

# Privacy Policy

WealthCare Saver<sup>1</sup> (collectively referred to as “we”, “us”) takes your personal privacy seriously. We recognize and respect the privacy expectations of today’s consumers and the requirements of applicable federal and state privacy laws. We believe that making you aware of how we use your non-public personal information (“Personal Information”), and to whom it is disclosed, will form the basis for a relationship of trust between us and the public that we serve. This Privacy Policy explains who we are and how we collect, use, and share Personal Information about you. We reserve the right to change this Privacy Policy from time to time consistent with applicable privacy laws.

As described below, we collect Personal Information about individual consumers in connection with the provision of our software and services we offer. We implement reasonable physical, administrative, and technical safeguards designed to protect your information from unauthorized access, use, or disclosure.

For more information about the specific pieces of Personal Information we have collected about you in connection with your health savings account (HSA), or to request disclosure of that information, please contact us using the contact information included at the end of this document.

## What We Do

WealthCare Saver is an HSA custodian. You can find out more about us at [wealthcaresaver.com](http://wealthcaresaver.com).

## Regarding the Protection of the Confidentiality and Security of Your Personal Information

We maintain physical, electronic, and procedural safeguards to protect your Personal Information from unauthorized access or intrusion. We limit access to your Personal Information only to those employees, contractors and agents who need such access in connection with providing products or services to you or for other legitimate business purposes. We comply with all laws and regulations to which we are subject regarding the collection, use, and disclosure of individually identifiable information.

## Categories of Sources

We collect and use information about you if you have an HSA with us. We may collect Personal Information about you from the following sources:

- From applications or other forms we receive from you or your authorized representative
- From your transactions with, or from the services performed by, us, our affiliates, or others

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<sup>1</sup> WealthCare Saver is a dba of Alegeus Technologies, LLC

- From our internet web sites
- From the public records maintained by governmental entities that we either obtain directly from those entities, or from our affiliates or others
- From consumer or other reporting agencies

### **Categories of Information**

When you use our services, we collect and use Personal Information which is necessary for the performance of those services. The majority of the Personal Information we collect and use to provide our services is supplied voluntarily by you, and most of that Personal Information is available for you to review by accessing our services. This information falls into the following categories:

- Basic information such as your name, the company you work for, and your relationship to a person
- Contact information such as postal address, email address, and telephone number(s)
- Identifiers such as unique personal identifier, online identifier, or user id. We collect social security numbers if your employer or health plan uses your social security number as your unique personal identifier. In some circumstances, such as when you use our services to open a bank account, we may be required to collect images of documents from you reflecting your social security number, driver's license number, or passport number to verify your identity
- Financial information (such as bank account information, credit and debit card numbers, tax registration information, billing details) in order to manage and process any payments that you make to us, we make to you, or you make to others using your HSA
- Medical information associated with medical bills if you use your HSA to pay medical bills
- Information such as your Internet Protocol address and geolocation data, which we use when we receive a request to log into our solution using your credentials to help us decide whether to allow access
- Information about your interactions with our services

### **How We Use Information**

We may use or disclose the Personal Information listed above for the following purposes, as permitted by applicable law:

- To provide you with information about our products and services
- To administer your HSA or to review and pay claims
- To engage service providers to assist us in administering and providing your HSA
- To provide data analytics to allow us to assess product performance or enhance our products or website

- To comply with administrative or legal requests, subpoenas, or otherwise required by law
- For any purpose permitted under HIPAA or Gramm-Leach-Bliley (GLBA)

We may share your Personal Information in the following ways with the following categories of third parties:

- Agents, brokers or representatives to provide you with services you have requested
- Banks to process payments
- Health insurance companies to receive accurate claims information
- With service providers, authorized third-party agents, or contractors to provide a requested service or transaction
- In response to a request for information by a competent authority if we believe disclosure is in accordance with, or is otherwise required by, any applicable law, regulation, or legal process
- With law enforcement officials, government authorities, or other third parties as necessary to comply with legal process or meet national security requirements; protect our rights, property, or safety and the rights, property or safety of our business partners, you, or others; or as otherwise required by applicable law
- In aggregated, anonymized, and/or de-identified form, which cannot reasonably be used to identify you
- If we otherwise notify you and you consent to the sharing

In addition, we will disclose your Personal Information when you direct or give us permission, when we are required by law to do so, or when we suspect fraudulent or criminal activities. We also may disclose your Personal Information when otherwise permitted by applicable privacy laws such as, for example, when disclosure is needed to enforce our rights arising out of any agreement, transaction or relationship with you.

Certain states afford you the right to access your Personal Information and, under certain circumstances, to find out to whom your Personal Information has been disclosed. Also, certain states and the Safe Harbor principles afford you the right to request correction, amendment or deletion of your Personal Information. We reserve the right, where permitted by law, to charge a reasonable fee to cover the costs incurred in responding to such requests.

### **Selling your Personal Information**

We do not sell your Personal Information.

### **Cookies**

We use cookies to make it easier for you to access our software and services.

### **Changes to Our Privacy Policy**

We may amend this policy from time to time to keep it up to date with legal requirements and the way we operate our business. Please regularly check for the latest version of this policy. If we make significant changes to this policy, we will seek to inform you by notice on our website or by email.

### **Retention of Personal Information**

We will store your Personal Information for as long as is reasonably necessary for the purposes for which it was collected and to comply with applicable law, such as HIPAA and GLBA.

### **Requesting this Policy in Alternative Format**

You are able to request this policy in an alternative format if you have a disability. Please see our contact information below to request an alternative format.

### **Contact Information**

If you have any questions or comments about our Privacy Policy, the ways in which we collect and use your information, your choices and rights regarding such use, please do not hesitate to contact us at:

Postal Address: Alegeus Technologies  
Attn: Privacy Officer  
1601 Trapelo Road  
Main Building, Suite 301  
Waltham, MA 02451

## **CALIFORNIA CONSUMER PRIVACY ACT SUPPLEMENT**

This California Consumer Privacy Act (“CCPA”) Supplement of our Privacy Policy is intended to explain some of your rights under the CCPA that are not already covered in our Privacy Policy. It applies if we have collected information about you and you are a California resident. We recommend that you read this CCPA Supplement in full, in conjunction with our overall Privacy Policy, to ensure you are fully informed.

The CCPA defines "Personal Information" as information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a consumer or device.

In addition to the information provided in our Privacy Policy above, this Supplement provides additional information on rights that only apply to California residents.

### **Right to know what information is collected about you**

Please see our Privacy Policy above.

### **Right to know if your information is sold, by whom to whom, and the right to opt out of that sale**

We do not sell your Personal Information.

### **Right to access the information that is collected about you**

You can access all Personal Information that we have collected about you by logging into your account. You can also contact us to request this information.

### **Right to have a business delete your information**

We are required by federal regulation and law, such as HIPAA and GLBA, to keep records of all Personal Information we collect, and therefore, we are not permitted to honor requests to delete.

### **Right to not be discriminated against for enforcing your rights under the CCPA**

We will not discriminate against you for exercising your CCPA rights.