

Updated February 29, 2024

This privacy policy (“**Privacy Policy**”) describes how Verdegard Administrators, LLC and its affiliates (collectively “**Verdegard,**” “**our,**” “**we,**” or “**us**”) collect, use, disclose, and protect information about you. It applies only to information that you provide through the Verdegard member portal website and mobile app, as well as any other sites that contain a link to this Privacy Policy (collectively, the “**Site**”). This Privacy Policy does not apply to any of our other websites, applications or services that do not link to this Privacy Policy. Certain parts of the Site are available only to members of health plans who have registered or created an account through the Site or, in some cases, through another mechanism provided by their health plans.

We are firmly committed to protecting the privacy of personal information we collect about you through the Site. Certain information you provide through the Site may also be covered by the Notice of Privacy Practices of your health plan if you obtain pharmacy services from it. When either of these Notices apply, they overrule conflicting terms in this Privacy Policy. If you have any questions about which terms apply, please do not hesitate to contact us as provided in the “**Contact Us**” section below

If you do not want us to collect, use or disclose information about you as described in this Privacy Policy, then you should not use the Site. By using the Site, you are accepting the practices set out in this Privacy Policy and our Terms of Use.

## Children Under the Age of 13

We do not knowingly collect personal information through the Site from children under the age of 13. Information about children under the age of 13 must be provided by a parent or legal guardian of that child. If you are the parent or legal guardian of a child under the age of 13 and believe the child has provided personal information through

the Site on their own, please notify us promptly. If we learn that a child under age 13 has provided us with personal information on their own, we will take steps to remove it.

## Information We Collect

We collect information about you when you access our Site and this information may be collected directly from you or it may be collected automatically when you use our Site. Separate from accessing this Site, we may also receive information about you from other sources, such as your health plan or other service providers.

*Information we collect directly from you:*

- When you create an account on the Site. This information may include your name, address, telephone number, email address and member ID. **You are not required to register on the Site. But if you don't register, we may not be able to provide you with certain services or Site functionality.**
- We collect information from you when you enter into a transaction with us, such as when you place an order for a drug for home delivery. For drug orders, we may ask for credit card, bank account, or other information necessary to process a payment from you. We may also ask for your shipping information.
- When you place an order or enter some other transaction with us through the Site. For drug orders, we may ask for credit card, bank account, or other information needed to process a payment from you. We may also ask for your shipping address.
- In some cases we may receive certain personal information about you from your health plan or employer. If you have questions about the information your health plan or employer may have shared with us, please contact your health plan or your employer.
- When you request customer service or to resolve a dispute.

*Examples of When We Collect Information Automatically from You:*

- **Browsing and Usage Information.** When you use our Site, some information is collected automatically. For example, when you visit our Site, our web server may automatically log your computer's operating system, access times, browser type and language, the website you visited before our site, and your activity on our websites.
- **Device Information.** We collect information about the computer or mobile device you use to access our Site. This may include the hardware model, operating system, and version or other identifiers.
- **Device Information.** We collect information about the computer or mobile device you use to access our Site. This may include the hardware model, operating system, and version or other identifiers.

For more information, please see the “Cookies and Similar Tools” section below.

#### How We Use the Information We Collect

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- Operating the Site, including to provide service features and Site functionality.
- To provide you the information and services you request when you use the Site.
- To customize your experience when you use the Site. For example, we may provide you with content based on your interests, requests, and location.
- To improve our products or services, develop new products and services, perform quality control activities, and conduct data analytics.
- To provide account management and customer service.
- To tell you about our products or services that may be of interest to you.
- To send service-related notices about the Site to you, which may include sending emails or text messages at the mobile device number you give us.
- To detect and respond to fraud, violations of our Terms of Use, violations of law, or other misuse of the Site.

When permitted by applicable law, we may also:

- Combine the information you provide us with other information obtained or held by us, and use that combined information for any of the above purposes.
- Remove information that can be used to identify you (such as your name, phone number, email address, and Member ID) and use that de-identified information for any purpose permitted by law.

### How We Share Information We Collect

We may share your personal information in limited circumstances, such as those described below:

- With service providers who help with our business activities. For example, this may include payment processing, order fulfillment, and improving our Site or services. We require our service providers to keep your information secure and use it only as we permit.
- We may share information about you or your drug claims with your physician or pharmacy. This is to help them provide health care services to you, such as to refill a prescription or obtain a new prescription.
- With your health plan to help pay for your drugs or otherwise provide their health benefits and programs to you.
- To auditors, lawyers, or other business consultants or advisors.
- To comply with our legal responsibilities, such as if we are required to do so by law or if we have a good faith belief that disclosure is necessary. For example, we may share your information to (1) comply with the law or with legal process served on us; (2) protect and defend our rights or property; or (3) to protect someone's safety.
- To any other third party with your prior consent.

We and our service providers may share reports on user demographics and traffic patterns that do not identify you, as well as other information that does not identify you with third parties.

## Information Security

We take reasonable steps to protect your personal information, which is any information that identifies you or could reasonably be linked to you. For example, a password is required to access your account and help to protect your account information. Please keep this password confidential. We also use encryption technology, called Transport Layer Security (TLS), to help protect personal information transmitted across the Internet. The presence of this encryption may be indicated by https in the browser URL or the image of a closed lock or solid key in the browser window. These indications may not be present in mobile services that use TLS. For payment card information, we use secured networks, encryption, monitoring and tests of security systems, and other safeguards to help protect your information.

Unfortunately, there is always some risk that an unauthorized third party may find a way around our security measures. We cannot guarantee that the Internet or any other technical system will be 100% secure or error-free. We are not responsible for the security of information you send over networks that we do not control, including the Internet and wireless networks. It is your responsibility to protect the security of your login information.

## Your Choices

If you register on the Site and create an account (a “Registered User”), you may change certain information you provide through the Site (e.g., shipping address for home delivery of medications). You may do this by logging into your account and going to the account settings. You may also have the option of allowing other Registered

Users to view your account information (including your profile and prescription drug history). This permission will be for no longer than 12 months. You may cancel this permission at any time by following the instructions on the Site or by contacting our Call Center toll free at +1 (888) 811-8944.

In the case of a Registered User below the age of 12 (a “Child”), the parents or legal guardian of the Child may register and create an account on behalf of the Child. If permitted by applicable law, this account will be automatically linked to the account(s) of the parent(s) or legal guardian who is/are Registered User(s). This allows them to see the Child’s account information. Once the Child reaches the age of 12, the parent or legal guardian will no longer automatically have access to that Child’s account information. The parent or legal guardian will be required to create a new account for the Child. The new account will not be linked to the account of the parent or legal guardian who is a Registered User.

We may send information about benefits, programs, products, services, or tools and/or general health information to you by various means, including email or text messages. You acknowledge and accept that email or text communications may be sent unencrypted and there is some risk of disclosure or interception of the contents of these communications. If we use your personal information to send you marketing emails, you may opt out of receiving these emails by following the instructions in the email, or by emailing us at [contact@verdegard.com](mailto:contact@verdegard.com). There are certain messages you may not be able to opt out of receiving, such as email messages about programs or services you have registered for or certain administrative, technical, or safety notices about the Site or our products or services.

The Site does not currently respond to “do not track” signals or other mechanisms that provide a method to opt out of the collection of information over time and across websites and online services you may use. If we allow this in the future, we will describe how we do so in this Privacy Policy.

## Links to Other Sites

Our Site may include links to external websites and online services that are not under our control. We are not responsible for the collection and use of your information on those websites and other online services. We encourage you to review the privacy policies and terms of use of each website and other online service you visit. If we provide any links to external websites and online services, that does not mean that we endorse or are associated with those websites and online services, or provide any kind of warranty about their products or services.

## Cookies and Similar Tools

We use cookies to collect, store and sometimes track information from your computer or mobile device. Cookies collect this information automatically for statistical purposes to improve the Site. If you use our Site, we may use a cookie, web beacons and other similar technologies on our website to save your settings and to provide personalized services. A cookie is a unique numeric code that we transfer to your computer that may let us know your location, the drug information visited while on our website and other websites you visited before visiting our website. If you are a Registered User, this information may be linked with your account information. Web beacons are small pieces of code placed on our website that allow us to obtain information about website usage. These cookies do not enable third parties to access any of your personal information.

If you prefer not to receive cookies from the Site, then set your browser to refuse all cookies from any websites that you may visit. This will provide you with more control over the acceptance of cookies on your computer. However, it is possible that this will cause some portions of the Site not to function properly or to perform more slowly. By using our Site and not disabling cookies, you consent to their use. Please note that other tracking technologies may still function.

## Changes and Updates

If you prefer not to receive cookies from the Site, then set your browser to refuse all cookies from any websites that you may visit. This will provide you with more control over the acceptance of cookies on your computer. However, it is possible that this will cause some portions of the Site not to function properly or to perform more slowly. By using our Site and not disabling cookies, you consent to their use. Please note that other tracking technologies may still function.

## Contact Us

If you have any questions about this Privacy Policy, please send them to [privacysecurity@verdegard.com](mailto:privacysecurity@verdegard.com). You may also write to us at:

Privacy Team:

Attention:

Privacy Officer

1600 W. Broadway Rd, Suite 300

Tempe, AZ 85282