

## European Union/General Data Protection Regulation Privacy Notice

Effective Date: February 20, 2020

This European Union (EU) Privacy Notice explains how Worldwide Insurance Services, LLC (Worldwide Services Insurance Agency, LLC in California and New York) trading as GeoBlue® (“GeoBlue”) processes personal data that may be subject to the EU’s General Data Protection Regulation (“GDPR”). With respect to the personal data processing activities described in this Notice, GeoBlue (“we” “our” “us”) acts as the data controller (the entity that determines the purposes and means of the data processing). This Notice also describes your rights and choices relevant to our processing of your personal data.

You may contact us for additional information about our data practices using the contact information at the bottom of this Notice.

### Personal Data Collection

Data You Provide to Us. GeoBlue may collect personal data directly from you. For example, when you create an account, file a claim, use our contact form, or otherwise communicate directly with us. This personal data might include your personal contact details, date of birth, personal identification number, health data, health insurance information or medical records, and your GeoBlue account authentication information and member identification number. If you apply for employment with GeoBlue, we may collect your contact details, curriculum vitae, and other information to help us assess your qualifications for employment.

Automatically Collected Data. GeoBlue uses various tools and technologies, such as cookies, web beacons, and web server logs, to collect data automatically when you visit our websites or use our online services. This data may include IP addresses, device identifiers, referring URLs, time and length of visits, and pages viewed. For additional information regarding our use of these online tools and technologies, including your ability to opt out, please review GeoBlue’s Online Privacy Policy on our website.

Information We Obtain from Third Parties. GeoBlue obtains certain personal data from third parties. For example, your employer might provide your employee identification number, work contact details, and job title, or your healthcare provider might provide health data or medical records to help us determine your benefits eligibility or to process your claims.

Some of the data we process may include special categories of personal data as defined in the GDPR.

### Personal Data Processing

We may process your personal data to:

- Communicate with you, transact with you, service your account, process your claims, and provide customer service

- Evaluate job applications received through our [Careers page](#)
- Facilitate, monitor, manage, analyze, and improve our services
- Provide you with information regarding our products and services
- Conduct research and analysis
- Prevent and address fraud or other unlawful activity, breaches of our policies or terms, and threats or harm
- Ensure the security and integrity of the personal data we process
- Comply with applicable legal requirements

These personal data processing activities are carried out pursuant to the following **legal bases**:

- The processing is **necessary for us to provide you with the services and products you request**, including **pursuant to a contract** we have with you or to respond to your inquiries regarding those services and products.
- We have a **legitimate interest** in processing your personal data. For example, we have a legitimate interest in processing personal data for the following purposes:
  - Analyzing and improving safety and security, including by implementing and enhancing security measures
  - Maintaining and improving GeoBlue’s products and services
  - Providing you with certain tailored communications, including developing and promoting our business
- We have a **legal obligation** to process your personal data, such as to comply with applicable laws and other government regulations or to comply with a court order, binding law enforcement request, or other legal processes.
- We have obtained your **consent** with respect to the processing of your personal data. When you consent to such processing, you can withdraw your consent at any time by contacting us by email at [privacy@geo-blue.com](mailto:privacy@geo-blue.com) or by phone at +1 (855) 282-3517.

## **Disclosure of Personal Data**

We may share personal data in the following ways:

- In order to provide services to you or upon your request, personal data you provide to GeoBlue, including health information and medical records, may be shared with our designated healthcare provider. This information may be shared whether or not you ultimately are seen by that healthcare provider.
- Certain personal data may be shared under confidentiality agreements with our business partners, vendors and other service providers who perform necessary functions to assist our operations. For example, we may use third parties for cloud hosting services and document storage and to help us provide customer support.
- We may share your personal data with members of GeoBlue’s corporate family when it is reasonably necessary or useful, such as to improve or support our member services.
- In some circumstances, we must share your personal data due to a legal obligation. For example, we may disclose your personal data to comply with the law, to establish or exercise our legal rights, to protect and defend our or others’ rights or property, or to prevent fraud or abuse.

- In the event of a business transaction, including negotiations of such a transaction, (for example, the sale, reorganization, liquidation, assignment, merger, or other transfer of all or a portion of GeoBlue's business to another business entity) we may share your personal data.

### **International Data Transfer**

Under certain circumstances, personal data may be transferred to GeoBlue in the United States or another country outside of the EU for processing. Examples of when this might happen include when medical records are required for claims processing, when health information is required to assess benefits eligibility, or when you contact us to request assistance with finding a healthcare provider. Please be aware that the data protection laws and regulations that apply to your personal data in other countries may differ from the laws in the EU.

Appropriate legal mechanisms and safeguards are applied to personal data transfers. For further information about how your data is transferred out of the EU, please contact us by email at [privacy@geo-blue.com](mailto:privacy@geo-blue.com) or by phone at +1 (855) 282-3517.

### **Security**

GeoBlue takes reasonable measures to protect personal data from loss, theft, misuse, unauthorized access, disclosure, alteration, and destruction. For example, when registering as a GeoBlue member or when requesting, accepting, or reviewing medical appointments, you will use the GeoBlue secure server. Through encryption, the personal data that users enter, including credit card numbers and personal identification numbers, cannot be read easily as the personal data travels over the Internet. Nevertheless, transmission via the Internet and online digital storage are not completely secure, so we cannot guarantee the security of your personal data.

You are responsible for maintaining the confidentiality of your GeoBlue account password. Never share your GeoBlue password with anyone you do not want to access your account, and inform GeoBlue of any need to deactivate an account or password. If you have a security concern about your account, contact GeoBlue by email at [privacy@geo-blue.com](mailto:privacy@geo-blue.com) or by phone at +1 (855) 282-3517.

### **Data Retention**

We will store your personal data for no longer than is necessary for the performance of our obligations or to achieve the purposes for which the information was collected, or as may be permitted under applicable law. To determine the appropriate retention period, we will consider the amount, nature, and sensitivity of the data; the potential risk of harm from unauthorized use or disclosure of the data; the purposes for which we process the data and whether we can achieve those purposes through other means; and the applicable legal requirements. Unless otherwise required by applicable law, at the end of the retention period we will remove personal data from our systems and records or take appropriate steps to anonymize it properly.

## Your Rights and Choices

Under the GDPR, EU data subjects have certain rights with respect to their personal data. Subject to certain conditions, you may make the following types of requests:

- **Access.** You may request that we provide you with information about our processing of your personal data and give you access to your personal data.
- **Correct.** You may request that we update or correct personal data about you that is inaccurate or incomplete.
- **Delete.** You may request that we delete your personal data.
- **Object.** You may object to our reliance on our legitimate interests as the basis for processing of your personal data.
- **Restrict.** You may request that we restrict the processing of your personal data.
- **Transfer.** You may request that we transfer a machine-readable copy of personal data you have given us to you or to a third party of your choice.

You also may request at any time that we stop sending you direct marketing communications. We may continue to send you communications related to your GeoBlue membership and other non-marketing communications.

You can submit these requests by email at [privacy@geo-blue.com](mailto:privacy@geo-blue.com) or by phone at +1 (855) 282-3517. We will respond to your request within a reasonable timeframe. We may request specific information from you to help us confirm your identity prior to processing your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions.

You also have the right to lodge a complaint with a supervisory authority. You can find information about your data protection regulator [here](#).

## Updates to this Notice

This EU Privacy Notice may be revised from time to time as we add new features and services, as laws change, and as industry privacy and security best practices evolve. We display an effective date on the policy in the upper right corner of this Notice so that it will be easier for you to know when there have been material changes. Your continued interaction with GeoBlue following the posting of changes to the Notice will mean that you accept those changes.

## Questions?

If you have questions about this Notice or about exercising your data protection rights under the GDPR, please contact us by email at [privacy@geo-blue.com](mailto:privacy@geo-blue.com) or by phone at +1 (855) 282-3517.