

Your Spending Account™

This mobile privacy statement is provided on behalf of Alight Solutions, LLC, hereinafter “Alight”. This privacy policy governs your use of the software application Reimburse Me®, (hereinafter the “Application”) on your mobile device. The Application allows you to upload claims documentation and review account balances and recent activity in connection with your account. This Reimburse Me® Mobile Privacy Statement hereinafter “Privacy Statement” should be read together with, and is subject to the terms of, the [Reimburse Me® – End User License Agreement](#).

Generally, “personal information” is information that can be used to identify you. We strive to protect the personal information under our control and to maintain the security and integrity of that information. This Privacy Statement explains how we collect, use, and share the information we obtain about you in the course of providing services to you.

User Provided Information

In addition to the information described in the section below, “How Alight Receives Personal Information,” the Application obtains the information you provide when you download and register the Application. Registration with us is mandatory in order to use the basic features of the Application.

When you register with us and use this Application, you may provide (a) your user ID and password and any other information needed for registration; (b) transaction-related information, such as when you make claims, or download or use applications from us; (c) information you provide us when you contact us for help; (d) payment card information you provide to pay claims; (e) information you enter into our system when using the Application, such as your contact information.

Automatically Collected Information

In addition, in order to fulfill service requests or conduct usage analysis, the Application may collect certain information automatically, such as the characteristics or usage of your device. This could include the type of mobile device you use, the device name, model, product name, screen height, hardware number, the IP address of your mobile device, your mobile operating system, the type of mobile browsers you use, whether a keyboard is present, and information about the way you use the Application. This Application does not collect precise information about the location of your mobile device at this time. We may use tracking tools within our Application to track how visitors use our Application so we can improve our Application and your experience.

We use “Google Analytics” to collect information about use of the Application. Google Analytics collects information such as how often users visit the Application and what pages they visit when they do so. We use the information we get from Google Analytics only to improve the Application. Google Analytics collects only the information assigned to you on the date you visit the Application, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Although Google Analytics sends a permanent cookie or anonymous identifier to your device to identify you as a unique user the next time you visit the Application, the cookie or anonymous identifier cannot be used by anyone but Google. Google’s ability to use and share information collected by Google Analytics about your visits to the Application is restricted by the [Google Analytics Terms of Use](#) and the [Google Privacy Policy](#).

How Alight Receives Personal Information In Connection With Your Spending Account

In addition to the information collected by the mobile Application, Alight collects other personal information needed to process your requests. Most of the personal information we receive relates to your participation in the compensation and benefits programs offered by your employer.

There are several methods by which we could receive personal information:



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- You might provide the information directly as a benefit plan participant by methods such as visiting our Web sites, telephoning our call center, or sending mail to our offices.
- Your employer might provide the information to us.
- Another service provider engaged by your employer (such as payroll processors, health plans, or mutual funds) that has a part in administering your employer's plans or programs might provide the information to us.

The types of personal information we receive may include, but is not limited to:

- **Contact information**, such as your name, address, phone number, and email address
- **Other personal information**, such as a Social Security number or other government-assigned identifier, date of birth, gender, and marital status
- **Employment information**, such as date of hire, employment status, pay history, tax-withholding information, performance records, and date of termination
- **Benefit program participation and coverage information**, such as benefit elections, beneficiary information, claims information, benefit plan account numbers and balances, and date of retirement

Alight's Commitment to Protecting Personal Information

We understand the responsibility that comes with being trusted with your personal information. We have implemented various security measures to protect the confidentiality of all the personal information we process, in both electronic and paper formats. We have policies, procedures, and controls to reduce the risk of unauthorized or accidental use, disclosure, or destruction of your personal information, and we train our employees on data security. Only employees who have a job-related need to access your personal information are authorized to do so. In addition to these employees, Alight limits access of your personal information by your employer, authorized service providers, or others as required by law. We also require that our service providers enter into confidentiality agreements intended to protect your personal information.

Our commitment to protecting personally identifiable information also means that:

- We will not sell your personal information to any third party.
- We will not use, transfer, or disclose your personal information to anyone outside of Alight, unless authorized by you or your employer, except in connection with your employer's plans and programs, as required by law or legal process, in response to law enforcement requests, and as necessary to protect the property, interests, and rights of Alight and/or your employer.
- If we process your "protected health information" as a business associate to your employer's health plan, we will also comply with the requirements of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) Privacy and Security Rules.

Access and Corrections

Alight is committed to respecting your rights to access your personal information. In many cases, you can access and update your personal information via our self-service Web sites, or by telephoning your benefits center.

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Alight is also committed to maintaining the accuracy of your personal information. In most cases, we rely on you and your employer to keep your personal information updated. If you need to update or correct your personal information, contact privacy.info@aonhewitt.com. Please understand that, in some circumstances, only your employer, and not Alight, may have the authority to update or correct your personal information. If this information is the type that only your employer can update or correct, we will forward your request to your employer.

International Transfers

This Application is not intended for use outside of the United States. If you are located outside the United States, your personal information may be maintained by the U.S. or in other countries. Even if these countries do not have privacy or data protection laws, we always assure adequate protection for your personal information in compliance with applicable laws.

Notification of Updates

Please be aware that we may periodically update or revise this Privacy Statement and we reserve the right to change our privacy practices, procedures and terms.

If the changes are not material or do not affect previously-provided information, we will simply post the revised Privacy Statement on our mobile Application. If the changes are material in the way we treat your personal information, we will provide notice before we make such a change. We encourage you to periodically review our Privacy Statement so that you will always know how we protect your personal information.

Contact Information

If you have any questions or concerns about Alight's use of your personal information or about this Reimburse Me® Mobile Privacy Statement, please send an email to privacy.info@aonhewitt.com.

Children

This Application is not intended for children. We do not market any products or services to children under the age of 13. If we become aware that information is or has been submitted by or collected from a child under the age of 13, we will delete this information from our files within the time required by law.

We May Disclose User Provided and Automatically Collected Information

- As required by law, such as to comply with a subpoena or similar legal process
- When we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request
- To our trusted service providers who work on our behalf, and who have agreed to adhere to confidentiality requirements
- To analytics companies to help us understand how the Application is being used, such as the frequency and duration of usage.

You may opt out of information collection by uninstalling the Application or by discontinuing use of the Application.

Security

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To help ensure the security of your personal information that you submit through the Application directly to Alight, we use secure socket layer (SSL) protocol, secure servers, and security safeguards. At Alight, we convey to our associates about the need to protect your information and have established physical, electronic and procedural safeguards to protect your information.

To help maintain the security of your information while accessing Reimburse Me®:

- Keep your user ID, personal identification number (PIN), or password for the Application confidential.
- Enable the password functionality on your mobile device.
- Make sure others are not watching you as you enter the information on your mobile device.
- Do not leave your mobile device unattended while logged into the Application. After you have completed your transaction, exit the Application or log out of the content.
- Do not save uploaded material, including photos or other content on your device in the event your device is lost or misplaced.

Please be aware that, although we endeavor to provide reasonable security for the information we process and maintain, no security system can prevent all potential security breaches.

Usage

We hope that you have found this Privacy Statement helpful. If you are not comfortable with any of the terms or policies described in this Privacy Statement, please discontinue the use of, and uninstall, the Application.

User Consent

By using the Application, you are consenting to our processing of User Provided and Automatically Collected information as set forth in this Privacy Policy, including using or accessing the personal information in any way permitted by law, including but not limited to, collecting, storing, deleting, using combining and disclosing information, all of which activities will take place in the United States. If you reside outside the United States, your information will be transferred to the U.S. and processed there under U.S. privacy standards and Alight privacy and security standards. By using the Application and providing information to us, you consent to such transfer to, and processing in, the United States.