

## **Administrative District Council 1 Welfare Fund (the “Fund”) Privacy Policy**

Effective 5/5/2021

For information regarding your protected health information and the Fund’s health plan functions, please visit the Fund’s [Notice of Privacy Practices](#)

This Privacy Policy describes:

- Information that we receive from you when you interact with this Website
- How we use and process the information that we receive
- If and why Personal Information may be disclosed to third parties
- Your choices regarding the collection and processing of your Personal Information

Please note that this Privacy Policy does not apply to information collected through third-party websites or services that you may access through the Website.

**Please review this privacy policy carefully.** When you submit information to or through the Website, you consent to the collection and processing of your information as described in this Privacy Policy. By using the Website, you accept the terms of this Privacy Policy and the [Terms of Use](#) and consent to our collection, use, disclosure and retention of your information as described in this Privacy Policy.

**If you do not agree with any part of this Privacy Policy or our Terms of Use, please do not use any of the services.**

The Effective Date of this Privacy Policy is set forth at the top of this Policy. Whenever possible, we will provide you with advance written notice of our changes to this Privacy Policy. We will not make retroactive changes that reduce your privacy rights unless we are legally required to do so. Your continued use of the Website after the Effective Date constitutes your acceptance of the amended Privacy Policy. The amended Privacy Policy supersedes all previous versions.

### **Information We Collect**

#### *Types of Information*

We collect various kinds of information that you provide to us as well as information we obtain from your use of the Website. Some of the types of information that we collect include:

- “Personal Information”—information associated with or used to identify or contact a specific person. Personal Information includes:
  1. contact data (such as e-mail address, telephone number and employer);
  2. demographic data (such as gender, date of birth and zip code);
  3. certain Usage Data (defined below), such as IP address; and
  4. benefit-related information submitted by you via the Website.

Certain Personal Information, such as information about personal health or finances is sensitive and subject to stricter regulation than other Personal Information. Before providing it to us, carefully consider what sensitive Personal Information is needed and whether disclosure to us is advisable. If you do provide sensitive Personal Information to us, you consent to its use and disclosure for the purposes and in the manner described in this Privacy Policy.

- “Usage Data”—information about an individual's online activity that, by itself, does not identify the individual, such as:
  - technical information, including your browser type, service provider, IP address, operating system and webpages visited;
  - information about what you've searched for and looked at while using the Website; and
  - metadata, which means information related to items you made available through the Website, such as the date and time a form you completed via the Website was submitted.

Generally, we do not consider Usage Data as Personal Information because Usage Data where it does not identify the individual. Personal Information and Usage Data may be linked together. Different types of Usage Information also may be linked together and, once linked, may identify an individual person. Some Usage Data also may be Personal Information under applicable law.

### *How We Collect Information*

Whether we collect certain types of information and how we process it depends on how you use and access the Website. Some information is collected automatically through use of cookies and similar data collection tools. We collect information about you in the following ways:

- Use the Website. We collect Personal Information from you when you log in to the Website, contact us for help or information or otherwise voluntarily provide your Personal Information. We collect information that you submit to us, such as when you complete forms and information via the Website.
- Usage Data. We also automatically collect Usage Data when you interact with the Website.
- From cookies and other data collection tools. We, along with the service providers that help us provide the Website, use small text files called “cookies”, which are small computer files sent to or accessed from your web browser or your computer’s hard drive that contain information about your computer, such as a user ID, user settings, browsing history and activities conducted while using the Website. Cookies are not themselves personally identifiable, but may be linked to Personal Information that you provide to us through your interaction with the Website. A cookie typically contains the name of the domain (internet location) from which the cookie originated, the “lifetime” of the cookie (i.e., when it expires) and a randomly generated unique number or similar identifier.

Cookies help us improve the Website by facilitating your use of the Website; enabling us to analyze technical and navigational information about the Website; and helping to detect and prevent fraud. We also use other cookies and other data collection tools (such as web beacons and server logs), which we collectively refer to as “data collection tools,” to help improve your experience with the Website.

The Website also may use data collection tools to collect information from the device used to access the Website, such as operating system type, browser type, domain and other system settings, as well as the operating system used and the country and time zone in which the computer or device is located.

Web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to manage and delete cookies, visit [www.allaboutcookies.org](http://www.allaboutcookies.org). Some web browsers (including some mobile web browsers) provide settings that allow a user to reject cookies or to alert a user when a cookie is placed on the user's computer, tablet or mobile device. Most mobile devices also offer settings to reject mobile device identifiers. Although users are not required to accept cookies or mobile device identifiers, blocking or rejecting them may prevent access to some features available through the Website.

### *How We Use Your Information*

We use the information we collect for any of the following purposes:

- to provide the Website to you;
- to operate, improve and personalize the Website services we offer, and to give each user a more consistent and personalized experience when interacting with us;
- for customer service, security, to detect fraud or illegal activities, or for archival and backup purposes in connection with the provision of the Website;
- to communicate with users, such as providing benefit and claims information; and
- to enforce our Terms of Use or other applicable policies.

### *How We Share and Disclose Your Information*

We may share and disclose information as described at the time information is collected or as follows:

- When you consent. We may share Personal Information with third parties if you have given us your consent to do so.
- To perform services. We may disclose Personal Information to third parties in order to perform services requested or functions initiated by users, such as to pay benefits or process claims. In addition, we may disclose Personal Information in order to identify a user in connection with communications sent through the Website.
- With third party service providers performing services on our behalf. We share information, including Personal Information, with our service providers to perform the functions for which we engage them. We may share information as needed to operate other related services.

- For legal purposes. We also may share information that we collect from users, as needed, to enforce our rights, protect our property or protect the rights, property or safety of others, or as needed to support external auditing, compliance and corporate governance functions. We will disclose Personal Information as we deem necessary to respond to a subpoena, regulation, binding order of a data protection agency, legal process, governmental request or other legal or regulatory process. We may also share Personal Information as required to pursue available remedies or limit damages we may sustain.
- In aggregated form. We may share Personal Information about you in an aggregated form—that is, in a statistical or summary form that does not include any personal identifiers.

### *Information Storage and Security*

We retain information as long as it is necessary and relevant for our operations. We also retain Personal Information to comply with applicable law, prevent fraud, resolve disputes, troubleshoot problems, assist with any investigation, enforce our Terms of Use, collect amounts owed the Fund and other actions permitted by law. After it is no longer necessary for us to retain information, we dispose of it according to our data retention and deletion policies.

We employ industry-standard security measures designed to protect the security of all information submitted through the Website. However, the security of information transmitted through the internet can never be guaranteed. We are not responsible for any interception or interruption of any communications through the internet or for changes to or losses of data. Users of the Website are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password protected or secure areas of any of our digital services. In order to protect you and your data, we may suspend your use of any of the Website, without notice, pending an investigation, if any breach of security is suspected. Access to and use of password protected and/or secure areas of any of the Website are restricted to authorized users only. Unauthorized access to such areas is prohibited and may lead to criminal prosecution.

### **Links to Third Party Services**

The Website may contain links to third-party websites and services (“Third Party Services”) with which we have no affiliation. A link to any Third Party Service does not mean that we endorse it or the quality or accuracy of information presented on it. If you decide to visit a Third Party Service, you are subject to its privacy policy and practices and not this Privacy Policy. We encourage you to carefully review the legal and privacy notices of all other digital services that you visit.

### **Disclaimer: Not Child-Directed**

The Website is not intended for use by children. If you are under the age of majority in your place of residence, you may use the Website only with the consent of or under the supervision of your parent or legal guardian.

## **Privacy Rights of Non-U.S. Residents**

This Website is hosted and operated in the United States, and is not intended to target E.U. and other non-U.S. residents. Use of this Website will result in transfer of information to the Fund in the United States. If you have nevertheless opted to access this site from outside the United States, this Privacy Policy will apply to personal information that the Fund collects, uses, and distributes. Should you have questions or concerns regarding your personal information, or to make a data subject request regarding your personal information please send an email to:

Milan Diklich  
[info@bacadcfunds.org](mailto:info@bacadcfunds.org)  
630-617-8666

## **Contact**

If you have any questions about this Privacy Policy, please contact the Fund at:

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