@imglobal.com](mailto:DPO@imglobal.com). We will respond to your request within a reasonable timeframe. In certain circumstances we may be required by law to retain your personal information, or may need to retain your personal information in order to continue providing a service.

## Children

Our websites are not structured to attract children. Accordingly, we do not solicit or knowingly collect any personal information from anyone who visits our websites that we know to be under 13 years of age. If we are made aware that information is or has been submitted by or collected from a child below 13, we will immediately delete their personal information. This provision does not apply to insureds, customers or other individuals on behalf of whom we provide services as a result of a customer or an insured relationship.

## Other Important Privacy Information

Below you will find additional privacy information you may find important. Much of this describes common practices that we want you to know about. And some of this is just stating the obvious (for example, we will

disclose information when the law requires it). Please keep in mind that this information is not a complete description of our practices – this is all in addition to the other, more specific information contained in the privacy statements, agreements and releases relating to each IMG product and service you use.

## Sharing or Disclosing Personal Information

Except as described in this privacy statement, we will not disclose your personal information to a third party without your prior consent and as permitted under applicable laws.

We may share your information with third parties who provide services on our behalf to help with our business activities. These companies are authorized to use your personal information only as necessary to provide these services to us. When we share information with these other companies to provide services for us, they are not allowed to use it for any other purpose and must keep it confidential. These services may include:

- Adjudicating and managing the claims process
- Payment processing to healthcare providers
- Providing customer service
- Sending marketing communications (subject only to your express consent)

In certain situations, IMG may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may also disclose your personal information as required by law, such as to comply with a subpoena or other legal process, when we believe in good faith that disclosure is necessary to protect the rights or property of IMG, our insureds, clients or our customers, including enforcing the terms governing your use of the services, protect your safety or the safety of others, investigate fraud, or respond to a government request. If IMG is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our website, of any change in ownership, uses of your personal information, and choices you may have regarding your personal information.

In addition to any sharing described in the privacy statement for the product or service you are using, IMG may share or disclose personal information with other IMG controlled subsidiaries and affiliates. For your (opt-out) choices on this type of sharing, please contact [DPO@imglobal.com](mailto:DPO@imglobal.com).

We may also share some search query data with selected third parties for research purposes. Before we do so, we remove all unique identifiers such as IP addresses and cookie IDs from the data. We also run the data through a process designed to remove identifiable information that users may have included in the search terms themselves (such as social security numbers or credit card numbers). Additionally, we require these third parties to keep the data secure and not to use the data for any other purposes.

## Protecting the Security of Personal Information

IMG is committed to protecting the security of your personal information. We use a variety of generally accepted standards of security technologies and procedures to help protect the personal information submitted to us, from unauthorized access, use or disclosure both during transmission and once it is received. For example, we store the personal information you provide on computer systems that have limited access and are in controlled facilities. When we transmit highly confidential information (such as a credit card number or password) over the Internet, we protect it through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

If a password is used to help protect your accounts and personal information, it is your responsibility to keep your password confidential. Do not share it. If you are sharing a computer, you should always log out before leaving a site or service to protect access to your information from subsequent users. If you have questions about the security of your personal information, you can contact [DPO@imglobal.com](mailto:DPO@imglobal.com).

We may retain your information for as long as your account is active or as needed to provide you services, comply with our legal obligations, resolve disputes and enforce our agreements.

Storage and Retention - We store search terms (and the cookie IDs associated with search terms) separately from any account information that directly identifies the user, such as name, e-mail address, or phone numbers. Further, we have built-in technological and procedural safeguards designed to prevent the unauthorized correlation of this data.

## Choice

We partner with a third party to display advertising on our website or to manage our advertising on other sites. Our third party partner may use cookies or similar technologies in order to provide you advertising based upon your browsing activities and interests. If you wish to opt out of interest-based advertising click [here](#) or if located in the European Union click [here](#). Please note you will continue to receive generic ads.

Furthermore, because cookies can be used for many purposes, users who object to behaviorally targeted advertising may choose to accept cookies but opt out from that particular use. Companies in the online advertising industry have developed guidelines and programs to help protect users' privacy, and these industry programs include web pages you can visit to opt out from receiving behaviorally targeted advertisements from all participating companies (including IMG). These pages include Digital Advertising Alliance (DAA) Consumer Choice Page [here](#) and Network Advertising Initiative (NAI) Opt-Out Page [here](#).

IMG uses Google Analytics for remarketing. When users have chosen to enable Google to associate their web and app browsing history with their Google account, and to use information from their Google account to personalize ads they see across the web, Google Analytics will collect these users' Google-Authenticated Identifiers, which are Google's personal data, and temporarily join them to Google Analytics data for remarketing purposes. To opt out from this data collection, you may visit [here](#).

You may sign-up to receive email or newsletter or other communications from us. If you would like to discontinue receiving this information, you may update your email preferences by using the "Unsubscribe" link found in emails we send to you or at your member profile on our website or by contacting [DPO@imglobal.com](mailto:DPO@imglobal.com).

We display personal testimonials of satisfied customers on our website in addition to other endorsements. With your consent, we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact [DPO@imglobal.com](mailto:DPO@imglobal.com).

Our website(s) offers publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your personal information from our blog or community forum, contact [DPO@imglobal.com](mailto:DPO@imglobal.com). In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

Our website(s) includes links to other websites whose privacy practices may differ from those of IMG. If you submit personal information to any of those websites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.



You may access IMG services when using other non-IMG sites or services. These sites may use the IMG API. You should refer to the privacy policy of the site for any questions about their information collection and usage practices.

## California Consumer Privacy Act

IMG does not sell your personal data to third parties and will not do so. Any data that IMG processes on your behalf is subject to your express consent or relates to services that you have asked us to perform on your behalf.

You may access, correct, or request deletion of your personal information by logging into your account or by contacting [DPO@imglobal.com](mailto:DPO@imglobal.com). We will respond to your request within a reasonable timeframe. In certain circumstances we may be required by law to retain your personal information or may need to retain your personal information in order to continue providing a service. If you believe you have other rights under the California Consumer Privacy Act or have other questions regarding your data, please contact IMG's Data Protection Officer.

## Giveaways & Sweepstakes

To read the terms and conditions for participation in IMG giveaways and sweepstakes, please [click here](#).

## Changes to Our Privacy Statements

We will occasionally update our privacy statements to reflect customer feedback and changes in our services. When we post changes to a statement, we will revise the "last updated" date at the top of the statement. If there are material changes to the statement or in how IMG will use your personal information, we will notify you either by prominently posting a notice of such changes before they take effect or by directly sending you a notification (sent to the e-mail address specified in your account). We encourage you to periodically review the privacy statements for the products and services you use to learn the latest information on our privacy practices.

## How to Contact Us

Questions about this Statement or about IMG's handling of your information, please contact [DPO@imglobal.com](mailto:DPO@imglobal.com), or

International Medical Group, Inc.  
2960 North Meridian Street  
Indianapolis, IN USA 46208-4715

W O R R Y   L E S S .  
*experience more.*

