

WEB SITE PRIVACY STATEMENT

Effective Date: April 24, 2014

Welcome! You have arrived at The Ventura County Health Care Plan (VCHCP) online Web site location (e.g., website or application) that is owned and operated by the VCHCP. This "Privacy Statement" governs your use of any online Web site location (e.g., web site or application) that posts a link to this Privacy Statement, and also applies to your use of interactive features, widgets, plug-ins, applications, content, downloads and/or other Web sites that: (i) we own and control and make available through an online Web site; or (ii) that posts a link to this Privacy Statement, regardless of how you access or use the Web site, whether via personal computers, mobile devices or otherwise. NOTE: We have widgets and links out to other web sites for which the user is not covered under this Statement.

The Information We Collect

Our web server automatically captures the IP address of the web page from which you enter our Web site, the pages you visit on our Web site and the amount of time you spend here. We do not collect any information that can reveal your personal identity unless you voluntarily provide it when you register to use interactive features of the Web site. The information we collect is not part of any designated record set. Personally identifiable information voluntarily provided by you may be retained indefinitely for the purposes described in this Privacy Statement.

Use of the Information this Web site Gathers/Tracks

Any personally identifiable information you give us will be used only to provide the product, Web site or information you have requested, or to support the programs for which you registered. Unless you specifically consent to let us do so, your personally identifiable information, including your e-mail address, will not be sold, rented, licensed, or otherwise shared with third parties, other than as required to fulfill a request from you. The non-personally identifiable information we gather in aggregate form may be used to improve our Web site, and we may share that information with delegates or our health and wellness sponsors. Personal information you voluntarily provide and the non-personally identifiable information we collect in aggregate form will not affect your insurance coverage, eligibility, premiums or claims payment by VCHCP.

We may use third-party vendors to perform certain Web site duties on our behalf, such as hosting the web site, designing and/or operating the web site's features, tracking the web site activities and analytics. We may provide these vendors with access to user information or they may directly collect your information to carry out

the Web site duties they are performing for you or for us. Third-party analytics and other Web site providers may set and access their own tracking technologies on your device and they may otherwise collect or have access to information about you, potentially including personal information, about you. We are not responsible for those third party technologies or activities arising out of them.

To the fullest extent permitted by applicable law, we may also disclose your information if we believe in good faith that doing so is necessary or appropriate to: (i) protect or defend the rights, safety or property of VCHCP or third parties (including through the enforcement of this Privacy Statement, and other applicable agreements and policies); or (ii) comply with legal and regulatory obligations (e.g., pursuant to law enforcement inquiries, subpoenas or court orders). To the fullest extent permitted by applicable law, we have complete discretion in electing to make or not make such disclosures, and to contest or not contest requests for such disclosures, all without notice to you.

Making Changes to the Information You Provide to Us

Information that you voluntarily provided will be maintained as long as VCHCP deems appropriate to fulfill the purpose for which you provided the information or until you request us to remove it.

Cookies

When you visit the Web site, we may place a temporary "session" or a permanent cookie on your computer that will allow us to customize and enhance your experience at the Web site, make improvements to our Web site, or to report Web site activity. Our session cookies are not permanently stored on your computer and expire when you leave. Permanent cookies are issued only to Web site visitors who link the Web site from a search engine and are used only to permit VCHCP to attract qualified users to the Web site. Our cookies will never be used to track your activity on any third party web sites or to send spam, nor will they provide us with any personally identifiable information about you. We store cookie information only in aggregate form and use the aggregate information only to make improvements to the Web site or in internal reports on Web site activity.

Sites We Link To

If you choose to use any of the links we provide to our member companies, sponsors, and other third party resources, you will be leaving our Web site and going to a new web site. Protection of your privacy at those other sites is governed by the privacy Statement at that site.

What Should Parents Know About Children?

We understand the importance of protecting children's privacy in the interactive world. We do not use the Web site to knowingly collect personal information from children under the age of thirteen (13) without parental consent. If you are a child under 13 years of age, you are not permitted to use the Web site and should not send any information about yourself to us through the Web site.

In the event that we become aware that we have collected Personal Information from any child, we will dispose of that information in accordance with the Children's Online Privacy Protection Act and other applicable laws and regulations. If you are a parent or guardian and you believe that your child under the age of 13 has provided us with information without your consent, please contact us at www.vhealthcareplan.org and we will take reasonable steps to ensure that such information is deleted from our files.

Changes to this Statement

If we make any changes to this Privacy Statement, we will let you know the effective date of the change with a website notice of the change. You can contact our Webmaster if you would like to know more about what's new. If you have any questions or comments or receive any unwanted e-mail from this Web site, please contact us via e-mail at VCHCP.Memberservices@ventura.org.