

PRIVACY POLICY

Palco Portal Privacy Policy

Collecting and Using Personal Information

When you visit and navigate our website, and when you communicate with us via our site, we may collect personal information about you. "Personal information" means information that is unique to an individual and by which the individual may be identified, such as name, address, Social Security number, or health or financial information that is associated directly with an individual. This information is collected in order to provide payroll, enrollment, information and assistance, and related support services to you and to continue to improve and enhance our service offerings. This information may include, but is not limited to, that which you provide voluntarily through your interactions with the site, as well as information about how you use and navigate through the site.

We will not sell, license, or transfer personal information we gather from you outside of Palco, Inc., except as necessary to provide you with information, services or products that we offer independently or jointly with others, as required by law or in connection with judicial or governmental proceedings, or in connection with the sale of all or substantially all of Palco, Inc. assets.

Confidentiality of Personal Information

Palco, Inc. uses reasonable efforts to protect the privacy and confidentiality of your personal information, including encrypting personal information as it is transmitted between your computer and Palco, Inc. via our website. In addition, employees of Palco, Inc. are subject to confidentiality and compliance policies relating to personal information.

When communicating personal information through the Palco, Inc. website, you will be provided with a user identification name and a password. Your password is your private key to access your account and personal information. To maintain the confidentiality of your account, you should never share your user identification name and/or password with anyone. In addition, you should change it periodically and you should select a password that is difficult for others to identify.



Palco, Inc. is not liable in any event that a user shares his or her login information. Additionally, never leave your computer or mobile device unattended while logged into our site. Palco is not liable for any data breach in these instances.

Non-Personal Information

We may use and disclose to others information about you and your use of the website by which you are not identified, such as the type of browser you use, the files you request, the URL (Uniform Resource Locator), and geographic location from which you request information, the URL that you came from and go to and similar information, and information compiled in the form of statistical, demographic, or aggregated information about visitors generally to the website. This information is referred to in this document as "Non-Personal Information."

We utilize technical mechanisms such as cookies and pixel tags (also called clear gifs) to gather non-personal site usage information. Cookies are small pieces of information that are stored by your browser on your computer's hard drive. Most web browsers automatically accept cookies, but you can usually change your browser to prevent the use of cookies. If you turn off cookies in your browser, however, some portions of our site may not be available to you. Pixel tags are embedded in the web page and note visits to certain site locations. They may also be used in email communications to note if you have received and opened email communications from us.

Mobile-Specific Information We Collect

Typically, we record your phone number. We record your phone number when you send it to us; ask us to remember it; or make a call or send a text message or SMS to or from Palco, Inc.

Most of the other information we collect for mobile, such as your device and hardware IDs and device type, the request type, your carrier, your carrier user ID, the content of your request, and basic usage stats about your device and use of Palco products and services does not by itself identify you to Palco, though it may be unique or consist of or contain information that you consider personal.

If you use location-enabled products and services, such as, but not limited to, Google Maps for mobile, you may be sending us location information. This information may reveal your actual location, such as GPS data.

Certain use of our products and services allow you to download and/or personalize the content you receive from us. For these products and services, we will record information



about your downloads and preferences, along with any information you provide yourself. If the product or service requires you to log in with a Palco account, this information will be associated with your Palco account.

Children

This site is not intended for use by children (persons under the age of 18).

Changes to this Privacy Policy

This Privacy Policy and related Terms of Use are effective as of January 1, 2017. Palco, Inc. may change this statement periodically without notice. Changes to our Internet Privacy Statement will be noted here so that you can be informed about the privacy protections we provide. This statement is not intended to and does not create any contractual or other legal rights in or on behalf of any party.

Email Provisions

Palco, Inc. guarantees that any emails sent by us originate from a secure location. However, Palco is not liable for any security associated with or on the receiving end. If email recipients are using unsecured methods for receiving email, the recipient assumes liability.

HIPAA Notice of Privacy Practice

Palco, Inc. is committed to protecting the privacy and confidentiality of your personal health information (PHI). We comply with federal laws and meet required standards for securing that information, including the privacy components of the Health Insurance Portability and Accountability Act (HIPAA) and its Administration Simplification provision (HIPAA-AS), which took effect April 14, 2003, and the Health Information Technology for Economic and Clinical Health (HITECH) Act of 2009.

PHI refers to individually identifiable health information received and stored by Palco. PHI information includes medical conditions, health status, claims, experience, medical histories, physical examinations, genetic information, evidence of disability, Medicaid and/or program eligibility, and other information.

No PHI will be released without proper written consent from the participant, representative, guardian, or legally responsible individual acting on behalf of the participant, unless the request is during an emergency or is authorized by federal or state law.



We are required to follow the terms of this Privacy Policy. We understand that medical information about you and your health is personal. We are committed to protecting your PHI. In the course of conducting business, we will create records regarding you and the treatment and services we provide to you. Your individual record is the physical property of Palco, which compiled it, but the content is about you and therefore belongs to you.

We are required by law to:

- Ensure protected health information that identifies you is kept private.
- Give you this notice of our legal duties and privacy practices regarding your protected health information.
- Follow the terms of the notice that is currently in effect.
- We are required to notify you in the event of a breach of your PHI.
- The terms of this notice apply to all records containing your PHI that are created or retained by Palco. We reserve the right to revise or change the terms of this policy at any time. Any revision or amendment to this notice will be effective for all of your records that Palco has created or maintained in the past, and for any of your records that we may create or maintain in the future. You may request a copy of our most current policy at any time. We will also post our most current Privacy Policy on our website.