# **MGRM Medicare's Privacy Policy**

MGRM Medicare respects your right to privacy. This policy summarizes what personally identifiable information we may collect, and how we might use this information. This policy also describes other important topics relating to your privacy.

# **MGRM Medicare's Privacy Policy**

It is MGRM Medicare policy to comply with all applicable privacy and data protection laws. This commitment reflects the value we place on earning and keeping the trust of our employees, customers, business partners and others who share their personal information with us.

This Global Internet Privacy Policy (this "Policy") describes how MGRM Medicare protects your privacy when we collect personal information on MGRM Medicare Internet sites. As used in this Policy, the term "personal information" means information that identifies you personally, alone or in combination with other information available to us.

This policy applies, in general, to all Internet sites operated by or on behalf of MGRM Medicare and its representative offices worldwide and MGRM Group companies

## **Website Privacy Statement**

Although this Policy applies to all MGRM Medicare Internet website in general, each MGRM Group website has a different purpose and different features. If additional or different disclosures are required with respect to a specific section of the MGRM Medicare internet website, we will provide those disclosures on the site itself or in a separate web site privacy statement ("Website Privacy Statement") posted on that site. Each individual disclosure or Web Site Privacy Statement supplements and amends this Policy, but only with respect to the MGRM Medicare Internet Site on which it is posted.

## **Your Consent**

By using a MGRM Medicare Internet Site or providing personal information to us, you are consenting to the collection, use and disclosure of your personal information as described in this Policy and any applicable Country or Web Site Privacy Statements.

If you do not consent to the collection, use and disclosure of your personal information as described in this Policy (and any applicable Country or Web Site Privacy Statements), do not use MGRM Medicare Internet Sites or Contact MGRM Medicare/Contact Us forms.

# Limitations on the Collection, Use and Disclosure of Personal Information

To the extent required by applicable law, whenever MGRM Medicare collects personal information on a MGRM Medicare website, MGRM Medicare will:

- provide timely and appropriate notice to you about its data practices;
- collect, use, disclose and transfer your personal information only with your consent, which may be express or implied, depending on the sensitivity of the personal information, legal requirements, and other factors;
- collect your personal information only for specific, limited purposes. The information we collect will be relevant, adequate and not excessive for the purposes for which it is collected;
- process your personal information in a manner consistent with the purposes for which it was originally collected or to which you have subsequently consented;
- take commercially reasonable steps to ensure that your personal information is reliable for its intended use, accurate, complete, and, where necessary, kept up-to-date;
- not use your personal information for direct marketing purposes without giving you an opportunity to "opt-out"; and
- take appropriate measures, by contract or otherwise, to provide adequate protection for personal information that is disclosed to a third party or transferred to another country, including transfers within MGRM Medicare.

#### Information Collected on MGRM Medicare Internet Sites and how it may be used

When you access and use a MGRM Medicare Internet Site, there are 3 ways we may collect information about you:

## 1. Information Sent to Us by Your Web Browser

MGRM Medicare collects information that is sent to us automatically by your web browser. This information typically includes the IP address of your Internet service provider, the name of your operating system (such as Macintosh® or Windows®) and the name and version of your browser (such as Internet Explorer® or Netscape®). The information we receive depends on the settings on your web browser. Please check your browser if you want to learn what information your browser sends or how to change your settings.

The information provided by your browser does not identify you personally. We use this information to create statistics that help us improve our sites and make them more compatible with the technology used by our Internet visitors.

# 2. Information Collected By Placing a "Cookie" On Your Computer

MGRM Medicare may obtain information about you by installing a "tag" on your computer's hard drive. This tag is known as a "cookie."

All of our MGRM Medicare Internet Sites use "session cookies." A session cookie is used to tag your computer with a computer-generated, unique identifier when you access our site. A session cookie does not identify you personally and expires after you close your browser. We use session cookies to collect statistical information about the ways visitors use our sites - which pages they visit, which links they use, and how long they stay on each page. We analyze this information (known as "clickstream data") in statistical form to better understand our visitors' interests and needs to improve the content and functionality of our sites.

Some of our MGRM website sections may also use "persistent cookies." These cookies do not expire when you close your browser; they stay on your computer until you delete them. By assigning your computer a unique identifier, we are able to create a database of your previous choices and preferences, and in situations where these choices or preferences need to be collected again, they can be provided by us automatically, saving you time and effort. For example, after you make a purchase, if you decide to make another purchase, your shipping address will have been retained and will only need to be confirmed. If a MGRM Medicare Internet Site uses "persistent cookies" we will notify you in the Privacy Statement posted on that site.

If you do not wish to receive cookies, you may set your browser to reject cookies or to alert you when a cookie is placed on your computer. Although you are not required to accept cookies when you visit a MGRM Medicare Internet Site, you may be unable to use all of the functionality of the site if your browser rejects our cookies.

## 3. Information You Knowingly and Voluntarily Provide

MGRM Medicare collects the information you knowingly and voluntarily provide when you use a MGRM Medicare Internet Site, for example, the information you provide when you sign up to receive email alerts, when you complete a survey, or when you ask us a question or email us with feedback. In many cases this information will be personal information.

MGRM Medicare uses this information for the purposes for which you provide it. For example, if you provide your e-mail address when you sign up to receive e-mail alerts, we use your e-mail address to deliver the e-mail alerts you request.

We may also use the information we collect on MGRM Medicare Internet Sites for various business purposes such as customer service, fraud prevention, market research, improving our products and services, and providing you and your company with information and offers we believe may be of interest to you. We may also remove all the personally identifiable information and use the rest for historical, statistical or scientific purposes.

Many sections of the MGRM Medicare internet site permit you to make choices about the use of your personal information. In most cases, we ask you to indicate your choices at the time and on the page where you provide your personal information.

# **Sharing Personal Information**

MGRM Medicare will not sell personal information collected from its Internet sites to mailing list brokers without your express consent.

MGRM Medicare may share your personal information with other MGRM Group companies or business units. When we do so, these business units will use your information in a manner consistent with the purposes for which it was originally collected (or to which you subsequently consented) and only as permitted under this Policy, any applicable country or website privacy statements, and all applicable privacy and data protection laws.

MGRM Medicare may also share your personal information with third parties that we hire to perform support services for us. These third parties are required to use the personal information we share with them only to perform services on our behalf and to treat your personal information as strictly confidential.

In some cases, MGRM Medicare may share your personal information with third parties who partner with us to provide products and services to our customers. When we do so, we will require our business partners to use the personal information we share with them in a manner consistent with the purposes for which it was originally collected (or to which you subsequently consented) and only as permitted under this Policy, any applicable Country or Web Site Privacy Statements, and all applicable privacy and data protection laws.

In certain, limited circumstances we may share or transfer personal information to unrelated third parties. For example, we may provide personal information to a third party (i) at your request; (ii) to comply with a legal requirement or court order; (iii) to investigate a possible crime, such as identity theft; (iv) in connection with the sale, purchase, merger, reorganization, liquidation or dissolution of MGRM Medicare or a MGRM Medicare business unit; or (v) under similar circumstances. If such an event occurs, we will take appropriate steps to protect your personal information.

Our MGRM Medicare Internet Site enables you, as a visitor, to make choices about the disclosure and/or transfer of your personal information. In most cases, we ask you to indicate your choices at the time and on the page where you provide your personal information.

# **Security of Personal Information**

Your personal information will generally be stored in MGRM Medicare databases or databases maintained by our service providers. Most of these databases are stored on servers located in the United States. To the extent required by law, if your personal information will be transferred outside your country an appropriate notice will be provided.

MGRM Medicare maintains reasonable safeguards to protect the confidentiality, security and integrity of your personal information. For example, we use secure socket layer (SSL) technology to transfer personal information over the Internet. Although we use security measures to help protect your personal information against unauthorized disclosure, misuse or alteration, as is the case with all computer networks linked to the Internet, we cannot guarantee the security of information provided over the Internet and will not be responsible for breaches of security beyond our reasonable control.

## **Links to Third Party Internet Sites**

MGRM Medicare Internet website may contain links to Internet sites that are not operated by MGRM Medicare. These links are provided as a service and do not imply any endorsement of the activities or content of these sites, nor any association with their operators. MGRM Medicare does not control these Internet sites and is not responsible for their content, security, or privacy practices. We urge you to review the privacy policy posted on the concerned websites you visit before using the site or providing personal information to them.

#### **Access to Personal Information**

You may review, correct and update the personal information that you provide to us at a MGRM Medicare Internet Site by using the feedback mechanisms provided at a particular MGRM Medicare Internet Site, by clicking on this <u>feedback link</u> or by writing to us at MGRM Medicare Private Limited.

#### **Retention of Personal Information**

MGRM Medicare retains the personal information collected on MGRM Medicare Internet Sites as long as necessary to provide the services, products and information you request or as permitted by applicable law.

#### **Children and Parents**

MGRM Medicare Internet Sites are generally not intended for persons under 13 years of age. MGRM Medicare does not knowingly solicit or collect personal information from or about children on its Internet Sites except as permitted under applicable law. If your child has submitted personal information and you would like to request that such information be deleted from our records, you may do so by using the feedback mechanisms provided at a particular section of the MGRM Medicare website, by clicking on this feedback link or by writing to us at MGRM Medicare Private Limited

## Questions about this Policy or our Privacy Statements

If you have any questions about this Policy or a Country or Web Site Privacy Statement or our use of your personal information, please contact us by clicking on this <u>feedback link</u> or write to us at MGRM Medicare Private Limited.

## **Changes to this Policy and our Privacy Statements**

MGRM Medicare reserves the right to update or modify this Policy, at any time and without prior

notice, by posting the revised version of this Policy on our MGRM Medicare Internet Sites. We also reserve the right to update or modify our Country or Web Site Privacy Statements, at any time and without prior notice, by posting the revised Privacy Statement on the applicable MGRM Medicare Internet Site. If we modify this Policy or any Privacy Statement, the modifications will only apply to the personal information we collect after we have posted the revised Policy or Privacy Statement on the applicable MGRM Medicare Internet site.

This Policy was last revised on September 5, 2010