

PRIVACY

1. **PURPOSE OF POLICY.** MIEC is committed to respecting the privacy rights of its consumers, visitors, and other users of www.miec.com (the “Site”). We created this www.miec.com Privacy Policy (the “Policy”) to provide you with a comprehensive description of our online and offline practices. This Policy has been amended to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and any terms defined in the CCPA have the same meaning when used in this Policy. This Policy is only applicable to the Site, and not to any other websites that you may be able to access from the Site, each of which may have data collection and use practices that differ materially from this Policy.
2. **NOTICE CONCERNING CHILDREN.** PLEASE NOTE: We are a general audience site, and do not direct any of our content specifically at children under 13 years of age. We understand and are committed to respecting the sensitive nature of children’s privacy online. If we learn or have reason to suspect that a Site user is under age 13, we will promptly delete any personal information in that user’s account.

INFORMATION COLLECTION PRACTICES

1. **WHAT BASIC INFORMATION DOES THE COMPANY COLLECT?** In operating www.miec.com, MIEC may include registration, online surveys, and other online forms that ask users to provide their names, e-mail addresses, and other contact information, as well as professional information and claims history.
2. **WHAT ADDITIONAL INFORMATION DOES COMPANY COLLECT?**
 - a) **AUTOMATIC COLLECTION.** Our servers automatically recognize visitors’ domain names and IP addresses (the number assigned to computers on the Internet). No personal information about you is revealed in this process. MIEC may also gather anonymous “traffic data” that does not personally identify you, but that may be helpful for marketing purposes or for improving the services we offer.
 - b) **COOKIES.** From time to time, we may use the standard “cookies” feature of major browser applications that allows us to store a small piece of data on your computer about your visit to our Web site. We do not set any personally identifiable information in cookies, nor do we employ any data capture mechanisms on our website other than cookies. Cookies help us learn which areas of our site are useful and which areas need improvement. You can choose whether to accept cookies by changing the settings on your browser. However, if you choose to disable this function, your experience at our Web site may be diminished and some features may not work as they were intended.

PERSONAL INFORMATION COLLECTED, USED OR DISCLOSED

Our website collects information that identifies, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“Personal information”). In particular, we have collected the following Categories of personal information from our consumers within the last twelve (12) months:

PERSONAL INFORMATION COLLECTED OR USED		
Category of Information	Source of Information	Purpose for Collection
Identifiers (real name, alias, postal address, identifier, Internet Protocol address, email, account name, online identifier, or other similar identifiers)	Provided by Consumer	<ul style="list-style-type: none"> • Verify your identity • Check your qualifications • Follow up with transactions initiated on a www.miec.com • Inform you of any changes to the Site or send you additional information about Company • Send you promotional material
Personal Information Categories Listed in the California Records statute (Cal. Civ. Code § 1978.80(e)) (insurance policy number, education, employment, financial information, medical information, health insurance. Some personal information in this Category may overlap with other Categories.)	Provided by Consumer and Issued by MIEC	<ul style="list-style-type: none"> • Verify your identity • Check your qualifications • Follow up with transactions initiated on a www.miec.com

Protected Classification Characteristics under California or Federal Law (age, sex, marital status)	Provided by Consumer	<ul style="list-style-type: none"> • Verify your identity • Check your qualifications
Internet or Other Similar Network Activity	Google Analytics	<ul style="list-style-type: none"> • Marketing and promotional service • Automatic collection of domain names and IP addresses
Professional or Employment Related Information (current or past job history)	Provided by Consumer	<ul style="list-style-type: none"> • Verify your identity • Check your qualifications and promote risk management • Follow up with transactions initiated on a www.miec.com

PERSONAL INFORMATION DISCLOSED TO A THIRD PARTY FOR A BUSINESS PURPOSE

Category of Information	Source	Business Purpose	Category of Third Party
Identifiers	Provided by Consumer and Issued by MIEC	<ul style="list-style-type: none"> • Underwriting support, decision making, and policy maintenance • Support invoicing from defense counsel • Claims handling for reported claims • Peer review and membership recruitment • Marketing support for MIEC’s customer and prospective customer database • Permit the accurate setting of reserves and pricing • Support claim recoveries from insurers • Support patient safety initiatives to improve safety of medical practices • Enable support and collection of insurance premium payments 	<ul style="list-style-type: none"> • Data Analytics Providers • Operating Systems and Platforms • Legal Services • Professional Medical Organizations • Financial Providers
Personal Information Categories Listed in the California Records statute (Cal. Civ. Code § 1978.80(e))	Provided by Consumer and Issued by MIEC	Same as Above	Same as Above
Protected Classification	Provided by Consumer	<ul style="list-style-type: none"> • Support patient safety initiatives to help improve the safety of medical practices • Underwriting support, decision making, and policy maintenance 	<ul style="list-style-type: none"> • Data Analytics Providers • Operating Systems and Platforms

Professional or Employment Related Information	Provided by Consumer	<ul style="list-style-type: none"> • Underwriting support, decision making, and policy maintenance • Support invoicing from defense counsel • Peer review and membership recruitment • Marketing support for MIEC's customer and prospective customer database • Permit the accurate setting of reserves and pricing 	<ul style="list-style-type: none"> • Data Analytics Providers • Operating Systems and Platforms • Professional Medical Organizations • Legal Services
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MIEC HAS NOT SOLD YOUR PERSONAL INFORMATION TO A THIRD PARTY IN THE LAST TWELVE (12) MONTHS.

For more information on the categories of personal information, see <https://oag.ca.gov/privacy/ccpa>

CONSUMER RIGHTS

1. **RIGHT TO KNOW IF YOUR PERSONAL INFORMATION IS COLLECTED, SOLD, OR DISCLOSED.** We may disclose personal information if required to do so by law or in the good-faith belief that such action is necessary to:
 - a) Conform to the edicts of the law or comply with legal process served on Company or its parent company, subsidiaries or affiliates;
 - b) Protect and defend the rights or property of Company or the users of the Site; or
 - c) Act under exigent circumstances to protect the safety of the public or users of the Site.

You have a right to request the disclosure of personal information we collect, use, or disclose to third parties for a business purpose. We reserve the right to verify each request and match the identifying information you provide to the personal information MIEC maintains about you. It is our practice to avoid requesting additional information about you for the purpose of verification. However, if we are unable to verify your identity from the information already maintained, we may request additional information, which shall only be used for verification purposes. The verification process may take up to a total of ten (10) business days.

2. **RIGHT TO REQUEST DELETION OF PERSONAL INFORMATION.** You have a right to request the deletion of personal information collected or maintained by MIEC. We reserve the right to verify each request and match the identifying information you provide to the personal information MIEC maintains about you. The verification process may take up to a total of ten (10) business days. If your verified request to delete the personal information is within the scope of your Consumer rights, your information will be deleted from our records within 45 calendar days.
3. **RIGHT TO OPT OUT OF THE SALE OF PERSONAL INFORMATION.** We may sell information collected through the Site. If MIEC sells all or substantially all of its assets; consumer information will be one of the assets transferred to the acquirer. In such case you have a right opt out of the sale of your personal information by MIEC. Subject to your opt out right, if your personal information is sold or disclosed for business purposes, we will notify you of the category or categories of your personal information we have sold, the personal information we have disclosed for a business purpose, or whether your information was not disclosed for a business purpose.
4. **RIGHT TO NON-DISCRIMINATION FOR THE EXERCISE OF CONSUMER'S PRIVACY RIGHTS.** You will not be discriminated against by MIEC for exercising your privacy rights conferred by the CCPA. If you choose to request or opt out of the sale of your consumer information, we will not respond to such request by engaging in any of the following:
 - a) Denying you goods or services;
 - b) Charging you different prices or rates for goods or services;
 - c) Providing you with a different level or quality of goods or services; or
 - d) Suggesting you will receive a different price or rate for goods or services or a different level of goods or services.

5. **RIGHT TO AN AUTHORIZED AGENT.** You have a right to designate an authorized agent to make a request to MIEC on your behalf.

OTHER INFORMATION WE MAY COLLECT, USE OR SHARE

- a) **ANONYMOUS INFORMATION.** We use anonymous information to analyze our Site traffic, but we do not examine this information for individually identifying information. In addition, we may use anonymous IP addresses to help diagnose problems with our server, to administer our Site, or to display the content according to your preferences. Traffic and transaction information may also be shared with business partners and advertisers on an aggregate and anonymous basis.
- b) **USE OF COOKIES.** We may use cookies to deliver content specific to your interests, to save your password so you don't have to re-enter it each time you visit our site, or for other purposes. Promotions or advertisements displayed on our site may contain cookies. We do not have access to or control over information collected by outside advertisers on our Site.
- c) **PUBLIC FORUMS.** The Site may include interactive forums such as message boards and chat rooms. Please remember that any information that is disclosed in these areas becomes public information and you should exercise caution when deciding to disclose your personal information.
- d) **THIRD PARTY WEBSITES.** The Site may contain links to other websites. If you choose to visit other websites, we are not responsible for the privacy practices or content of those other websites, and it is your responsibility to review the privacy policies at those websites to confirm that you understand and agree with their policies.
- e) **SECURITY.** The Site has security measures in place to prevent the loss, misuse, and alteration of the information that we obtain from you, but we make no assurances about our ability to prevent any such loss, misuse, to you or to any third party arising out of any such loss, misuse, or alteration.

HOW TO EXERCISE YOUR CONSUMER RIGHTS

If you have any questions about this Policy, our practices related to this Site, or if you would like to exercise your consumer rights as expressed in this Policy, please feel free to contact us at the following:

Email: underwriting@miec.com

Phone: 800.227.4527

Address: Medical Insurance Exchange of California 6250 Claremont Avenue Oakland, CA 94618

If a verified request regarding the collection, use, or disclosure of your personal information has been made, we will disclose and deliver the required information to you free of charge within 45 calendar days of receiving such request. The time period to provide the required information may be extended once by an additional 45 days when reasonably necessary, provided you are given notice of the extension within the first 45-day period. You are not required to create an account in order to make a verifiable consumer request.

UPDATES AND CHANGES

We reserve the right, at any time, to add to, change, update, or modify this Policy, simply by posting such change, update, or modification on the Site and without any other notice to you. Any such change, update, or modification will be effective immediately upon posting on the Site. It is your responsibility to review this Policy from time to time to ensure that you continue to agree with all of its terms. This Policy was last reviewed on October 19, 2023.