

## WEBSITE PRIVACY POLICY

**Last Updated: 5/5/2022**

This privacy statement ("Privacy Policy") describes how the United Food and Commercial Workers Unions and Employers–Benefits Administration, LLC (the “LLC,” “we,” “us” or “our”), on behalf of the health and benefits plans we support (the “Plans” including the UFCW Unions and Employers Legal Assistance Fund, the UFCW Union Local 1995 and Employers Health and Welfare Fund, the UFCW Unions and Employers Health and Welfare Fund- Atlanta or the UFCW Consolidated Pension Fund), collects, uses and shares information about visitors (a “User,” “you” or “your”) to this website, <https://www.ufcwemprfund.com> (the "Website"). The Plans respect the privacy of your personal information. If you have any questions about this Privacy Policy, the Website, or the manner in which we use or disclose personal information, we encourage you to contact us through any of the methods identified below.

### **Information Collection**

Throughout this Website, you may voluntarily provide information about yourself through forms that allow you to initiate actions, view information, and request information. These forms may ask for contact information (such as name, mailing address, and email address), login and password information, and other personal or financial information.

We may collect domain names and/or IP addresses of Users to measure what pages and features are accessed by visitors. This information helps us administer the Website, improve content, and improve service. We also use Google Analytics to improve the performance of the Site and for analytics purposes. For more information about how Google Analytics collects and uses data when you use our Site, visit [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners), and to opt out of Google Analytics, visit [tools.google.com/dlpage/gaoptout](http://tools.google.com/dlpage/gaoptout).

We may use cookies to collect anonymous usage statistics to track Website utilization. A "cookie" is a small summary text file that is stored on your device or by your browser. Cookies allow the Website to store some information about Users, allowing the Website to recognize a User and respond appropriately. Your browser may offer tools to limit the use of cookies or to delete cookies; however, if you use these tools, the Website may not function as intended.

### **Information Use and Disclosure**

The LLC and the Plans may use your information for any lawful purpose, including the following:

- To provide services you request;
- To respond to your inquiries;
- To troubleshoot Website issues and improve online services;
- To operate, personalize, and improve the Website, including for analytical purposes;
- To ensure basic functionality for authenticated users, including but not limited to initiating and terminating valid sessions;
- To fulfill our administrative, regulatory or legal obligations;
- To maintain the security of the Website; and
- With your consent, or otherwise disclosed at the time information is collected.

The LLC and the Plans may share the information collected with other parties, including the following:

- Plans' vendors necessary to verify your eligibility, manage your benefits, and to fulfill the Plans' administrative, regulatory, or legal obligations or their services;
- With benefit providers in order to administer the Plans;
- With any affiliates that the LLC may have in the future;
- As part of a corporate sale, merger, or acquisition, or other transfer for all or part of the LLC's assets, including as part of a bankruptcy proceeding;
- With third-party service providers who process information on our behalf, such as website hosts, software providers, and professional advisors;
- Pursuant to a court order, subpoena, governmental inquiry, or other legal process or as required by law, to protect our rights or the rights of third parties, or to protect the safety or security of any person or entity; or
- With your authorization or as otherwise disclosed at the time of data collection or sharing.

We may share information that has been de-identified or aggregated without limitation.

### **Links to Third-Party Websites**

The Website may contain links to other websites not affiliated with the LLC or the Plans. The LLC or the Plans are not responsible for the privacy practices or the content of such other websites. We encourage you when you leave the Website to read the privacy policies of every linked website as the privacy policies of each may differ from this Privacy Policy.

### **Security**

We maintain commercially reasonable procedures and technology to minimize the risk of unauthorized third party access to personal information.

We will not email Users requesting their login or password information. If you receive an email purporting to be from the Plans or the LLC requesting your personal, financial, or login information, do not provide such information unless you have first verified that the email is actually from the Plans or the LLC.

### **HIPAA Notice of Privacy Practices**

The Plans' Notice of Privacy Practices and Privacy Policies ( [Atlanta Notice of Privacy Practices](#) | [Nashville Notice of Privacy Practices](#) ) governs the Plans' use and disclosure of, and your rights to access, "protected health information" as that term is defined under the Health Insurance Portability and Accountability Act of 1996 and its implementing regulations. Copies of the Plans' Notice of Privacy Practices and Privacy Policies are available upon request. To the extent the terms of this Privacy Policy and the terms of the Notice of Privacy Practices conflict, the Notice of Privacy Practices shall control.

### **Changes to Privacy Policy**

The LLC and the Plans reserve the right to change this Privacy Policy at any time. Any changes to the Privacy Policy will be posted on this page and will be effective immediately upon posting. We encourage you to visit this page periodically to learn of any updates.

**Contact**

If you have questions about this Privacy Policy, please contact us at [insurancedepartment@ufcwemprfund.org](mailto:insurancedepartment@ufcwemprfund.org), [pensiondepartment@ufcwemprfund.org](mailto:pensiondepartment@ufcwemprfund.org), or 770-997-9910.