

## **WPS Website Privacy Policy**

At Wisconsin Physicians Service Insurance Corporation (WPS), and/or its wholly owned subsidiaries, The EPIC Life Insurance Company (EPIC Specialty Benefits), and WPS Health Plan, Inc. (Arise Health Plan) (hereinafter “WPS” or “WPS Health Solutions”) we take our customers' privacy seriously and understand that visitors of our website need to be in control of their personally identifiable information (name, email address, postal address, etc.). This statement discloses the information practices for WPS and its wholly-owned subsidiaries, including what type of information is gathered and tracked, how that information is used, and with whom the information is shared.

### **Our Information Collection and Use Practices**

Your information may be collected by WPS for internal marketing and development purposes. WPS will not sell any personal information to third parties for purposes of marketing, advertising, or promotion. WPS does, however, use cookies to track language preferences and Google Analytics as described later in this policy.

### **Data Collection, Use and Disclosure**

WPS will not gather personally identifiable information about you unless you specifically and knowingly provide this information to us. Personally identifiable information (PII) is any information about an individual maintained by WPS with respect to, but not limited to, education, financial transactions, medical history and criminal or employment and information that can be used to distinguish or trace an individual's identity (e.g. name, Social Security number, date and place of birth, mother's maiden name, biometric) etc. including any other personal information linked or linkable to an individual.

### **Personal Information**

WPS websites may include web pages that give you the opportunity to provide us with personal information about yourself. You do not have to provide us with personal information if you do not want to; however, that may limit your ability to use certain functions of this website or to request certain services or information.

You may choose to give us personal information in a variety of situations. For example, you may give us information, such as your name and address or email address, to correspond with you, or to sign up for our newsletter. Additionally, WPS may collect specific PII from you when you enroll in our member, provider or employer portal(s) to establish your account and to properly authenticate you for access to the portal. **We intend to let you know how we will use such information before we collect it from you; if you tell us that you do not want us to use this information to make further contact with you beyond fulfilling your requests, we will respect your wishes.**

If you provide us with personally identifiable information, including your name and contact information (address, email, telephone number), we may use this information to contact you directly. If you give us personal information about somebody else, such as a spouse or work colleague, we will assume that you have their permission to do so.

### **Forms and Transactions**

WPS sites may use online data entry forms to collect personal information from web visitors who choose to identify themselves for the purpose of transacting e-commerce or receiving products, services, or information.

For example, if you complete applications and forms or request something from the WPS site, such as a product or service, a callback, or specific marketing materials, we will use the information you provide to fulfill your request. Your information, including your personal information, may be shared with third parties, for instance, WPS Business Partners, to complete your transaction. In connection with a transaction we may also contact you as part of our customer satisfaction surveys or for market research purposes.

### **Sharing Personal Information**

WPS is committed to ensuring that our customer's information is properly collected, used and maintained. WPS and its wholly-owned subsidiaries may share your personal information with one another to support our business operation, to provide services to you and for any other purpose described in this Privacy Notice.

We will not disclose, give, sell or transfer any personally identifiable information that you provide through our website to third parties except as outlined in this policy and as otherwise permitted by law. We may share personal information with other third party companies that we collaborate with or hire to perform services on our behalf. For example, we may hire a company to help us send and manage email, and we might provide the company with your email address and certain other information in order for them to send you an email message on our behalf. Similarly, we may hire companies to host or operate some of our websites and related computers and software applications. We may also share your personal information with third parties to permit them to send you marketing communications, if you have opted in to such sharing.

Additionally, we may share your information in other limited circumstances, including in response to a valid subpoena, warrant, or court order or as otherwise required by law or regulation or to cooperate with law enforcement authorities in investigating and prosecuting activities that are illegal, violate our rules, or may be harmful to other visitors. We may also share your information in the event of the sale or transfer of WPS or some of our assets, or in the context of similar transactions.

### **Security**

While no system can provide guaranteed security, we take reasonable efforts to keep information you provide to us secure. We implement reasonable safeguards, including encryption technology and physical security at the location of the server where information is stored.

### **Website Analytics**

When you browse through any website, certain information about your visit may be collected. WPS uses a web analytics program to collect information automatically and continuously. WPS uses this information to measure the number of visitors to its sites and to distinguish between new and returning visitors to help make the site more useful. However, no PII is collected.

WPS performs analyses of user behavior in order to measure customer interest in the various areas of our site. The reports are only available to limited staff that require this information in order to perform their job.

WPS website may also use online surveys to collect opinions and feedback from a random sample of visitors. This survey does not collect PII. Participation in the survey is voluntary. If you decline to participate, you will still have access to the identical information and resources on WPS' websites as those who do decide to take the survey. Answers to the survey help us to improve our provider websites to make them easier for you to use. WPS may utilize third-party vendors, such as Google Analytics and Foresee to perform our web measurements and customizations.

### **How WPS Uses Cookies**

When you visit a website, its server may generate a piece of text known as a "cookie" to place on your computer. The cookie allows the server to "remember" specific information about your visit while you are connected. The cookie makes it easier for you to use the dynamic features of web pages. Requests to send cookies from WPS' web pages are designed to collect information about your browser session only; they do not collect personal information about you. Note that regardless of the particular uses for cookies on our website, we will not share any cookie information with any third parties.

There are two types of cookies: "Temporary session cookies" (single session) and "persistent cookies" (multi-session). Temporary session cookies will last only as long as your browser is open. Once you close your browser, the temporary session cookie will disappear. Persistent cookies are stored on your computer for longer periods.

### **How WPS Uses Temporary Session Cookies**

WPS uses temporary session cookies for technical purposes such as improving navigation through our site. These cookies let WPS servers know that you are continuing to visit its site. The temporary cookie is not permanently stored on your computer. The cookie and the information about your visit are automatically deleted shortly after you close your browser to end the session.

### **How WPS Uses Persistent Cookies**

WPS uses persistent cookies to help recognize new and returning visitors to WPS' websites. Persistent cookies remain on your computer between visits to the application websites until they expire. WPS does not use this technology to identify you or any other individual site visitor.

WPS websites may use persistent cookies to track language preferences. WPS also uses persistent cookies to enable its Web analytics program to measure how new and returning visitors use WPS websites over time.

### **How to "Opt Out" or Disable Cookies**

If you do not wish to have temporary or persistent cookies placed on your computer, you may disable them using your browser. If you decide to "opt out" of cookies, you will still have access to information and resources WPS websites provide, but you may be unable to fully use certain portions of the website.

You can remove any cookies that have been created in the cookie folder of the most popular Internet browsers. Simply click the "Help" function on your browser and enter "cookies" to search for information on how to remove all or individual cookies.

### **Online Privacy Notice for Children**

Our services are not directed to or intended for children. WPS does not knowingly collect or post information from children under the age of 13 in compliance with laws protecting the privacy of children.

### **Employment Applicants**

We collect information, including personal contact information, education and work history, as well as Social Security and similar national identification numbers in order to process and consider your applications. We will not sell your application to unaffiliated third parties for marketing purposes. The information you provide WPS on your application may be shared with background check services and our affiliates and used for certain regulatory, compliance and legal purposes.

### **Social Media**

WPS may maintain certain profiles and/or pages on various social media platforms, including Facebook, Twitter and LinkedIn. If you choose to "Like," "Follow" or take any other similar action on a social media site, you are providing your consent to receive information updates, including solicitations, from WPS. To stop receiving this information from WPS on a social media site, you must follow the procedures established by the site to "Unlike" or "Unfollow" WPS's profile or page.

### **Links to Non-WPS Websites**

WPS' websites may contain links to other websites. WPS is not responsible for the privacy practices or the content of those other websites.

### **Privacy Policy Updates**

WPS reserves the right to modify this privacy policy at any time. We encourage visitors to frequently check this page for any changes to its Privacy Policy. Your continued use of this site after any change in this Privacy Policy will constitute your acceptance of such change.

### **Contacting the WPS Privacy Officer**

WPS has a designated Privacy Officer who is available to answer privacy questions or for reporting privacy issues. You may contact the WPS Privacy Officer by submitting your comments or questions via *email to*: [WPSprivacyofficer@wpsic.com](mailto:WPSprivacyofficer@wpsic.com) or by *mail to*: WPS Health Solutions, Attention: WPS Privacy Officer, 1717 W. Broadway, PO Box 8190, Madison, WI 53708-8190.

**Email**

Electronic mail is not necessarily secure so we do not recommend sending confidential or personal information via email. If you send us an email with questions or comments, we may use your personally identifiable information to respond to your questions or comments, and we may save your questions or comments for future reference.

**Site Security**

For site security purposes and to ensure that this service remains available to all users, WPS uses software programs to monitor traffic to identify unauthorized attempts to upload or change information or otherwise cause damage. In the event of authorized law enforcement investigations, and pursuant to any required legal process, information from these sources may be used to help identify an individual.

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