

INTERNET PRIVACY POLICY ("PRIVACY POLICY")

We want you to know that the privacy of your information is important to us, so we have described below the types of information we collect through our websites and the ways we handle it. This Privacy Policy refers to the information collected and maintained from Bright Health Websites, including but not limited to mobile apps and web pages.

This Privacy Policy applies to all users of our websites, regardless of whether you are a member of a Bright Health plan. By using Bright Health's websites, you consent to our collection, use, disclosure and storage of information as described in this Privacy Policy.

Each time you access, use, and/or browse any of our websites, you signify your acceptance of this Privacy Policy, including the collection, use, and disclosure of information by Bright Health as described herein.

If you do not accept this Privacy Policy, you are not authorized to access, use, and/or browse our websites and you must immediately discontinue use.

Disclaimer

The health-related information and resources on our websites are made available to you for informational purposes only. We're here to help you get medical advice, not to give it, so none of the information you receive from us should be considered a substitute for professional medical care. Nothing on any of our websites is intended to be used for medical diagnosis or treatment. Be smart and always seek the advice of your health care provider before beginning any new treatment or if you have any questions regarding a medical condition. If you are ill or need immediate medical care, please contact your health care provider or, in an emergency, call 911 or go to the nearest emergency room.

Information We Collect

Bright Health collects personal and non-personal information through your online interactions with our websites.

Personal information is collected from information you provide to us voluntarily and may include data that is unique to you as an individual, such as your first and last name, address, telephone number, date of birth, user name, gender, credit or debit card number, or other payment method.

The non-personal information that Bright Health collects about you is aggregated or otherwise does not identify you personally, and may include, without limitation, your Internet Protocol ("IP") address, Collection Technology information (as described below), the pages you request, type of device you use, the operating system you use, the type and version of browser you use, your activities while visiting our websites and the content you access or view when using them, the time of your visit, the pages you visit and the time spent, your general geographic location such as the city from which your device is connecting to the Internet, information regarding the websites you visit prior to and after visiting our websites, and information regarding your age, gender, and interests.

How We Collect Information

Bright Health may collect personal information that you voluntarily provide to us through your online interactions, such as:

- · Signing up for an email newsletter through our websites;
- · Registering/signing up for classes, meetings, or other events;
- · Filling out an online form on one of our websites to request information;
- · Contacting Bright Health customer service or support, or providing feedback to Bright Health; and
- · Creating an online account.

Bright Health may collect non-personal information through your accessing, using, and browsing of our Websites, and other online interactions with Bright Health and our Websites, in a variety of ways, such as:

- server log files, which automatically record certain non-personal information on server logs;
- cookies, web beacons, pixels, gifs, tags, and other technologies that collect information in similar ways ("Collection Technology"), which may store a piece of data on your browser or device, or may identify, compile, aggregate and/or collect information through other means;
- other information that you voluntarily provide, if the portion of such information that personally identifies you or any other user is removed; and
- · Google Analytics, a web analytics service provided by Google, Inc., as described below.

When you visit our websites, your browser or device may be exposed to Collection Technology, which may be stored on your browser or device. You may delete and/or refuse the use of certain Collection Technology, by selecting the appropriate settings on your browser. You may use our websites even if you choose to refuse or delete such Collection Technology; however, please note this may affect your ability to use the full functionality of our website.

Our websites may use Google Analytics, which uses Collection Technology to collect and store anonymous information about you, which may include the non-personally identifiable information described above. You can read Google Analytics' privacy policy at http://www.google.com/analytics/learn/privacy.html and Google Analytics Terms of Use at http://www.google.com/analytics/tos.html.

Our websites may use the "Demographics and Interest Reporting" feature of Google Analytics to analyze information regarding the interests and demographics of users of our websites. You can opt-out of being tracked by Google Analytics in the future by downloading and installing Google Analytics Opt-out Browser Addon for your current web browser at http://tools.google.com/dlpage/gaoptout?hl=en.

How We Use Information

Bright Health may use your personal information for number of purpose, such as:

- to provide you with access to your online account;
- improve your Web experience;
- · complete your registration to participate in classes, meetings, or other events;
- administer surveys;
- send you newsletters or information or contact you via e-mail, postal mail, or telephone about your request for information, our services, offers, and news that may be of interest to you, and participation in classes, meetings, or other events;
- · respond to your communications;
- · communicate with you about our services;
- provide you with customer service and support; and
- attend to tasks relating to your transactions with Bright Health.

Bright Health may use your non-personal information in many ways, including, without limitation:

- · to administer and improve our websites;
- analyze website trends and how our websites are used;
- · improve navigation of our websites;
- analyze the performance of our websites and diagnose problems; and
- · improve the products and services we offer.

How We Share Information

We want to reassure you that, Bright Health will not share, sell, or rent any of your personal information that we collect, except with your consent, as permitted by law or as described in this Privacy Policy. We may share personal information with third parties whom we engage to perform services on our behalf, under confidentiality or similar agreements, such as administering and processing payments, printing and shipping ID cards, hosting our websites, communicating with you about offers or other information relevant to Bright Health, and/or to perform the other tasks that Bright Health may use personal information for as outlined in this Privacy Policy.

Bright Health may share personal information about you in response to or to cooperate with law enforcement, government requests, subpoenas, court orders, or legal process; to respond to your requests for customer service or other information; to enforce our websites' Terms of Use; to establish or exercise our legal rights or defend against legal claims; or to protect the safety or property of Bright Health or others. Bright Health also may share information about you if Bright Health believes it is necessary to share information to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or as otherwise required or permitted by law.

Bright Health may share non-personal information with third parties that Bright Health reasonably believes need such information or to perform the other tasks that Bright Health may use non-personal identifiable information for under this Privacy Policy, as well as under the circumstances described in the preceding paragraph.

How We Protect Information

We take our responsibility to protect your information very seriously. Bright Health stores information using industry standard, reasonable, and technically feasible physical, technical, and administrative safeguards against foreseeable risks, such as unauthorized access. Please be aware that our websites and data storage are run on software, hardware, and networks, any component of which may, from time to time, require maintenance or experience problems or breaches of security beyond Bright Health's control. Bright Health is not responsible for the acts and omissions of any third parties.

Bright Health cannot guarantee the security of the information on and sent from our websites. No transmission of data over the Internet is guaranteed to be completely secure. It may be possible for third parties not under the control of Bright Health to intercept or access transmissions or private communications unlawfully. While we strive to protect your personally identifiable information, Bright Health cannot ensure or warrant the security of any information you transmit to us over the Internet. Any such transmission is done at your own risk.

How We Retain Information

Bright Health will retain information long enough to achieve the specified objective for which the data was collected, and as required for state and federal accountability.

Unemancipated Minors

Bright Health may provide services to minors. Should an unemancipated minor wish to use a service or feature available through a Bright Health Website that requires registration (e.g., Bright Health's Member Portal), their parent or legal guardian must provide confirmation at the time of registration. Bright Health does not knowingly collect or use any information from unemancipated minors. If we learn that any unemancipated minors have provided information about themselves, then the information will be deleted.

Protected Health Information

Bright Health's Notice of Privacy Practices governs how Bright Health may use and disclose your Protected Health Information (PHI). Websites that contain PHI are password protected and require individuals to register and log-in. PHI is protected from unauthorized access by multiple layers of security controls and monitoring. To read more about our privacy practices regarding health and medical information under the Health Insurance and Portability and Accountability Act (HIPAA) please refer to your plan materials.

Direct Access to Other Sites

Bright Health offers direct links to other websites that are independent of Bright Health's Websites. Other websites may not follow the same privacy guidelines as Bright Health. We are not responsible for and have no control over the content, acts, or privacy policies of the websites to which Bright Health provides direct links. A link to a website does not constitute an endorsement of that website or the entity that controls the website.

Changes to This Internet Privacy Policy

This Privacy Policy may be revised from time to time as we add new features and services, as laws change, and as industry privacy and security best practices evolve. We will indicate the effective date of any revised policy at the top of this page for you to know when there has been a change. Changes apply to the information collected from the date we post the revision, as well as to information we already hold. Your continued use of websites following the posting of changes to these terms will mean you accept those changes. Please check this policy periodically to learn of any changes.