

## Privacy Notice for Virginia Consumers

This **Privacy Notice for Virginia Consumers** applies to individuals who live in the Commonwealth of Virginia and whose data is subject to the Virginia Consumer Data Protection Act (“VCDPA”). Below describes what information **Carelon**, its businesses, and Sydney Community (“Carelon”, “We” or “Us”) collects that is subject to the VCDPA, your rights under the VCDPA, and how you can enforce those rights under the VCDPA. Any terms defined in the VCDPA have the same meaning when used here.

### Definitions & Exceptions

As defined by the VCDPA:

**Consumer:** A consumer is a natural person who is a resident of the Commonwealth of Virginia acting only in an individual or household context. It does not include a natural person acting in a commercial or employment context.

**Personal Data :** any information that is linked or reasonably linkable to an identified or identifiable natural person.. Personal Data does **not** include:

- Publicly available information lawfully made available from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the VCDPA’s scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Virginia Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - Personal Data covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or the Virginia Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

**Sensitive Data:** The VCDPA has further categorized certain personal data as “Sensitive Data”. This category includes identifiers such as:

- Racial or ethnic origin, religious beliefs, mental or physical health diagnosis, sexual orientation, or citizenship or immigration status;
- Precise geolocation data;
- Personal data collected from a known child (a minor younger than 13 years of age); and
- Processing of genetic or biometric data for the purpose of identifying a natural person.

For Sensitive Data that is covered by VCDPA, Carelon will not process such information without your consent. For Sensitive Data concerning a known child, we will not process the data, except in compliance with the federal Children’s Online Privacy Protection Act (15 U.S.C § 6501 et seq.).

If certain types of information are exempt from VCDPA, and therefore this policy, other Carelon privacy policies may apply such as our HIPAA Notice of Privacy Practices.

## Information We Collect

Within the last the last twelve (12) months, Carelon has collected the following categories of Personal Data, including Sensitive Data, from its consumers :

Category	Examples	Collected?
A. 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, passport number, or other similar identifiers.	YES
B. Personal data from categories listed in the VCDPA	<p>Information that is protected against security breaches such as: name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, 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.</p> <p>Some Personal Data included in this category may overlap with other categories may not be subject to all the rights under the VCDPA.</p>	YES
C. Protected classification characteristics under Virginia or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO

Category	Examples	Collected?
E. 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
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Inferences drawn from other Personal Data.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

We generally do not collect additional categories of Personal Data or use the Personal Data we collected for significantly different or meaningfully unrelated purposes without providing you notice.

## Where We Obtain Personal Data

We obtain the categories of Personal Data listed above from the following categories of sources:

- Directly from you or your devices. For example, from your posts on the Sydney Community app, describing your experiences as a caretaker for a relative..
- Indirectly from you. For example, from observing your actions on our website or interactions with our advertisers.
- Other users of our services.

- Affiliates.
- Advertising networks.
- Internet service providers.
- Government entities.
- Operating systems and platforms.
- Social networks.
- Resellers including consumer data brokers.
- Business partners. For example, pharmacy benefit managers or providers.
- Publicly accessible sources. For example, National Provider Identifier.

## Use of Personal Data

We may use, or disclose the Personal Data we collect for one or more of the following business and commercial purposes:

- Fulfilling or meeting the reason you provided the information. For example, providing you with information, products or services that you request from Carelon.
- Providing you with email alerts, event registrations and other notices concerning Carelon's services, or news that may be of interest to you.
- Sending you text messages or push notifications.
- Updating your status on social networks, sending messages on your behalf to your social networks, and providing other features and services to you.
- Facilitating the connection of third-party services or applications, such as social networks.
- Marketing purposes, such as developing and providing promotional and advertising materials that may be useful, relevant, valuable or otherwise of interest to you.
- Facilitating transactions and payments.
- De-identifying and aggregating information collected through our services and using it for any lawful purpose.
- Responding to trust and safety issues that may arise.

- Carrying out our obligations and enforce our rights arising from any contracts or other terms entered into between you and Carelon, including billing, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency.
- Auditing related to a current interaction with you and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- Personalizing your experience on our services, such as presenting tailored content.
- Undertaking activities to verify or maintain the quality or safety of our services, and to improve, upgrade, or enhance our services.
- For testing, research, analysis, and product development, including the development of data models and algorithms, and for demonstration purposes.
- Auditing related to a current interaction with you and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Debugging to identify and repair errors that impair existing intended functionality.
- Short-term, transient use.
- Contracting with service providers to perform services on our behalf or on their behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.
- Otherwise enabling or effecting, directly or indirectly, a commercial transaction.
- For other purposes for which we provide specific notice at the time the information is collected.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your Personal Data or as otherwise set forth in the VCDPA.

## Sharing of Personal Data

Carelon may disclose your Personal Data to a third party for a business purposes, in order to perform our normal operations. When we disclose Personal Data for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that Personal Data confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, Carelon has disclosed the following categories of Personal Data for a business purpose:

- Category A: Identifiers
- Category B: Virginia Customer Records
- Category C: Protected classification characteristics under Virginia or federal law.
- Category F: Internet history
- Category I: Professional or employment-related information

In the preceding twelve (12) months, Carelon has not sold personal data. The VCDPA defines “selling” personal data to include providing it to a third party in exchange for money.

Pursuant to our [Privacy Notice](#), we share your information with the following categories of third parties for a business purpose:

- **Advertising Providers:** Advertising technology companies, such as advertising networks.
- **ISPs:** Internet service providers.
- **Analytics Providers.**
- **Government:** Government entities.
- **OS/Platform Provider:** Operating systems and platforms.
- **Social Networks.**
- **Resellers:** Consumer data brokers.
- **Affiliates.**
- **Vendors:** Vendors and service providers.
- **Integrated Third Parties:** Third parties integrated into our services.
- **Third Parties as Legally Required:** Third parties as required by law and similar disclosures.
- **Third Parties in Merger/Acquisition:** Third parties in connection with a merger, sale, or asset transfer.
- **Third Parties with Consent:** Other third parties for whom we have obtained your permission to disclose your Personal Data.

For avoidance of doubt, we do not sell health information subject to HIPAA without your express authorization. If you give us such an authorization, you may revoke it in writing at any time. Your revocation will not affect any use or disclosure permitted by your authorization while it was in effect.

## Your Privacy Rights and Choices

The VCDPA provide Consumers with specific rights regarding their Personal Data. This section describes your VCDPA rights and explains how to exercise those rights.

Right	To Exercise This Right	Time Frame and Response From Carelon	If We Cannot Complete Your Request
<p>To confirm whether or not Carelon is processing your personal data to access such data, after verification of your identity.</p>	<p>Submit request and confirm your "verifiable consumer request" via the contact information below.</p>	<p>We will evaluate and respond to your request by mail (at your request) within 45 days. If we require more time, we will inform you of the reason and extension period in writing.</p>	<p>We will explain the reasons we cannot comply with a request in our response.</p>
<p>Deletion of information.</p> <p>You have the right to have Carelon delete your personal data, subject to certain exceptions and after verification of your identity.</p>	<p>Submit request and confirm your "verifiable consumer request" via the contact information below.</p>	<p>We will evaluate and respond to your request by mail (at your request) within 45 days. If we require more time, we will inform you of the reason and extension period in writing.</p> <p>Once we confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal data from our records.</p>	<p>We will explain the reasons we cannot comply with a request in our response.</p> <p>The law does not require us to honor requests to delete where it is necessary in certain circumstances for us or service provider to maintain personal data. These reasons may include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>- Provide a good or service, perform our contract or take action reasonably anticipated in the context of our ongoing relationship with you.</li> <li>- Detect and protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.</li> <li>- Debug products to identify and repair errors that impair existing intended functionality.</li> <li>- Exercise and/or support free speech provided for by</li> </ul>

Right	To Exercise This Right	Time Frame and Response From Carelon	If We Cannot Complete Your Request
			<p>law.</p> <ul style="list-style-type: none"> <li>- Investigate, establish, exercise, prepare for, or defend legal claims.</li> <li>- Engage in research for which you provided informed consented that complies with applicable laws when deletion will seriously impair the research.</li> <li>- Use internally for purposes aligned with your expectations and our relationship.</li> <li>- Comply with a legal obligation or make other lawful use compatible with the context in which information was provided.</li> </ul>
<p>Opt out of the processing, of personal data for purposes of (i) targeted advertising; (ii) sale of your personal data; or (iii) profiling in the course of making certain decisions that concern you.</p>	<p>Submit request and confirm your "verifiable consumer request" via the contact information below.</p>	<p>We will evaluate and respond to your request by mail (at your request) within 45 days. If we require more time, we will inform you of the reason and extension period in writing.</p>	<p>We will explain the reasons we cannot comply with a request in our response.</p>
<p>Correction of personal data</p> <p>You have the right to have Carelon correct errors in the personal data it maintains about you.</p>	<p>Submit request and confirm your "verifiable consumer request" via the contact information below.</p>	<p>We will evaluate and respond to your request by mail (at your request) within 45 days. If we require more time, we will inform you of the reason and extension period in writing.</p>	<p>We will explain the reasons we cannot comply with a request in our response.</p>
<p>To confirm whether or not Carelon is processing your personal data to access such</p>	<p>Submit request and confirm your "verifiable consumer request" via</p>	<p>We will evaluate and respond to your request by mail (at your request) within 45 days. If we require more</p>	<p>We will explain the reasons we cannot comply with a request in our response.</p>



Right	To Exercise This Right	Time Frame and Response From Carelon	If We Cannot Complete Your Request
data, after verification of your identity.	the contact information below.	time, we will inform you of the reason and extension period in writing.	

### "Verifiable Consumer Request"

To exercise your rights to access or delete your Personal Data under the VCDPA, you must submit a "verifiable consumer request." Only you, or a person registered with the Virginia Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Data. You may also make a verifiable consumer request on behalf of your minor child.

A verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Data or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

If we cannot verify your identity or authority to make the request, we will not be able to fulfill your request. The information provided for verification will only be used for that purpose.

### Authorizing an Agent

To authorize an agent to make a request to know or delete on your behalf, please write to the contact address below. To authorize an agent to make an opt-out request on your behalf, please send a written authorization signed by you and the authorized agent to us via the Contact Information section.

### Processing Fees

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### Appeal Rights

Should you disagree with a refusal of ours to act on a request you have made, you may submit an appeal of our decision by sending an email to [privacy.office@carelon.com](mailto:privacy.office@carelon.com). Once we receive your appeal, we will inform you in writing within 60 days of our response to your

appeal, with a written explanation of our decision. Should you disagree with our denial of your appeal, you may contact the Virginia Attorney General by calling 1-800-552-9963 (in Virginia) or (804) 786-2042 (from the Richmond area or from outside of Virginia). Or file a complaint online at <https://www.oag.state.va.us/consumercomplaintform>.

## Non-Discrimination

We will not discriminate against you for exercising any of your VCDPA rights. Unless permitted by the VCDPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

We may offer you certain financial incentives such as discounted prices, rates, or quality levels. Any permitted financial incentive we offer will reasonably relate to your Personal Data's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

## Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date.

**Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

## Contact Information

You can contact Carelon with your questions, comments, rights requests, and other VCDPA-related inquiries by:

Mail: Carelon Privacy Office  
Mail Drop: CO0109-0903  
700 Broadway  
Denver, CO 80273

Or contacting the applicable areas below:

**HealthCore:** Phone: 833-905-1643

**Sydney Community** (link appears on the app's login page)

**Provider Services:** Phone: 800-677-6669

**Human Resources:** Phone: 866-777-9636

**Ethics Department:** 877-725-2702

If you believe your Personal Data was accessed without permission, please contact Carelon by the means listed above.

**MODIFICATIONS AND REVISIONS**

Version	Date Approved	Description
V 1.0	11/9/2022	Initial creation of Notice