

Wellness Works Tracking System Participant Web Pages Privacy Policy

Introduction

This section of the Privacy Policy includes some key information that we think is important for you to understand before you use the OMC LLC Tools (collectively the "Site"); however, this is only an introduction. We urge you to read the entire Privacy Policy for additional information about our privacy practices as they relate to your use of the OMC LLC Tools.

By using the OMC LLC Tools, you signify your acceptance of this Privacy Policy. If you do not accept this Privacy Policy, do not use the OMC LLC Tools. Certain terms used in this Privacy Policy are defined at the end of this Privacy Policy.

Privacy

OMC LLC AND ITS LICENSORS are making this site available to you and your dependents. This site will be available to you as long as your employment status is active. If your employment status changes to terminated from company, this site will no longer be available to you and your dependents. If you choose to register by completing a personal assessment, the registration process and subsequent assessments will request certain personal information, including, but not limited to, individually identifiable health information ("Protected Health Information"). OMC LLC and ITS LICENSORS will gather the Protected Health Information you voluntarily provide in your profile, and in other interactive features within the site, and may use such Protected Health Information to communicate with you and to personalize your online experience with the site. Protected Health Information may include sensitive information relating to diseases, psychological or psychiatric treatment, behavioral or mental health services, or alcohol abuse. Any protected Health Information you provide as outlined herein will be kept confidential. OMC LLC AND ITS LICENSORS do not collect, and the site was neither designed nor appropriate for the collection of, Protected Health Information from any person we actually know is a child under the age of 13.

By your acceptance, you hereby authorized OMC LLC, AND ITS LICENSORS without identifying you individually, to disclose to the Company or to our business partners data or reports that have been aggregated from Protected Health Information provided by you and by other authorized Company users of the site.

Personalized Emails/Messages

OMC LLC, ITS LICENSORS, AND ITS SUPPLIERS, may send you personalized emails or electronic messages, including news, reminders, and opportunities, pertaining to health conditions related to the Personal Information, including Personal Health Information that you provide when using the OMC LLC Tools.

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Disclosure to OMC LLC Contractors-Suppliers

OMC LLC operations and maintenance contractors/suppliers sometimes have limited access to Personal Information of users in the course of providing products or services to OMC LLC. These contractors include vendors and suppliers that provide OMC LLC with technology, services, and/or content related to better operation and maintenance of the OMC LLC Tools. Access to your Personal Information by these contractors is limited to the information reasonably necessary for the contractor to perform its limited function for OMC LLC. OMC LLC also requires that its operations and maintenance contractors not use or disclose your Personal Information for any purpose other than providing us with products and services or as required by law.

OMC LLC Tools

Each time you voluntarily provide your Personal Information in connection with your use of one of the OMC LLC Tools, OMC LLC uses that information to provide you with personalized and wellness relevant information via your personalized Home Page and throughout the OMC LLC Tools. Only you, as the assigned user of your personalized Home Page have access to your personal information. In some cases a Health Coach who is assigned to your company may have access to your information and you grant the Health Coach access to the health information and in some cases the Health Coach may contact you via internal messaging, phone, or email.

Obtaining a Copy of Your Personal Information

You can print a copy of your Personal Health Information (Your Wellness Summary, Physician Letter, or Health Risk Assessment) displayed under the My Wellness Profile screen by choosing the print option in the PDF viewer. You can also print your Food Diary entries by utilizing the print button on the screen of that page.

Changing Information

The OMC LLC Tools allow you to correct, update or review some information you previously submitted for use with the OMC LLC Tool. To do this, simply access your personalized Home Page and easy-to-use functions will show you how to correct, update, or review your information.

Limitations on Removing or Changing Personal Information

Your ability to correct, update, or remove previously provided Personal Information or Personal Health Information covers only information within the reasonable control of OMC LLC Tool. We place certain restrictions on your ability to correct, update, or remove professionally-sourced Personal Health Information that you have authorized to be entered into your OMC LLC Health Manager record.

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How OMC LLC Protects Your Personal Information

In order to protect the security of Personal Information, OMC LLC employs the following security procedures:

- The OMC LLC Tools require passwords to authenticate users before granting access to Personal Information;
- OMC LLC limits access to Personal Information to you, ITS LICENSORS, and any third-party vendor that provides services on behalf of the Program;
- OMC LLC uses firewalls to protect information held in our servers;
- OMC LLC maintains audit trails to track who has accessed your records; and
- OMC LLC protects the physical security of OMC LLC servers. OMC LLC servers back up information to ensure information is not lost. The site maintains physical security through pass code locked door access and passes code authority.

Despite precautions, there is always some risk that an unauthorized third party may find a way to thwart security systems or that Personal Information transmitted over the Internet will be intercepted.

In certain limited circumstances OMC LLC AND ITS LICENSORS may release your Personal Information, including Personal Health Information, to third parties in response to (i) a court order, search warrant, subpoena or other legal action that we reasonably deem to be valid; (ii) in special cases, such as in response to a physical threat to you or others, to protect property or defend or assert legal rights; or (iii) in connection with a corporate transaction or proceeding resulting in a transfer of the assets or line of business relating to such data. In the event that OMC LLC AND ITS LICENSORS are legally compelled to disclose such Personal Information to a third party, OMC LLC AND ITS LICENSORS will attempt to notify you unless doing so would violate the law or court order.

Changes to the OMC LLC Privacy Policy

OMC LLC reserves the right to change, modify, add, or remove portions of this Privacy Policy, or any of its supplemental policies, at any time. You are responsible for checking this policy from time to time for updates.

Non-Material Changes — OMC LLC may make non-material changes to the Privacy Policy that do not expand the permissible uses or disclosures of Personal Information or Personal Health Information. We may not notify you of such non-material changes.

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The OMC LLC Tools Are Intended for Adults

All OMC LLC Tools are intended for adult use only. A parent or guardian, however, may use the OMC LLC Tools to view only certain areas of the tool. The parent or guardian is solely responsible for providing supervision of the minor's use of the OMC LLC Tools. The parent or guardian also assumes full responsibility for the interpretation and use of any information or suggestions provided through OMC LLC for the minor.

Glossary

Aggregate Information or Data: As a web site gathers individual pieces of non-Personal Information from its users, it may combine similar data from many or all the users of the web site into one big "batch." For example, the site may add up the total number of people in Peoria, Illinois (but not their names) who are seeking information about weight loss and compare that to the number of people in Petaluma, California seeking the same information.

This sort of statistical information is called aggregate data because it reflects the habits and characteristics of a large group of anonymous people. Web sites may use aggregate data or share it with their business partners so that the information and services they provide best meet the needs of the users.

Non-Personal Information: Information that is not traceable back to any individual and cannot be used to identify an individual

Cookie: Small amounts of information passed between a web site and the web browser on the user's computer that allow a user's browser to "remember" that specific information later during visits to that web site, and that the web server can later retrieve.

Personal Information: Information that can be traced back to an individual (contrast with Non-Personal Information and Aggregate Information). Examples of Personal Information include your name, home address, telephone number, email address, and Social Security number.

Personal Health Information: A special category of Personal Information that contains information about your health or medical information.

Third Party: Any entity other than OMC LLC.

Licensors: Medical Firms licensing OMC LLC Tool to use in managing wellness program

Third Party Contractor or Supplier: A Third Party that serves content and/or services on this Portal that is served on web sites hosted by a company other than OMC LLC.

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Company: Contracts with OMC LLC or ITS LICENSORS to manage wellness programs. No Personal Health Information is shared with Company. Company may provide demographic downloads.

OMC LLC Tool: Any Internet based tool that collects Personal Information from employees or (their dependents) of an entity to which OMC LLC or ITS LICENSORS may provides services.

Most frequently asked questions:

What kind of information is collected on this site?

In order to develop a personalized program for your unique needs, this Website will ask you to provide information about your lifestyle and your health. You will also be asked for some personal demographic information—such as your name and e-mail address—so that we can create a secure site that only you can log into. We will ask you to answer 3 security questions of your choice that only you will know the answer to. These will be used to further enhance the security of your information. We would use these if there was an unsuccessful log-in attempt or if you forget your user name and password, or if you access your account from a different computer. The answers would be used to verify your identity and that you are in fact the person trying to log in. Your information will be kept confidential and will not be sold or given to anyone. It will be used only for purposes associated with - the wellness program offered by your employer. It will be managed in accordance with all applicable regulations related to the collection, storage and use of information of this sort.

How do I know this Website is safe?

This Website uses secure socket layer (SSL) encryption to protect the transmission of information. This means that when you submit information to this Website, you will be using secure online forms. All the information submitted through these forms is stored securely offline where others cannot access it. In addition, the first time you register, a cookie will be stored on your computer. If you attempt to access your information from a different computer, you will have to answer your security question to obtain access to your data.

Who will see my information?

When you create your Member Profile, you will be asked to choose a private User ID and password. Your User ID and password will allow you to log into this Website and see your personal information. If you are working with a health coach they will have access to the information in your PWP or Online HRA. This will enable them to work with you as needed to help you reach the goals you may be working on. As long as you don't share your User ID and password with anyone, the only other person who will see your information is *you*. Your employer will not have access to any personally identifiable information from your profile, though they will have access to aggregate reports. Also, technical personnel and vendors will have access to any data located on out servers which is necessary to insure proper maintenance and operation of the site. When you are done viewing your

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information, you should log out so others cannot see it. A Log Out button is located at the top of every page. If you are logged into this site and have not done anything on the site for 10 minutes, you will be automatically logged out to protect your privacy.