

**MATRIX**

**ABSENCE MANAGEMENT**

**A MEMBER OF THE TOKIO MARINE GROUP**

# **Privacy Policy**

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## Purpose

Matrix values your trust and is committed to the responsible management and protection of your privacy. This privacy notice explains how Matrix collects, uses, transfers, and protects the personal information collected when you use Matrix's websites, mobile applications, and other services administered by Matrix (collectively, referred to as the "Site"). The Matrix privacy program is designed to protect all Non-Public Information (NPI) on customers and claimants against unauthorized use or disclosure.

## Definitions

### **Affiliates**

Companies related by common ownership or control. Our affiliates include other companies which are part of The Tokio Marine Group.

### **Aggregate Information**

Any information that is not specific to an individual such as general, non-personal, statistical information about the use of the Site. Examples include areas visited on the Site, how many visitors visit an area on the Site, how long visitors stay in an area, or the browser used to access the Site.

### **CCPA**

Means the California Consumer Privacy Act of 2018 and any regulations issued thereunder, as they may be amended from time to time.

### **California Personal Information**

"California Personal Information" refers to any personal information collected by Matrix that is subject to California privacy law. This excludes any personal information regulated by Title V, Subtitle A of the GLBA.

### **Cookie(s)**

A small, electronic file that a website transfers to an individual's hard drive for record-keeping purposes that retains information relating to visits to and use of a website. Cookies allow users to visit the Site more efficiently, but can be disengaged by changing your browser settings.

### **Internet Protocol Address**

An address or other identifier that is automatically assigned to your computer by your Internet Service Provider (ISP).

### **Non-Public Information (NPI)**

As defined by Matrix means any information that is not publicly available and includes:

- Any Matrix business information (e.g., financial information, claim data, client data, client lists, contracts, vendor lists, sales/marketing data, intellectual property, information security data, policies/procedures, etc.);

- Any information that is not publicly available, that when combined together can be used to identify an individual such as social security number; first & last name, e-mail address, or claim information.

Any information or data, except age or gender, in any form or medium created by or received from a healthcare provider.

### **Personal Information**

For purposes of this policy, the term “Personal Information” shall have the same definition as “Nonpublic personal information” as defined by the Gramm-Leach-Bliley Act (“GLBA”). “Nonpublic personal information” generally is any information that is not publicly available and that: a consumer provides to a financial institution to obtain a financial product or service from the institution; results from a transaction between the consumer and the institution involving a financial product or service; or a financial institution otherwise obtains about a consumer in connection with providing a financial product or service. Personal Information may include NPI, PII, or PHI.

A majority of the personal information relayed to and collected by Matrix comes from the group policyholder who maintains all personal information on the individuals insured under the policy or from a claimant when a claim is filed.

### **Personally Identifiable Information (i.e. Personal Information), (PII or PI)**

As defined by the National Institute of Standard and Technology (NIST). PII is defined as a person’s first name or first initial and last name in combination with one or more of the following data elements:

- Social security number
- Date of Birth
- Address

### **Privacy Notice**

“Privacy Notice” refers to the current version of Matrix’s Privacy Notice found at [Matrixcos.com](http://Matrixcos.com).

### **Privacy Notice for California Residents**

“Privacy Notice for California Residents” refers to the current version of Matrix’s Privacy Notice for California Residents found at [Matrixcos.com](http://Matrixcos.com).

### **Processing**

Means any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### **Protected Health Information (PHI)**

As defined by the Health Insurance Portability and Accountability Act (HIPAA). PHI is defined as any “individually identifiable” information that is stored by a covered entity, and related to one or more of the following:

- Past, present or future physical or mental health condition of an individual.
- Provision of health care to an individual.
- Past, present or future payment for the provision of health care to an individual.

PHI is considered “individually identifiable” if it contains one or more of the following identifiers:

- Name
- Address smaller than state including street address, city, county, precinct or zip code
- Dates related to an individual including birth, admissions, discharge, and death date
- Telephone/Fax numbers
- Electronic mail addresses
- Social security numbers
- Medical record numbers
- Health plan beneficiary numbers
- Account numbers
- Certificate/license numbers
- Device identifiers and serial numbers
- Biometric identifiers, including finger and voice prints
- Full face photographic images and any comparable images
- Any other unique identifying number or characteristic that could identify an individual

If the health information does not contain one of the above referenced identifiers and there is no reasonable basis to believe that the information can be used to identify an individual, it is not considered as PHI.

## Information We Collect

All personal information is collected and used for the business purpose of providing a service and/or fulfilling a contractual obligation under a client contract. We collect anonymous data from every visitor to our Site to monitor traffic, fix bugs, and build better services. We collect various types of voluntarily provided personal information from our customers, but we may also collect or verify information from:

1. Publicly available information;
2. Group Policyholders;
3. Physicians;
4. Health care providers;
5. Claimants; or

## 6. Consumer Investigative Organizations.

### How We Collect Information

Matrix only collects personal information necessary to achieve the purpose of use, or as required by law. Matrix will only collect personal information by lawful and fair means. Matrix will not collect personal information by any illicit means.

### How We Use Information

We may use and disclose the personal information voluntarily provided by customers to/for:

- Process claims;
- Communicate about a claim;
- For general claim administration purposes to assist in performance of our contractual obligations;
- Respond to your requests, inquiries, comments and/or concerns;
- Detect, investigate and help prevent security threats, fraud or other malicious activity;
- Comply with applicable laws and regulations;
- Comply with valid legal processes and respond to or comply with any law, regulation, subpoena, court order or other legal obligation;
- Enforce our terms of service and to protect our rights and properties;
- Protect the rights, privacy, safety or property our users, visitors, employees, customers, and others;
- Identify usage trends and for data analysis; or
- Other purposes that are disclosed at the time information is requested.

We also may de-identify the personal information collected by removing identifiers such as your name or your date-of-birth or by aggregating information as described in the sections below.

### How We Disclose or Share Information

We may disclose personal information to a service provider or third party for a business purpose. When we disclose personal information, we request that the recipient both keep that personal information confidential and not use it for any purpose except performing the service. We may share personal information with the following categories of entities:

- With our affiliates or group companies;
- Parties to whom a consumer has directed or authorized disclosure;
- Service Providers;
- Employers;
- Consumer Investigative Organizations;
- Competent law enforcement, regulatory or government agencies, courts, or

- Other third parties where we believe disclosure is necessary as a matter of applicable law or regulation, to exercise or defend our legal rights, or to protect a consumer's vital interests or those of any other person.

## How We Protect Your Personal Information

The security of your personal information is important to us. Matrix will take full security measures to manage personal information securely and to prevent disclosure, loss or damage to personal information we handle, and will ensure the accuracy and prompt updating of personal information where necessary to achieve the purpose of use.

We encrypt data in transit and data at rest, as well as, classify and handle all Non-Public Information (NPI), Personally Identifiable Information (PII) and Protected Health Information (PHI) as a Tier 1 Confidentiality/Restricted and/or Tier 2 –Internal Private. We restrict access to personal information to our employees, contractors, and agents who need to know that information in order to operate, develop, or improve our services.

All Matrix staff complete privacy and security awareness training to ensure NPI is handled in accordance with Matrix's information security policies and procedures. All Matrix employees must abide by our privacy policy. Employees who violate our privacy policies are subject to disciplinary action, up to and including termination.

## Record Retention

All Matrix records are subject to our Record Retention Policy and Schedule, which must be consulted prior to information disposal. The Company's policy regarding record retention is consistent with applicable legal requirements.

## Privacy Notices

The Privacy Notice, as defined by Title V, Subtitle A of the Gramm-Leach-Bliley Act ("GLBA"), is provided to customers and describes Matrix's policies and practices with respect to collecting and sharing personal information.

The California Privacy Law grants certain special rights to California residents and Matrix provides a supplemental Privacy Notice for California residents.

These privacy notices may be updated and changed from time to time. We will post any new policies at [Matrixcos.com](http://Matrixcos.com).

## California Privacy Law

*Information covered by California Privacy Law*

California privacy law grants special rights to California residents. Personal information may already be protected by GLBA as well as other laws such as the California Financial Information Protection Act; the Health Insurance Portability and Accountability Act (HIPAA); the Fair Credit Reporting Act (FCRA); and/or the Driver's License Protection Act. California privacy law does not apply to information already protected under these laws but may apply to some California personal information collected by Matrix. In addition to the privacy practices listed above, California residents are entitled to the following rights and disclosures.

#### *Privacy Notice*

In addition to our Privacy Notice, Matrix posts a supplemental Privacy Notice for California Residents on our website which contains all rights specific to California residents that are not contained within our Privacy Notice.

#### *California Resident Rights to California Personal Information*

1. The right to know what personal information is collected, used, shared or sold, both as to the categories and specific pieces of personal information;
2. The right to delete personal information held by businesses and by extension, a business's service providers;
3. The right to opt-out of the sale of personal information.
4. The right to non-discrimination when a consumer exercises a privacy right under California privacy law.

#### *Collection of Information*

Under California privacy law, Matrix must disclose the categories and specific types of information collected in the past 12 months. For purposes of this section, the terms used below have the same meanings as defined under California privacy law. Matrix has collected the following categories and specific types of personal information about consumers in the past 12 months: identifiers; personal information categories listed in the California resident records statute (Cal. Civ. Code § 1798.80(e)); protected classification characteristics under California or federal law; Sensory data; and Employment data.

#### *Request for Access to Specific Information, Data Portability Rights*

California Civil Code Section 1798.93 permits California residents to request information about the collection and disclosure of their California Personal Information over the past 12 months. Matrix endeavors to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, but not more than ninety (90) days, we will inform the consumer of the reason and extension period in writing. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt and is only applicable to California Personal information. The response we provide will also explain the reasons we cannot comply with a request, if applicable.



#### *Verification of person making the request*

An individual making a request will need to provide information to us to verify that he/she is legally entitled to the information requested.

#### *Request for Deletions*

A California resident may have the right to ask Matrix to delete a piece of California Personal Information collected. Matrix may deny a request for any California Personal Information that falls under an exemption permitted by applicable California or Federal law.

#### *Submitting Requests*

If a California resident wishes to exercise his or her rights under California privacy law, Matrix has dedicated telephone line and email inbox to these requests. A California resident may contact us at:

Matrix Absence Management <b>Privacy Officer</b> 2421 W. Peoria Avenue, Suite 200 Phoenix, AZ 85029
Email : <a href="mailto:MatrixCompliance@matrixcos.com">MatrixCompliance@matrixcos.com</a>
Toll-free: 1-888-238-4002

#### *Sales of Personal Information*

Matrix does not sell personal information and, in the preceding twelve (12) months, Matrix did not sell any categories of personal information (for either minors or non-minors).

#### *Non-Discrimination*

California Residents have a right not to receive discriminatory treatment for the exercise of the privacy rights conferred by the CCPA. Matrix will not discriminate against any individual in any way for exercising any of his or her CCPA rights.

## Children's Privacy

This Site is not directed to or intended for children. Neither Matrix nor any of our products or services are directed to children younger than age sixteen (16).

## Social Media

Matrix maintains profiles and/or pages on various social media sites including LinkedIn, Twitter, and Facebook. If you choose to "Follow" Matrix on Twitter, "Like" Matrix on Facebook, or take any similar action on another social media site, you are providing your consent to receive information updates, including solicitations, from Matrix. To stop receiving this information, you must follow the procedure(s) established by the social media site.

## Violations

Any failure on the part of any employee to adhere to this policy may result in disciplinary action up to and including termination.

## Changes to Our Privacy Policy

We may change this privacy policy from time to time. Any changes will be posted on this page with an updated revision date.

## How to Contact Us

For any questions about this privacy policy or to exercise any of your rights listed above or any applicable policy section, please contact:

Matrix Absence Management <b>Privacy Officer</b> 2421 W. Peoria Avenue, Suite 200 Phoenix, AZ 85029 Email : <a href="mailto:MatrixCompliance@matrixcos.com">MatrixCompliance@matrixcos.com</a>
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**Last updated 12/18/2020**

# Addendum A

## Privacy Notice

### Current Privacy Notice found at Matrixcos.com

FACTS	WHAT DOES MATRIX ABSENCE MANAGEMENT, INC. DO WITH YOUR PERSONAL INFORMATION?	
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.	
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>• Social Security number</li> <li>• Financial Information</li> <li>• Date of birth</li> <li>• Name, address, telephone number</li> <li>• Health information, including medical history</li> <li>• Information about your job and salary</li> </ul> <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>	
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information, the reasons Reliance Standard chooses to share, and whether you can limit this sharing.	
Reasons we can share your personal information	Does Matrix share?	Can you limit this sharing?
For our everyday business purposes - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	YES	NO
For our marketing purposes - to offer our products and services to you	YES	NO
For our joint marketing with other financial companies	NO	N/A
For our affiliates' everyday business purposes - Information about your transactions and experiences	YES	NO
For our affiliates' everyday business purposes - Information about your credit worthiness	NO	N/A
For our affiliates to market to you	NO	N/A
For our non-affiliates to market to you	NO	N/A
<b>Who we are</b>		
Who is providing this notice?	MATRIX ABSENCE MANAGEMENT, INC.	
<b>What we do</b>		
How does Matrix protect my information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. In addition, we have policies and procedures that direct our employees and agents to protect your personal information. We do not share your personal information except as authorized by you or allowed by law.	
How does Matrix collect my personal information?	We collect your personal information; for example, when file a claim. We may collect your personal information from you, your employer, your medical providers, consumer reporting agencies or anyone you have authorized to provide us with information.	
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>• sharing for affiliates' everyday business purposes - information about your credit worthiness.</li> <li>• affiliates from using your information to market to you</li> <li>• sharing for non-affiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing</p>	
<b>Definitions</b>		
Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies. <ul style="list-style-type: none"> <li>• Our affiliates include other companies which are part of the Tokio Marine Group</li> </ul>	
Non-Affiliates	Companies not related by common ownership or control. They can be financial and non-financial companies. This includes entities which provide claim administration, underwriting, investigation, reinsurance, policyholder or other services to us or on our behalf.	
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Our joint marketing partners include insurance agents and brokers.	
Questions?	Call 800-980-1006 or go to <a href="http://www.matrixcos.com">www.matrixcos.com</a>	
<b>Other Important Information</b>		
<p><b>Independent Sales Agents.</b> Your employer's or insurance carrier's contract with us may have been placed with us through an independent agent or broker ("Sales Agent"). A Sales Agent may gather and retain information about you. The use and protection of information by the Sales Agent is the Sales Agent's responsibility, not our responsibility. If you have questions about whether or how the Sales Agent uses or discloses such information, please contact the Sales Agent.</p>		

## Addendum B

### Privacy Notice for California Residents

#### **Current Privacy Notice for California Residents found at Matrixcos.com**

This **Privacy Notice for California Residents** supplements the information contained in our Privacy Notice and applies solely to consumers who reside in the State of California (consumers or you).

#### **Information covered by California Privacy law**

The California Consumer Privacy Act of 2018 (CCPA) grants new rights to California consumers. As a third party benefits administrator providing administrative services for managing employee leaves of absence, disability benefits, worker's compensation benefits, and ADA accommodations, Matrix Absence Management, Inc., (Matrix) is subject to federal privacy regulation under Gramm-Leach-Bliley Act and implementing regulations (collectively GLBA). California Privacy law exempts information "collected, processed, sold or disclosed" pursuant to GLBA. This includes information Matrix collects and shares information from you related to administrative services for leaves of absence, disability benefits, worker's compensation benefits, and ADA accommodations. For purposes of this notice, "California Personal Information" refers to any information collected by Matrix that falls outside of the GLBA definition of personal information and is subject to California Privacy law.

#### **California Consumer Rights to California Personal Information**

1. The right to know what personal information is collected, used, shared or sold, both as to the categories and specific pieces of personal information;
2. The right to delete personal information held by businesses and by extension, a business's service providers;
3. The right to opt-out of the sale of personal information.
4. The right to non-discrimination when a consumer exercises a privacy right under CCPA.

#### **Sources of Your Personal Information**

You are the most important source of California Personal Information but we may also verify or collect information on you from: (1) an insurance agent or group policy holder servicing your policy, (2) physicians; (3) other health care providers; (4) employers; (5) consumer investigative organizations.

#### **Information That We Collect and How We Use It**

Matrix may collect, use, and share California Personal Information about consumers to provide consumers with our services and perform a contract.

#### *Collection of information*

All information collected is collected and used for the business purpose of providing a service to you and fulfilling a contractual obligation. We collect information about individual consumers from our group policyholders, from employers, from consumers' recorded phone calls with our customer service and/or claims agents, and from consumers' medical providers. Matrix has collected the following categories and specific types of personal information about consumers in the past 12 months: Identifiers, Personal

information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), Protected classification characteristics under California or federal law, Sensory data, and Employment data.

#### *Use of information*

We may use and/or disclose the personal information we collect for one or more of the following business purposes: To set up a new client; To process claims; To communicate about a claim; For general claim administration purposes; To comply with our legal and regulatory obligations; To defend or prosecute legal claims; or To investigate or prosecute fraud.

#### *Sharing of Information*

Matrix may disclose information to a service provider or third party for a business purpose. When we disclose your personal information, we request that the recipient both keep that personal information confidential and not use it for any purpose except performing the contract. We share your personal information with the following categories: to our group companies; to group policyholders/employers to determine claimant eligibility; to perform medical reviews during the claims process; to investigative services for the purposes of fraud detection; to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect a consumer's vital interests or those of any other person; and to any other person with consumer's consent to the disclosure.

#### **Request for Access to Specific Information, Data Portability Rights**

If you are a California Resident, California Civil Code Section 1798.93 permits you to request information about the collection and disclosure of your California Personal Information over the past 12 months. Matrix endeavors to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt and is only applicable to California Personal information. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

#### **Verification of person making the request**

Matrix values the responsibility of handling sensitive personal information. An individual making a request will need to provide information to us to verify that he/she is legally entitled to the information requested.

#### **Request for Deletions**

You may have the right to ask Matrix to delete a piece of California Personal Information collected about you. We may deny your request for any California Personal Information that falls under an exemption permitted by an applicable California or Federal law.

#### **Submitting Requests**

If you wish to exercise your rights under California privacy law, you may call our Customer Service Department at 1-888-238-4002; email your request to [MatrixCompliance@matrixcos.com](mailto:MatrixCompliance@matrixcos.com) or write to us

at: Privacy Officer, Attn: California Privacy Rights, Matrix Absence Management, Inc., 2421 W Peoria Ave #200, Phoenix, Arizona 85029.

**Sales of Personal Information**

In the preceding twelve (12) months, Matrix has not sold any categories of personal information (for both minors and non-minors).

**Non-Discrimination**

You have a right not to receive discriminatory treatment for the exercise of the privacy rights conferred by the CCPA. We will not discriminate against you in any way for exercising any of your CCPA rights.

**An Explanation of Cookies and How We Use Them**

Please see the **About Cookies** disclosure on our website.

**Changes to Our Privacy Notice**

This privacy notice may be updated and changed from time to time. We will post the new policy on this page.

# Addendum C

## About Cookies

### **Current About Cookies Disclosure found at Matrixcos.com**

#### **About Cookies**

You may have noticed this term used across the Internet to describe bits of information that some websites create when you visit their sites and then store on your computer. A cookie is unique to the computer you are using and can only be read by the website that gave it to you. Cookies are a basic way to identify the computer you happen to be using at the time, and do not identify you personally. They cannot be used to obtain data from your hard drive, your email address or personal information stored on your computer. Cookies do not contain viruses.

#### **How Matrix uses Cookies**

We use cookies for various reasons – these are specified below:

- To help you navigate and interact with the content on our site more efficiently, we also use session cookies. For example, session cookies may save you from having to enter the same information twice during an online session. These cookies also help us keep track of how you arrived at certain content, so that we can adapt the presentation of subsequent content to ensure it is relevant to your situation.
- To personalize your website experience, we may create cookies that help our site remember your preferences when you return at a later time and present customized products and services that may be of special interest to you. Unlike session cookies, which do not remain active after you log off a site, these cookies remain on your computer after you log off. You can delete these cookies from your computer at any time.
- To evaluate our website, we may use cookies to facilitate online surveys or to track how visitors use our site, such as which pages are viewed the most or identify the most common navigation paths. This information is used to improve the content, usability and functionality of our website. Although these cookies remain on your computer after you log off, you may delete them from your computer at any time.

#### **Cookies – We Want You to Know**

Although we do not collect any personally identifiable information from, or store personal information in cookies, Matrix will still treat the information supplied through cookies with the security and privacy protections as we do with other customer information we receive.

We may contract with other companies to assist us in setting cookies or tracking technology for the purposes described above, and compiling and analyzing anonymous ad or website response information. These companies are prohibited by legal agreement from using the information they gather for their own purposes or from sharing this information with others.

**Do you have to accept cookies?**

No, you can disallow cookies by making the appropriate selection from your browser options to inform you when cookies are set or to prevent cookies from being set. You should understand, however, that cookies are required to login and navigate within our secure extranets. Therefore, if you set your browser options to disallow cookies, you may limit the functionality we can provide when you visit our site.