

# EMG Personal Wellness Coverage Privacy Disclosures

**Effective Date: February 1, 2022**

At EMG, we are committed to safeguarding your privacy. We want you to know how we may collect, use, share, and keep Information about you and the available choices.

## **Notice:**

**EMG will maintain fully compliant business practices with any national/federal, provincial/state, and local privacy and data management laws, regulations, and established policies concerning all aspects of its interactions and communication with other businesses and all individuals, clients, employees, and other persons in which we come in contact with, either by electronic means or person-to-person contact. This privacy/data policy is applied consistently throughout this Privacy Disclosure Statement.**

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Depending upon your personal situation, when we provide EMG products or services to you, we may also give you specific additional details about how we will use your Personal Information. If you have an EMG product or service not provided by EMG (such as a card issued by one of our partner banks), please review the relevant privacy notice that covers such product or service or contact your product or service provider for Information about their privacy practices.

This online privacy statement applies to EMG websites, online applications ("apps") that run on smartphones, tablets, and other devices that link to this statement. It does not apply to websites with their own online privacy statements, including the EMG Network website, emedglobal.com.

Our websites and apps are not intended for children under the age of 13. We do not knowingly solicit data online from or market online to children under 13 years of age.

Since we may change this online privacy statement, we recommend that you check the current version available from time to time. If we change this statement, we will update the "Effective Date" at the top of this page.

## **What Information does this Online Privacy Statement cover?**

This online privacy statement describes how we (and our Service Providers) may collect, use, share and keep information that we get about you online. We gather Online Information if you:

- Visit or use our website or apps;
- Receive or reply to electronic communications from us;
- View or click on our ads or other online content; and
- Interact with us through social media websites and other websites and applications.

Some Online Information is Personal Information.

This statement also explains how we may combine Online Information with Other Information and how we then use the combined information.

What Information do we collect online, and how do we collect it?

The types of information we collect depend on which product or service you use.

Sometimes you give information directly to us (or to our Service Providers). For example, you might give us your name, account number, email, mailing address, biometric data, phone number, or date of birth when you:

- fill out an online form or survey, including when you book travel with us;
- register, log into or update the settings on your account using our online services;
- enter a competition or register for a marketing offer; or
- sign up for our products and services.

We (and our Service Providers or Third-Party Ad-Servers) also collect information through Cookies and Similar Technologies. Most Cookies and Similar Technologies will only collect De-Identified Information such as how you arrive at our website or your general location. However, certain Cookies and Similar Technologies do collect Personal Information. For example, if you click Remember Me when you log in to our website, a cookie will store your username.

We (and our Service Providers or Third-Party Ad-Servers) may collect information using Cookies and Similar Technologies about:

- the device you use to browse our websites or to access our apps (for example, we may collect information about the operating system or the browser version and the type of device you use to open electronic communications from us);

- the IP address and information related to that IP address (such as domain information, your internet provider, and general geographic location);
- browsing history on our website or in our apps (such as what you search for, the pages you view, how long you stay, and how often you come back);
- how you search for our website, from which websites you link to our website, and which of our Business Partners' websites you visit;
- which ads or online content from us and our Business Partners you view, access, or click on;
- your browsing and app use activities over time, and across other websites and apps, following your visit to one of our websites or apps (Service Providers or Third-Party Ad-Servers perform such activities on our behalf);
- the likely associations among different browsers and devices;
- whether you open our electronic communications and which parts you click on;
- and the location of your mobile device (for example, when you use mobile websites or apps to register to receive location-based content).

We (and our Service Providers or Third-Party Ad-Servers) may also collect information made available through third-party platforms and apps (such as online social media platforms), through online databases or directories, or that is otherwise legitimately obtained. This information may be governed by the third party's privacy notice(s) at the time of collection.

### **How do we use the Information we collect about you?**

We may use Online Information we collect about you on its own or combine it with Other Information to:

- deliver products and services, including to:
- recognize you when you return to our websites or use our apps across multiple devices;
- complete transactions;
- tell you about updates to your accounts, products, and services;
- update you about new features and benefits;
- answer questions and respond to your requests made through our websites and third-party websites (including social media);

- use the location of your mobile device for location-based services that you may request;
- determine how to best provide services to you and manage your accounts, such as the best way and time to contact you;
- improve our websites or apps and make them easier to use;
- advertise and market our products and services – and those of our Business Partners – including to:
- present content or ads online that are tailored to your interests, including Targeted Advertising, across multiple devices; send or provide you with ads, promotions, and offers;
- analyze whether our ads, promotions, and offers are effective;
- help us determine whether you may be interested in new products or services;
- provide location-based content and advertising personalization;
- conduct research and analysis, including to:
- better understand our customers and our website visitors or app users;
- allow you to give feedback by rating and reviewing our products and services and those of our Business Partners;
- produce data analytics, statistical research, and reports;
- review and change our products and services; manage fraud and security risk, including to:
- detect and prevent fraud or criminal activity;
- safeguard the security of your Information;
- assess credit risks relating to our business, including to:
- evaluate and process your applications for our products and services and manage your existing accounts; and
- use it in other ways as required or permitted by law or with your consent.

EMG has relationships with several third-party advertising networks and social media partners (also known as Advertising Partners) that allow us to serve you with targeted advertising relevant to you when you are on a third-party website. We only work with Advertising Partners who adhere to industry standards and provide you with the ability to opt-out of such targeted advertising. We encourage you to learn more about targeted advertising and your choices by referring to the privacy statement and ad preferences of our Advertising Partners.

### **How do we share your Information?**

### **How do we treat your Personal Information?**

We may share Personal Information as required or as permitted by law, with:

- credit bureaus and similar institutions to report or ask about your financial circumstances, and to report or collect debts you owe;
- regulatory authorities, courts, and governmental agencies to comply with legal orders, legal or regulatory requirements, and government requests;
- our Service Providers, regulatory authorities, and governmental agencies to detect and prevent fraud or criminal activity and to protect the rights of EMG or others;
- the EMG Family of Companies;
- our Service Providers who perform services for us and help us operate our business (we require Service Providers to safeguard Personal Information and only use your Personal Information for the purposes we specify);
- financial institutions or Co-brand Partners with whom we jointly offer or develop products and services, in connection with those joint offerings; or
- necessary parties in the context of a sale of all or part of the EMG Family of Companies or their assets.

We only share Personal Information with third parties for their use with your consent or, if applicable, as otherwise described in the Business Card Privacy Notice.

We may transfer Personal Information to Service Providers or companies within the EMG Family of Companies throughout the world, for example, to process transactions and provide you with our products or services. Regardless of where we process your information, we still protect it in the manner described in this online privacy statement and according to the applicable laws.

## **How do we handle Aggregated and De-identified Information?**

Aggregated Information or De-identified Information does not identify you individually; it helps analyze patterns among groups of people. We may share Aggregated Information or De-identified Information in several ways, for example;

- for the same reasons as we might share Personal Information
- with Business Partners to help develop and market products or services and present targeted content and Targeted Advertising;
- with Business Partners to conduct analysis and research about customers and website visitors; or
- with Third-Party Ad-Servers to place ads (including our Business Partners) on various websites and apps and analyze the effectiveness of those ads.

## **How do we keep and safeguard your Information?**

We use administrative technical and physical security measures to protect your Personal Information. These measures include computer safeguards and secured files and facilities. We take reasonable steps to securely destroy or permanently de-identify Personal Information when we no longer need it. We will keep your Online Information only as long as we must to deliver our products and services unless we are required by law or regulation or for litigation and regulatory investigations to keep it.

## **What are your choices?**

You have choices about how EMG uses your Information, such as how we market to you or manage Cookies and Similar Technologies.

We participate in the Digital Advertising Alliance (DAA) self-regulatory program and adhere to the DAA principles for Online Behavioural Advertising. [Click here](#) to learn more about the DAA and your choices related to Targeted Advertising. If you do not want to receive Targeted Advertising from EMG on websites, [Click here](#). If you do not want to receive Targeted Advertising from EMG in apps, you can turn off mobile device ad tracking or reset the advertising identifier in your device setting, where these tools are available from your device platform, on each of the devices that you use. If you do not want to receive Targeted Advertising using precise location data, you can turn off location-based services in your device settings.

## **What are your choices about how we directly market to you?**

You can choose how you would like to receive direct marketing communications - whether we send them to you through postal mail, email, and telephone. If you choose not to receive marketing communications from us, we will honor your choice. Please be aware that if you choose not to receive such communications, certain offers attached to your chosen product or services may be affected. We will still communicate with you in connection with servicing your account, fulfilling your requests, or administering any promotion or any program in which you have elected to participate.

## Glossary

**Advertising Partners** - social media and online partners such as Facebook and Google that act as Third-Party Ad-Servers, providing the technology to place ads on websites and apps and track how ads perform.

**Aggregated Information** - data or Information relating to multiple people who have been combined or aggregated. Aggregated Information includes Information that we create or compile from various sources, including card transactions or specific data from Cookies and Similar Technologies.

**EMG (we, our, us)** - the EMG Company identified at the beginning of this online privacy statement.

**EMG Family of Companies** - any affiliate and subsidiary of and any company-owned or controlled by the EMG Company.

**Business Partners**- any third parties with whom we conduct business and have a contractual relationship, such as a business that accepts EMG branded cards.

**Co-brand Partners** - businesses we partner with to offer cards featuring both brand logos.

**Cookies and Similar Technologies** - a cookie is a small data file that a website transfers to your computer's hard drive. We may place cookies when you visit our website or websites where our ads appear or when you make purchases, request or personalize information, or register for certain services. If you accept the cookies used on our website, websites that are "powered by" another company on our behalf, or websites where our ads appear, you may give us access to information about your interests. We may use that information to personalize your experience. Similar technologies such as web beacons, pixels, gifs, tags, and device ID technology also do the same thing. We use the term Cookies and Similar Technologies in this statement to refer to all technologies that collect information in this way.

**De-identified Information** - data or Information used in a way that does not identify you to a third party. We often derive De-identified Information from Personal Information. It includes information that we may collect from various sources, such as card transactions or specific data from Cookies and Similar Technologies.

**IP Address** - a number assigned to a device when connecting to the Internet.

**Online Information**- data or Information collected on the EMG websites and apps and websites and apps of third parties relating to topics about our business.

**Other Information**- EMG internal information (for example, Card transaction data), external data that financial companies use to process applications and complete transactions, and other online and offline Information we collect from or about you.

**Personal Information-** Information that can identify a person, such as a name, address, telephone number, and email address.

**Service Providers-** any vendor, third party, and a company that performs business operations on our behalf, such as printing, mailing, and other communications services (email, direct mail, etc.), marketing, data processing, servicing, collections, or ad management.

**Targeted Advertising-** Ads that we, or our Service Providers, or Third-Party Ad-Servers display on websites or in apps outside the EMG Family of Companies based on the preferences or interests inferred from data collected from a computer or device regarding viewing behaviors or app use over time and across different websites or apps. Targeted Advertising may occur across browsers or mobile devices that have been associated together.

**Third-Party Ad-Servers-** companies that provide the technology to place ads on websites (and apps) and track how ads perform. These companies may also place and access cookies on your device. The Information they collect from our websites is in a form that does not identify you personally.

**END.**