# **Privacy Notice**

Capital District Physicians' Health Plan, Inc. ("**CDPHP**<sup>®</sup>") owns the CDPHP Insights community website for the purpose of collecting information for use in the CDPHP Insights community. The CDPHP Insights community is administered through Vision Critical, Inc. ("**Vision Critical**"). Vision Critical is a third-party service provider who processes the CDPHP Insights community data for CDPHP. The CDPHP Insights community Statement of Privacy outlined below applies to the websites, web surveys, and other supporting panel websites administered by Vision Critical on behalf of CDPHP.

## Privacy Commitment and Philosophy

The CDPHP Insights community is being managed for market research purposes only. No one will ever attempt to sell you anything as a direct result of your participation. All individual information provided is strictly confidential. You are free to choose whether or not to participate in a survey, free to choose not to answer any specific questions and free to discontinue participation at any time.

When filling out surveys, do not provide personal information unless it is explicitly requested. For example, do not provide information about a health condition in a field that is requesting information about your favorite food. When submitting information about others, Vision Critical requires that you obtain their consent before providing their information.

# **Collection of Personal Information**

To join the CDPHP Insights community, we invite you to complete a brief registration survey that gathers some personal information. We ask that you provide your name and email address so that we can send you email invitations to participate.

Vision Critical may also collect information about your computer hardware and software. This information may include (among other things) your IP address, browser type, domain names, access times and referring Web site addresses. This information is used by Vision Critical for the operation of our Web sites and services, to maintain quality of our services, and to provide general statistics regarding use of our Web sites and services.

## **Usage and Sharing of Personal Information**

CDPHP is the party collecting data for use in the CDPHP Insights community. Generally, CDPHP does not provide personal information to third parties. CDPHP has engaged the services of Vision Critical to process data collected by CDPHP into aggregate, anonymized data and survey results that do not identify individual respondents. From time to time, however, CDPHP and Vision Critical may share your personal information with others including their clients and other third parties under the following circumstances:

- The third party provides a service to CDPHP or Vision Critical, such as a hosting provider, and is contractually bound to protect the confidentiality of your personal information;
- To administer Survey Dollars, sweepstakes/contest and other promotions;
- You have consented to participate directly in a study conducted by or on behalf of our client;
- You post the information while participating in an open discussion forum; or

• When we believe it necessary to comply with the law, to protect the rights or safety of our website, other users, or third parties.

CDPHP will never use your personal information for reasons that we have not disclosed to you, including selling it to marketers or advertisers for their own purposes.

#### **Communications from the Site**

In order to participate in the CDPHP Insights community, you must opt-in to receive emails. The first email you receive will be sent to confirm your subscription and verify that the email address you have provided is valid. Subsequent emails will be sent to invite you to participate in surveys, to respond to your inquiries and support requests, to send you newsletters and other informative content, and to administer sweepstakes.

#### **Cookies and Related Technology**

When you visit the Site, participate in a survey, access the member portal, or interact with a survey invite email, Vision Critical uses certain technologies to retain your preferences and provide other Site functionality. These technologies include cookies, web beacons, and digital fingerprints. To learn more about these technologies and your options, please visit Vision Critical's cookie policy.

#### **Opting Out**

At any time, you may choose to opt-out of the CDPHP Insights community by clicking the Unsubscribe link at the bottom of the emails, by using the Unsubscribe option in the Profile area of the member portal, or by contacting Vision Critical directly. Please note that when you unsubscribe, Vision Critical will not only cease sending you emails, Vision Critical will also deactivate your membership. Any information that you have submitted to Vision Critical, including survey invites and personal information will continue to be retained in accordance with our data retention practices outlined below. Any Survey Dollars you have accumulated and/or sweepstakes eligibility will be immediately forfeited and cannot be reclaimed even if you sign up again at a later date.

Opting-out of the CDPHP Insights community does not unsubscribe you from other communities you have chosen to join, including Associate or other client communities. If you have opted-in to participate in an Associate survey or have otherwise become a participant in one of our client's communities and wish to be removed, you will need to contact them directly to unsubscribe.

Certain communications are transactional in nature and do not provide you the ability to opt out.

## **Children's Privacy**

The CDPHP Insights community is not intended for children under the age of 13. From time to time, however, CDPHP may conduct surveys that are targeted at children. When CDPHP conducts such surveys, they will request express permission from a parent, legal guardian or other person legally responsible for the child before inviting the child to participate. We do not share the personal information of children with third parties, and participation can be revoked by the parent or guardian at any time by using the options listed above.

#### **Data Retention**

Vision Critical will retain your personal information and survey responses for as long as it remains necessary or relevant for the purposes identified or as permitted/required by law. For example, Vision Critical may need to retain the personal information of an unsubscribed member for the purposes of maintaining the integrity of the study, or to honor that member's opt-out preference (by retaining the email address). If you would like to explicitly request the removal of your personal information, please contact Vision Critical using the contact information listed above. Non-personal information is not subject to any retention limitations, and may be retained indefinitely.

#### **Changes to this Policy**

CDPHP has the sole discretion to change the terms of this policy at any time.

# EMAIL DISCLAIMER

CDPHP is the owner of the CDPHP Insights community website and Vision Critical is a thirdparty service provider who hosts/develops the CDPHP Insights community. Participation in the CDPHP Insights community through the CDPHP Insights community website is completely voluntary, and you are able to opt-out of participation at any time. Any information you provide will remain confidential, will not affect the terms of your CDPHP member contract, and will not lead to unsolicited contact from third parties not related to your involvement with the CDPHP Insights community. Participation in the CDPHP Insights community does not guarantee participants any incentives or prizes.