

## Privacy Notice

**Last Updated: September 4, 2024**

In this Privacy Notice, we describe how DIRECTED HEALTH INSURANCE SOLUTIONS, LLCd/b/a Directed Health, a Florida limited liability company, and our affiliated and subsidiary companies (collectively, “**Directed Health**,” “**we**,” or “**us**”) collect, use, disclose, and protect the personal information about our customers and users of our websites and services. For information about how we collect, use, and disclose consumer health data, please follow [this link](#).

We provide online and over the telephone information about certain insurance products and can connect you with a licensed insurance agent to assist with enrollment into an insurance plan offered by a third-party insurer. By calling us or completing a web form, you will have the opportunity to speak with a licensed insurance agent who can help determine your eligibility, provide information about the plans that we offer, answer your questions and/or assist with enrollment into a plan (individually and collectively, the “Services”).

If you apply through the Services for insurance offered by third party insurers with whom we work (each a “Third-Party Insurer”), we will share your personal information with such Third-Party Insurer so that they may evaluate and process your application. The use of your personal information by a Third-Party Insurer is subject to that Third Party Insurer's notice and not this Privacy Notice.

### Notice at Collection

We collect the categories of personal information listed in the table below.

<b>Category of Personal Information Collected</b>	<b>Shared</b>
<b>Identifiers</b> , such as names, online identifiers, IP addresses, email addresses, and other similar identifiers.	Yes
<b>Commercial information</b> , such as products or services purchased, obtained, or considered.	Yes
<b>Internet or other electronic network activity information</b> , such as browsing history and information regarding interactions with our Sites and advertisements.	Yes
<b>Geolocation data</b> , such as IP location.	Yes

<b>Audio, electronic, visual, or similar information</b> , such as phone call recordings.	Yes
<b>Inferences</b> , meaning inferences drawn from any of the information in the above-listed categories of information.	Yes
<b>Sensitive personal information</b> , such as Social Security numbers, driver's license/state ID card numbers, passport numbers, and account log-in information in combination with passwords.	Yes

We use the personal information that we collect for the following purposes:

- ***Providing the Services and related support***, including to confirm, process, or otherwise complete your requested transaction(s); to process and fulfill your orders and requests for products and services; to process your application for one or more insurance policies; to provide troubleshooting and other technical support; and to fulfill other customer service and support purposes.
- ***Communicating with you***, including responding to your requests, submissions, and inquiries; requesting feedback from you; and to send you important updates and communications about this Privacy Notice and/or other applicable terms and conditions.
- ***Protecting the integrity of the Services***, including to verify your identity and to detect and prevent fraud and unauthorized activities.
- ***Analyzing and improving the Services and our business***, including to better understand how you and others access and use the Services; to evaluate and improve the Services and our business operations; to develop new features, offerings, and services; to conduct surveys and other evaluations; and to fulfill other research and analytical purposes.
- ***Personalizing the Services***, including to tailor content we display on the Sites and send you relating to the Services (e.g., information that is relevant to your geographic area); to offer personalized help and instructions; and/or to otherwise personalize your experiences with the Services.
- ***Sending marketing and promotional communications***, including emails and other communications about the Services and/or those of our affiliates and other parties that we think may interest you. Such communications

would come from us; we do not share phone numbers with third parties for the purpose of enabling them to send marketing text messages or to place telemarketing calls to you. Where required by applicable law, we will obtain your consent to use your personal information for marketing and related purposes. **We do not use personal information that you provide us on your insurance application(s) for marketing or promotional purposes.** Details on how to exercise your choices with respect to marketing and promotional communications from us can be found in the “Your Choices” section below.

- ***Engaging in interest-based advertising***, including to send or display advertising on the Sites and/or across other websites, mobile applications, social media platforms, and other online services that are tailored to your interests and to evaluate, measure, and improve the effectiveness of our advertising campaigns. **We do not use personal information that you provide us on your insurance application(s) for interest-based advertising purposes.** Details on how to exercise your choices with respect to interest-based advertising can be found in the “Your Choices” section below.
- ***Securing and protecting our business***, including to protect and secure our business operations, our assets, the Services, and our systems and networks and to investigate, prevent, detect, and take action regarding fraud, unauthorized access, situations involving potential threats to the rights or safety of any person or third party, and/or other unauthorized activities or misconduct.
- ***Defending our legal rights***, including to manage and respond to actual and/or potential legal disputes and claims and/or to otherwise establish, defend, or protect our rights or interests, including in the context of anticipated or actual litigation.
- ***Auditing, reporting, corporate governance, and internal operations***, including to carry out financial, tax, and accounting audits and assessments of our operations, privacy and/or security posture, financial controls, risks, and compliance with legal obligations; to carry out our general business, accounting, record keeping, and legal functions; to maintain appropriate business records; to enforce company policies and procedures; and to carry out business transactions (e.g., any actual or

contemplated merger, acquisition, asset sale or transfer, financing, bankruptcy, or restructuring of all or part of our business).

- ***Satisfying our legal obligations***, including to comply with applicable laws and regulations and respond to lawful requests and communications, such as warrants, subpoenas, court orders, and/or regulatory or law enforcement requests.
- ***Consent***. We will also use your personal information as described to you at the point of information collection or with your consent.

We “share” (as these terms are defined in applicable privacy laws) certain categories of personal information, and you may exercise your right to opt out of such disclosures by clicking the Do Not Sell or Share My Personal Information link in the footer of the Site.

We retain each category of personal information that we collect for as long as necessary to fulfill the purposes described in this Privacy Notice, including to satisfy legal or reporting requirements.

## **Scope**

This Privacy Notice applies to the personal information that Directed Health collects or receives about individuals who use our products and Services (as defined below), either for themselves or on behalf of an organization or entity:

- through any website that includes a link to this Privacy Notice (each, a “Site” and collectively, the “Sites”);
- in connection with our business development and marketing activities; and
- through our other interactions with you (e.g., when you speak with one of our call center representatives over the telephone, communicate with us online or through SMS/text messaging, write to us to learn about the insurance products we offer, provide us with feedback or complete an online survey related to our products, etc.).

The above-listed activities and our interactions with you are included as part of the **Services**.

This Privacy Notice does not apply to any third-party websites, mobile applications, services, or products maintained by other companies, including those

that are linked to or accessible from the Services. In addition, this Privacy Notice does not apply to any personal information that we collect and process that is subject to the Health Insurance Portability and Accountability Act of 1996 (HIPAA) or the Gramm-Leach Bliley Act (GLBA), including the implementing regulations associated with these laws. For information about how we collect, use, and disclose “consumer health data” please follow [this link](#).

In this Privacy Notice, “**personal information**” means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to you, which is sometimes called “personal data.”

By providing your personal information to us through the Services or otherwise interacting with us, you understand and acknowledge that Directed Health will handle your personal information in accordance with this Privacy Notice. If you do not want this Privacy Notice to apply to you, please do not use the Services or interact with us. If required by applicable law, we will obtain your consent to collect, use, transfer, and/or disclose your personal information.

### **Collection of Personal Information**

Depending on how you use the Services and how you otherwise interact with us, we may collect your personal information in several ways, including: (1) directly from you; (2) automatically when you visit and interact with the Sites; and (3) in some cases, from Third-Party sources, such as Third-Party Insurers, in connection with the Services.

Generally, we collect your personal information on a voluntary basis. However, if you decline to provide certain personal information that is marked mandatory, you may not be able to access certain Services, or we may be unable to fully respond to your inquiry. The personal information that we collect, and process will vary depending upon the exact circumstances of your interaction with us. Additional details regarding our collection of your personal information are included below.

***Information Collected Directly from You.*** We collect personal information that you provide to us when you inquire about or use the Services, request a quote from us, fill out forms or fields on the Sites, create or submit an application through the Services, request information from us, sign up for our newsletters or our email list, participate in a survey or promotion administered by us (or on our behalf), or when

you otherwise communicate or interact with us (via the Sites, telephone, email, or other means).

Depending on the context of your interactions with us and the Services, the categories of personal information that we may collect directly from you include:

- **Contact information**, including your name, email address, and telephone numbers.
- **Unique identifiers**, including your government-issued identification number(s) (e.g., Social Security number, driver's license/state ID card number, or passport number).
- **Demographic information**, including your birth year.
- **Payment information**, including your credit/debit card information and billing address.
- **Correspondence and communications**, including any correspondence related to providing you with the Services and recordings of our email and phone conversations with you.
- **Preferences**, including how frequently you wish to receive marketing and promotional communications from us.
- **Other information you choose to provide**, including any information you include in any forms that you complete and submit on the Sites and other information that you provide during your interactions with us.

***Information Collected Automatically.*** When you visit and interact with the Sites, we (and our vendors and partners) use cookies, pixels tags, log files, and other similar technologies to collect certain information automatically.

The specific types of information we (and our vendors and partners) may collect include:

- ***Browser and device information***, including your browser type, device type, operating system, software version, Internet Protocol (IP) address and/or other unique identifiers assigned to your device, and the location of your device.
- ***Usage and interaction information***, including the date and time of your visits(s) to the Sites; the referring URL(s), and clickstream data (e.g., data about the areas or pages on the Sites you view and links you click).

The information that we collect automatically may be linked with other personal information we (and our vendors and partners) collect. For more information, see the Cookies and Analytics section below.

***Information Received from Third-Party Sources.*** We may obtain your personal information from other sources, including our service providers, our business partners, our analytics partners, social media platforms, and publicly accessible databases. Sometimes we collect information about you from the Third-Party Insurers or other companies that we work with to provide you our Services, or they may provide us with your information at your direction. The information that we receive from these sources may include contact information, demographic information, and internet or other electronic network activity information. We use the information that we receive from these sources to help us maintain the accuracy of or supplement the information that we collect; personalize your experience with the Services; conduct internal business analysis; and fulfill other business or commercial purposes described in this Privacy Notice.

Additionally, if we help you identify, apply for, or obtain insurance from a Third-Party Insurer, we may receive limited information back from the Third-Party Insurer when your insurance policy is issued (e.g., the date, term, premium amount, payment terms, etc.).

***Combination of Information.*** We may combine the personal information that we receive from and about you, including information you provide to us, information we automatically collect through the Sites, and information we receive from third-party sources. Where applicable, we will use, disclose, and protect the combined information as described in this Privacy Notice.

## **Disclosure of Personal Information**

We may disclose each of the categories personal information we collect to the following categories of recipients for business purposes:

- ***Our Affiliates and Subsidiaries.*** We disclose your personal information to our affiliated companies (i.e., companies that own or control, or are that common ownership, control, or management with us) for business, operational, promotional, and marketing purposes (but not for the purpose of enabling them to send marketing text messages or to place telemarketing calls to you).

- ***Our Service Providers:*** We disclose your personal information to third-party service providers who use the information to perform services for us, such as hosting providers, auditors, advisors, consultants, and customer service/support providers.
- ***Third-Party Insurers:*** If you request a quote, services, or information from a Third-Party Insurer; request that we match your request with relevant Third-Party Insurers (each, a “**Request**”); or submit an application to a Third-Party Insurer (an “**Application**”), we will disclose your personal information to the relevant Third-Party Insurer(s). The Third-Party Insurer(s) will use and further disclose your personal information subject to the Third-Party Insurer's own privacy notice and applicable terms.  
IF YOU MAKE A REQUEST OR SUBMIT AN APPLICATION, YOU ACKNOWLEDGE, UNDERSTAND, AND CONSENT TO OUR DISCLOSURE OF YOUR PERSONAL INFORMATION TO THE RELEVANT THIRD-PARTY INSURER(S), WHO MAY CONTACT YOU DIRECTLY VIA TELEPHONE, FAX, AND/OR EMAIL. YOU MAY RECEIVE TELEPHONE CALLS AS A CONSEQUENCE OF SUBMITTING A REQUEST ON THE SITES, EVEN IF YOU ARE ON THE NATIONAL DO NOT CALL REGISTRY OR ANY OTHER DO NOT CALL REGISTRY.
- ***Our Business Partners:*** We disclose your personal information to other companies with whom we partner as necessary to provide the Services and carry out other related activities. For example, we may disclose personal information to third parties that co-sponsor a promotion with us or that we work with to bring selected opportunities to customers or potential customers. We may also disclose your personal information to third parties that offer products or services that may interest you.

We have sold or shared the categories of personal information identified in the Notice at Collection with the following types of recipients:

- ***Our Analytics Partners:*** We disclose your personal information to parties who assist us in performing analytics and help us understand how individuals interact with the Sites and measure the effectiveness of the Services and our marketing and advertising efforts.
- ***Our Marketing and Advertising Partners:*** We disclose your personal information to our marketing and advertising partners, who assist us in



serving advertisements and optimizing our campaigns and/or provide related services. We may provide or make available to these third parties information about your browsing on the Sites and/or other information about your use of the Services to help us better reach you with relevant ads and/or measure our ad campaigns overtime and across devices. **We do not disclose personal information from your insurance application(s) or personal information provided as part of a Request or Application to third parties for marketing or advertising purposes. Nor do we disclose telephone numbers to third parties for the purpose of enabling them to send marketing text messages or to place telemarketing calls to you.**

We also disclose personal information to the following recipients:

- ***Relevant Third Parties in Connection with a Business Transaction:*** We may disclose and/or transfer personal information as part of any actual or contemplated merger, sale, transfer of assets, acquisition, financing, and/or restructuring of all or part of our business, bankruptcy, or similar event, including related to due diligence conducted prior to such event (where permitted by law).
- ***Governmental and Public Authorities:*** We will disclose your personal information to governmental and public authorities as necessary or permitted by the laws of any jurisdiction in which we operate (e.g., in response to a subpoena or court order).
- ***Other Third Parties:*** We may disclose your personal information to other parties as we believe necessary or appropriate either to: (1) respond to claims asserted against us; (2) enforce or administer our agreements and terms; (3) investigate and prevent against fraud and mitigate other risks; and (4) protect our rights, property, or safety and/or those of others.

Finally, we may disclose your personal information for other reasons that we will describe at the time of information collection or prior to disclosing your personal information. Additionally, we will disclose your personal information with your consent or when you direct us to do so.

**Aggregate and De-identified Data.** We may de-identify personal information and create anonymous and aggregated data sets and reports to assess, improve, and develop our business, products, and services; to prepare benchmarking reports on

our industry; and to fulfill other research, marketing, and analytics purposes. When we de-identify personal information, we implement reasonable measures as required by law to ensure that the de-identified data cannot be associated with any individual. We will only maintain and use such data in a de-identified manner and not attempt to re-identify the data, except as required or permitted by law. We may disclose aggregate or de-identified information to third parties for research, marketing, advertising, analytics, and/or other purposes.

### **Cookies and Analytics**

We may use cookies, pixels tags, session replay scripts, and other technologies, which may be provided by third parties, on the Sites to enable certain functionality and for security and fraud detection and prevention purposes. We also use such technologies to collect usage information about the Sites and the emails that we send, to personalize content, and to serve interest-based ads to you. We may combine the information we collect via these technologies with other information, including personal information that we collect directly from you. Additional details about our use of these technologies can be found below.

***Cookies.*** Cookies are files that are transferred to your device through your web browser for record-keeping purposes. Some cookies enable you to log in to the Sites or save certain settings and preferences, while others allow us to track usage and activities on the Sites, personalize content on the Sites, or deliver more relevant ads on the Sites and third-party services. If your browser automatically accepts cookies, you can set your browser options to block them. Please refer to your browser's "Help" section to learn how to prevent your device from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If you disable cookies, however, certain features on the Sites may not be available or function properly.

***Pixel Tags and Embedded Scripts.*** Pixel tags (aka clear GIFs or web beacons) are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your device, pixel tags are embedded invisibly on web pages. We may use these in connection with the Sites to, among other things, track activity on the Sites and gather usage information and personalize and manage content on the Sites. We may also use these in HTML emails to help us identify when our emails are viewed, track whether our emails are forwarded, and track email response rates.

***Session Replay Scripts.*** We may use session replay software to capture information concerning your interaction(s) with the Sites, including keystrokes, mouse movements, and clicks; movements within a webpage and through a Site; interactions with menus, banners, and forms; and form field entries. We may use third-party software embedded in the script of a Site to monitor your interaction with the Site and/or for our compliance verification purposes, which may mean that the third-party software provider also collects this information. By using the Sites, you consent to this collection and disclosure of your information.

***Google Analytics.*** We may use Google Analytics to better understand how users interact with the Sites. For information on Google Analytics' information handling practices and how you can control the use of information sent to Google, please visit <https://policies.google.com/technologies/partner-sites>. If you wish to prevent your information from being used by Google Analytics, Google has developed the Google Analytics opt-out browser add-on available at <https://tools.google.com/dlpage/gaoptout>.

***Opt-Out Preference Signals and “Do-Not-Track” Signals.*** If you enable the Global Privacy Control (“GPC”) on your browser when visiting the Sites, the Sites will treat the signal as a valid request to exercise your opt-out right(s) under applicable privacy law. For more information about the GPC and to learn how to implement it on your browser, please visit [globalprivacycontrol.org](http://globalprivacycontrol.org). Please note the Sites do not recognize or respond to any signal which your browser might transmit through its so-called “Do Not Track” (“DNT”) feature. If you wish to disable cookies on the Sites, you should not rely on DNT browser settings. For more information about DNT signals, please visit [allaboutdnt.org](http://allaboutdnt.org).

### **Interest-Based Advertising**

We work with third-party ad networks, channel partners, measurement service providers, analytics providers, and others (“**third-party ad companies**”) to display advertising on the Sites and to manage or measure our advertising on third-party websites, social media platforms, mobile apps, and online services. We and these third-party ad companies may use cookies, pixels tags, and other tools to collect activity information when you visit the Sites (and third-party websites and services), as well as your IP address, device ID, cookie and advertising IDs, other online identifiers, general location information, and, with your consent, your device's geolocation information. We and these third-party ad companies use this

information to serve more relevant ads and content to you and to evaluate the success of such ads and content.

***Custom Lists and Matching.*** We may create and disclose hashed customer list information (such as name and email address) to third parties—such as Facebook and Twitter—so that we can better target ads and content to you and others with similar interests on third-party services. These third parties use the personal information we provide to help us target ads and to enforce their terms, but we do not permit them to use or disclose the personal information we provide to other third-party advertisers.

***Opt Out of Interest-Based Advertising.*** You may be able to opt out of receiving interest-based advertising using the browser opt-out tools and consumer choice mechanisms provided by interest-based advertising self-regulatory groups by following the links below:

- **Digital Advertising Alliance (DAA):** <http://www.aboutads.info/choices>
- **Network Advertising Alliance (NAI):** <http://www.networkadvertising.org/choices/>

Please note that you will need to opt out separately on all of your browsers and devices, as each opt-out will apply only to the specific browser or device from which you opt out. If you delete or reset your cookies, change browsers, or use a different device, you will have to opt out again on that browser or device.

Using the opt-out methods linked to above will not opt you out of being served advertising. Specifically, you may continue to receive generic or “contextual” ads on the Sites. You may also continue to receive ads tailored to your interests on other websites from companies that do not participate in the above-listed programs.

Some of our advertising partners may provide you with additional choices with respect to interest-based advertising. For example, certain social media platforms may allow you to control your advertising preferences directly through their services. Please review the privacy policies of the third-party services you use for more information.

## **Information Retention**

We retain personal information as long as necessary to accomplish the purposes identified in this Privacy Notice, including to satisfy our legal and reporting requirements. This means that we may be required to maintain your personal

information, for example, to: (1) comply with our legal or regulatory compliance needs (e.g., maintaining records of transactions you have made with us); (2) exercise, establish, or defend legal claims; and/or (3) protect against fraudulent or abusive activity. For these and possibly other reasons, we may be unable to delete personal information upon your request in certain cases.

We may retain different categories of personal information for different periods of time for the instances stated above. However, it is our policy as an organization that when personal information is no longer needed or after legal authority to retain it has expired, personal information will be deleted, destroyed, or de-identified in accordance with applicable law and pursuant to procedures established in relation to the relevant services, systems, or processes. Retention periods for records maintained by us, including those containing personal information, are established based upon business need, statutory and regulatory record keeping requirements in the geographies where we do business, and legal obligations.

## **Your Choices**

We provide you with the ability to make certain choices about how we use your personal information, as described below.

***Access and correct personal information:*** If you would like to review and/or update your contact details or other personal information provided to us, please contact us as set forth in the Contact Us section below.

***Marketing Communications Preferences:*** You may opt out of receiving marketing communications from us as follows:

- **Email:** To stop receiving marketing-related emails from us on a going-forward basis, please: (i) send an e-mail to [jb3@mydirectedhealth.com](mailto:jb3@mydirectedhealth.com); or (ii) write to us at the address set forth in the “Contact Us” section below requesting that we stop sending you marketing-related emails.
- **Direct Mail:** To stop receiving promotional offers from us through direct mail on a going-forward basis, please write to us at the address set forth in the “Contact Us” section below requesting that we stop sending you direct mail marketing communications.
- **Phone:** To stop receiving marketing phone calls from us on a going-forward basis, please: (i) call us at 800-531-9897; (ii) ask to be placed on our Do Not Call list when you receive a call from us; (iii) write to us at the address set forth in the “Contact Us” section below requesting that your telephone

number be placed on our Do Not Call list; or (iv) send an email to [jb3@mydirectedhealth.com](mailto:jb3@mydirectedhealth.com) and provide the telephone number you wish to have placed on our Do Not Call list.

Please note that even if you opt out of receiving marketing communications from us, you will still receive non-marketing or transactional communications from us, including responses to your inquiries/requests.

To unsubscribe from a Third-Party Insurer's communications, you must contact such Third-Party Insurer directly.

***Interest-Based Advertising:*** To exercise your interest-based advertising choices, please review and follow the instructions set forth in the Interest-Based Advertising section above.

### **Third-Party Links and Services**

The Sites may contain links to third-party owned and/or operated services, which are not governed by this Privacy Notice. These third-party services have separate privacy policies and information handling practices, and we have no responsibility or liability relating to such policies or practices. We encourage you to review all third parties' privacy policies before providing them with your personal information.

### **Information Security**

We take certain physical, electronic, contractual, and managerial steps to safeguard and secure the personal information we collect. Despite this, the security of the transmission of information via the Internet cannot always be guaranteed and you acknowledge this in your access and use of the Sites.

Please note that it is your responsibility to maintain the confidentiality of the password associated with any account that you create on the Sites, if any.

### **Minors**

The Services are not designed for individuals under the age of 18, and we do not knowingly solicit or collect personal information from individuals under the age of 18. If we gain actual knowledge that we have collected or received personal information relating to anyone under the age of 18, we will take reasonable steps to delete it.

### **Changes to this Privacy Notice**

We may amend this Privacy Notice from time to time to reflect changes in our information handling and privacy practices and/or changes in applicable law.

The “Last Updated” date at the top of this page indicates when this Privacy Notice was last revised. When we make changes, we will revise the date at the top of this page and, in the case of material changes, we will provide appropriate online notice to you.

Unless otherwise stated, the current version of this Privacy Notice applies to all personal information under our control. We encourage you to review this Privacy Notice periodically to remain informed about our information handling and privacy practices.

### **Contact Us**

If you have any questions or suggestions regarding this Privacy Notice or our information handling practices, you should feel free to email us [jb3@mydirectedhealth.com](mailto:jb3@mydirectedhealth.com) or write to us at:

**Directed Health Insurance Solutions, LLC**

**141 Fifth Street NW Suite 201**

**Winter Haven FL 33881**