

# Privacy Policy

At Decisely Insurance Services (“Decisely,” “we,” “us,” or “our”), we know you care about how your personal information is used and shared. We take your privacy seriously. This Privacy Policy explains what information we collect, how we use it, how we share it, and the rights available to you under applicable laws, including the California Consumer Privacy Act (as amended by the CPRA) and other U.S. state privacy laws.

By using our websites, products, or services (the “Services”), you agree to the practices described in this Privacy Policy. Use of our Services is also subject to our [Terms of Use](#).

## 1. Information We Collect

We collect a variety of personal information from you and/or your employer to provide and administer our Services, including:

- **Identifiers:** Name, username, social security number, physical address, date of birth, email address, phone number.
- **Protected Class Information:** Age, citizenship, race, marital status, medical condition, disability, sex/gender (including identity/expression, pregnancy or childbirth, and related medical conditions), sexual orientation, veteran status.
- **Commercial Information:** Direct deposit information, benefit elections, contribution amounts.
- **Internet or Electronic Network Activity:** Cookies, IP address, browsing history, device identifiers, operating system, browser type, referring URL, website interactions.
- **Professional/Employment Information:** Hire/termination date, job title, work location, salary, dependent details, group benefit plan choices, carrier information, group number(s), premium amounts, provider codes, employee contribution of premium, employee classification, insurance coverage dates, security access level.
- **Sensitive Personal Information:** Social Security number, precise financial account details, health and medical information.

## 2. Notice at Collection

The table below summarizes the categories of personal information we collect, why we use it, and whether we sell or share it:

Category	Examples	Purpose of Collection/Use	Sold or Shared?
<b>Identifiers</b>	Name, SSN, email, phone	Provide and administer services; validate identity; fraud prevention; compliance	No
<b>Protected Class Information</b>	Age, race, marital status, gender, disability	Benefits enrollment and administration; legal compliance	No
<b>Commercial Information</b>	Direct deposit, benefit plan elections	Process transactions; manage payroll/benefits	No
<b>Internet Activity</b>	Cookies, IP, browsing history	Website functionality, analytics, marketing	No (however, certain internet activity data may be shared with analytics and advertising partners as described below)
<b>Professional Information</b>	Job title, hire date, salary, dependents	Administer benefits; compliance reporting	No
<b>Sensitive Personal Information</b>	SSN, health information, precise financial data	Administer benefits; legal/contractual compliance	No (limited to permitted uses)

We do not collect additional categories of personal information without providing notice.

## 3. How We Use Your Information

We use collected personal information to:

- Administer and deliver our Services.
- Provide customer service and support.
- Validate user information for fraud and risk detection.
- Prevent, detect, and address security incidents or illegal activity.

- Comply with legal and regulatory obligations.
- Manage our business operations, including payment processing, contract enforcement, corporate governance, compliance, and auditing.
- Recruit employees (if you apply for a job with us).
- Internal marketing.
- Determine eligibility for the Services and partner programs.
- Improve, analyze, and develop our Services and user experience.
- Generate anonymized or aggregated data for internal reporting.

We do not make important decisions about you—such as your employment, benefits, or finances—based only on automated systems or algorithms without human involvement.

## Marketing Activities

We may use your personal information to contact you about our products, services, promotions, newsletters, and other marketing activities in accordance with applicable law. We may also use certain tracking technologies and share limited data with service providers and partners to support analytics and marketing efforts, in accordance with applicable law. You may opt out of receiving these promotional communications at any time by clicking the unsubscribe link in our emails or contacting [support@decisely.com](mailto:support@decisely.com).

If you opt out, we may still send you non-promotional communications related to your use of the Services or our ongoing business relationship with you.

## 4. Legal Basis for Processing Personal Information

Some privacy laws outside the United States, such as the European Union’s General Data Protection Regulation (GDPR), require us to identify the lawful basis for processing personal information. While U.S. state laws generally do not require this, we provide the following for transparency and to demonstrate our commitment to global compliance:

- **Consent:** We may process your personal information when you have given us clear permission to do so, such as when you sign up for marketing communications.
- **Contractual Necessity:** We may process personal information to perform a contract with you or your employer, such as administering benefits and providing our Services.
- **Legal Obligation:** We may process personal information to comply with laws, regulations, subpoenas, or other legal processes.
- **Legitimate Interests:** We may process personal information when it is reasonably

necessary to achieve our legitimate business purposes (such as improving services, ensuring security, or preventing fraud), provided those interests are not outweighed by your rights and interests.

If you are located in the EU, UK, or another jurisdiction that requires it, you may contact us at [support@decisely.com](mailto:support@decisely.com) to learn more about how we balance our legitimate interests with your privacy rights.

## 5. Cookies and Tracking

We use cookies and similar technologies to recognize your browser or device and understand how our Services are used.

- **Essential Cookies:** Required for site functionality and login.
- **Performance Cookies:** Monitor usage patterns to improve user experience.
- **Functionality Cookies:** Remember your settings and preferences.
- **Marketing Cookies:** Support targeted advertising.

You may adjust your browser settings to refuse cookies, though some Services may not function properly without them. You may also exercise your right to opt out of certain tracking technologies used for analytics or advertising purposes by selecting “Your Privacy Choices” on our website, where available.

### Do Not Track

Some web browsers and devices include a “Do Not Track” (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. Currently, we do not respond to browser DNT signals. However, where required by law, we honor legally recognized universal opt-out mechanisms that communicate your privacy choices (such as Global Privacy Control signals).

We may also use third-party pixels, tags, or similar technologies provided by analytics and advertising partners to collect information about your interactions with our Services for measurement, analytics, and advertising purposes.

## 6. How We Share Information

We do not rent or sell your personal information. We share it only as necessary to operate our business and deliver our Services.

### Categories of Third Parties With Whom We May Share Personal Information

Category of Third Party	Purpose of Sharing	Examples
<b>Employers, Insurance Carriers, Benefits Providers, and Brokers</b>	To enroll you in benefits programs and manage your benefits	Your employer, health or dental insurance carrier, benefits broker
<b>Service Providers and Contractors</b>	To host systems, provide IT support, secure our infrastructure, manage communications, or deliver customer support	Cloud hosting providers, data centers, chat support platforms, email/SMS providers
<b>Analytics and Marketing Providers</b>	To improve our website functionality, measure performance, and provide marketing communications (in compliance with law)	Web analytics tools, performance monitoring services
<b>Legal and Regulatory Authorities</b>	To comply with laws, regulations, subpoenas, or court orders; to defend legal claims; or to cooperate with regulators	State regulators, courts, law enforcement
<b>Fraud Prevention and Security Partners</b>	To investigate, prevent, or act regarding suspected fraud, threats to safety, or security incidents	Security monitoring vendors, fraud detection services
<b>Corporate Transaction Partners</b>	In connection with financing, insurance, mergers, acquisitions, restructuring, or sale of assets	Prospective buyers, investors, insurers
<b>HIPAA-Covered Business Associates</b>	To process health-related data under applicable Business Associate Agreements	Third-party administrators, healthcare service partners

*(Chart continued on next page)*

Category of Third Party	Purpose of Sharing	Examples
<b>Others With Your Consent</b>	When you, your employer, or authorized representative direct us to share your information	Authorized third parties explicitly approved by you or your employer
<b>Text Messaging and SMS Communications</b>	If you opt in to receive text messages from us, we will use your phone number and consent solely for the purpose of delivering those communications. Text messaging originator opt-in data and consent will not be shared with any third parties, except for aggregators and service providers that support the delivery of such messages.	

When sharing information, we require third parties to maintain appropriate safeguards and use personal information only for permitted purposes.

## 7. Your Privacy Rights

Depending on your location, you may have rights regarding your personal information, including:

- **Access** – Request details about what we collect and how we use it.
- **Correction** – Ask us to fix inaccurate information.
- **Deletion** – Request deletion of personal information, subject to exceptions.
- **Portability** – Request a copy of your information in portable form.
- **Objection/Restriction** – Limit or object to certain processing activities.
- **Complaint** – File a complaint with a supervisory authority.

Contact us at [support@decisely.com](mailto:support@decisely.com) to exercise your rights. Requests are subject to verification. We will not discriminate against you for exercising your rights.

## 8. U.S. State Privacy Rights

Residents of certain U.S. states—including **California, Virginia, Colorado, Connecticut, Utah, Oregon, Montana, and Delaware**—have specific rights regarding their personal information.

## Your Privacy Rights

Depending on your state of residence, you may have the right to:

- **Access and Portability:** Know and obtain a copy of the personal information we collect, use, and disclose about you.
- **Correction and Deletion:** Request correction of inaccuracies or deletion of your personal information, subject to legal exceptions.
- **Opt-Out:** Direct us not to sell or share your personal information or use it for targeted advertising or certain profiling activities.
- **Sensitive Information:** Limit or withdraw consent to the use or disclosure of sensitive personal information (such as Social Security numbers or health data).
- **Appeal:** Appeal our decision if we decline to act on your privacy request.
- **Non-Discrimination:** Exercise your rights without discrimination.

## How to Exercise These Rights

You may submit a verifiable privacy request by:

- **Webform:** [Privacy Request Form](#)
- **Toll-Free Number:** 800-976-7194
- **Email:** [support@decisely.com](mailto:support@decisely.com)

Authorized agents may act on your behalf with written authorization. We confirm requests within **10 business days** and respond within **45 days** (extendable to 90 with notice), consistent with applicable law.

## Our Practices

- Decisely does **not sell personal information**. We may share certain information with analytics and advertising partners for purposes such as improving our Services and delivering relevant content. Where required by law, you may opt out of such sharing by using the “Your Privacy Choices” link available on our website.
- We process sensitive personal information **only as necessary to provide our Services** (for example, administering benefits) or **with your consent**, where required by law.
- We honor **legally recognized universal opt-out mechanisms**, such as **Global Privacy Control (GPC)** signals, where applicable.
- This Policy applies to **consumers acting in a personal or household capacity** and does not apply to information collected in an employment or business context.

- **We do not sell or share personal information of consumers under 18 years of age.**
- Certain personal data may be exempt where protected under laws such as the **Health Insurance Portability and Accountability Act (HIPAA)**, the **Gramm-Leach-Bliley Act (GLBA)**, or employment privacy laws.

## 9. Data Retention

We retain personal information as long as necessary to provide Services, comply with contracts or legal obligations, resolve disputes, and enforce agreements. Anonymous or aggregated information may be retained indefinitely.

## 10. International Transfers

We store personal information on servers located in the United States. However, to provide our Services, we may transfer personal information to other countries outside of the United States for the purposes described in this Privacy Policy.

When we transfer personal information internationally, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and applicable law. We will not transfer personal information to an organization or a country unless there are adequate controls in place to protect the security, confidentiality, and integrity of your data and other personal information.

These safeguards may include contractual protections such as Standard Contractual Clauses, reliance on adequacy decisions issued by relevant authorities, or other lawful transfer mechanisms.

## 11. Security of Personal Information

We use reasonable physical, electronic, and organizational safeguards to protect the confidentiality, integrity, and availability of personal information. Our security program includes, among other measures:

- **Encryption:** Sensitive information is encrypted during transmission, and stored data is protected in accordance with industry standards.
- **Access Controls:** Access to personal information is limited to authorized personnel with a business need, subject to authentication and monitoring.
- **Training & Awareness:** Our employees receive ongoing training on privacy, security,

and data protection responsibilities.

- **Monitoring & Incident Response:** We maintain procedures to detect, investigate, and respond to potential security incidents.
- **Data Management:** Personal information is stored, backed up, and disposed of securely, following applicable standards and policies.
- **Business Continuity:** We maintain contingency and recovery plans to help ensure data and services remain available in the event of disruption.

While we strive to protect your information, no method of transmission over the internet or method of storage is completely secure. We encourage you to do your part by keeping your account credentials confidential and signing out when using shared devices.

## 12. Children's Privacy

Our Services are not directed to children under 13, and we do not knowingly collect information from them. We may collect information about dependents under 18 only as provided by their parent or guardian for benefits administration. If we learn we have collected personal data from a child under 13, we will delete it promptly.

## 13. Changes to This Policy

We may update this Privacy Policy from time to time. If we make material changes, we will notify you via our website or email. Continued use of our Services after updates constitutes acceptance of the revised Policy.

## 14. Contact Us

If you have questions or concerns about this Privacy Policy or our data practices, please contact us at:

### **Decisely Insurance Services, LLC**

12735 Morris Road, Suite 350

Alpharetta, Georgia 30004

Email: [support@decisely.com](mailto:support@decisely.com)