Privacy Policy

Effective Date: July 1, 2021

Protecting your privacy is important to MMM Holdings, LLC.! MMM Holdings, LLC., including its subsidiaries and affiliates (hereinafter referred to as "MMM") is committed to protecting the privacy of the personal information we receive from you when you interact with our MMM Interoperability API Developer Portal ("API Website"), via our mobile applications and website or through a website or application hosted by a third party or one of our affiliated companies. MMM API Website contains information about the interoperability application program interfaces (APIs) that facilitate connections between the API Website, its clients, and third parties interested to integrate with MMM.

This Privacy Policy describes how we may collect, what and why we collect it and what we do with your personal information through your interactions with us on the API Website https://prodmmmtzinterop.developer.healthtranzformdev.com. By using the API Website, you agree to the **Terms and Conditions** of this Privacy Policy.

The API Website is designed for MMM enrollees or the enrollee's personal representative who will interact with the API Website via mobile applications and website hosted by us or third parties. The API Website is controlled and operated by MMM, a company located in the Commonwealth of Puerto Rico, a territory of United States. By utilizing the API Website, you affirm you are of legal age to enter into the resulting Agreement and are an authorized user of the API Website, and consent to the transfer or storage of your information to United States territory, including Puerto Rico.

Types of Information We Collect

We want your understanding that certain information about you can be collected when you browse the API Website and how the information you provide is collected and used. Personal information is any information that we can use to identify, contact you or to locate you. This type of information may include, without limitation, your name, email address, phone number, identification information, fax number. We may collect and store personal information when you provide it to use or to our service providers. Examples of personal information that the API Website can collect and when we collect it includes:

- **Registration**: During the registration process to the API Website, we collect personal information from users (our enrollees or enrollee's personal representatives) when you register on the Website. This information will be used for the registration process described in the **Terms and Conditions of Use**.

- **Surveys**: Sometimes we will request information from you via surveys on the API Website. Participation in these surveys is voluntary, and the information collected is used in

accordance with this Privacy Policy. We use this survey to collect opinion and feedback. If you do answer to these questions, don't include personally identifiable information (PII) or protected health information (PHI) in your answers.

- **Contact Information**: We collect personal information from users of the API Website in order to provide technical support to the technology supplied by the developer portal. MMM is always looking the way to enhance and improve our technologies to continue providing outstanding services to our enrollees.

- **Website Interaction**: We may record how you used our API Website and/or online services, including page views and response times or how you navigate within the API Website. In other words, we may record your interactions with our API Website, the same way when you browse or visits pages in the internet.

- **Other Sources:** We may collect data about you from publicly available sources. For example: we may obtain data from third parties to improve the accuracy of the information we had about you.

The provision of your personal information is voluntary. However, if you choose not to provide your personal information to us, MMM may not be able to perform the review needed for the requested services and you will not be able to see your information through a third-party app of your choice.   If you provide any personal information on behalf of other person in connection with the API Website, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy and federal and state privacy laws and regulations.

Use and Disclosure of Information

We use your personal information to respond to your or your personal representative requests related to your information. We may also use your information to send you email alerts, communications and administrative information important to you about your information.

MMM may use your personal information to personalize your experience on the API Website and for business purposes such as data analysis, website enhancements, audits, fraud prevention and monitoring, new services and to determine the effectiveness of our technology. If MMM or some of our business, assets or stocks are sold or transferred, or to the extent we engage in business negotiations with third parties, your personal information may be transferred to or shared with such third parties as part of the transaction or negotiation.

MMM may also use your information as permitted by applicable federal and state laws and regulation related to privacy such as HIPAA Act. We may disclose personal information to our service providers, who provide support to our API Website or provide services related to data

analysis, adjudication and payment processing, auditing, case management analysis, information technology, related infrastructure provision and other services.

If requested by judicial or law enforcement officials to provide personal information of you through court orders, legal procedures, subpoenas, official requests, or in order to give information to any government agency or official, we may do so, as permitted by law.

We may use or disclose personal information to investigate security breaches or cooperate with local and federal agencies.

We may use or disclose information that does not identify you, also known as "de-identified information", for any purpose, except if limited by law.

Links

The API Website may contain links to third party websites, services or other resources not operated by MMM or on our behalf. This links will not constitute an affiliation, endorsement or sponsorship of the third-party website by MMM. We do not control third-party websites or applications and they are not subject to the terms of this Privacy Policy and we are not responsible for the privacy protections of any information you provide to them. Before sharing your information with such third parties, you should actively review its privacy policies before using them, so you understand how your information may be uses or disclosed.

Cookies and Other Technologies

Through the MMM API Website, we collect information about Website traffic and usage patterns by cookies and servers' logs. This information is used to ensure that the functionality of the API Website is appropriate, to facilitate navigation, to personalize your experience, to identify technology problems, to monitor how and what purpose users are using the API Website and to administer the API Website. The cookie allows the sever to remember specific information about your visit while you are connected to our API Website. Your browser software can be set to reject or accept cookies. We also may use analytics providers that use cookies, pixel tags and other technologies to collect information about your use of our API Website. You can decide if and how your computer will handle cookies by configuring your options in your browser or mobile device settings. However, MMM notify you that if you reject all cookies, the API Website may not function properly.

On other hand, the collection of IP addresses is a standard and acceptable practice and is done automatically by many websites and applications. Our API Website will collect the IP addresses of all users navigating the Website. Your IP address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider. Device information may be also collected such as: hardware model or version, operating system, unique device identifiers, browser, mobile network information.

Security

MMM has committed to protecting your information within our organization according to the Health Insurance Portability and Accountability Act of 1996, Pub. L. No. 104-191, and its implementing regulations at 45 C.F.R. Parts 160, 162, and 164, as amended by the Health Information Technology for Economic and Clinical Health (HITECH) Act of the American Recovery and Reinvestment Act of 2009, Pub. L. No. 111-5 (collectively, "HIPAA"). MMM infrastructure is protected using security protocols, standards and best practices procedures according to the privacy and security laws. Also, we use best practices for maintenance of the API Website and monitor our IT infrastructure regularly.

Spam, Phishing and Fraud Sites

Fraudulent websites and cyber-attacks continue to increase simultaneously with the improvement of technology, so you must be informed of how you can protect your information while browsing websites, applications, and the internet. Please be aware that there may be fraudulent website that illegally use MMM company brand logos or sends fraudulent communications electronically through fraudulent phishing practices. If you receive correspondence that appears to be from MMM, but contains grammatical errors, typographical error or strange content, please proceed with caution, as this email may be fraudulent. If you receive this type of fraudulent or spam email, avoid the replying to it and contact us immediately at https://forms.office.com/r/bjSiV0jY3x.

Your Choice

We can collect your personal information, including your email address or mobile phone number, to deliver promotional messages, alerts or e-Newsletters. You can opt-out of these communications at any time by selecting to opt out within the email. We will continue sending you administrative messages.

Removal Request

To request access to the removal or modification of the personal information you have provided to us, please contact us at https://forms.office.com/r/bjSiV0jY3x. We only accept requests with respect to the personal information associated with the registered email address within the API Website. We may need to verify your identity during the process. Please be aware, that we may need to retain certain information for recordkeeping purposes because of a regulatory requirement and/or to complete any transaction requested or began prior to requesting the corresponding change or deletion.

Your Responsibility

As a user, it is your responsibility to:

a. Authorize, monitor, and control access to and use of MMM API Website account, User ID and Password.
b. Ensure that your software application meets security requirements;
c. Have appropriate procedures and systems in place in order to maintain your operations and availability if the API Website, including its content, is unavailable;
d. Comply with all applicable laws and regulations and;
e. Promptly inform us of any need to deactivate a password or an account by contacting us at https://forms.office.com/r/bjSiV0jY3x.

Contact Information

If you have any questions or concerns about this Privacy Policy, or about the way your information is collected and used by MMM API Website, please contact us at https://forms.office.com/r/bjSiV0jY3x. If you have questions about the content of this Privacy Policy or any matter related to privacy, please contact MMM Chief Compliance Officer or MMM Privacy Officer at the following address:

Compliance Department
Phone: 787-622-3000
PO Box 71114
San Juan PR 00936-8014