# wellabe

### **Financial Notice of Privacy Practices**

## This notice applies to all prospects, applicants, customers, and former customers who have inquired about or purchased insurance products used primarily for personal, family, or household purposes.

At Wellabe, we keep your personal information confidential and share it only in a responsible manner as necessary to provide and service the products you purchase from us, or to offer you additional products. For purposes of this Notice, "Wellabe," us," "our," or "we" includes Wellabe, Inc., and its affiliates including American Republic Insurance Company, American Republic Corp Insurance Company, Medico Insurance Company, Medico Life and Health Insurance Company, Medico Corp Life Insurance Company, and Great Western Insurance Company.

For information on how we use data collected from visitors to Wellabe websites, mobile applications, and products and services that we own or operate, please refer to the "Wellabe Notice of Online Services Privacy and Security Practices."

#### What information do we collect?

To provide and administer products and services, we must refer to relevant personal information that can be identified to you or your household and that may not be available in public records ("nonpublic personal information"). We may collect the following:

- Information received from your application, surveys, or other forms, during conversations with us or our representatives, or electronically, including when you visit our website or mobile application(s). For example, name, address, social security number, age, medical and financial information.
- Information about your relationship and transactions with us, our affiliates, our agents, and others, including your identification and policy number(s), the type of products you buy, the premiums you pay, and your payment history.
- Information received from a consumer reporting or credit agency or from public records.
- Information received from a third party, for example, to verify your identity and to better understand your product and service needs.
- Information received from service providers regarding treatment of health conditions and payment for that treatment.
- Information collected as part of any programs or services we administer.

Information by which you cannot be identified, for example, anonymous or aggregated information, is not considered nonpublic personal information and therefore is not subject to this Notice.

#### What information do we share with others?

We may share the information we collect about you as allowed by law, including sharing your information among our affiliated companies for everyday business purposes.

To help us provide you with the best possible products and services, we maintain strong relationships with contracted third parties. In the course of conducting business and as permitted or required by law, we may share nonpublic personal information for the following purposes:

- Processing transactions you have requested, are legally required, or that are necessary to administer our business, including processing your application and issuing your policy.
- Maintaining or supporting products or services you have requested, including normal everyday business purposes, such as paying your claims, making policy changes, or other administrative handling.
- Providing customer service, responding to your inquiries,

corresponding with you, providing you with updates about your account and service, sending you electronic newsletters, administering surveys and promotions, or business research and analysis.

- Performing analytics and to improve our products, website, mobile application(s), and advertising.
- Providing you with information about products and services that you may be interested in, subject to limits imposed by law. We may provide informational or promotional offers, as permitted by law, that we believe may be useful to you, such as information about products or services provided by us or other companies.
- Administer programs or services that add value to you but are not part of your benefit plan.
- As otherwise necessary or useful for us to conduct our business, so long as such use is permitted by law or for any other purpose with your consent.

We may disclose relevant portions of the information we collect, as described above, to third parties that perform services on our behalf or with whom we have joint marketing agreements. Before we share your information with a nonaffiliated third party for marketing purposes, we will offer you the opportunity to opt out, as required by applicable law.

Other than the disclosures listed above, we do not release your information to nonaffiliated third parties. We will not for any reason share your information with or sell it to telemarketing agencies or other agencies that market products other than those products provided or administered by Wellabe or its contracted third parties. Our contracted third parties are bound by the same restrictions on the release and use of such information.

There are state and federal laws that may require or permit us to release your information to government agencies, other regulatory bodies and law enforcement officials, or other organizations as permitted or required by law. For example, for tax purposes, fraud prevention, or to respond to a valid court order or subpoena.

#### Fair credit reporting act

We do not disclose information subject to the Fair Credit Reporting Act except as permitted or required by law. To the extent that we decide in the future to make any disclosures of your nonpublic personal information that are subject to the Act, we will follow the necessary requirements of the Act including providing you with the opportunity to restrict our ability to disclose information.

#### How do we protect your information?

We maintain appropriate physical, electronic and procedural safeguards to ensure the confidentiality of your nonpublic personal information. We follow security standards and procedures to help prevent unauthorized access to personal information. Only employees or our contracted third parties who need the information we collect from or about you to provide products or services to you may access that information. Employees and contracted third parties are required to comply with our established policies.

#### What about former customers?

We do not disclose information about former customers unless permitted or required by law.

#### Financial Notice of Privacy Practices (continued)

#### How can you correct inaccurate information?

We want to keep our records of your information accurate. If you discover inaccuracies in any communications from us, please call our customer success team at the number listed on your contract materials. We will respond promptly when we learn corrections are needed.

#### **Contact Information**

You can contact our Customer Success team at:

Wellabe, Inc. P.O. Box 1 Des Moines, IA 50306-0001 800-247-2190 If you have any questions or complaints about this notice, please contact us at:

Wellabe, Inc. Attn: Privacy Officer 601 6th Avenue Des Moines, IA 50309

You may also visit us on our website at: www.wellabe.com

Effective Date: January 2024