

## STATE CONSUMER PRIVACY NOTICE

Depending on which Optum product or service you use, and your state of residency, you may have rights as outlined in this Notice. This State Consumer Privacy Notice applies to residents of California, Colorado, Connecticut, Utah, or Virginia,<sup>1</sup> and sets forth their rights under their respective state's comprehensive privacy laws.

This State Consumer Privacy Notice supplements our Privacy Policy. It explains what Personal Information (PI) we collect about you, where and from whom we obtain it, why we collect it, and your respective state rights regarding it. If you are a California, Colorado, Connecticut, Utah, or Virginia resident, this notice applies to any PI that we collect about you.

### PI We Collect and Disclose for Business Purposes

In the preceding twelve (12) months, depending on the product or service you have used we may have collected the following categories of PI and have disclosed/shared it for the business purposes described as follows:

Category of PI	Examples	Collected	Categories of Third Parties to Which We Disclose PI for Business Purposes	Shared for Advertising Purposes	Categories of Third Parties with Which We Share PI for Advertising Purposes
Some Personal Information included in the categories below may overlap with other categories.					
Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, or other similar identifiers.	Yes	Contracted Service Providers, Employers, Health Care Providers, Vendors, Insurance Carriers, and other third parties at your request	Yes	Contracted Service Providers
Personal information categories	A name, signature, Social Security number, physical characteristics or description, address, telephone number, driver's license or state identification card number,	Yes	Contracted Service Providers, Employers, Health Care Providers, Vendors, Insurance Carriers, and other third parties at your request	No	Not applicable

<sup>1</sup> As of January 1, 2023, this Notice applies to residents of California and Virginia. It applies to residents of Colorado and Connecticut as of July 1, 2023 and to residents of Utah as of December 31, 2023.

	insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.				
Protected classification characteristics	Age, race, color, ancestry, national origin, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status, genetic information (including familial genetic information).	Yes	Contracted Service Providers, Employers, Health Care Providers, Vendors, Insurance Carriers, and other third parties at your request	No	Not applicable
Sensitive personal data categories	Government-issued identification number, financial account information and account login credentials, precise geolocation information, genetic data, racial or ethnic origin, biometrics data, health data, mental or physical health condition or diagnosis, data concerning sex life or sexual orientation.	Yes	Contracted Service Providers, Employers, Health Care Providers, Vendors, Insurance Carriers, and other third parties at your request	No	Not applicable
Commercial information	Products or services purchased, obtained, or considered, or other purchasing or	Yes	Contracted Service Providers, Employers, Health Care Providers, Vendors, Insurance Carriers, and other	No	Not applicable

	consuming histories or tendencies.		third parties at your request		
Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	Yes	Contracted Service Providers, Employers, Health Care Providers, Vendors, Insurance Carriers, and other third parties at your request	No	Not applicable
Internet and/or network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes	Contracted Service Providers, Employers, Health Care Providers, Vendors, Insurance Carriers, and other third parties at your request	Yes	Contracted Service Providers
Geolocation data	Physical location or movements.	Yes	Contracted Service Providers, Employers, Health Care Providers, Vendors, Insurance Carriers, and other third parties at your request	No	Not applicable
Sensory data	Audio, electronic, visual, thermal, or similar information.	Yes	Contracted Service Providers, Employers, Health Care Providers, Vendors, Insurance Carriers, and other third parties at your request	No	Not applicable
Professional or employment-related information	Current or past job history or performance evaluations.	Yes	Contracted Service Providers, Employers, Health Care Providers, Vendors, Insurance Carriers, and other third parties at your request	No	Not applicable

Education information subject to the Family Educational Rights and Privacy Act	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No	Not applicable	No	Not applicable
Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Yes	Contracted Service Providers, Employers, Health Care Providers, Vendors, Insurance Carriers, and other third parties at your request	No	Not applicable
We will retain the foregoing categories of PI consistent with our internal record-retention policies and for as long as is necessary to provide products and services to you or as required by law.					

**PI does not include:**

- De-identified or aggregated consumer information
- Publicly available information from government records
- Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data
- PI covered by other privacy laws, including: The Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA), the California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994

**Categories of Sources of PI**

We obtain the categories of PI listed above from:

- You or your authorized agent,
- Service providers,
- Affiliates,
- Publicly available information,
- Organizations with which you are employed or affiliated, or
- Activity on our apps and websites.

Collection from these sources may occur online, in person, via paper or other electronic means, and may occur automatically where state law permits such profiling absent an explicit request to opt-out.

## **Why We Collect PI**

We collect your PI for one or more of the following business purposes:

- To respond to an email or particular request from you
- To communicate with you
- To personalize services for you
- To process an application as requested by you
- To administer surveys and promotions
- To provide you with information that we believe may be useful to you, such as information about products or services provided by us or other businesses
- To perform analytics and to improve our products, websites, and advertising
- To comply with applicable laws, regulations, and legal processes
- To protect someone's health, safety, or welfare
- To protect our rights, the rights of affiliates or related third parties, or take appropriate legal action
- To keep a record of our transactions and communications
- To detect and protect against security incidents
- To debug to identify and repair errors
- As otherwise necessary or useful for us to conduct our business, so long as such use is permitted by law

## **Sharing Your PI**

At times, some of our products or services may share your PI with third parties to display advertisements to you based on your activities, preferences, or interests. If we do this, we will provide that you may opt-out of this activity using our cookie management tool on our website.

In the preceding twelve (12) months, we have not sold any PI.

Third parties are not allowed to use or disclose your PI other than as specified in our contract and as permitted by law.

If we seek to use your PI for a materially different purpose than we previously disclosed in this notice, we will notify you and will not use your PI for this new purpose without your explicit consent.

## **Sensitive Personal Data**

We only process Sensitive Personal Data to render services or offer products to you.

Virginia and Colorado residents, your acceptance of this Privacy Policy constitutes your opt-in consent to our processing of any Sensitive Personal Data about you.

## **Your Rights**

1. You have the right to request that we disclose certain information to you about our collection and use of your PI. Once we receive and confirm your verifiable consumer request, we will disclose to you:
  - What PI we collect about you
  - Where and from whom we collect PI about you
  - Our business purpose for collecting PI about you
  - The types of third parties with whom we share your PI
  - The specific pieces of PI we collect about you, in a readily-usable format—note that we will not disclose your actual Social Security number, driver's license number or other government-issued identification number, financial account number, any health insurance or medical identification number, an account password, or security questions and answers
  - The types of PI that we disclosed about you for a business purpose, and the categories of third parties to whom we disclosed your PI
2. You have the right to be informed about the PI that we collect about you at the time that or before we collect it. This is that notice.
3. You have the right to request that we delete any PI about you that we have.
4. You have the right to request a correction of any inaccurate information in the PI we collect about you.
5. You have the right to stop us from sharing your PI to display advertisements to you based upon your activities, preferences, and interests.
6. If we use your sensitive PI for purposes other than to render services or offer products to you, you will have the right to request that we limit the processing of your sensitive PI.
7. You will not be discriminated against or penalized for exercising your rights to your PI, and we will honor your rights by not:
  - Denying you services,
  - Charging you different prices or rates for services,
  - Imposing penalties, or
  - Providing you with a different level or quality of services.
8. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why and you may appeal this decision (see additional information in Appeals section below).

### **How to Exercise Your Rights**

- You may exercise your rights by calling us at 1-888-839-7948 or by emailing us at [consumerprivacy@optum.com](mailto:consumerprivacy@optum.com).
- If we do share your PI, you may opt-out of the sharing of your PI by using our cookie management tool on our website.
- You may be required to submit proof of your identity for these requests to be processed.

- We will not be able to comply with your request if we are unable to confirm your identity.
- You may designate an authorized agent to make a request on your behalf subject to proof of identity and authorization.

### **Timing**

- We will acknowledge receipt of your request within 10 days of receipt of your submission. You will receive our response to your request within 45 days of your request, unless we provide you with notice that it will take more than 45 days to respond (in that case, we won't take more than 90 days to respond).

### **Appeals**

- If the business denies any of your requests, you may appeal by calling us at 1-888-839-7948 or by emailing us at [consumerprivacy@optum.com](mailto:consumerprivacy@optum.com).
- We will respond to your appeal within 45 days of receipt, unless we notify you that we will require an additional 15 days to respond.
- If you remain concerned about the result of that appeal, you may contact the attorney general in your state of residency.

### **Changes**

We will review this notice annually and update it from time to time. Any changes will be posted on this page and will become effective as of the "Last Revised" date. We encourage you to review this notice periodically to be sure you are aware of those changes.

**Last Revised:** 12/20/2022