

Website Privacy

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INSXCloud Notice of Privacy Policy

Welcome to the website of INSXCloud, Inc., a company that provides information and services to help you find, enroll in, and make the best use of your marketplace health insurance! INSXCloud is committed to protecting and respecting your privacy. This Privacy Notice describes how we collect, use, protect and share information about you that we obtain when you access and use our website, including when you register for an account, request a quote, or submit questions or feedback. The Privacy Notice also applies to information that we obtain when you communicate or interact with us outside of the website, including by e-mail, telephone and otherwise.

INSXCloud Commitment to Data Privacy Protection

At INSXCloud, we know how important your privacy is to you. We are committed to protecting any personal information that you provide us on this website according to applicable laws, regulations and accreditation standards and practices. We are constantly evaluating new administrative, technical, and physical safeguards for protecting your information. We urge you to read our Privacy Policy so that you will understand both our commitment to you and your privacy, and how you can participate in that commitment.

Please read this Privacy Notice carefully before you use our website or communicate with us. Changes to this Privacy Notice are discussed at the end of this document.

BY ACCESSING OR USING OUR WEBSITE/PLATFORM, OR COMMUNICATE WITH US OUTSIDE OF THE WEBSITE, YOU ARE ACCEPTING AND CONSENTING/AGREEING TO BE BOUND AND ABIDE BY THE TERMS OF USE AS WELL AS ANY PRACTICES DESCRIBED IN THIS PRIVACY POLICY, WHICH MAY BE UPDATED AND AMENDED FROM TIME TO TIME. IF YOU DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY, YOU MUST NOT ACCESS OR USE OUR WEBSITE OR OTHERWISE COMMUNICATE WITH US.

The Information We Collect

When you access our Web sites, we may automatically (i.e., not by registration) collect non-personal data (e.g., type of Internet browser and operating system used, domain name of the Web site from which you came, number of visits, average time spent on the site, pages viewed). This information is used internally at INSXCloud to improve our Web sites performance or content.

How Information May Be Used – Personally Identifiable Information (PII)

We may use the Personally Identifiable Information we collect to:

- Create and manage your account;
- Provide the website to you;
- Operate our website, including, without limitation, providing quotes, and submitting and monitoring health insurance applications, access management, payment processing, website administration, internal operations, troubleshooting, data analysis, testing, research, statistical and survey purposes;
- Send you information that enables you to use our website;
- Contact you about activity on your account;
- Provide you access to, and updates regarding health insurance and other related offers via text message;
- Respond to your requests, feedback or inquiries;
- Notify you about updates, information, or alerts regarding our website;
- Process payments;
- Protect and enforce our rights and the rights of other Users against unlawful activity, including identify theft and fraud, and other violations of our Terms of Use;
- Protect and enforce our rights arising under any agreements entered into between you and us, including billing and collection;

- Protect the integrity and maintain the security of our website, including secured areas of the website;
- Operate, evaluate, and improve our business, including conducting surveys and market research, developing new products, services, and promotions (such as, for example, special events, programs, offers, contests), analyzing and enhancing existing products, services, and promotions, managing our communications; performing accounting, auditing, and other internal functions;
- Provide you with information and advertisements about products, services, and promotions, from us or third parties, that may interest you; and
- Administer your participation in such products, services, and promotions.

In addition, we may use your information as described in any notice provided at the time you provide the information and for any other purpose for which you may provide consent.

How Information May Be Used – Non-Personally Identifiable Information

In addition to the uses described above, we may also use Non-Personally Identifiable Information to:

- Deliver content (including advertising) tailored to your interests and the manner in which you use our website;
- Present content in a manner that is optimized for your device; and
- Measure and analyze the effectiveness of advertising we serve you.

We may also combine technical information, or Non-Personally Identifiable Information, about your use of our website with information that we obtain from other Users to use in an aggregate or anonymous manner for similar purposes.

How Information May Be Shared - Personally Identifiable Information (PII)

We will not sell or share your Personally Identifiable Information with third parties for the third party's own direct marketing purposes without your express consent. We may share your Personally Identifiable Information with:

- The Centers for Medicare and Medicaid Services ("CMS") in order to obtain an eligibility determination for you, and to enroll you in health insurance plans offered on the federal healthcare exchange;
- The organizations or entities on behalf of which we are providing the Website to you and/or on behalf of which you access or use the Website, such as your employer, and other companies associated with those organizations or entities in order to enable their systems to operate with the Website;
- Third party insurance companies to which you submit an application for health insurance on, or through, the website;
- Your employer(s), affinity group, and/or benefits administrators or consultants, if you are referred to the Website by such respective parties;
- If you are a licensed insurance agent using INSXCloud's agent platform, the designated administrator of your account, if you have an individual sub-account, regarding use of the Services by individual sub-accounts;
- Your licensed insurance agent, if applicable;
- Our service providers to the extent reasonably necessary to enable us to operate our business and provide our website to you, as described in this Privacy Notice (e.g., to an e-mail service provider in order to enable us to e-mail you);
- A buyer or other successor in interest to INSXCloud, Inc. in the event of a merger, divestiture, restricting, reorganization, dissolution, liquidation, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which Personally Identifiable Information held by us about our Users is among the assets transferred;
- Other third parties with your express consent for any purpose disclosed by us when you provide the information; and
- You, upon your written request.

We may also share Personally Identifiable Information with law enforcement agencies, government officials, or other third parties as necessary for the purpose of:

- Complying with any court order, law or legal process, including to respond to any government or regulatory request;
- Preventing fraud protection and credit risk reduction;

- Investigating potential unauthorized access or misuse of our website or other breach of our Terms of Use, Supplemental Terms, Website Policies or other agreements;
- Protecting the assets or property, and enforcing the rights of INSXCloud, Inc., including for billing and collection purposes; and
- Protecting the rights, property, or safety of our Users or others.

How Information May Be Shared - Non-Personally Identifiable Information

In addition, we may share Non-Personally Identifiable Information, including aggregated or anonymized data:

- With our partners about how our Users collectively use our website, so that our partners may also understand how often people use their services and our website;
- With analytics companies, search engines, or other service providers that help us improve our website;
- To report to our affiliates, licensors and service providers, advertising partners and ad networks about the use of various aspects of the website;
- With other Users or prospective Users of the Website; and
- To advertisers and advertising networks to select and serve relevant advertisements.

We will use "Cookies" – Information Stored Automatically on Your Computer

When you view one of our Web sites, we may store some data on your computer in the form of a "cookie" to automatically recognize your PC next time you visit. Cookies can help us in many ways, for example, by allowing us to tailor a Web site to better match your interests.

There are two types of cookies: single session (temporary) and multi-session (persistent). Session cookies last only as long as your Web browser is open. Once you close your browser, the cookie disappears. Persistent cookies are stored on your computer for longer periods.

- **Session Cookies:** We use session cookies for technical purposes such as to allow better navigation through our site. These cookies let our server know that you are continuing a visit to our site.
- **Persistent Cookies:** We use persistent cookies to understand the differences between new and returning INSXCloud website visitors. Persistent cookies remain on your computer between visits to our site until they expire.

How to Opt Out or Disable Cookies

If you do not wish to receive cookies, please configure your Internet browser to erase all cookies from your computer's hard drive, block all cookies or to receive a warning before a cookie is stored. If you opt out of cookies, you will still have access to all information and resources on INSXCloud websites.

IP Addresses

We collect and log the IP address of all visitors to our websites. An IP address is a number automatically assigned to your computer whenever you access the Internet. IP addresses allow computers and servers to recognize and communicate with one another.

We collect IP address information so that we can properly administer our systems and gather aggregate information about how our site is being used, including the pages visitors are viewing. This aggregate information is not shared outside of INSXCloud. To maintain your anonymity, we do not associate IP addresses with records containing personal information.

We will use IP address information, however, to personally identify you in order to enforce our legal rights or when required to do so by law enforcement authorities.

Security of Your Personal Information

The security of your Personal Information is very important to INSXCloud. We use physical, electronic, and administrative safeguards that are designed to protect your Personal Information from loss, misuse, and unauthorized

access, disclosure, alteration, and destruction. In addition, INSXCloud uses standard security protocols and mechanisms to exchange the transmission of sensitive data. When you enter sensitive Personal Information on our site, we encrypt it using secure socket layer (SSL) technology.

Since no system can guarantee complete security of your information, should your Personal Information be acquired, or is reasonably believed to have been acquired, by an unauthorized person and applicable law requires notification, INSXCloud will notify you by e-mail, fax, or U.S. mail. INSXCloud will give you notice promptly, consistent with the reasonable needs of law enforcement and/or INSXCloud to determine the scope of the breach and to investigate and restore the integrity of the data system. **Please note that you are responsible for protecting your password(s) and for the security of information that you transmit to us over the internet.**

Sensitive Information

We ask that you not send us, and you not share any sensitive Personal Information (e.g., Social Security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background, or trade union membership) on INSXCloud.com.

Children

INSXCloud sites are intended to be used by persons who are aged 18 and older. It is not intended for or designed to attract people under the age of 18. If you are under 18 years of age, you are not permitted to register for an account or otherwise submit any Personally Identifiable Information to us, including your name, address, or e-mail address. By registering for an account or submitting any Personally Identifiable Information to us, you represent and warrant that you are 18 years of age or older.

If we discover that we have received any Personally Identifiable Information directly from a child under the age of 18, we will suspend the associated account and remove that information from our database as soon as possible. By registering for an account or otherwise submitting any Personally Identifiable Information to us, you represent and warrant that you are 18 years of age or older. This restriction does not apply to information collected from a parent or legal guardian who provides information regarding a dependent child under the age of 18 in connection with a health insurance application or other related purpose.

Links to Other Web Sites

INSXCloud Web sites may contain links to other Web sites and services, including those of third-party insurance providers and advertisers. Please note that these links are provided for your convenience and information, and the websites and services may operate independently from us and have their own privacy policies or notices, which we strongly suggest you review. This Privacy Notice applies to INSXCloud, Inc. and our websites only. We do not accept any responsibility or liability for the policies or practices of any third parties. If you choose to access any websites or services linked from our website, please check the applicable policies before you use or submit any personal data to such website or service.

Your Consent

By using our website, you consent to the collection and use of the information discussed above by INSXCloud. If you do not agree with this policy, or do not want to provide your required information as discussed above, please do not use our Site. Changes in this policy will be posted on this page so that you may always be aware of what information is being collected, how it is being used, and under what circumstances it is being disclosed.

Retention and Deletion

INSXCloud will retain your Personal Information for as long as your account is active; as needed to provide you products or services; as needed for the purposes outlined in this policy or at the time of collection; as necessary to comply with our legal obligations (e.g., to honor opt-outs), resolve disputes, and enforce our agreements; or to the extent permitted by law.

At the end of the retention period, INSXCloud will delete your Personal Information in a manner designed to ensure that it cannot be reconstructed or read.

Changes to This Notice

We reserve the right to change the terms of this Notice of Privacy as necessary and to make the new notice effective for all data maintained by us. All changes to this Privacy Notice will be reflected on this page and the Effective Date will be stated at the top of this Privacy Notice. Unless stated otherwise, our current Privacy Notice applies to all information that we have about you and your account. Users should regularly check this page for any changes to this Privacy Notice. INSXCloud, Inc. will always post new versions of the Privacy Notice on the website. In the event that an amendment materially alters your rights or obligations, we may notify you of the amendment, such as by posting a notification to the home page of the website, or sending a notification to you at the address we have on file for you, if any.

Your continued use of the website or communication with us after the updated Privacy Notice has been posted (or any other indication of your consent) will constitute your acceptance of the updated Privacy Notice. You may obtain a copy of the current notice from www.INSXCloud.com, or by mailing a request to the INSXCloud Privacy Officer listed below.

Access, Corrections, and Profile Updates

You may request to review, correct, update, suppress, or otherwise modify any of your Personal Information that you have previously provided to us through INSXCloud.com, or object to the use or processing of such Personal Information by us.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information that you have provided to us suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information that you have provided to us.

While the majority of questions and issues related to access can be handled quickly, complex requests may take more research and time. In such cases, issues will be addressed, or you will be contacted regarding the nature of the problem and appropriate next steps, within thirty days.

Requests and/or Complaint process

If you have a question, complaint, request to inspect/amend records, or if you believe your privacy rights have been violated, you may contact the INSXCloud Privacy Officer via email at privacy@INSXCloud.com or postal mail at:

INSXCloud Privacy Officer
4040 Embassy Parkway, Suite 270
Akron, OH 44333

To file a HIPAA Privacy Rule and Security Rule complaint, please contact the HHS [Office for Civil Rights \(OCR\)](https://www.hhs.gov/office-for-civil-rights/). OCR manages HIPAA privacy and security complaints and enforcement activities.

There will be no retribution for filing a complaint.