

# Privacy Policy

Competitive Health values the privacy of those who use our website and services (collectively, the “Services”) and makes all commercially reasonable efforts to protect it. You can be confident knowing your personal information is secured and kept private, protecting you against potential identity theft and fraud. We encourage you to read this Information Privacy Notice. Your access to and use of the Services are subject to the Competitive Health terms of service and all applicable laws. Any capitalized terms not defined herein are defined in the Terms of Service.

This privacy policy discloses the privacy practices of Competitive Health, which operates the website myshowbenefits.com, (the “Site”) and its respective contents and the SHOWBenefits mobile application (“App”), all of which are hosted in the United States, whether accessed via computer, mobile device, telephone, or other technology.

## **Customer Information Security**

Because we care about your privacy, we make every reasonable effort to protect your information regardless of the form of storage or transmission. This includes the implementation of administrative, physical and technical safeguards. All employees, agents or representatives that act on our behalf are contractually obligated to keep all information deserving legal protection confidential and private. We continue to safeguard your information after you no longer do business with or close your account with us.

## **Information We Collect**

We may receive your information through our website, account creation, email notifications, or other interactions with the Services. When using any of the Services you consent to the collection, transfer, manipulation, storage, disclosure or other uses of your information as described in this Privacy Policy.

## **Types of Information Collected**

To enhance your user experience and improve the Services, we collect information about you from three sources:

- information you affirmatively give to us
- information automatically collected when you use the Services and
- information your employer provides

Third parties involved administration, sales, marketing, legal, system administration, technical service providers, mail carriers, hosting providers, IT companies, and communications agencies may also collect your information in connection with your use of the Services unless a user refuses to consent to the disclosure of information to third parties.

## **Information You Affirmatively Give Us**

In using the Services, you may provide us with personally identifiable information. This refers to information about you that can be used to contact or identify you, and information about your use of and activities on our website that may be connected with you (“Personal Information”). Personal Information that we collect may include, but is not limited to, your first and last name, email address, birth date, billing information, username, password, telephone number, names of your dependents, and zip code.

Personal Information may also include information you supply to us concerning your preferences, geographic location, and other interests expressed in the course of your use of the Services, as well as certain representations and warranties that you are required to make while using the Services. You are responsible for any personal data of third parties obtained, published or shared through this Site and confirm that you have the third party's consent to provide the data to Competitive Health.

### **Information Automatically Collected**

We also collect information about your visit from the browser on your computer or mobile device including but not limited to the time and date you access the Services, your geographic location, IP address, device information, cookies and the pages you request — to analyze trends, administer the site, track your navigation of the site, deliver relevant advertisements and gather broad demographic information for aggregate use (note that IP addresses are not linked to “personally identifiable information”).

Additionally, we collect aggregate information from multiple users without personally identifying individuals, such as geographic region, which we may share with our business partners — to improve understanding of customer needs and provide relevant services.

### **Information Your Employer Provides**

If you have SHOWBenefits as part of your employee benefits program, we have received information about you from your employer. Personal Information that we collect may include, but is not limited to, your first and last name, email address, birth date, telephone number, and zip code. By using the Services, you are giving us permission to use and store such information consistent with this privacy policy.

### **What's Private**

This data will not be publicly displayed or revealed to other users:

- any payment information you provide
- your password details
- your phone number

We don't give your personal information to any third-party services, except when it's necessary to provide the Services (like when we partner with payment processors). When we share data with third-party services that support our delivery of the Services, we require that they protect your personal information to the same standards we do. We do reserve the right to disclose personal information when we believe that doing so is reasonably necessary to comply with the law or law enforcement, to prevent fraud or abuse, or to protect our legal rights.

### **Uses of Your Personal Information**

We will use the information you provide to us for a variety of purposes, including to:

- enable us to provide you with and improve the Services;
- identify you when you sign in to your account;
- send you marketing communications we think you may find useful, including newsletters, marketing or promotional materials and other information on services and products offered by us or third parties but only in accordance with your email preferences;
- request ratings or reviews;

- enable us to contact you regarding any question or request you make through the Services;
- notify you of any changes to the SHOWBenefits or Competitive Health, Inc. policies; and
- use for other purposes that we may disclose to you when we request your information.

We use the information we obtain by technical means (such as the automatic recording performed by our servers or through cookies) for the above purposes and to monitor and analyze the use of the Services; for technical administration of the Services; to increase functionality and user-friendliness of the Services; to better tailor the Services to your needs, and to generate and derive useful data and information concerning the interests, characteristics, and use behavior of our users.

### **Sharing of Information**

When you send information to the Services, you are granting us permission to use and take other actions regarding such information (as described in the Terms of Service), to provide the Services. We do not share, sell, rent or otherwise distribute this information to others, except as disclosed in this Privacy Policy. We may share your information with third parties outside of Competitive Health, under the following circumstances, if we:

- have your explicit consent to share the information;
- need to share your information to fulfill your Order;
- wish to contact you with information about services from our business partners;
- have a good faith belief that sharing or otherwise permitting access, disclosure, use or preservation of such information is reasonably necessary to comply with our legal obligations;
- believe it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud or potential threats against persons or property; or
- believe it is necessary to investigate potential violations of our Terms of Service, or to enforce those Terms of Service.

### **With Whom Information is Shared**

#### **Personal Information**

Subject to the paragraph that follows, if we have your express consent, we may share your personal information it collects with business partners and other third parties that are not affiliated with Competitive Health.

Under narrow circumstances, we may disclose your personal information without asking for your consent to protect the legal rights of Competitive Health or our affiliates, and each of their respective investors, directors, officers, employees, agents, and suppliers; to protect the safety and security of users of the Services or to enforce our Terms of Service; to protect against fraud or for risk management purposes; or to comply with or respond to the law or legal process or a request for cooperation by a government entity, whether or not legally required.

If you notify us that you believe your legal rights have been violated by Competitive Health or another user of the Services, we may provide the information you provide to us to others if we believe it is necessary to evaluate and respond to your complaint. For instance, if you submit a notice of copyright infringement to us, we may send a copy to the person or entity who uploaded, stored, or transmitted the material addressed by the communication.

### **Non-Personal Information and Aggregate Data**

Competitive Health may share with third parties your non-personal information and related aggregated data. For example, we may share IP addresses or general demographic information of its users to provide anonymous aggregated data to business partners about the volume of use on the Services and the opportunities in which users are most interested. Because this form of data does not identify particular users, these third parties will not be able to contact you based solely on this data.

### **Controlling the Collected Information**

You have the choice about whether to disclose your personal information or other information about yourself to Competitive Health. To modify or delete the personal information you have provided to us, please log in and update your profile. We may retain certain information as required by law or for necessary business purposes. We are under no obligation to store such Personal Information indefinitely and disclaim any liability arising out of, or related to, the destruction of such Personal Information. In addition, you should be aware that it is not always possible to completely remove or delete all of your information from our databases without some residual data because of backups and other reasons. As an individual member, you may cancel your account at any time. Employer clients can cancel based on their agreement. Please note that if you cancel your account, we may retain some information about you but will discontinue posting such information on the Services. Additionally, deleting your account will not delete any content that you have already posted on the Services.

On request, we will give you a copy of all the personal information about you that we hold. This information is subject to a fee not exceeding the prescribed fee permitted by law.

You may always direct us not to share your Personal Information with third parties, not to use your Personal Information to provide you with information or offers, or not to send you newsletters or promotional e-mails by:

1. Sending us an e-mail at: [info@myshowbenefits.com](mailto:info@myshowbenefits.com)
2. Contacting us by mail at:  
**Competitive Health, Inc.**  
237 A St, Suite # 78817  
San Diego, California  
92101-4003, US
3. Or by following the removal instructions in the communication that you receive (e.g., the unsubscribe link at the bottom of an email).

Your opt-out request will be processed within 30 days of the date on which we receive it. Of course, we will continue to have the right to email you concerning any matters pertaining to your account.

Regardless of your choices regarding promotional communications and updates regarding content, we may send you administrative messages, service announcements, terms, and conditions of your account, or other similar communications, without offering you the opportunity to opt-out of receiving them.

### **Email Policies**

We want to communicate with you only if you want to hear from us. We give you the ability to opt-out of any marketing communications we send. We will send you emails relating to your personal

transactions. You will also receive certain marketing email communications, in accordance with your preferences, and from which you may opt-out at any time. We may send you service-related announcements on rare occasions when it is necessary to do so.

### **Change of Control**

If Competitive Health sells all or part of its business, makes a sale or transfer of assets, is otherwise involved in a merger or business transfer, or in the unlikely event of bankruptcy, Competitive Health may transfer your personal information and non-personal information to one or more third parties as part of such transaction.

### **Collecting Data**

Competitive Health uses various technologies to collect usage information of the Services including:

#### **Cookies**

These are small data files that a website you visit may save on your hard drive that usually includes an anonymous unique identifier. A cookie cannot retrieve any other data from your hard drive, pass on computer viruses, or capture your e-mail address. The Services use cookies for user authentication, keeping track of your preferences, promotional campaigns that require user identification, keeping track of our audience size and traffic patterns, and in certain other cases. You can configure your browser to accept cookies, reject cookies or notify you when a cookie is being used. If you wish to opt-out of any of the Advertising Cookies (cookies that enable the Services to serve advertisements of products and services, including special offers) you may do so by visiting or sending us an e-mail at: [info@myshowbenefits.com](mailto:info@myshowbenefits.com)

#### **Google Analytics**

We use Google Analytics to better understand how visitors interact with our site. This service provides non-personally identifiable data including but not limited to data on where visitors came from, what actions they took on our site and where visitors went when they left our site.

### **Third Party Links**

The Services may contain links to other sites. We are not responsible for the privacy policy or other practices employed by websites linked to, or from, our website nor the information or content contained therein. This privacy statement applies solely to information collected by our Services.

### **Our Policy Toward Children**

The Services are not directed to children under 18 years of age. If you are under 13 years of age, you are not authorized to use the Services, with or without registering. In addition, if you are under 18 years old, you may use the Services, with or without registering, only with the approval of your parent or guardian. A parent or guardian may, however, create an account on behalf of a minor.

We do not knowingly collect personally identifiable information from children under 13 without parental consent. If we determine upon collection that a user is under this age, we will not use or maintain his or her personal information without the parent or guardian's consent. If a parent or guardian learns his or her child has provided us with personal information, he or she should contact us at [help@CompetitiveHealth.com](mailto:help@CompetitiveHealth.com) (please include the child's name, address, username, and e-mail

address) If we learn a child under 18 has provided us with Personal Information without parental consent, we will delete such information from our files.

### **Consent to Transfer**

Our computer systems for the Services are currently governed by and operated in the United States, so your personal data will be processed by us in the United States, where data protection and privacy regulations may not offer the same level of protection as in other parts of the world, such as the European Union. Competitive Health makes no representation that the Services are governed by or operated in accordance with the laws of any other nation. If you create an Account with the Services as a visitor from outside the United States, by using the Services, you agree to this Policy and you consent to the transfer of all such information to the United States, which may not offer an equivalent level of protection of that required in the European Union or certain other countries, and to the processing of that information as described in this Policy.

### **Changes and Updates**

From time to time, we may change this Privacy Policy. To ensure that you are familiar with our most updated policies and practices, check the effective date indicated above of this Privacy Policy each time you use the Services. If we make any changes, we will notify you of such changes by posting the updated Privacy Policy on the Site. We may also send you an email alerting you of such changes. You will be bound by any such changes to the policy when you use the Services after those changes have been posted. If we make material revisions concern practices where we have represented, we will obtain your consent to use or disclose your personal information, we will obtain your consent before taking any action inconsistent with those representations.