



Specialty Pharmacy

# Privacy policy

## Online services privacy policy

We recognize that the privacy of your information is important. This Online Services Privacy Policy ("Privacy Policy" or "Policy") describes our practices in connection with information we collect through online and mobile websites, platforms, services and applications that we own or operate and that contain a link to this Privacy Policy (collectively, "Online Services"). Some online services offered by us may be governed by a separate privacy policy.

As used in this Policy, terms such as "we," "us," "our," and "Company" refer to current and future affiliated entities of Optum.

By using the Online Services, you consent to our collection, use, disclosure, and storage of information as described in this Privacy Policy.

Our privacy policy explains:

- **[What Information We Collect.](#)**
- **[How We Use Personal Information.](#)**
- **[How We Share Personal Information.](#)**
- **[How to Manage Your Information.](#)**
- **[How We Protect Information.](#)**
- **[How to Learn About Health and Financial Privacy Practices.](#)**
- **[Specific Product Privacy Practices.](#)**
- **[Additional Rights for California Residents.](#)**
- **[When this Privacy Policy Applies.](#)**
- **[How to Contact Us.](#)**

## What information we collect

We may collect two basic types of information through Online Services: information

you provide directly to us and information that is automatically provided to us or collected through your use of our Online Services (collectively, "Information"). Such Information may include your full name, telephone number, e-mail address, postal address, certain account numbers, the User ID you create or is assigned to you, and other information described in this Privacy Policy.

When you use Online Services, you may also provide certain information directly to us, including when you allow us to obtain information about you from other sources.

We may also obtain automatically-collected information through the Online Services. See [Cookies and Tracking](#) for more information. Our mobile applications may also collect information about your mobile device, such as its unique device identifier and precise geolocation information.

You may limit the Information you provide or make available to us; however, that may limit your ability to access or use certain Online Services functions. It may also limit your ability to request, or for us to provide further details about, certain services or information.

Our Online Services operate on computer servers in the United States; therefore any Information you provide will be transferred to and processed by a computer server located within the United States.

## How we use information

We may use the Information for a number of purposes such as:

- To respond to an e-mail or particular request from you.
- To communicate with you.
- To provide you with content through our Online Services or other services that we may offer.
- To process an application for a product or service as requested by you.
- To authenticate you on any portion of our Online Services and with vendors acting on our behalf.
- To administer surveys and promotions.
- To personalize your experience with us.
- To provide you with informational or promotional offers, as permitted by law, that we believe may be useful to you, such as information about products or services provided by us or other businesses.
- To perform analytics and to improve our products, general services, Online Services, and advertising.

- To comply with applicable laws, regulations, and legal process.
- To protect someone's health, safety, or welfare.
- To protect our rights, the rights of affiliates or related third parties, or take appropriate legal action, such as to enforce our Terms of Use.
- To keep a record of our transactions and communications.
- As otherwise necessary or useful for us to conduct our business, so long as such use is permitted by law or for any other purpose with your consent.

We may use Information to contact you through any contact information you provide through our Online Services or any other services we offer, including any e-mail address, telephone number, cell phone number, or fax number. To learn more about our communications practices, please visit our [Consumer Communications Notice](#)

We may, when permitted, combine your Information with other information, whether online or offline, maintained or available to us from you or from other sources, such as from our vendors, and we may use and disclose combined data for the purpose described in this Section or for internal business purposes. We may also aggregate and/or de-identify your Information. We may, when permitted, use and disclose de-identified and aggregated data for any purpose, which may include, without limitation, disclosures to third parties for analytics purposes such as evaluating the Online Services and providing additional benefits, programs, and services.

## How we share information

We will only share your Information with third parties as outlined in this Policy and as otherwise permitted by law or as permitted with your consent.

We may share Information if all or part of the Company is sold, merged, dissolved, acquired, or disbanded to any extent, or in connection with steps that may need to be taken in anticipation of such events.

We may share Information in response to a court order, subpoena, search warrant, or to comply with law or regulation. We may cooperate with law enforcement authorities in investigating and prosecuting activities that are illegal, violate our rules, or may be harmful to other visitors.

We may also share Information within the Company, including among affiliates, or with our parent company, or subsidiaries.

We may also share Information with other third party companies that we have a business relationship with or hire to perform services on our behalf. For example, we may hire a company to help us send and manage e-mail, and we might provide that


company with your e-mail address and certain other information in order for them to send you an e-mail message on our behalf. Similarly, we may hire companies to host or operate some of our Online Services and related computers and software applications.

## Posting messages, comments, and content

Our Online Services may have collaboration areas, including but not limited to "blogs," "bulletin boards," "leader boards," and "health games," that permit users to have collaborative discussions and/or share information. Some of our Online Services may permit you to select a display name or image that will be a "nickname" on the Online Service. Please note, any information you submit or post to these collaboration areas, including your display name or image, may be visible by other users of the Online Service, and such users may share them with others. Therefore, please be thoughtful in what you write and understand that this information may become public.




## How to manage your information

Our Online Services may permit you to view your profile, if applicable, and access related Information about you and to request changes to, or deletion of, such Information. If this function is available, you may have access to a page on the Online Services through which you may review your profile, if applicable, and related Information about you, and you may have options to modify or delete or such Information. Please remember, however, if we have already disclosed some of this Information to third parties, we may not have access to that disclosed information and may not be able to force the deletion or modification of any information by the third parties to whom we have made those disclosures.

We may communicate, electronically or via telephone with you about existing benefits, programs, products, services, or tools and/or general health information. We may communicate protected health information with you via unencrypted methods. You acknowledge and accept that communications may be sent unencrypted and there is some risk of disclosure or interception of the contents of these communications. Our [Consumer Communications Notice](#)  outlines how we may communicate with you. If you need additional assistance in opting-out of a communication, please [Contact Us](#) for assistance. Please be aware that opt-outs may not apply to certain types of communications, such as account status, Online Services updates, or other communications.

# Cookies and tracking

The Company may use various technologies, including cookies, tokens, tags, web logs, web beacons, scripts, and web server logs to gather automatically-collected information and may aggregate this information from our Online Services visitors or to enable certain features of our Online Services. This information may include demographic data, technical information about the technology (e.g., phone, computer) used to connect to the Online Services, web browser information, your IP address, and browsing behavior such as pages visited and how often they are visited ("Activity Information"). We may also use third party analytics companies to provide these services.

We may also allow third party service providers to use cookies and other technologies to collect information and to track browsing activity over time and across third party websites such as web browsers used to read our websites, which websites are referring traffic or linking to our websites, and to deliver targeted advertisements to you. We do not control these third party technologies and their use is governed by the privacy policies of third parties using such technologies. For more information about third party advertising networks and similar entities that use these technologies, see <http://www.aboutads.info/consumers> , and to opt-out of such ad networks' and services' advertising practices, go to [www.aboutads.info/choices](http://www.aboutads.info/choices)  and <http://www.networkadvertising.org/choices> . Once you click the link, you may choose to opt-out of such advertising from all participating advertising companies or only advertising provided by specific advertising companies. Please note that to the extent advertising technology is integrated into the Online Services, you may still receive advertisements even if you opt-out of tailored advertising. In that case, the ads will just not be tailored. Also, we do not control any of the above opt-out links and are not responsible for any choices you make using these mechanisms or the continued availability or accuracy of these mechanisms.

Activity Information is captured using various technologies and may include cookies. "Cookies" are small text files that may be placed on your computer when you visit an Online Service or click on a URL. Cookies may include "single-session cookies" which generally record information during only a single visit to a website and then are erased, and "persistent" cookies which are generally stored on a computer unless or until they are deleted or are set to expire. You may disable cookies and similar items by adjusting your browser preferences at any time; however, this may limit your ability to take advantage of all the features on our Online Services. In addition, you may also have additional means to manage the collection of Activity Information by:

- Managing the use of "flash" technologies with the [Flash management tools](#) available at Adobe's website;
- Visiting the [Adobe Digital Marketing Suite](#) to "Opt-Out" of data aggregation and analysis;
- Clicking on the available "Opt-Out" link at the bottom of the applicable home web page;
- Visiting [Google](#) to "Opt-Out" of display advertising or customize Google display network ads; and/or
- Clicking on the Rakanto "Opt-Out" [link](#).

Please note that we do not currently respond to web browser "Do Not Track" signals that provide a method to opt-out of the collection of information about online activities over time and across third party websites or online services because, among other reasons, there is no common definition of such signals and no industry-accepted standards for how such signals should be interpreted.

We gather Activity Information about you in order to improve the quality of our services, such as the best method and time to contact you. Without limiting the other ways in which we may use Information as described herein, we may otherwise use and disclose your Activity Information unless restricted by this Policy or by law. Some examples of the ways we use your Activity Information include:

- Customizing your experiences, including managing and recording your preferences;
- Authenticating your account information;
- Marketing, product development, and research purposes;
- Tracking resources and data accessed on the Online Services;
- Developing reports regarding Online Service usage, activity, and statistics;
- Assisting users experiencing problems with our services;
- Updating and servicing our Online Services;
- Enabling certain functions and tools on the Online Services; and
- Tracking paths of visitors to the Online Services and within the Online Services.

As described above, we may use tracking technologies that allow us recognize your device when you return to our Online Services within a period of time, as determined by us, and to support automatic login to your Online Services. To maintain your privacy, you should affirmatively log out of your account prior to your session ending (whether you end your session or we end your session, for example if our Online Services has "timed out" – i.e. we have ended your session automatically after a period of inactivity as determined by us in our sole discretion). Unless you affirmatively log out of your account, you may be automatically logged back in the next time you, or any user of your devices visits the Online Services.

## How we protect information

We maintain administrative, technical and physical safeguards designed to protect the information that you provide on our Online Services. These safeguards vary based on the sensitivity of the information that is being collected, used and stored.

However, no security system is impenetrable and we cannot guarantee the security of our Online Services, nor can we guarantee the security of the information you transmit to us over the Internet, including your use of e-mail. We are not liable for the illegal acts of third parties such as criminal hackers.

It is your responsibility to safeguard the devices you use to access our Online Services (such as laptops, tablets and mobile devices), and to use appropriate security settings on those devices. If those devices are lost, stolen or misplaced, others may be able to access your account and your personal information using those devices. If you log into the Online Services using a public computer or device, or the computer or device of another person, you should affirmatively log out of your account (i) prior to ending your session, or (ii) if you will be inactive on the Online Services for more than a few minutes otherwise, the next user of that computer or device may be able to access your account and the Information in your account if your session has not ended.

You agree that we are not responsible for any harm that may result from someone accessing your account or personal information on a lost, stolen or misplaced device or on a public computer or kiosk where you do not for any reason take the necessary steps to log out of your account prior to ending a session on such public computer or kiosk.

We may offer mobile apps that enable us to communicate with you through push notifications. Where mobile apps are offered, you may be able to turn off push notifications in your mobile phone settings. You may also be able to control preview settings in your e-mail applications.

We retain Information for as long as necessary for the purpose for which it is collected, subject to a longer period if the information is relevant to a legal challenge.

## Children under 13

We will not intentionally collect any personal information (as that term is defined in the Children's Online Privacy Protection Act) from children under the age of 13 through our Online Services without receiving parental consent. If you think that we



have collected such personal information from a child under the age of 13 through our Online Services, please [Contact Us](#) immediately.

## SSN protection policy

It is our policy to protect the confidentiality of Social Security numbers ("SSNs") that we receive or collect in the course of business. We secure the confidentiality of SSNs through various means, including physical, technical, and administrative safeguards that are designed to protect against unauthorized access. It is our policy to limit access to SSNs to that which is lawful, and to prohibit unlawful disclosure of SSNs.

## How to learn about health and financial privacy practices

Some of our products and services are regulated by certain laws, including the Health Insurance Portability and Accountability Act ("HIPAA") and the Gramm-Leach-Bliley Act. To learn more about our regulated practices, read our Product Privacy Notices available in the [Specific Product Privacy Practices](#) section of this Policy.

Additional rights for California residents

## California privacy rights

California law permits our customers who are California residents to request certain information regarding the disclosure of personal information to third parties for their direct marketing purposes.

If we have disclosed any personal information to third parties for direct marketing purposes, we will provide a list of the categories of personal information, along with the names and addresses of these third parties to you at your request. To make such a request, write us at the postal or e-mail address found in the [Contact Us](#) section of this Policy.

This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted other than to the specified e-mail or postal



address. You should put "California Privacy Rights" in the e-mail subject line and in the body of your request. You must provide us with specific information regarding yourself so that we can accurately respond to the request.

## California minors under 18

If you are a California resident under the age of 18 and are a registered user of our Online Services, you may request that we remove from our Online Services any content you post to our Online Services that can be accessed by any other user (whether registered or not). Please note that any content that is removed from visibility on our Online Services may still remain on our servers and in our systems. To request removal of content under this provision, please write or e-mail us at the postal or e-mail address found in the [Contact Us](#) section of this Policy. When you write us, provide us with a description of the content and the location of the content on our Online Services, and any other information we may require in order to consider your request. Please note that removal of content under this provision does not ensure complete or comprehensive removal of the content or information posted on the Online Services by you.

## When this privacy policy applies

Our Policy applies to Online Services that we own or operate and that contain a link to this Privacy Policy. Our Policy does not apply to information collected through other means such as by telephone, via mobile application that do not link to this Privacy Policy, or in person, although that information may be protected by other privacy policies.

Our Policy does not apply to the practices of other companies or other websites or software applications that may be linked from or made available through our Online Services. Some online services offered by us may be governed by a separate privacy policy.

The inclusion of a link on our Online Services or the ability to utilize a third party website or software application through our Online Services does not imply that we endorse, or otherwise monitor the privacy or security practices of that third party website or software application or the accuracy of its content and your use of the third party website or software application is governed by the third party's privacy policy.

Some of our products and services may have specific privacy practices ("Product Privacy Notices") such as a HIPAA Notice of Privacy Practices or other specific privacy practices that we want you to be aware. This information can be found in the [Specific Product Privacy Practices](#) section of this Privacy Policy. When a Product Privacy Notice exists, the content of the Product Privacy Notice applies to your use of the product and service.

This Privacy Policy is not intended to and does not create any contractual or other legal rights in or on behalf of any party.

## Changes

We may change this Policy at any time. If we do so, such change will appear on this page. We will also provide notice and choices to you, on this website and in other appropriate locations, based on the scope and extent of changes. You may always visit this Policy to learn of any updates. Your continued access to or use of the Online Services constitutes your consent to these changes to this Policy.

## How to contact us

Contact us regarding this Policy or our related privacy practices. If you believe we or any company associated with us has misused your information, please contact us immediately.

Optum  
Optum Privacy Office  
MN101-E013, 11000 Optum Circle  
Eden Prairie, MN 55344  
[privacy@optum.com](mailto:privacy@optum.com)

Rally Health  
Rally Privacy Office  
3000 K Street NW  
Suite 350  
Washington, DC 20007  
[info@werally.com](mailto:info@werally.com)

## Effective date

## Specific product privacy practices

The following Product Privacy Notices supplement this Policy and explain specific privacy practices with respect to certain products and services that you may use, including access to more information about health or financial privacy practices.

- **OptumRx**
- **Optum Bank**

### OptumRx

- **HIPAA notice of privacy practices:** Read our [HIPAA Notice of Privacy Practices](#) to learn more about our privacy practices regarding health and medical information under HIPAA.

### Optum Bank

- **Contact us:** Our [Customer Support Center](#) provides information about how you can connect with our customer service team over the phone or online. Representatives are available Monday through Friday from 8:00 a.m. to 8:00 p.m. Eastern time.