

Mobile Application Privacy Policy

Introduction

This mobile application is hosted and operated by your health plan or healthcare provider. As such, some information collected through the mobile application may be considered “protected health information,” as that term is defined in the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) and its implementing regulations.

We recognize that the privacy of your information is important to you. The purpose of this Mobile Application Privacy Policy is to let you know how we handle the information collected through the use of this mobile application.

The Wellhop for Mom & Baby Program (“the Program”), which is owned and operated by UnitedHealthcare Services, Inc. and its affiliates, provides a community of support, a trained facilitator, virtual group calls, a community for discussion, and topic library. We understand the importance of your privacy and respect the confidential nature of your personal information. For that reason, we have made efforts to help make your use of the Program secure and private.

This policy does not apply to information collected through other means such as by telephone or in person, although that information may be protected by other privacy policies. As used in this policy, terms such as “we,” “us,” “our,” and “Company” refer to UnitedHealth Group and its current and Affiliates (an entity controlling, controlled by, or under common control with named party). “You” or “User” means any user of this Program who is a member or dependent of a Participating Employer, Health Plan, or OptumCare site or a legal representative of such member.

Any information you provide, including any personal information, may be transferred to and processed by a computer server located within the United States.

This policy is in addition to the HIPAA Notice of Privacy Practices provided by your health plan or provider that describes how your health plan or provider uses and discloses your protected health information. Depending on your health plan or provider, the NPP can be found at the following links below:

- [HIPAA Notice of Privacy Practices - Medical for Employers and Individual Plans](#)
- [HIPAA Notice of Privacy Practices - Medical for Community Plan](#)
- [HIPAA Notice of Privacy Practices – American Health Network](#)
- [HIPAA Notice of Privacy Practices – Southwest Medical Associates](#)

Information Collection

This mobile application may access or collect personal information and non-personal information. This information is accessed and collected in a variety of ways, including through the operating system of your mobile device and through information you submit through the mobile application. The table below describes the information that we may access or collect in connection with your use of this mobile application.

This mobile application may include features that give you the opportunity to provide us with personal information about yourself. You do not have to provide us with personal information if you do not want to; however, that may limit your ability to use certain functions of this mobile application or to request certain services or information.

This application collects the following information:

Information that Identifies You

- Information you provide which may include account info, name, email address, user credentials, age, address, or phone number
- Health, Medical, or Therapy information
- Information provided by your health plan or provider
- Location Data such as GPS, WiFi, or carrier network location
- User files stored on your device, e.g., calendar, pictures and video

What You Do on Your Device

- Camera Use
- Local Storage
- Phone Dialer
- Use of Screen, e.g., what points are touched, frequency, etc.
- Patterns of App Usage

Device or System Data

- Mobile Device Identifier, e.g., UDID, Android ID
- Technical information about your device and system and application software, e.g., type of phone, operating System (OS), and IP address

We do not store information about your location after the service is performed or share your location data with third parties. You can withdraw consent to use precise, real-time or network location data at any time by turning off the location-based feature on your mobile device or by not using any location-based features. If you withdraw consent, functionality associated with precise, real-time or network location, e.g., navigation, will no longer work.

If you agree to participate in the Program, you acknowledge and consent to receive emails, phone calls, and SMS texting containing: information about your participation in the Program, scheduling, communication updates, community post updates, and general Program updates which you acknowledge will be sent unencrypted. You agree to receive SMS text messages regarding Program updates, reminders and RSVPs, communication updates, participation in the Program, and general updates. You will have the opportunity to opt out of the text messages at any time Text “STOP” to stop receiving text messages. Text “HELP” for assistance. Standard messaging rates may apply.

If you agree to participate in the Program, you acknowledge and consent to disclosing your name and contact information to us solely for the purposes of administering enrollment incentives and confirming your eligibility. This information will not be further used or disclosed for any purpose.

Information Uses

We may use information unless restricted by this policy or by law. We may use information for a number of purposes such as processing your requests or personalizing products and services for you. The table below outlines some examples of how we may use information.

How We May Use Information

- To provide the services and functionality offered by the mobile application.
- To respond to requests from you.
- To customize your experience on the mobile application, including managing and recording your preferences.
- To process an application as requested by you.
- To combine personal and non-personal information we collect through the mobile application with information about your medical condition or other health information maintained by your health plan or provider that allows us to tailor the mobile application to your specific needs and provide content and services designed for you.
- To administer surveys and promotions.
- To provide you with information that we believe may be useful to you, such as information about health products or services provided by us or other businesses to the extent allowable under HIPAA.
- To perform analytics and to improve our products and mobile applications.
- To develop reports regarding usage, activity, and statistics.
- To comply with applicable laws, regulations, and legal process.
- To protect someone’s health, safety, or welfare.
- To protect our rights, the rights of affiliates or related third parties, or take appropriate legal action, such as to enforce our Terms of Use.
- To keep a record of our transactions and communications.

- To facilitate the provision of software updates and product support.
- To improve products and other services related to the mobile application or to provide services or technologies to you.
- To connect non-personal information, we collect through the mobile application with personal information you provide to us.
- To contact you through information you provide through this mobile application, including any email address, telephone number, cell phone number, text message number, or fax number. Please see the section below titled "Our online communications practices."

Information Sharing

We will only share your personal information with third parties as outlined in this policy and as permitted by law.

How We May Share Information

- To third parties at your direction and as described in this Mobile Privacy Policy and your health plan or provider's HIPAA Notice of Privacy Practices.
- If all or part of the Company is sold, merged, dissolved, acquired, or in a similar transaction.
- As required by law or to comply with a judicial proceeding, court order, or other legal process.
- To cooperate with law enforcement authorities in investigating and prosecuting activities that are illegal, violate our rules, or may be harmful.
- With other companies that perform services on our behalf or that we collaborate with. For example, we may hire a company to help us send and manage email, and we might provide the company with your email address and certain other information in order for them to send you an email message on our behalf. Similarly, we may hire companies to operate some of our mobile applications and related computers and software applications. Each subcontractor that will receive any protected health information to perform a service on our behalf has signed an agreement that binds them to the same restrictions on use and disclosure of your protected health information with which we comply.
- Within the Company. We may also combine personal information that you provide us through this mobile application with other information we have received from you, whether online or offline, or from other sources such as from our vendors. For example, if you have purchased a product or service from us, we may combine personal information you provide through this mobile application with information regarding your receipt of the product or service.

Information Access and Choices

Personal Profile: You may view and edit your personal profile on this Program at any time by logging into your account, clicking on the profile icon or menu option, and then clicking on the settings icon or menu option.

Use of Personally Owned Devices: Participants are required to use personally owned devices (e.g., home computers, personal smart devices) in connection with their participation in the Program.

Account Cancellation: If you wish to cancel your participation in the Program, please contact us. However, you acknowledge that the Program reserves the right to retain your information if doing so is necessary to comply with applicable law or legal process (including a court order or subpoena), to cooperate with law enforcement (including investigation of an alleged or suspected crime, fraud or other illegal activity), to complete a pending transaction, to resolve a claim or dispute, or to enforce an applicable agreement between you and the Program.

Data Retention

We will retain your information for as long as you continue to participate the Program and thereafter in accordance with our data retention policies or continue to use this Program. You may request deletion of your data after participation in the Program, in accordance with our record retention policies. In addition, the Program reserves the right to retain your information as necessary to comply with its legal obligations, resolve disputes, and/or enforce an applicable agreement between you and the Program. Please note that aggregate user activity information collected from this Program may be retained and used by the Program indefinitely.

Analytics and Tracking

We may use various technologies to gather information from our users, such as which mobile application features are used and the frequency of use. We may also allow third-party service providers to use technologies to collect such information. We do not control these third-party technologies and their use is governed by the privacy policies of third parties using such technologies. Note that we do not currently respond to web browser “Do Not Track” signals that provide a method to opt out of the collection of information about online activities over time and across third-party websites or online services as we await the development of industry-accepted standards for how such signals should be interpreted.

Reviewing Your Information

This mobile application may permit you to view your user profile and related information and to request changes to such information. If this function is available, we will include a page or heading such as “My Profile” or similar words. Navigating to that portion of the mobile application will take you a page through which you may review such information.

Information Security

We maintain reasonable administrative, technical, and physical safeguards designed to help us protect the personally identifiable information that you provide. However, no security systems are impenetrable, and we cannot guarantee the security of our mobile application, nor can we guarantee that the information you supply will not be intercepted while being transmitted to us over the Internet and we are not liable for the illegal acts of third parties such as criminal hackers.

Please also note that most standard email providers provide unencrypted means of communication. There is a risk that unencrypted emails may be accessible or intercepted by unauthorized third parties, and the Program does not warrant or guarantee the security of any information transmitted to or from you by electronic means.

It is our policy to protect the confidentiality of Social Security numbers ("SSNs") that we receive or collect in the course of business. We secure the confidentiality of SSNs through various means, including physical, electronic, and administrative safeguards that are designed to protect against unauthorized access. It is our policy to limit access to SSNs to that which is lawful, and to prohibit unlawful disclosure of SSNs.

If you choose to use a persistent log-in, for example, having your username or password be remembered, others may be able to access information through your mobile device. If you are concerned about the unauthorized use or disclosure of information via your mobile device, you should lock your mobile device when not in use or elect to not use the persistent log-in feature.

Some Information you provide to this mobile application will be stored locally on your mobile device. To prevent unauthorized use or disclosure of information via your mobile device, you should lock your mobile device when not in use or elect to not use the persistent log-in feature.

Our Online Communication Practices

We send communications in accordance with this policy and applicable laws. We may use cookies or other technologies to monitor whether you open and/or click on URLs in email communications such as newsletters. We offer you appropriate consent mechanisms for

communications, such as an opt-in or an opt-out. Please be aware that consent mechanisms may not apply to certain types of communications, such as account status, site updates, and other communications.

Your Choices

As described in this policy, you may turn off application features and provide consent for appropriate communications. Please note, choosing to disable certain functionality of the mobile application may impact the functionality of other areas of the mobile application. The application may also seek your opt-in permission for certain data collections or uses which will be clearly presented to you.

Your Individual Rights

Because information collected through your use of the mobile application is collected by a health plan, the individual rights you have to access, correct or modify your protected health information that are set forth in the HIPAA Notice of Privacy Practices of your health plan may apply to some or all of the information collected through this mobile application. Please consult that notice for a description of those rights and how to exercise them.

Information for Children Under 13

We will not knowingly collect any personal information from children under the age of 13 through this mobile application. If you think that we have collected personal information from a child under the age of 13 through this mobile application, please contact us.

Contact Us

To contact us regarding this Mobile Application Privacy Policy and our related privacy practices, email us at: wellhop@uhg.com.

Effective Date

The Effective Date of this Mobile Application Privacy Policy is May 21, 2020.

Changes to this Mobile Application Privacy Policy

We may change this Mobile Application Privacy Policy. If we do so, such change will appear on this page of our mobile application. You may always visit this policy to learn of any updates.