



Effective as of April 4, 2022

## WEBSITE PRIVACY POLICY

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**Collection and Use of Information.** UFCW Employers Benefit Plans of Northern California Group Administration, LLC dba UFCW & Employers Trust, LLC dba TotalTrust, LLC (the "Trust Fund Office", "us" or "we"), is concerned with your privacy when you visit this website, just as we are concerned with your privacy in all of your dealings with the Trust Fund Office and the various pension and health and welfare trust funds administered by us ("Trust Funds" or "Plans"). While visiting this website or otherwise dealing with us, you will provide us or our service providers with personal information. We consider any information which relates to your participation in the Trust Funds as "personal information". Information which does not identify you, or cannot be reasonably related to you or a beneficiary, is not "personal information" and is not covered by this website privacy policy.

As part of your communication with us (or our authorized vendors) by text, e-mail and/or through this website (or the websites of such authorized vendors), or your registration and maintenance of an on-line account with us ("Account"), we will need information from you, such as your name and physical street and/or mailing address, e-mail address, e-mail address, phone number, social security number, date of birth, Trust Fund identification number, enrollment information, claims information, payment information or other personal information, in order to answer your questions and communicate with you, to process a payment made by you, to provide you with Account access, and/or to provide you with information, services and/or materials requested by or available to you, including, without limitation, enrollment and benefits related services, offers and opportunities. Further, if you elect to make an online payment when visiting this website, you will be redirected to our third party payment vendor to process such payment and such vendor will collect the credit card, debit card or other payment information provided by you to process such payment.

To enhance your experience with this website, we may use "cookies", "web beacons", "clear .gifs" or similar technologies.

Cookies are text files we place in the browser of your mobile phone, tablet computer or other wireless device or computer (your "Device") to store your preferences. Generally, cookies, by themselves, do not tell us your personal information, but they do contain information that can be related, or linked, to specific information about your interaction with this website. Additionally, when you furnish us with personal information, this information may be linked to the data stored in the cookie or similar technologies.

"Web beacons" or "clear .gifs" are small pieces of code placed on a webpage or in content to monitor the behavior and collect data about the visitors viewing a webpage or certain content. For example, we may use web beacons to count the users who view a certain webpage or view certain content or to deliver a cookie or similar code to the browser or Device of a visitor viewing that page or content.

We may also use cookies, web beacons, clear .gifs, third party analytics tools (such as Google Analytics), or similar technologies to understand usage of this website and to improve its contents and offerings. For example, we may use these technologies to personalize your experience on this website (e.g., to recognize you by name when you visit this website, and to enable your access to certain features of this website). We also may use cookies or similar technologies to provide you with certain information, offers and materials (including by collecting information about the searches you conduct via or on this website).

Third party analytics tools may collect your IP address or other Device identifier information, information about how often you visit this website and what pages you visit when you do so, and other information sent by your browser as part of interactions with this website. We may use the information we get from these analytic tools in connection with operating this website, developing and launching new benefits, resources and materials, and improving your user experience. The third parties which provide these analytics tools also receive the information

collected by such tools, and the use of the information by such third parties is governed by their own terms of use and privacy policies.

We may also directly collect, via the technology used to operate our websites, IP addresses, Device identifier information, browser, software or operating system information and data, click-stream data or other session data for purposes of system administration, security, fraud prevention, improving this website, or other internal uses related to this website. An IP address is a number that is automatically assigned to your computer whenever you access the Internet. We may identify your computer by its IP address, and we may identify your Device by its identifier. When you request pages or content from this website, we may log your IP address and/or Device identifier.

In the course of ensuring network security and consistent service for all users, we may also employ software programs to do such things as monitor network traffic, identify unauthorized access or access to nonpublic information, detect computer viruses and other software that might damage our computers, this website or our network, and monitor and tune the performance of this website or our network. In the course of such monitoring, these programs may detect such information as e-mail headers, addresses from network packets, and other information. Information from these activities is used only for the purpose of maintaining the security and performance of our network and computer system.

You can visit us at this website and choose not to share any information about yourself or reveal any information about who you are. However, the numbers of visitors to this website, Device identifiers and other similar information may be collected automatically.

**Disclosure of Information.** Except as set forth in this privacy policy (or, with respect to a health Plan, in the health Plan's HIPAA Notice of Privacy Practices), or as otherwise authorized by you, we will not disclose your personal information collected by us as outlined above to a third party unless it is necessary: (i) for the administration and business operations of the

Trust Fund Office and/or the Trust Funds (including the Trust Funds' payment activities and healthcare operations, and the processing of employer contributions); (ii) the operation, maintenance or security of this website or your Account; (iii) to respond to your inquiries; (iv) to provide you (or your dependents) with your applicable benefits or other services or materials requested by you, or information related to other opportunities that may be useful to you (including opportunities offered by the business partners, business associates and vendors of the Trust Funds and/or the Trust Fund Office); or (v) to inform you of such benefits, services and opportunities. Specifically, your personal information may be disclosed for the purpose of utilization review, quality assurance, surveys, processing of claims, financial audits, or to perform other Trust Fund administrative functions. Further, the personal information of your dependents may also be disclosed for the purposes set forth above, including to provide them with their applicable benefits and other related services and opportunities. Notwithstanding the foregoing, we may disclose your contact and demographic information to the union locals and contributing employers for their internal administrative purposes to the extent permitted by applicable law.

We may also access and disclose your personal information, any communications sent or received by you, and any other information that we may have about you: (a) as may be permitted or required by law, regulation, rule or court order; (b) pursuant to requests from governmental, regulatory or administrative agencies or law enforcement authorities; (c) to prevent, investigate or take any other lawful action regarding suspected fraud, violations of this website's Terms of Use, potential threats to the physical safety of any person, or other activity that we believe to be illegal or may expose us and/or the Trust Funds to legal liability; (d) to our lawyers, accountants, tax consultants and employees for the purpose of conducting our business and providing you with information; or (e) in the event of a merger of one or more of the Trust Funds with another benefit plan or the termination of a Trust Fund and transition of a Trust Fund's participants to a successor plan.

Because the Trust Fund Office, the Trust Funds and a number of the service providers we use are located in the United States, your personal information will be processed and stored inside the United States, and the United States government, courts, or law enforcement or regulatory agencies may be able to obtain disclosure of your personal information under United States laws.

The Trust Fund Office does not sell your personal information.

**Review of Account Information.** We offer you the ability to review and change/update your Account registration, verification and contact information by logging into your Account and entering in the new information yourself or by contacting us at 1-800-552-2400 or through the Contact Us form on this website. You must promptly update such information if it changes or is inaccurate.

**Health Information.** The use of your "protected health information" (as such term is defined by the Health Insurance Portability and Accountability Act of 1996 and the regulations issued thereunder ("HIPAA")) by the Trust Fund Office, the Trust Funds and the Trust Funds' providers is subject to the applicable Trust Fund's [HIPAA Notice of Privacy Practices](#).

**Security Safeguards.** The Trust Fund Office has implemented reasonable safeguards appropriate to the sensitivity of the personal information we maintain. Safeguards will vary depending on the sensitivity, format, location, amount, distribution and storage of the personal information. They include physical, technical and managerial measures to keep personal information protected from unauthorized access. Note that due to the nature of the internet and related technology, we cannot absolutely guarantee the security of personal information disclosed over the internet, and the Trust Fund Office expressly disclaims any such obligation.

**Modifications to Privacy Policy.** We reserve the right to change this website's privacy policy from time to time. If we make any substantial changes in the way we use your personal information, we will notify you by posting a prominent announcement on this website. This privacy policy is not intended to and does not confer upon you any contractual or other legal rights in respect to the Trust Fund Office, the Trust Funds or any other party.

**Children's Privacy.** We recognize the importance of protecting the privacy of children, and this website is not intended for use by children. For this reason, we do not knowingly collect personally-identifiable information directly from children under the age of 13.

**Third Party Websites.** Third party websites linked to on this website operate under different privacy practices and policies which are not under our control. We are not responsible for the privacy practices of such websites or their operators. If you decide to access any such third party websites, the Trust Fund Office encourages you to review the privacy policies and terms of use of such third-party websites.

**Do Not Track.** Some web browsers incorporate a "Do Not Track" feature (DNT) that signals to the websites that you visit that you do not want to have your online activity tracked. Many websites and applications, including this Website, do not currently respond to web browser DNT signals because such signals are not yet uniform. However, we also do not track your online activities over time and across third-party websites or online services or allow third parties to do so.

#### NOTICE TO CALIFORNIA RESIDENTS – YOUR CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83 requires any operator of a website to permit its California-resident customers to request and obtain from the operator a list of what personal information the operator disclosed to third parties for direct marketing purposes, for the preceding calendar year; and the addresses and names of such third parties. The Trust Fund

Office does not share any personal information collected from this site with third parties for their direct marketing purposes.

**Questions.** If you have any questions related to how your personal information is handled, or this privacy policy, please contact the Trust Fund Office at 1-800-552-2400.