Website and Mobile Application Privacy Notice (“Privacy Notice”)

Last Updated: December 1, 2022

Introduction

This Privacy Notice applies to personal information collected through the Cigna Corporation (“Cigna,” “we” or “us”) or Cigna-affiliated website or mobile application on which it is posted, including Cigna.com and mycigna.com, unless otherwise modified by another notice. We refer to these websites and mobile applications as “Services” throughout this Privacy Notice. Please note that this Privacy Notice may supplement, or be superseded by, other applicable policies, practices, and privacy notices that may relate to the specific relationship you have with Cigna. To review other notices applicable to our businesses, please visit Cigna’s Privacy Notices page.

We handle personal information in accordance with the terms set out in this Privacy Notice, other notices referenced herein, and applicable state and federal laws and regulations. By using our Services, you are consenting to the collection, use, and disclosure of your personal information in accordance with this Privacy Notice, and other notices referenced herein, as applicable. If you do not agree with the practices described in this document, please do not use our Services.

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Information We Collect

Personal information is information that identifies you as an individual or relates to an identifiable person. Examples of personal information we may collect about you through our Services include the following:

- **Identifiers** such as name, contact information, online identifiers, and government-issued ID numbers;
- **Commercial Information** related to services we provide such as medical information, insurance information, and financial information;
- **Characteristics of Protected Classifications** under state or federal law such as age and medical conditions;
- **Commercial Information** such as transaction information and purchase history;
- **Internet or Network Activity Information** such as browsing history, interactions with our website, Internet Protocol (IP) address, Media Access Control (MAC) address; operating system and version; Internet browser type and version (for more information, see the Cookies and Similar Technologies section, below);
- **Geolocation Data** such as device location;
- **Audio, Electronic, Visual and Similar Information** such as call and video recordings; and
- **Professional or Employment-Related Information** such as place of employment and job title.

We may supplement the information we receive through our Services with other personal information we have about you, including information from our affiliates and vendors, as well as information from other sources, such as public and nonpublic records, joint marketing partners, social media platforms (including from people with whom you are friends or otherwise connected), and from other third parties.

If you provide us or our service providers with personal information relating to other people, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Notice.

Health Information

In some circumstances, Cigna’s collection and use of personal information will be subject to the requirements of the Health Insurance Portability and Accountability Act (“HIPAA”). For example, if information collected through the Services is identifiable member information, the terms of the applicable HIPAA Notice of Privacy Practices will apply and will supersede this notice. If you are a member covered by a Cigna insured policy, please review Cigna’s Notice of Privacy Practices. If you are covered through a self-funded employer plan, ask your employer for a copy of its Notice of Privacy Practices.
GLBA Privacy Notice

For U.S. customers, we will use and share any information that we collect from or about you in accordance with the Gramm-Leach-Bliley Privacy Notice for Cigna Policyholders, which may be accessed from our Privacy Notices page.

How We Use Personal Information

We use personal information received through our Services for various purposes, including the following:

- Providing our Services to you, including completing transactions, processing claims, and providing quotes;
- Providing you with information about our Services, including information about health care, health related services, resources and benefits that will help you manage your health; sending administrative information to you, such as changes to our terms, conditions, and policies; sending marketing information we think may be of interest to you; and fulfilling any other purpose for which you provide it;
- Improving our Services;
- Providing and improving customer services, including through email or text communications, or any chat or similar feature available through our services;
- Conducting our business, such as data analysis; audits; developing new products; enhancing, improving or modifying our services; identifying usage trends; determining the effectiveness of our promotional campaigns and operating and expanding our business activities; tailoring offers and advertisements to you for products or services that you may find helpful on our Services and those on third-party sites;
- Sending you surveys;
- To provide certain functionality, such as allowing you to send messages to a friend through the Services;
- Authenticating or confirming your identity;
- To de-identify it;
- Taking any action that we believe to be necessary or appropriate:
  o to investigate, prevent and detect illegal activities;
  o to carry out our obligations and enforce our rights arising from any of our contracts, including for billing and collection;
  o under applicable laws, including laws outside your country of residence;
  o to comply with legal process;
  o to respond to requests from public and government authorities including public and government authorities outside your country of residence;
  o to enforce our Terms of Use and one or more of our privacy notices, including this notice;
  o to protect our operations or those of our affiliates;
  o to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and
  o to allow us to pursue available remedies or limit the damages that we may sustain.
- Informing you of job opportunities and evaluating your suitability for a job;
• Other purposes specifically disclosed at the time we request your information; and
• For any other purpose with your consent.

Our Sharing and Disclosure Practices

We may disclose personal information for the following purposes:

• **Operating Services and Sites and Providing Related Support.** To provide and operate our Services, communicate with you about your use of the Services, provide troubleshooting and technical support, respond to your inquiries, fulfill your orders and requests, and for similar service and support purposes.

• **Business Transfers.** If we or our affiliates are or may be acquired by, merged with, or invested in by another company, or if any of our assets are or may be transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may transfer the information we have collected from you to the other company. As part of the business transfer process, we may share certain of your personal information with lenders, auditors, and third-party advisors, including attorneys and consultants.

• **In Response to Legal Process.** We may disclose your personal information to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.

• **To Protect You, Us, and Others.** We disclose your personal information when we believe it is appropriate to do so to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our [Terms of Use](#) or this Policy, or as evidence in litigation in which we are involved.

We may disclose the personal information that we collect for the purposes described above with the following parties:

• **Vendors.** We may disclose personal information we collect to our service providers or agents who perform functions on our behalf. These may include, for example, IT service providers, help desk, payment processors, analytics providers, consultants, auditors, and legal counsel.

• **Our Affiliates.** We may disclose personal information we collect to our affiliates or subsidiaries.

• **Our Business Customers.** Any personal information that we collect and process on behalf of a business client will be disclosed as directed by that business customer.

• **Third-Party Ad Networks and Providers.** We may disclose personal information to third-party ad network providers, sponsors and/or traffic measurement services. These third parties may use cookies, JavaScript, web beacons (including clear GIFs), and other tracking technologies to measure the effectiveness of their ads and to personalize advertising content to you. These third-party cookies and other technologies are governed by each third party's specific privacy policy, not this one. To exercise your choices about receiving third-party ads, see the “Tracking and Advertising Choices” section below.
• **Government or Public Authorities.** We may disclose personal information to a third party if (a) we believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process, or governmental request, (b) to enforce our agreements, policies, and terms of service, (c) to protect the security or integrity of our Services, (d) to protect the property, rights, and safety of us, our users, or the public from harm or illegal activities, (e) to respond to an emergency which we believe in the good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person, or (f) to investigate and defend ourselves against any third-party claims or allegations.

**Do Not Track Signals**

We do not honor a web browser's “Do Not Track” signals.

**Cookies and Other Tracking Technologies**

**How We Use Cookies**

We may use cookies and other tracking mechanisms to track your use of our Services. For more information on the types of personal information we collect through these technologies, please see the section above titled “The Personal Information We Collect.” For resources and instructions on how to disable tracking technologies, see the section below titled “Tracking and Advertising Choices.”

Cookies are alphanumeric identifiers that we transfer to your device’s hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Services, while others are used to enable a faster login process or to allow us to track your activities on our Services. There are two types of cookies: session and persistent cookies.

• **Session Cookies.** Session cookies exist only during an online session. They disappear from your device when you close your browser or turn off your device. We use session cookies to allow our systems to uniquely identify you during a session or while you are logged in. This allows us to process your online transactions and requests and verify your identity after you have logged in, as you move through the website.

• **Persistent Cookies.** Persistent cookies remain on your device after you have closed your browser or turned off your device.

**Tracking and Advertising Choices**

If you wish to prevent cookies from tracking your activity on our websites or visits across multiple websites, there are tools you can use to disable cookies and opt out of interest-based advertising. Please note that your opt-out may not be effective if your browser is configured to reject cookies.
• **Browser Solutions for Disabling Cookies.** If you wish to prevent cookies from tracking your activity on our website or visits across multiple websites, you can set your browser to block certain cookies or notify you when a cookie is set. The Help portion of the toolbar on most browsers will tell you how to prevent your device from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Visitors to our Services who disable cookies will be able to browse the Site, but some features may not function.

• **Industry Solutions for Opting Out of Interest-Based Advertising.** Notwithstanding the above, you may follow the steps provided by initiatives that educate users on how to set tracking preferences for most online advertising tools. These resources include the Network Advertising Initiative (https://thenai.org/about-online-advertising/) and the Digital Advertising Alliance (https://digitaladvertisingalliance.org/). The Digital Advertising Alliance also offers an application called AppChoices (https://youradchoices.com/appchoices) that helps users to control interest-based advertising on mobile apps.

**Other Website and Tracking Technologies**

• **Technologies Similar to Cookies.** We may use technologies that are similar to cookies, such as pixels and web beacons, to collect information about your activities on our Services, including online identifiers and Internet and Network Activity Information. Unless you opt out of such collection as described above or through another solution, this information will be automatically generated and may be combined with other information about you.

• **Facebook.** We may use Facebook Pixel, a web analytics and advertising service provided by Meta, Inc. on our Services. With its help, we can keep track of what users do after they see or click on a Facebook advertisement, keep track of users who access our website, applications, or advertisements from different devices, and better provide advertisements to our target audiences. The data from Facebook Pixel is also saved and processed by Facebook. Facebook can connect this data with your Facebook account and use it for its own and others advertising purposes, in accordance with Facebook’s Data Policy which can be found at https://www.facebook.com/about/privacy/. Please click here if you would like to withdraw your consent for use of your data with Facebook Pixel https://www.facebook.com/settings/?tab=ads#_=_.

• **Google.** Our Services may use Google products, including Google Analytics and Google Floodlights Tags. These technologies are used for analytics and advertising purposes. You can learn about Google’s practices by going to www.google.com/policies/privacy/partners/, and opt out of Google Analytics by downloading the Google Analytics opt-out browser add-on, available at https://tools.google.com/dlpage/gaoptout.

• **Session Recording and Replay Software.** We may use third party services that employ software code to record users’ interactions with the Services in a manner that allows us to watch replays of those user sessions. The replays include users’ clicks, mouse movements, scrolls, and keystrokes/key touches (including information inputted into the site) during those sessions. These replays help us diagnose usability problems and identify areas for improvement.
- **Device Fingerprinting and Browser Fingerprinting.** In order to assist with site design and improve site functionality and accessibility, we may also use other technologies that are similar to cookies. Through a process known as Device Fingerprinting or Browser Fingerprinting, we may gather device attributes and combine information collected by most browsers or automatically through your device to create a unique ID that identifies your browser or device with reasonable certainty. In this context, we may collect Internet and other Network Activity Information about your visit, including geolocation data. You may be able to reduce the amount of information that your browser provides to Cigna for use in the Device Fingerprinting or Browser Fingerprinting process by enabling the private or incognito modes of your browser.

- **Adobe.** We may use various Adobe products, such as Adobe Analytics or Adobe Flash ("Flash LSO"), for analytics and to allow our websites to function. These products may collect and store information about your use of the Services, and may store information on your computer. If you do not want Flash LSOs stored on your computer, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the Website Storage Settings Panel. You can also go to the Global Storage Settings Panel and follow the instructions. Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications.

In some instances, we may combine other information with personal information we receive through the Services, such as combining your name with your geographical location. If we do, we will treat the combined information as personal information as long as it remains identifiable.

**Anonymous and Aggregate Information**

Cigna may de-identify or aggregate personal information so that it does not personally identify you or any other user of the Services. For example, we may aggregate or de-identify personal information to analyze the percentage of our users who have a particular area code. Additionally, we may use and share this information for any purpose permissible under applicable law.

**Our Online Privacy Notice for Children**

Our Services are designed for a general audience and are not directed to children under the age of 13. We do not knowingly collect personal information online from any person we know to be under the age of 13. If you believe we have impermissibly collected personal information from someone under the age of 13, please contact us using the information below.

**Our Data Protection and Security Policy**

We take reasonable precautions to safeguard the personal information transmitted between visitors and the Services and the personal information stored on our servers. Unfortunately, no method of transmitting or storing data is 100% secure. As a result, although we strive to protect your personal information, we cannot ensure the security of any information you transmit to us through, or in connection with, the Services. If you have reason to believe that your interaction
with us is no longer secure, please notify us of the problem by contacting us in accordance with the “Contacting Us” section below.

**Information for Employment Applicants**

We collect information, including personal contact information, education and work history, as well as Social Security and similar national identification numbers in order to process and consider your application. This information, as well as information from your application, may be shared with background check services and our affiliates, and as otherwise described in this Notice. We will not sell your application information to unaffiliated third parties for marketing purposes.

**Additional Information for Users of a Cigna Mobile Application**

When you download and use a Cigna mobile application, we and our service providers may track and collect application usage data, such as the date and time the application on your device accesses our servers, what information and files have been downloaded to the application based on your device number, and whether your device is rooted or jailbroken. When using certain functions via a Cigna mobile application, we may use your location information if your mobile device uses global positioning system (“GPS”) technology, trackers or other location tools, if you allow your device to provide this information to the mobile application. We will use this information to estimate your location and to provide you with more personalized content and/or services.

A Cigna mobile application may also permit you to upload a photograph from your mobile device. The photograph is for your use only and Cigna will not have access to it. Cigna will not upload it to a Cigna server. This paragraph does not apply to scans or images of documents you submit to Cigna in connection with your use of the Services or any services provided by Cigna.

**Cross-Border Transfers**

Your personal information may be transferred to, stored and processed in any country where we have facilities or in which we engage service providers, including the United States. By using the Services, you consent to the transfer of information to countries outside of your country of residence, which may have different data protection rules than your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal information.

Cigna does not represent or warrant that the Services, or any part of them, are appropriate or available for use in any particular jurisdiction. Those who choose to access the Services do so on their own initiative and at their own risk and are responsible for complying with all applicable local laws, rules and regulations.

**Changes to this Privacy Notice**

We reserve the right to amend this Privacy Notice at any time. If changes are made, we will post the revised Privacy Notice on our Services or announce the change on the home page of the
website or app. You can determine when we revised the Privacy Notice by referring to the “Last Updated” date at the top of this notice. Any changes will become effective when we post the Privacy Notice on our websites. By continuing to use the Services following such changes, you will be deemed to have consented to such changes. If you do not agree with the terms of this Privacy Notice, in whole or in part, please do not use the Services.

**Links to Other Websites**

The Services contain links to websites operated by third parties. When you follow any such link, your interaction will no longer be subject to this Privacy Notice. Instead, your interaction with the third-party website will be subject to the privacy policies of that third party. We encourage you to read all legal notices posted on those sites, including their privacy policies.

We provide links through the Services to other websites only as a convenience, and the inclusion of these links does not imply endorsement of the linked site. We are neither responsible nor liable for your use of third party websites. We are not responsible for the collection, usage and disclosure policies and practices (including the data security practices) of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any personal information you disclose to other organizations through or in connection with our mobile applications or other websites.

**State-Specific Privacy Information for Residents of California, Colorado, Connecticut, Virginia, and Utah**

Residents of California, Colorado, Connecticut, Virginia, and Utah may have additional rights with respect to personal information we collect through our Services, depending on the effective dates of those states' laws. Residents of these states should consult the U.S. State Law Privacy Notice, available from our Privacy Notices page, for additional information.

**Other California Privacy Rights**

California’s “Shine the Light Law” permits California residents who provide personal information in obtaining products and services for personal, family, or household use to request certain information regarding the disclosure of their personal information to third parties for the third party’s direct marketing purposes. Eligible individuals may request this information once per calendar year for information that was disclosed in the preceding year. If you are a California customer and wish to make such a request, please call us at 1.800.234.4077.

**Other Access Requests**

Certain individuals may have rights to review, correct, update, suppress or delete personal information that you have previously provided to us. You may submit such a request by emailing us here. We will respond to your request consistent with applicable law, but may not accommodate your request unless legally required to do so. Residents of California, Colorado, Connecticut,
Virginia, and Utah should review the information available in the U.S. State Law Privacy Notice with respect to rights that may be available to residents of those states.

In your request, please specify what personal information you would like to have changed, whether you would like to have your personal information suppressed from our database, or otherwise let us know what limitations you would like to put on our use of your personal information. For your protection, we may only accommodate requests only for personal information associated with the email address used to submit the request, and we may need to verify your identity before implementing your request. Please note that, unless required by applicable law to comply with the request, we reserve to right to refuse any such requests.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which may not be removed.

**Contacting Us**

If you have any questions about this Privacy Notice please contact us by email at Privacyoffice@Cigna.com or call toll-free at 1.800.234.4077.