

# Periscope Privacy Policy

This Privacy Policy applies to the collection of Personal Information by The Periscope Group (Periscope). This Privacy Policy applies to Periscope products, communications, digital properties including websites, online platforms, and mobile applications, that refer to this Privacy Policy, any offline interactions that we may have with you, and where Periscope may obtain and control your Personal Information (as defined herein) from a third party (collectively, the “Services”). This Privacy Policy describes how Periscope collects and uses the Personal Information. It also describes the choices available to you regarding our use of your Personal Information and how you can access and update this information.

This Privacy Policy does not apply to Protected Health Information or information subject to the California Confidentiality of Medical Information Act that may be collected by Periscope in its capacity as a Business Associate.

We are committed to maintaining the highest level of confidentiality with all the information we receive from you. For purposes of this Privacy Policy, Periscope is not a controller (i.e., responsible party) of your Personal Information. If “member”, your health insurance company is the controller since we administer the Services on behalf of our clients. In these instances, Periscope acts as a processor or service provider to such clients, in which case the client’s privacy policy, if any, will supersede this policy.

Please read this Privacy Policy carefully. We want you to understand what information we collect from you when you use our Services, how we use such information, and whether and with whom we disclose such information. Using our Services is voluntary, and by accessing or using the Services, you (i) acknowledge that you have read and understand this Privacy Policy; and (ii) agree that your access to and use of the Services are subject to this Privacy Policy and related Terms of Use. We reserve the right to change the Privacy Policy at any time. Please review the Privacy Policy periodically to be aware of any modifications.

## **California Consumer Notice of Collection**

This Notice of Collection is provided to all California consumers subject to this Privacy Policy.

## **Categories of Personal Information We May Collect**

Through your use of the website and the Services, we may collect your Personal Information. Personal Information generally refers to any information that can be linked to an identified or unidentifiable person. Please note that certain information may not be

personally identifiable when standing alone (e.g., your age), but may become so when combined with other information (e.g., your age and address). The term Personal Information also covers certain categories of "sensitive" or "special" Personal Information that often receive additional protections and/or are subject to additional restrictions under applicable laws.

The Personal Information that we may collect about you or have collected about you in the past 12 months, varies depending on the context of our interactions with you. Personal Information collected from or about you fall into the following categories:

**Direct and Personal Identifiers:** We may collect various Personal Information that identifies you. This information includes your name, email, any username and password that you may provide, your address, your tax identification number, unique identifiers (such as a mobile device ID) and your email and other personal contact information.

**Demographic Information:** Under certain circumstances, we may collect Personal Information regarding your gender, race, or other protected classification data.

**Electronic Network Activity:** We collect information regarding your use of our websites and mobile applications. This data includes but is not limited to Internet Protocol address information, information obtained through weblogs concerning your activity on our websites and application, mobile device identifiers and other related metadata regarding use of our mobile applications. We may collect information, including your browser type, operating system, domain name, device ID, language preferences, referring website, the length of time you are visiting our website, and/or a date/time stamp for visitors. We may also collect such information in relation to monitoring potential malicious code on our systems, such as through the collection of metadata and traffic data, or portions or hashes (a file that has been converted into a numerical string by a mathematical algorithm) of any of the information listed here. For more information relating to the use of such tools, review our "Cookies" section.

**Geolocation Information:** We may collect information about the location from which you are accessing our mobile applications. For more information relating to the use of such tools, review our "Cookies" section.

**Audio, Visual or Other Information:** We may collect your photograph or other images identifying you through certain of our mobile applications. If you call our call center, we may record your image or voice.

### **Sources of personal information**

We collect your Personal Information in the following ways, pursuant to applicable law:

**Directly From You**, when you use our Services, register for an account, contact us, respond to a survey, sign up to receive emails, text messages, and/or postal mailings.

**Through Our Use of Cookies and Other Automatic Data Collection Technologies**, when you visit our websites, use our mobile applications, open or click on emails we send you, or interact with our advertisements. We work to automatically collect certain information using technologies such as cookies, web beacons, clear GIF, pixels, internet tags, web server logs, and other data collection tools. For more information, please see the “Cookies and Similar Tracking Technologies” section below.

### **Use of Your Personal Information**

We use your Personal Information and sensitive Personal Information for the following business purposes (“**Processing Purposes**”) associated with our general business operations. We may collect your Personal Information:

#### **Providing our Services**

- To provide you the Services, employment, or other responses to your inquiries.
- To process your payments and send notifications to you related to your account.
- To enable you to access and use our websites and mobile applications.

#### **Communicating With You**

- To communicate with you and to respond to your requests, questions, comments, and other inquiries.

#### **Analytics and Administration of Website**

- To administer, maintain, evaluate, and improve our websites, mobile applications, and Services.
- To conduct research and analytics related to our websites and Services, including combining any or all the information that we collect or obtain.

#### **Core Business Functions**

- To manage our business operations, perform our obligations and exercise our rights under any agreement that you or your organization has with Periscope.
- For other purposes with your consent, or as otherwise permitted or required by applicable law.

## Legal Obligations

- We use Personal Information to comply with our legal or regulatory obligations, to establish or exercise our rights, and to defend against a legal claim.

## Security and Fraud Prevention

- We use Personal Information to detect, investigate, prevent, or act regarding possible malicious, deceptive, fraudulent, or illegal activity, including fraudulent transactions, attempts to manipulate or violate our policies, procedures, and terms and conditions, security incidents, and harm to the rights, property, or safety of Periscope and our users, customers, employees, or others.

## Use of Your Sensitive Personal Information

Regarding sensitive Personal Information, we only use your sensitive Personal Information to provide you with the requested services and to administer your account. We do not disclose Sensitive Personal Information for purposes other than those which cannot be limited under California law.

## Disclosures of Personal Information

We respect the importance of privacy. Generally, we do not disclose the Personal Information we collect.

We may disclose each category of your Personal Information to the following categories of third parties in the following ways:

- **Service Providers.** We may disclose your Personal Information to authorized third parties who perform services for us (including cloud services, data storage, sales, billing and human resources). Our contracts with our service providers include commitments that they agree to limit their use of Personal Information and to comply with privacy and security standards at least as stringent as the terms of this Privacy Policy.
- **Other Third Parties.** We may disclose your Personal Information to legal, governmental, or judicial authorities, as instructed or required by those authorities or applicable laws, or in relation to a legal activity, such as in response to a subpoena or an investigation. We may also disclose such Personal Information if we believe disclosure is necessary to prevent physical, financial, or other harm, injury, or loss.
- **Other Disclosures Required by Law.** We may disclose your Personal Information for legal reasons as we believe to be necessary or appropriate to: (a) satisfy any

applicable law, legal process, or proper governmental request; (b) enforce any agreement we may have entered into with you or your organization, including investigating any violations or asserting remedies; (c) detect, prevent, or otherwise address fraud, security or technical issues; (d) protect against harm (whether tangible or intangible) to the rights, property, or safety of Periscope, our users, or the public as required or permitted by law; and (e) establish or exercise our rights, defend against a legal claim, and investigate, prevent, or take action regarding possible illegal activities or a violation of our policies.

## **Data Retention**

The time periods for which we retain your Personal Information depend on the purposes for which we use it and applicable law for the type of data and use. Periscope will keep your Personal Information for as long as you are a registered customer or user of our Services or for as long as we have a valid business purpose to do so and, thereafter, for no longer than is required or permitted by law, as reflected in Periscope's internal Records Retention Policy.

## **Cookies**

Cookies are small text files that are placed on your computer or mobile device when you visit a website. For purposes of this Privacy Policy, cookies also include similar technologies, such as pixels, web beacons, and social network plugins (collectively, "cookies"). Cookies help the website remember information about your visit, which can make it easier to visit the website again and make the site more useful to you. Some cookies are deleted once you close your browser (session cookies), while other cookies are retained even after you close your browser so that you can be recognized when you return to a website (persistent cookies). More information about cookies and how they work is available at [www.allaboutcookies.org](http://www.allaboutcookies.org).[\(opens in new window\)](#)

## **Do Not Track and Commercially Recognized Opt-out Signal**

### **Your Rights and Choices**

Depending on where you are located, you may have additional rights, as detailed below.

- **The right to access:** You may have the right to obtain from your Insurance company confirmation as to whether or not Personal Information concerning you is being processed, and, where that is the case, to request access to the Personal Information. This access to information includes the purposes of the processing, the categories of Personal Information concerned, and the recipients or categories

of recipient to whom the Personal Information has been or will be disclosed, among other categories of information. However, this is not an absolute right and the interests of other individuals may restrict your right of access. You may have the right to obtain a copy of the Personal Information, subject to certain restrictions, directly from your health plan.

- **The right to correction:** You may have the right to request that we correct any Personal Information about you that is inaccurate. Depending on the purpose of the processing, you also have the right to request that we complete the Personal Information we hold about you where you believe it is incomplete, including by means of providing a supplementary statement.
  - After completing the sign in process, website users have the option to change their password, email address, and security question and response. If the website user forgets or misplaces their password, Periscope will use the security question and response to identify the website user and grant access to the website. To change personally identifiable information, registered members and patients must contact the appropriate Periscope Customer Care representative listed on the [admin@periscope365.com](mailto:admin@periscope365.com).
  
- **The right to deletion:** You may have the right to request that we erase your Personal Information, under certain conditions. However, because we keep track of past transactions, you cannot delete information associated with past transactions on the website. This request is made directly to your health insurer, and they will contact us with approval of your request. In addition, it may be impossible or disproportionately burdensome to completely delete your information.
  
- **The right to restrict processing:** You may have the right to request that we restrict the processing of your Personal Information, under certain conditions. In such case, the data will be marked and may only be processed by us for certain purposes. This request is made directly to your health insurer, and they will contact us with approval of your request.
  
- **The right to data portability:** You may have the right to request that we transfer the Personal Information we have collected about you to another organization, or directly to you, in a structured, commonly used, and machine-readable format,

under certain conditions. This request is made directly to your health insurer, and they will contact us with approval of your request.

**Right to limit the use and disclosure of sensitive Personal Information:** We will only use sensitive or special Personal Information as needed for the purposes for which it was collected. If this changes, your health insurer will contact you, and you may have the right to restrict such additional uses.

We do not discriminate against individuals for the exercise of any of their rights described in this Privacy Policy. However, Periscope may require the use of your Personal Information to provide access to the Services. Therefore, when you exercise your deletion right as well as other rights, you may lose access to certain aspects of the Services that require your Personal Information.

### **Text Messages**

**SMS terms:** The Periscope Group offers you the option to engage in SMS text conversations about your job application, status of request or other Service. By participating, you also understand that message frequency may vary depending on the status of your request, and that message and data rates may apply. Please consult your carrier for further information on applicable rates and fees. Periscope or its carriers are not liable for delayed or undelivered messages. Reply STOP to cancel and HELP for help.

By opting-in to receiving SMS text messages, you acknowledge and agree that your consent data, mobile number, and personal information will be collected and stored solely for the purpose of providing you with updates and information related to your request. No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

### **Exercising Your Rights**

To exercise your rights, or appeal a decision we have made regarding your rights, please contact us as stated in the “Contact Us” section of this Privacy Policy, or you may submit a request directly to your health plan.

In certain jurisdictions, a person authorized to act on your behalf may make a verifiable consumer request related to your Personal Information. If you designate an authorized person to submit requests to exercise certain privacy rights on your behalf, we will require verification from your health plan that you provided the authorized agent with such permission.

Your verifiable request must: (i) provide sufficient information (e.g., name, address, phone number, and/or email address) that allows us to reasonably verify that you are the person about whom we collected Personal Information or an authorized representative; and (ii) describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity with your health plan or authority to make the request.

Prior to complying with your request, we will need to verify your identity. Our verification procedure may differ depending on whether you have a registered account, the sensitivity of the Personal Information, and the risk of harm to you by unauthorized disclosure or deletion as applicable. You may also be asked to submit a signed declaration under penalty of perjury stating that you are the individual whose Personal Information is the subject of the request.

### **Internal Security Procedures**

Information that you share on the website is kept strictly confidential and fully secure. Your encrypted (encoded) sensitive information is protected using "Secure Socket Layers (SSL)" as it passes between your browser and this website. We follow generally accepted industry standards to protect the Personal Information submitted to us, both during transmission and once we receive it.

No method of transmission over the internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. Only authorized persons are permitted to access your Personal Information. All authorized persons must abide by security, privacy, and confidentiality agreements.

### **Children's Privacy**

We do not knowingly collect, use, or disclose Personal Information about persons under 13 years of age. Users under the age of 13 should not submit any Personal Information to us. If you believe we have collected Personal Information from your child in error or have questions or concerns about our practices relating to children, please notify us using the details in the "Contact Us" section below. We will take prompt steps to remove the Personal Information from our systems.



## **Privacy Policy Changes**

This Privacy Policy is effective as of January 2023 and was last updated September 2024. This Privacy Policy is not intended to and does not create any contractual or other legal rights with or on behalf of any party.

We reserve the right to modify, expand, or update this Privacy Policy at any time as we deem appropriate to reflect those changes. When we make changes to this Privacy Policy, we will post the updated Privacy Policy on the website and update the Privacy Policy's "last updated" date above. It is important that you check back from time to time and make sure that you have reviewed the most current version of this Privacy Policy. If you do not agree with the changes, then you should stop using our website and Services and notify us that you do not want your Personal Information used in accordance with the changes.

## **Accessibility**

We are committed to ensuring that our communications are accessible to people with disabilities. To make accessibility-related requests or report barriers, contact Periscope Customer Care on the [Customer Support](#) section of this website.

## **Contact Periscope**

### **How do you contact Periscope if you have any questions or concerns?**

Questions concerning this website can be directed to the appropriate Periscope Customer Care representative listed on the [Customer Support](#) section of this website.