Privacy Policy

At Wisconsin Physicians Service Insurance Corporation d/b/a WPS Data Logistics or WPS Data Logistics, Inc. ("Data Logistics"), 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 Data Logistics, 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 Data Logistics for internal marketing and development purposes. Data Logistics will not sell any personal information to third parties for purposes of marketing, advertising, or promotion. Data Logistics does, however, use cookies to track language preferences and Google Analytics as described in our Cookie Notice.

Data Collection, Use and Disclosure

Data Logistics 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 Data Logistics with respect to, but not limited to, education, financial transactions, medical history, and criminal or employment 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

The Data Logistics website may include web pages that give you the opportunity to provide us with personal information about yourself or your organization. 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. 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 work colleague, we will assume that you have their permission to do so.

Forms and Transactions

Data Logistics 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 a form or request something from the Data Logistics 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, Data Logistics 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

Data Logistics is committed to ensuring that our customers' information is properly collected, used, and maintained. Data Logistics may share your personal information 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 Data Logistics 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.

Covered Entities and HIPAA Enforcement

The U.S. Department of Health and Human Services' Office for Civil Rights (OCR) enforces the HIPAA Privacy, Security, and Breach Notification Rules. Data Logistics is not a Covered Entity under HIPAA but may be subject to HIPAA requirements as a business associate. Data Logistics will enter into a business associate agreement, when required, that addresses Data Logistics' use and disclosure of health information.

Website Analytics

When you browse through any website, certain information about your visit may be collected. Data Logistics uses a web analytics program to collect information automatically and continuously. Data Logistics 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 other than IP address is collected.

Data Logistics 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.

Data Logistics' 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 Data Logistics' websites as those who do decide to take the survey. Answers to the survey help us to improve our websites to make them easier for you to use. Data Logistics may utilize third-party vendors, such as Google Analytics and Foresee, to perform our web measurements and customizations.

For more information on tracing and use of cookies, please see our Cookie Notice.

Online Privacy Notice for Children

Our services are not directed to or intended for children. Data Logistics 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 employment applications. We will not sell your employment application to unaffiliated third parties for marketing purposes. The information you provide Data Logistics on your employment application may be shared with our affiliates and background check services and used for certain regulatory, compliance and legal purposes.

Social Media

Data Logistics 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 Data Logistics. To stop receiving this information from Data Logistics on a social media site, you must follow the procedures established by the site to "Unlike" or "Unfollow" Data Logistics' profile or page.

<u>Links to Non-WPS Data Logistics Websites</u>

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

Privacy Policy Updates

Data Logistics 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 Data Logistics Privacy Officer

<u>WPS</u> Data Logistics has a designated Privacy Officer who is available to answer privacy questions or for reporting privacy issues. You may contact the WPS Data Logistics, Inc. Privacy Officer by submitting your comments or questions via email to: <u>Privacy Officer</u> or by mail to:

WPS Data Logistics, Inc. Attention: Privacy Officer 1717 W. Broadway P.O. Box 8190 Madison, WI 53708-8190