

Blue Cross Complete of Michigan Online and Mobile Communication Privacy Notice

Blue Cross Complete of Michigan (“Blue Cross Complete” or “BCC”) is committed to maintaining the privacy and security of the personal information of its plan members (“Members”), mobile application and/or member portal users (“Users”) and website visitors (“Visitors”). In this Privacy Notice, Blue Cross Complete refers to Members, Users and Visitors together as “Participants.” Blue Cross Complete appreciates that medical information is particularly sensitive. This Online and Mobile Communication Privacy Notice details the information gathering and dissemination practices of Blue Cross Complete with respect to its: (i) corporate website (mibluccrosscomplete.com), (ii) the member portal, (iii) mobile application and (iv) any texting features offered to Users, collectively “Blue Cross Complete’s Online and Mobile Communication Services.” For a summary of Blue Cross Complete’s privacy obligations as a health plan under the Health Insurance Portability and Accountability Act (“HIPAA”), see our HIPAA Notice of Privacy Practices for the particular health plan or company found on the applicable Blue Cross Complete website, Blue Cross Complete member portal or Blue Cross Complete mobile application.

1. Acceptance of Privacy Notice

By using Blue Cross Complete’s Online and Mobile Communication Services, you agree to accept the terms and conditions set forth in this Privacy Notice. If you don’t agree to the terms and conditions of this Privacy Notice, don’t use Blue Cross Complete’s Online and Mobile Communication Services. Your continued use of Blue Cross Complete’s Online and Mobile Communication Services following the posting of any changes or updates to these terms and conditions will mean that you accept those changes.

2. Collection of Personal Information from Blue Cross Complete’s Online and Mobile Communication Services

Through Blue Cross Complete’s Online and Mobile Communication Services, Blue Cross Complete and/or its Third Party business partners may collect and/or track: (1) the home server

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domain names, email addresses, type of computer or mobile device used, IP address, files downloaded, search engine used, operating system employed, mobile device telephone number and type of web browser of online or mobile Participants; (2) the e-mail addresses of a Participant who communicates with Blue Cross Complete via e-mail; (3) information knowingly provided by a Participant in online forms, registration forms, surveys, e-mails, texts, contest entries and other online or mobile avenues (including demographic and personal profile information); and (4) aggregate and user-specific information on which web pages or application features the Participant accesses.

To better serve Participants of the Blue Cross Complete website and the member portal, Blue Cross Complete may use "cookies" to enhance a visitor's browsing experience. Cookies are simple text files stored by a user's browser that provide a way to distinguish among Participants. The cookies placed on a Participant's computer by using the Blue Cross Complete website or the member portal don't contain personally identifiable information. A Participant can refuse a cookie or delete the cookie file from his or her computer at any time by using any one of a number of widely available methods.

When a Participant performs a search within a Blue Cross Complete Online and Mobile Communication Service, Blue Cross Complete may record information identifying the Participant or linking the Participant to the search performed. Blue Cross Complete may also record limited information for every search request and may then use that information to solve any technical problems with the applicable Blue Cross Complete Online and Mobile Communication Service and to calculate overall usage statistics.

Blue Cross Complete may collect certain information about Participants that's either in aggregate form or not personally identifiable, such as aggregate information about Blue Cross Complete's Online and Mobile Communication Services usage, and Blue Cross Complete may share such de-identified information with third parties.

3. Collection of Other Personal Information from the Blue Cross Complete Mobile Application and/or Member Portal

Through the Blue Cross Complete mobile application or the Blue Cross Complete member portal, Blue Cross Complete may collect personal information provided by a User, such as medication information supplied through the “Medicine Cabinet” feature, personal information contained in questions submitted through the “Contact Us” feature, health information or medical history information supplied via text or demographic information supplied when you change your “Profile and Settings.”

4. Use of Personal Information Collected

Personal information collected by Blue Cross Complete may be used by Blue Cross Complete for many purposes, including: editorial and feedback; statistical analysis of Participants' usage; product development; content improvement; and/or customization of the content and layout of Blue Cross Complete's Online and Mobile Communication Services. Aggregate information on Participants' home servers may be used for internal purposes or provided to third parties. Individually identifiable information, such as names, postal and e-mail addresses, phone numbers, and other personal information that Participants voluntarily provide to Blue Cross Complete, may be added to Blue Cross Complete's databases and/or used for future calls and mailings regarding Blue Cross Complete's Online and Mobile Communication Services updates, new products and services, upcoming events and for other purposes in accordance with state and federal law.

5. Disclosure of Personal Information to Third Parties

- **Members/Users.** For Members and/or Users using Blue Cross Complete's Online and Mobile Communication Services, Blue Cross Complete will only use and disclose personal information as permitted by applicable laws, and as described in our HIPAA Notice of Privacy Practices for the particular health plan or company found on the

applicable Blue Cross Complete website, Blue Cross Complete member portal or Blue Cross Complete mobile application.

- **Visitors.** For Visitors to the Blue Cross Complete website who haven't identified themselves as Members, Blue Cross Complete won't sell, rent, license or trade your personal information with third parties for their own direct marketing use unless Blue Cross Complete receives your express consent to do so. Unless you give permission to do so, Blue Cross Complete won't share the personal information of Visitors other than as specified in this Privacy Notice. Blue Cross Complete may share your personal information under confidentiality agreements with other companies that work with, or on behalf of, Blue Cross Complete to provide products and services, such as a vendor that helps Blue Cross Complete collect information on how you use the Blue Cross Complete website. These companies may use your personal information to assist Blue Cross Complete in its operations. However, these companies don't have any independent right to share this information. Blue Cross Complete may provide information about Visitors to respond to subpoenas, court orders, legal process or governmental regulations or to establish or exercise their legal rights or defend against legal claims. Blue Cross Complete believes it's necessary to share information in order to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person or as otherwise required by law.

6. Link Disclaimer

Blue Cross Complete may occasionally provide links to other entities' websites for convenience to the Participants in locating health-related information, services and products. When you link to other websites, remember that you're leaving Blue Cross Complete's website, and these

other websites are maintained by organizations that Blue Cross Complete doesn't control. Accordingly, a link on a Blue Cross Complete Online and Mobile Communication Service doesn't constitute endorsement by Blue Cross Complete of the content, viewpoint, policies, products or services provided or advertised on that website. Once you link to a website not maintained by Blue Cross Complete, you're subject to the terms and conditions of that website, including, but not limited to, its privacy policy.

7. Security Measures

Blue Cross Complete has implemented numerous security features to prevent the unauthorized release of, or access to, personal information, including the measures it's adopted in running its health plans and other lines of business pursuant to HIPAA security requirements. For example, all Blue Cross Complete employees are required to certify their understanding that personal information is considered confidential, that it's important to safeguard personal information and that Blue Cross Complete will take appropriate action against any employee who fails to adhere to our privacy standards.

Be advised, however, that the confidentiality of any communication or material transmitted to or from Blue Cross Complete through a Blue Cross Complete Online and Mobile Communication Service, e-mail or text cannot be guaranteed. Accordingly, Blue Cross Complete isn't responsible for the security of information transmitted through the internet. For more private communications, including communications pertaining to medical or health information, Participants who have health coverage through or administered by Blue Cross Complete can contact Blue Cross Complete at the phone number listed on their member identification card.

8. Opt-Out Right

Visitors who are not Members may opt-out of having their personal information retained by Blue Cross Complete by contacting Blue Cross Complete through regular mail or telephone at the addresses provided in Section 14 below. This opt-out right doesn't apply to collection or public

traffic information such as the type of web browser that you use to access the Blue Cross Complete website, your geolocation or your operating system.

9. Access to and Ability to Correct Personal Information

Upon request by regular mail or phone, Blue Cross Complete will provide to any Participant a summary of any personal information retained by Blue Cross Complete regarding the Participant. Participants may modify, correct, change or update personal information Blue Cross Complete has collected through a Blue Cross Complete Online and Mobile Communication Service by contacting Blue Cross Complete by regular mail or telephone at the addresses provided in Section 14 below. The rights of Members to access and correct their personal information maintained by Blue Cross Complete is governed by our HIPAA Notice of Privacy Practices for the particular health plan or company found on the applicable Blue Cross Complete website, Blue Cross Complete member portal or Blue Cross Complete mobile application.

10. Collection of Personal Information from Children

Blue Cross Complete understands the importance of protecting children's privacy in the interactive online world. Blue Cross Complete's Online and Mobile Communication Services, including the Blue Cross Complete website, the Blue Cross Complete member portal and the Blue Cross Complete mobile application, are not designed for, or intentionally targeted at, children under 13 years of age. It's not the policy of Blue Cross Complete to intentionally collect information about anyone under the age of 13. No one under the age of 13 should submit any personal information to Blue Cross Complete through the Blue Cross Complete website, the Blue Cross Complete member portal and/or the Blue Cross Complete mobile application.

11. Response to "Do Not Track" Signals

Some internet browsers include the ability to transmit "Do Not Track" signals. Since uniform standards for "Do Not Track" signals haven't yet been adopted, Blue Cross Complete's Online and Mobile Communication Services doesn't process or respond to "Do Not Track" signals.

12. Your Role in Protecting Your Privacy

You're responsible for maintaining the confidentiality of your account password for any Blue Cross Complete Online and Mobile Communication Services. Login and password information is unique to an individual user and isn't permitted to be utilized by others. You agree that any user of your password to Blue Cross Complete's Online and Mobile Communication Services is bound by the terms set forth in this Privacy Notice and the Terms of Use. It's your sole responsibility to inform Blue Cross Complete of any need to deactivate a password.

13. Privacy Notice Changes

This Blue Cross Complete Online and Mobile Communication Privacy Notice may be revised from time to time as we add new features and services, as laws change and as industry privacy and security best practices evolve. Blue Cross Complete displays an effective date at the top of this Privacy Notice so that it will be easier for you to know when there's been a change. If Blue Cross Complete makes any change to this Privacy Notice regarding use or disclosure of personal information, they'll provide appropriate advance notice through Blue Cross Complete's Online and Mobile Communication Services. Small changes or changes that don't significantly affect individual privacy interests may be made at any time and without prior notice.

14. Questions

If you have any questions or concerns about this Privacy Notice or about Blue Cross Complete's handling of your personal information, contact us by mail at Blue Cross Complete of Michigan, 100 Galleria Officentre, Suite 210, Southfield, Michigan 48034; by telephone at 1-800-228-8554; or via e-mail through our [secure e-mail submission form](#).