



Privacy Notice

Effective Date: July 1, 2023

At UnitedHealthcare Student Resources International, we respect your rights to privacy and the protection of your personal data. The purpose of this privacy notice is to explain how we routinely collect and use personal data about individuals, including applicants and members (“you”) for the provision of our products and services and what rights you have in relation to your personal information.

Throughout this document references to “we”, “us”, “our”, or “the company” refer to UnitedHealthcare Student Resources International and its subsidiaries and affiliated companies.

Different types of information we collect about you

To allow us to provide our products and services and to run our business, we collect and process various categories of personal contact information about you. We may collect and process:

- Name;
- Date of birth;
- Postal and assignment address;
- Email address;
- Contact telephone number (landline & mobile);
- Name of school;
- Nationality;
- Gender;
- Health & medical information; and
- Banking details.

How we collect your personal data

We obtain most our information directly from you, including through the application or claim form(s) you complete as well as any additional information you provide. We may contact you by phone, email, or mail to obtain additional information. We may obtain information about you from other transactions with us, our affiliates, or other third parties.

How we use your personal information

We will use your personal information:

- To consider an application for a health plan purchased by you or on your behalf;
- If a plan is accepted, to facilitate the administration of your plan;
- To process a claim and assist you in the event of a medical emergency;
- To communicate with you, including information about your policy and quality of our services;
- To develop reports, including anonymizing your personal information and conducting analysis on our operations; and

- To evaluate any potential risk of fraud.

Legal bases for processing

Our legal bases to use and process your personal information include that the processing is necessary for:

- our legitimate interests, including activities related to coverage and administration of your policy;
- where applicable, for the performance of a contract to which you are a party;
- compliance with our legal obligations, such as complying with regulatory audits, accounting and tax requirements; and
- for sensitive personal data, on the basis of your consent, which may be subsequently withdrawn without affecting the lawfulness of processing based on consent before its withdrawal.

Disclosures of personal information

We may not be able to provide some of our services to you without your personal data. Access to non-public personal information is limited to those employees, authorized representatives, attorneys and service providers who specifically need such information to conduct their business responsibilities. In addition, when providing our services to you, we may share your information with:

- Introducers and other insurers who work with us to help manage the underwriting process and administer our policies;
- Authorized third party administrators who work with us to help manage the underwriting process, administer our policies and help us manage the claims process;
- Authorized service providers, medical clinics, hospitals and other medical facilities, assistance providers, sub-contractors, and third-party service providers;
- Limited members of personnel within the company;
- UnitedHealth Group companies; and
- Statutory and regulatory bodies.

We require that our service providers and third-party vendors abide by applicable privacy laws in handling non-public personal information obtained through their business relationship with Student Resources International. Additionally, we may disclose non-public personal information to third parties as allowed or required by law. For example, we may release your information to comply with reporting requirements, to comply with a subpoena, warrant, legal process or other order or inquiry of a court, governmental agency or state or federal regulator. We may also share your personal information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies.

If you conclude your relationship with Student Resources International, we will continue to safeguard your privacy in accordance with the standards described in this notice.

Data Security and Data Integrity

We maintain reasonable physical, electronic and procedural safeguards to protect personal information from loss, interference, misuse, unauthorized access, disclosure, alteration or destruction. We also maintain reasonable procedures to help ensure that such data is reliable for its intended use and is accurate, complete and current.

Data retention

We will retain your personal information only for so long as reasonably necessary for the purposes set out above, in accordance with applicable laws.

Your rights

You have certain rights in relation to how we use your personal information and the manner in which we process it. This includes:

- A right to access your information;
- A right to request that we correct inaccurate information or update incomplete information;
- A right to request that we restrict processing of your information in certain circumstances;
- A right to object to us processing your personal information for our legitimate business interests or direct marketing purposes;
- A right to object to us making decisions relating to you based solely on automated decision-making in certain instances;
- A right to have your information deleted or our use of your data restricted in certain circumstances. We may be unable to comply with a data deletion request where doing so would place us in breach of our obligations under applicable laws, regulation or codes of practice. However, in some circumstances, you may be able to request that your data be blocked from further processing;
- A right to data portability (i.e., obtain a transferable copy of your information we hold to another provider) in certain circumstances; and
- A right to withdraw consent at any time where processing is based on consent.

You may contact us at the address listed below in the “Contact Information” section with any questions relating to this notice or to submit a request relating to any of the above mentioned rights.

You may lodge a complaint with a supervisory authority, including the Cayman Islands Ombudsman, if you consider our processing of your personal data infringes applicable law.

Contact Information

If you have any questions about this Privacy Notice or about how we use the information we collect, please contact us at:

privacy@uhcsrinternational.com

We reserve the right to amend this notice at any time. If we make material changes, we will notify you as required by law.