

SOLUTIONS

INSIGHTS

ABOUT

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Privacy Policy

Last Updated: September 15, 2023

1. Introduction

Purpose of this Notice

bswift LLC (“**bswift**” or “**we**” or “**us**”) respects your privacy and is committed to protecting it through our compliance with this policy.

This Privacy Notice (our “**Privacy Notice**” or “**Notice**”) describes the types of information we may collect from you or that you may provide when you visit the websites at www.bswift.com, communicationagency.bswift.com, <https://latest.bswift.com/en>, and www.bswift360.com (collectively, the “**Websites**”) and/or communicate with us (whether electronically, in-person at events or tradeshows, or otherwise), and our practices for collecting, using, maintaining, protecting, and disclosing that information.

IT IS OUR POLICY TO COMPLY WITH APPLICABLE PRIVACY LAWS, SO OUR PRIVACY PRACTICES MAY VARY DEPENDING ON WHERE YOU LIVE. PLEASE SEE THE JURISDICTION-SPECIFIC DISCLOSURES IN THIS PRIVACY NOTICE

FOR ADDITIONAL INFORMATION THAT MAY APPLY TO YOU DEPENDING ON WHERE YOU LIVE.

Please read this Privacy Notice carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to communicate with us or use our Websites. By communicating with us or accessing or using our Websites, you agree to this Privacy Notice. This Privacy Notice may change from time to time (see Changes to Our Privacy Notice). Your continued communications with us and/or use of our Websites after we make changes is deemed to be acceptance of those changes, so please check this Privacy Notice periodically for updates.

Applicability of this Notice to You

We provide benefits administration solutions to help companies (our clients) and their employees get the most out of their health and welfare benefits. As part of our services, our clients may share your information with us to perform support services including, but not limited to health care benefits enrollment, management, and administration services, billing services, compliance support, and other related services. To facilitate these services, we also host web portals and applications, on behalf of our clients (such as your employer) to provide services related to the benefits offered by your employer. When we are collecting information from you on behalf of our clients, we will only collect, use, and otherwise process your information as directed by our clients, as set forth in our contractual agreements with such clients or as otherwise permitted by applicable law. Accordingly, this Privacy Notice does not apply to the extent we process your information, including any Personal Data (as defined below), in the role of a processor or service provider on behalf of our clients.

If you contact us for the purpose of verifying your identity in relation to your bswift account or use of our services, transmit information to us via your employer portal in connection with your use of our services, or log in to an existing account on our Websites or mobile app, this Privacy Notice does not apply to any information you provide in any of those settings, as we merely collect this information as part of the services we perform on behalf of our clients. For detailed privacy information related to our collection and use of your information on behalf of the bswift client (your employer) who uses our services, or if you need to access or delete any Personal Data we may have collected from you as permitted by applicable law or the agreement between us and our client, please reach out to your employer directly. We are not responsible for the data security practices of our clients, which may differ from those set forth in this Privacy Notice.

If you are a bswift employee, independent contractor, or job applicant, your information collected in those contexts is subject to a separate privacy notice that we provide to you where and when appropriate. If bswift is not acting as a processor or service provider, and your Personal Data is not otherwise excluded as set forth above, the following information applies to how we, collect, use, and disclose your Personal Data collected via our Websites and through your communications with us (whether electronically, in-person at events and tradeshow, or otherwise).

2. Children Under the Age of 18

Our Websites are not intended for children under eighteen (18) years of age. No one under age 18 may provide any Personal Data to or on the Websites. We do not knowingly collect Personal Data from children under

eighteen (18). If you are under eighteen (18), do not use the Websites or provide any information on our Websites or through any of its features. If we learn we have collected or received Personal Data from a child under eighteen (18) without verification of parental consent, we will delete that information. If you believe we might have any information directly from a child under eighteen (18), please contact us at by calling toll free on **1.877.927.9438** or by email at **bcompliant@bswift**.

3. Information We Collect About You and How We Collect It

Throughout this Privacy Notice, the term “Personal Data” means any information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. However, Personal Data does not include any deidentified or aggregated information.

Generally

We collect Personal Data from various sources, including:

- directly from you when you provide it to us;
- automatically as you navigate through the Websites; and
- from third parties.

Information You Provide to Us

We collect the following types of Personal Data directly from you when you communicate with us or otherwise access or use our Websites: real name, postal address, email address, telephone number, job title, and employer name. In addition, we also collect other types of information

that you may provide us, such as when you communicate with us. This includes:

- information that you provide on our Websites and in-person, such as at a conference or trade show. This includes information provided at the time of requesting information about our products and services, filling in forms, making a general inquiry, entering a contest or promotion sponsored by us, and/or responding to surveys that we might ask you to complete. We may also ask you for information when you report a problem with our Websites; and
- records and copies of your correspondence (including email addresses), if you contact us.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Websites, we may use automatic data collection technologies to collect certain Personal Data about your interaction with our Websites, including information about your equipment, browsing actions, and patterns, such as:

- details of your visits to our Websites, including browsing history, search history, traffic data, location data (which may be used to locate the city and state that you are in but cannot be used to precisely locate you), log file information, referring/exit pages, date and time of your visit, error information, links clicked, and other communication data and the resources that you access, use, or otherwise interact with on the Websites; and
- information about your computer and internet connection, such as your IP address, operating system, and browser type.

The information we collect automatically may include Personal Data, or we may maintain it or associate it with Personal Data we collect in other ways

or receive from third parties. It helps us to improve our Service and to deliver a better and more personalized service by enabling us to: (i) estimate our audience size and usage patterns; (ii) store information about your preferences; (iii) customize our Websites according to your individual interests; (iv) speed up your searches; and (v) recognize you when you return to use our Websites.

This information may be collected through the use of cookies (or browser cookies), which are small data files placed on your computer that allow us to collect certain information whenever you visit or interact with our Websites. Some of these cookies are managed by us (first-party cookies), while others are managed by third parties that we do not control (third-party cookies).

We may also use other, similar technologies from time to time, like web beacons to recognize and track users for marketing purposes. These are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited our Websites or opened an email that we have sent them. This allows us, for example to understand whether you have come to our Websites from an online advertisement displayed on a third-party website, and to measure the success of our email marketing campaigns.

Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on our Websites are served by third parties, including advertisers, ad networks and servers, content providers, analytics providers, social media companies, and application providers. These third parties may use cookies, alone or in conjunction with web beacons or other tracking technologies, to collect information about you when you use our Websites. The information they

collect may be associated with your Personal Data or they may collect information, including Personal Data, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

Information We Collect from Third Parties

We may also collect Personal Data from third-party sources, including business-to-business databases and social networking platforms, to strengthen the accuracy and reliability of data that we hold on our current and prospective business contacts, as well as enhance our related marketing and sales efforts.

4. How We Use Your Information

We use information that we collect about you or that you provide to us, including any Personal Data for the following purposes:

- Fulfilling or meeting the reason that you provided the Personal Data.
- Providing, supporting, improving, personalizing, debugging, and developing our Websites, products, and services.
- Facilitating client relationship management ("CRM") and administration.
- Sending newsletters, targeted content, information about events and white papers, and other similar communications.
- Advertising or marketing our products and services to you.

- Monitoring the performance of our Websites, including metrics such as total number of visitors, and traffic.
- Providing you with support and responding to your inquiries (including investigating and addressing concerns and monitoring/improving responses).
- Helping to ensure security and integrity of our services and IT infrastructure to the extent the use of the Personal Data is reasonably necessary and proportionate for these purposes.
- Undertaking internal research for technological development and demonstration.
- Evaluating or conducting a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of bswift's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by bswift about our Websites' users and other individuals is among the assets transferred.
- Notifying you about changes to our Websites we offer or provide through them.
- Carrying out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- As otherwise described to you when collecting your Personal Data or as otherwise permitted or required by law.

5. How We May Disclose Your Information

We do not share, sell, or otherwise disclose your Personal Data for purposes other than those outlined in this Privacy Notice, including any applicable jurisdiction-specific addendum appended to this Privacy Notice. However, we may disclose aggregated information about you, and

information that does not identify you, without restriction.

We also may disclose Personal Data that we collect or you provide as described in this Privacy Notice:

- to service providers, contractors, and other third parties we use to support our business. These entities provide, on our behalf, IT and infrastructure support services, CRM services, advertising and/or marketing services (e.g., advertisers and ad networks), and analytic services (e.g., internet cookie information recipients), among other services;
- to a potential or actual buyer or other successor in the event of a planned or actual merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of bswift's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by bswift about its Websites' users and other individuals is among the assets transferred;
- to fulfill the purpose for which you provide it;
- for any other purpose disclosed by us when you provide the information; and
- with your consent or as otherwise permitted by applicable law.

We may also disclose your Personal Data to:

- comply with: (i) federal, state, or local laws, or to comply with a court order or subpoena to provide information; (ii) civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities; and/or (iii) certain government agency requests for emergency access to your Personal Data if you are at risk or danger of death or serious physical injury;

- cooperate with law enforcement agencies concerning conduct or activities that we (or one of our service providers') believe may violate federal, state, or local law;
- evaluate or engage in any actual or contemplated merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of bswift's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by bswift about its Websites' users and other individuals is among the assets transferred.
- exercise or defend legal claims, and to enforce or apply our agreements;
- protect the rights, property, or safety of bswift, its clients, or others; and/or
- otherwise fulfill the purpose for which you provided it.

6. Your Choices About How We Use and Disclose Your Information

We generally do not control the use of your information , which is received by those third parties described above in How We May Disclose Your Information. When possible, however, these organizations are under contractual obligations to use this data only for providing the services to us and to maintain this information strictly confidential. These third parties may, however, aggregate the information they collect with information from their other clients for their own purposes.

In addition, we strive to provide you with choices regarding the Personal Data you provide to us. We have created mechanisms to provide you with control over your Personal Data:

- Tracking Technologies and Advertising. You can set your browser or device to refuse all or some cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of our Websites may then be inaccessible or not function properly. You can find more information about cookies at <http://www.allaboutcookies.org>.

Web beacons can be refused when delivered via email by disabling HTML images or refusing HTML (select "Text Only") emails via your email software. In many instances, web beacons are reliant on cookies to function properly, and so declining cookies will impair their functionality.

As noted above, we do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. If you would like more information about this practice, and to know your choices with respect to it, please either visit the Digital Advertising Alliance's opt-out page (currently available at <http://www.aboutads.info/choices/>) or the Network Advertising Initiative's opt-out page (currently available at <http://www.networkadvertising.org/choices/>). Please note that you may continue to receive generic ads that are not based on your preferences.

- Marketing Emails from bswift. We may also use your information to contact you about our goods and services that may be of interest to you (with your consent, if required by law). If you do not wish to have your email address used by us to promote our own products and services, you can opt-out at any time by clicking the unsubscribe link at the bottom of any email or other marketing communications you receive from us. This opt-out does not apply to information provided to bswift as a result of a product or service experience, purchase, or other transaction.

7. Other Rights and Disclosures

General

In addition to the choices made available to you with regard to the Personal Data that you provide to us, you may also contact us at the Contact Information below to request access to or correct any Personal Data that we have collected about you. You may also notify us of errors or changes in any Personal Data we have about you to ensure that it is complete, accurate, and as current as possible. We may not be able to accommodate your request if we believe it would violate any law or legal requirement or cause the information to be incorrect.

Jurisdiction-Specific Privacy Rights and Disclosures

The law in some jurisdictions may provide you with additional rights and disclosures regarding our processing of Personal Data. To learn more about our processing activities and any additional privacy rights with respect to such data that may be applicable to you as a resident of one of these jurisdictions, please see the privacy addendum for your jurisdiction that is summarized below and attached to this Privacy Notice.

- For Residents of California: Please refer to our California Privacy Addendum.

8. Do Not Track Signals

Some web browsers permit you to broadcast a signal to websites and online services indicating a preference that they “do not track” your online activities. However, there is no accepted standard for how a website or online service should respond to this signal and, at this time, we do not take any action in response to such a signal.

9. Data Security

We have implemented measures designed to secure your Personal Data from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted to our Websites. Any transmission of Personal Data is at your own risk. We are not responsible for circumvention of any privacy settings or security measures deployed on the Websites.

10. Changes to Our Privacy Notice

We may change this Privacy Notice at any time. It is our policy to post any changes we make to our Privacy Notice on this page and we may post a notice that the Privacy Notice has been updated on the home pages of our Websites. If we make material changes to how we treat our users' Personal Data, we will notify you by email to the email address we have on file, through a notice on the home pages of our Websites, or by using a similar method. The date this Privacy Notice was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-

date active and deliverable email address for you, and for periodically visiting our Websites and this Privacy Notice to check for any changes.

11. Contact Information

If you have any questions, concerns, complaints, or suggestions regarding our Privacy Notice or the ways in which we collect and use your Personal Data described in this Privacy Notice, have any requests related to your Personal Data pursuant to applicable laws, or otherwise need to contact us, you may contact us at the contact information below or through the “Contact” page on our Websites.

bswift LLC
500 West Monroe Street, Suite 3800
Chicago, IL 60661 USA
1.877.927.9438
bcompliant@bswift.com

California Privacy Addendum

Last Updated: September 15, 2023

1. Introduction

This Privacy Notice Addendum for California Residents (the “**California Privacy Addendum**”) supplements the information contained in bswift’s Privacy Notice and describes our collection and use of Personal Information (as defined below). This California Privacy Addendum applies solely to all visitors, users, and others who reside in the State of California

("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the "CPRA"), and any terms defined in the CPRA have the same meaning when used in this notice.

2. Scope of this California Privacy Addendum

This California Privacy Addendum applies to information that we collect from or about you on our Websites and/or through our communications with you (i) when we are not acting as a processor or service provider, and (ii) that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household ("**Personal Information**").

As described in our Privacy Notice, bswift acts as a service provider when it provides benefits administration solutions to help companies (our clients) and their employees get the most out of their health and welfare benefits. As part of our services, our clients may share your information with us to perform services on their behalf including, but not limited to, health care benefits enrollment, management, and administration services, billing services, compliance support, and other related services. To facilitate these services, we also host web portals and applications, on behalf of our clients (such as your employer) to provide services related to the benefits offered by your employer. When we are collecting information from you on behalf of our clients, we will only collect, use, and otherwise process your information as directed by our clients, as set forth in our contractual agreements with such clients or as otherwise permitted by the CPRA and any other applicable law. Accordingly, this California Privacy Addendum does not apply to the extent we process your

information, including any Personal Information, in the role of a service provider on behalf of our clients.

If you contact us for the purpose of verifying your identity in relation to your bswift account or use of our services, transmit information to us via your employer portal in connection with your use of our services, or log in to an existing account on our Websites or mobile app, this Privacy Notice does not apply to any information you provide in any of those settings, as we merely collect this information as part of the services we perform on behalf of our clients. For detailed privacy information related to our collection and use of your information on behalf of the bswift client (your employer) who uses our services, or if you need to access or delete any Personal Information we may have collected from you as permitted by applicable law or the agreement between us and our client, please reach out to your employer directly. We are not responsible for the data security practices of our clients, which may differ from those set forth in this California Privacy Addendum.

In addition, this California Privacy Addendum does not apply to:

- Employment-related Personal Information collected from bswift's California-based employees, job applicants, contractors, or similar individuals ("Personnel"). Please contact us at the Contact Information below or your local human resources department if you are part of our California Personnel and would like additional information about how we process your Personal Information.
- Medical information governed by the California Confidentiality of Medical Information Act ("CMIA"), protected health information collected by a covered entity or business associate governed by the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), or a

provider of health care governed by the CMIA or covered entity governed by HIPAA to the extent the provider or covered entity maintains patient information in the same manner as medical information or protected health information under the CMIA or HIPAA, respectively.

- Publicly available information from government records.
- Deidentified and aggregate consumer information.
- Other exclusions as set forth under the CPRA.

In the event that bswift is not acting as a service provider or your employer, and your Personal Information is not otherwise excluded as set forth above, the following information applies to how we, collect, use, and disclose your Personal Information via our Websites and through your communications with us (whether electronically, in-person at events and tradeshow, or otherwise).

3. Information We Collect About You and How We Collect It

We collect, and over the prior twelve (12) months have collected, the following categories of Personal Information:

Category	Applicable Pieces of Personal Information Collected
Identifiers.	A real name; postal address; email address; and IP address.

Personal information as listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name; address; telephone number; and employment. *NOTE: Some Personal Information included in this category may overlap with other categories.
Internet or other electronic network activity (“Internet or Network Activity”) information.	Browsing history; search history; and information on your interaction with the Websites or an application or advertisement.
Professional or employment-related information.	Name of current employer; job title.

We will not collect additional categories of Personal Information without providing you notice. As further described below, **we do not (i) “sell” any categories of Personal Information for valuable, non-monetary consideration, or (ii) “share” any categories of Personal Information for cross-context behavioral advertising purposes.**

4. Sources of Personal Information

We collect Personal Information about you from the sources described in our Privacy Notice.

5. Use of Personal Information

We only use your Personal Information for the purposes described in our Privacy Notice and this California Privacy Addendum. We will not use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

6. Disclosures of Personal Information

Disclosures of Personal Information to Third Parties for Business Purposes

We may disclose your Personal Information to third parties for one or more business purposes.

In the preceding twelve (12) months, we have disclosed the following categories of Personal Information for one or more of the business purposes described below to the following categories of third parties:

Personal Information Category	Categories of Third-Party Recipients
Identifiers.	Service providers we use to support our business (e.g., CRM vendors, IT and infrastructure support service providers, advertisers/ad networks, Internet cookie information recipients, such as analytic services, etc.).
Personal information as listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Service providers we use to support our business (e.g., CRM vendors, IT and infrastructure support service providers, advertisers/ad networks, Internet cookie information recipients, such as analytic services, etc.).
Internet or Network Activity information.	Service providers we use to support our business (e.g., CRM vendors, IT and infrastructure support service providers, advertisers/ad networks, Internet cookie information recipients, such as analytic services, etc.).

Professional or employment-related information.	Service providers we use to support our business (e.g., CRM vendors).
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We disclose your Personal Information to the categories of third parties listed above for the following business purposes, in addition to those described in our Privacy Notice:

- Helping to ensure security and integrity of our products, services, and IT infrastructure to the extent the use of the Personal Information is reasonably necessary and proportionate for these purposes.
- Debugging to identify and repair errors that impair existing intended functionality.
- Performing services on our behalf, including CRM services, IT and infrastructure support services, analytic services, and other similar services.
- Providing advertising and marketing services, except for cross-context behavioral advertising, to consumers.
- Undertaking internal research for technological development and demonstration.

In addition to the above, we may disclose any or all categories of Personal Information to any third-party (including government entities and/or law enforcement entities) as necessary to:

- comply with: (i) federal, state, or local laws, or to comply with a court order or subpoena to provide information; (ii) civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities; and/or (iii) certain government agency

requests for emergency access to your Personal Information if you are at risk or danger of death or serious physical injury;

- cooperate with law enforcement agencies concerning conduct or activities that we (or one of our service providers') believe may violate federal, state, or local law;
- evaluate or engage in any actual or contemplated merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of bswift's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by bswift about its Websites' users and other individuals is among the assets transferred.
- exercise or defend legal claims, and to enforce or apply our terms of service and other agreements;
- protect the rights, property, or safety of bswift, its clients, or others; and/or
- otherwise fulfill the purpose for which you provided it.

"Selling" and "Sharing" of Personal Information

In the preceding twelve (12) months:

- We have not "sold" Personal Information for either monetary or other valuable consideration, and we do not have any actual knowledge that we "sell" the Personal Information of consumers under the age of sixteen (16) for monetary or other valuable consideration.
- We have not "shared" Personal Information for the purpose of cross-context behavioral advertising, and we do not have any actual knowledge that we "share" the Personal Information of consumers under the age of sixteen (16) for such purposes.

7. Consumer Data Requests

The CPRA provides consumers with specific rights regarding their Personal Information. This section describes your CPRA rights and explains how to exercise those rights. You may exercise these rights yourself or through your authorized representative (as defined below). For more information on how you or your authorized representative can exercise your rights, please see [Exercising Your CPRA Privacy Rights](#).

- **Right to Know.** You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past twelve (12) months (a “Right to Know” Consumer Request). This includes: (i) the categories of Personal Information we have collected about you; (ii) the categories of sources from which that Personal Information is collected; (iii) our purposes for collecting this Personal Information; (iv) the categories of third parties with whom we have shared your Personal Information; and (v) if we have “sold” or “shared” or disclosed your Personal Information, a list of categories of third parties to whom we “sold” or “shared” your Personal Information, and a separate list of the categories of third parties to whom we disclosed your Personal Information. You must specifically describe whether you are making a Right to Know Consumer Request or a Data Portability Consumer Request (defined below). If you would like to make both such requests, you must make them clear in your request. If it is not reasonably clear from your request, we will only process your request as a Right to Know Consumer Request. In response to a Right to Know Consumer Request, we will provide you with all relevant information we have collected or maintained about you on or after January 1, 2022, unless you request a shorter time period or an exception applies. You may make a Right to Know Consumer Request a total of two (2) times within a twelve (12)-month period at no charge.

- **Access to Specific Pieces of Information.** You also have the right to request that we provide you with a copy of the specific pieces of Personal Information that we have collected about you, including any Personal Information that we have created or otherwise received from a third-party about you (a “Data Portability” Consumer Request). If you make a Data Portability Consumer Request electronically, we will provide you with a copy of your Personal Information in a portable and, to the extent technically feasible, readily reusable format that allows you to transmit the Personal Information to another third-party. You must specifically describe if you are making a Right to Know or Data Portability Consumer Request. If you would like to make both such requests, you must make them clear in your request. If it is not reasonably clear from your request, we will only process your request as a Right to Know Consumer Request. We will not provide this information if the disclosure would create a substantial, articulable, and unreasonable risk to your Personal Information or the security of our systems or networks. We will also not disclose any Personal Information that may be subject to another exception under the CPRA. If we are unable to disclose certain pieces of your Personal Information, we will describe generally the types of Personal Information that we were unable to disclose and provide you a description of the reason we are unable to disclose it. In response to a Data Portability Consumer Request, we will provide you with all relevant information we have collected or maintained about you on or after January 1, 2022, unless you request a shorter time period or an exception applies. You may make a Data Portability Consumer Request a total of two (2) times within a twelve (12)-month period at no charge.
- **Correction.** You have the right to request that we correct any incorrect Personal Information about you to ensure that it is complete, accurate, and as current as possible. You may request that we correct the Personal Information we have about you as described below under Exercising Your CPRA Privacy Rights. In some cases, we may require you to provide reasonable documentation to show that the Personal

Information we have about you is incorrect and what the correct Personal Information may be. We may also not be able to accommodate your request if we believe it would violate any law or legal requirement or cause the information to be incorrect or if the Personal Information is subject to another exception under the CPRA.

- **Deletion.** You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your Consumer Request (see Exercising Your CPRA Privacy Rights), we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies pursuant to the CPRA. Some exceptions to your right to delete include, but are not limited to, if we are required to retain your Personal Information to complete the transaction or provide you the products or goods for which we collected the Personal Information or otherwise perform under our contract with you, to detect security incidents or protect against other malicious activities, and to comply with legal obligations. We may also retain your Personal Information for other internal and lawful uses that are compatible with the context in which we collected it.
- **Limiting Our Uses and Disclosures of Sensitive Personal Information (“SPI”).** You have the right to request that we limit our use and disclosure of your SPI (as defined in the CPRA) to only those purposes specifically enumerated in the CPRA. Currently, however, we do not collect SPI. Should this change in the future, we will update this California Privacy Addendum and provide you with methods to limit the use and disclosure of SPI.
- **Non-Discrimination.** We will not discriminate against you for exercising any of your CPRA rights. Unless permitted by the CPRA, we will not do any of the following as a result of you exercising your CPRA rights: (i) deny you goods or services; (ii) charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties; (iii) provide you a different level or

quality of goods or services; or (iv) suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Exercising Your CPRA Privacy Rights

To exercise the rights described above, please submit a request (a **“Consumer Request”**) to us by either:

- Calling us toll free at 1.877.927.9438
- Emailing us at bcompliant@bswift.com

If you fail to make your Consumer Request in accordance with the ways described above, we may either treat your request as if it had been submitted with our methods described above or provide you with information on how to submit the request or remedy any deficiencies with your request.

Only you, or someone that you have authorized to act on your behalf (an **“authorized representative”**), may make a Consumer Request related to your Personal Information. You may also make a Consumer Request on behalf of your minor child. All Consumer Requests must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative of such a person. This may include providing certain information about yourself, such as your name, postal address, email address, and/or telephone number.
- Be described with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm which Personal Information relates to you or the individual for whom you are making the request as their authorized representative.

Making a Consumer Request does not require you to create an account with us. We will only use Personal Information provided in a Consumer Request to verify the requestor's identity or authority to make the request.

8. Personal Information Retention Periods

We retain all categories of Personal Information that we collect as required by applicable law or our record retention guidelines applicable to the type of personal information or category of record. However, we may retain any or all categories of Personal Information when your information is subject to one of the following exceptions:

- when stored in our backup and disaster recovery systems, in which case your Personal Information will be deleted when the backup media your Personal Information is stored on expires or when our disaster recovery systems are updated;
- when necessary for us to exercise or defend legal claims;
- when necessary to comply with a legal obligation; or
- when necessary to help ensure the security and integrity of our Websites and IT systems.

Your Personal Information will be deleted when we no longer require your Personal Information for any of the above purposes.

9. Changes to This California Privacy Addendum

We reserve the right to amend this California Privacy Addendum at our discretion and at any time. When we make changes to this California Privacy Addendum, we will post the updated addendum on the Websites and update the addendum's effective date. **Your continued use of our Websites following the posting of changes constitutes your acceptance of such changes.**

10. Contact Information

If you have any questions or comments about this California Privacy Addendum, the ways in which bswift collects and uses your information described above and in the Privacy Notice, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

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