

MTM Privacy Policy

Effective as of January 1, 2020

Last updated August 4, 2023

INTRODUCTION

Medical Transportation Management, Inc. and our affiliate companies and subsidiaries (collectively, “MTM,” “we,” “our,” or “us”) respects the privacy of your information. This Privacy Policy is designed to assist you in understanding how we collect, use, and safeguard your information. This Privacy Policy applies to individuals who access our websites that link to this Privacy Policy (“Sites”) and any of our online and, where required, offline services (collectively, “Services”).

From time to time, we may change this Privacy Policy. If we do, we will post an amended version on this webpage. Please review this Privacy Policy periodically.

This Privacy Policy covers the following topics:

- 1. PERSONAL DATA WE COLLECT**
- 2. HOW WE USE YOUR PERSONAL DATA**
- 3. HOW WE SHARE YOUR PERSONAL DATA**
- 4. UNIVERSAL OPT-OUT MECHANISMS**
- 5. SECURITY**
- 6. THIRD PARTY LINKS**
- 7. CHILDREN’S PRIVACY**
- 8. YOUR STATE PRIVACY RIGHTS AND ADDITIONAL DISCLOSURES**
- 9. NOTICE TO CALIFORNIA RESIDENTS**
- 10. ACCESSIBILITY**
- 11. HOW TO CONTACT US**

1. PERSONAL DATA WE COLLECT

We collect personal data from you through your use of the Sites and Services. Personal data is information that is linked or reasonably linkable to an identified or identifiable individual. We collect the following types of personal data:

Personal Data You Provide

Depending on how you interact with our Sites and Services, we will collect the following personal data that you voluntarily provide to us for the following purposes:

- *Account.* If you create an account for any of our Services, including to schedule appointments or transportation, we will collect your first and last name, a home or other physical address, phone number, email address, Medicaid ID, disability information for ADA assessments, driver's license/insurance/vehicle information for transportation reimbursement, and password. We may use this information to reimburse you for transportation expenses, assess for ADA transportation services, and deliver reminders and details of upcoming appointments or denial of services.
- *Member Chat.* If you use our online chat feature, we will collect your first and last name and certain personal data pertaining to the Member, including the Member's first and last name and phone number. We also will ask you to provide the Member's date of birth and postal zip code. Our online chat feature may collect, record, and store the information you provide in the chat.
- *Contact Us.* When you complete our online contact form, we will collect your first and last name, a home or other physical address, phone number, email address, and any personal data that you choose to provide in your comments.
- *Subscribe to Newsletter.* When you sign up to receive our newsletter, we will collect your first and last name, email address, and company.

To review or request changes to any of your personal data, please contact us through the methods described in the “**HOW TO CONTACT US**” section below.

Personal Data as You Navigate Our Sites

We automatically collect certain personal data through your use of our Sites and our use of cookies and other tracking technologies, such as the following:

- *Usage Information.* For example, the pages on the Sites you access, the frequency of access, and what you click on while on the Sites.
- *Device Information.* For example, hardware model, operating system, application version number, and browser.
- *Mobile Device Information.* Aggregated information about whether the Sites are accessed via a mobile device or tablet, the device type, and the carrier.
- *Location Information.* Location information from site visitors on a city-regional basis.

To learn more about how we use cookies and to manage your cookie settings, please see our Cookie Policy.

2. HOW WE USE YOUR PERSONAL DATA

In addition to the purposes stated above, we may use all the personal data we collect in accordance with applicable law such as to:

- Maintain and improve our Sites and Services;
- Protect the security and integrity of our Sites and Services;
- Investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of our terms, and to otherwise fulfill our legal obligations;
- Monitor compliance with and enforce this Privacy Policy and any applicable agreements and policies;
- Defend our legal rights and the rights of others;
- Fulfill any other purposes for which you provide it;
- For any purpose that is reasonably necessary to or compatible with the original purpose for which we collected the personal data as disclosed to you; and
- Comply with applicable law.

3. HOW WE SHARE YOUR PERSONAL DATA

We may share the personal data that we collect about you in the following ways:

- With vendors who perform data or Site-related services on our behalf (e.g., transportation providers, marketing providers, analytics providers, advertising networks, etc.);
- With public authorities in instances where we must disclose personal data as required by applicable law;
- To the extent that we are required to do so by law;
- In connection with any legal proceedings or prospective legal proceedings;
- To establish, exercise, or defend our or third party's legal rights, including providing information to others for the purposes of fraud prevention;
- With any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal data where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal data;
- With any other person or entity as part of any business or asset sale, equity transaction, merger, acquisition, bankruptcy, liquidation, or similar proceeding, or in preparation for any of these events;
- With any other person or entity where you consent to the disclosure; and

- For any other purpose disclosed by us when you provide the personal data or for any other purpose we deem necessary, including to protect the health or safety of others.

For more information on how we sell personal data with third parties, see our **“YOUR STATE PRIVACY RIGHTS AND ADDITIONAL DISCLOSURES”** section below.

4. UNIVERSAL OPT-OUT MECHANISMS

The Sites recognize the Global Privacy Control (“GPC”) signal. If you are using a browser setting or plug-in that sends an opt-out preference signal to each website you visit, we will treat that as a valid request to opt out. To download and use a browser supporting the GPC browser signal, click here: <https://globalprivacycontrol.org/orgs>. If you choose to use the GPC signal, you will need to turn it on for each supported browser or browser extension you use.

Some internet browsers incorporate a “Do Not Track” feature that signals to websites you visit that you do not want to have your online activity tracked. Given that there is not a uniform way that browsers communicate the “Do Not Track” signal, the Sites do not currently interpret, respond to or alter their practices when they receive “Do Not Track” signals.

5. SECURITY

We maintain commercially reasonable security measures to protect the Personally Identifiable Information we collect and store from loss, misuse, destruction, or unauthorized access. However, no security measure or modality of data transmission over the Internet is 100% secure. Although we strive to use commercially acceptable means to protect your Personally Identifiable Information, we cannot guarantee absolute security.

6. THIRD-PARTY LINKS

The Sites and Services may contain links that will let you leave the Sites and Services and access another website. Linked websites are not under our control. We accept no responsibility or liability for these other websites.

7. CHILDREN’S PRIVACY

The Sites and Services are not intended for children under 13 years of age. We do not knowingly collect, use, or disclose personal information from children under 13.

8. YOUR STATE PRIVACY RIGHTS AND ADDITIONAL DISCLOSURES

Depending on the state in which you reside, you may have certain privacy rights regarding your personal data. If you are a California resident, please see our **“NOTICE TO CALIFORNIA RESIDENTS”** section below. For other state residents, your privacy rights may include (if applicable):

- The right to confirm whether or not we are processing your personal data and to access such personal data;

- The right to obtain a copy of your personal data that we collected from and/or about you in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the information to another controller without hindrance, where the processing is carried out by automated means;
- The right to delete personal data that we collected from and/or about you, subject to certain exceptions;
- The right to correct inaccurate personal data that we maintain about you, subject to certain exceptions;
- The right, if applicable, to opt out of the processing of your personal data for purposes of (1) targeted advertising; (2) the “sale” of your personal data (as that term is defined by applicable law); and (3) profiling in furtherance of decisions that produce legal or similarly significant effects concerning you;
- If we are required by applicable law to obtain your consent to process sensitive personal data, the right to withdraw your consent; and
- The right not to receive discriminatory treatment by us for the exercise of your privacy rights.

Depending on how the applicable privacy law defines a “sale,” we may sell personal data to third parties. For instance, if you are a resident of Colorado or Connecticut, our use of cookies and tracking technologies constitutes a sale of personal data to third-party advertisers. We also use cookies and other tracking technologies to display advertisements about our products to you on nonaffiliated websites, applications, and online services. This is “targeted advertising” under applicable privacy laws. We do not use personal data for profiling in furtherance of decisions that produce legal or similarly significant effects concerning individuals.

To exercise your rights, please submit a request by emailing us at #QCCContractCompliance@mtm-inc.net or by calling us at 888-444-1189. If legally required, we will comply with your request upon verification of your identity and, to the extent applicable, the identity of the individual on whose behalf you are making such request. To do so, we will ask you to verify data points based on information we have in our records. If you are submitting a request on behalf of another individual, please use the same contact methods described above. If we refuse to take action regarding your request, you may appeal our decision by emailing us at #QCCContractCompliance@mtm-inc.net or by calling us at 888-444-1189. If you would like to opt out of targeted advertising, you may alter your cookie preferences [here](#).

9. NOTICE TO CALIFORNIA RESIDENTS

The California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2020 (“CCPA”) requires that we provide California residents with a privacy policy that contains a comprehensive description of our online and offline practices regarding the collection, use, disclosure, and sale of personal information and of the rights of California residents regarding their personal information. This section of the Privacy Policy is intended solely for, and is applicable

only as to, California residents. If you are not a California resident, this does not apply to you and you should not rely on it.

The CCPA defines “personal information” to mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. Personal information does not include publicly available, deidentified or aggregated information. For purposes of this “**NOTICE TO CALIFORNIA RESIDENTS**” section we will refer to this information as “Personal Information.”

The CCPA, including the consumer rights described in this section, however, does not apply to any protected health information that we collect through our Medical Transportation Management business in our capacity as a business associate governed by the privacy, security, and breach notification rules issued by the United States Department of Health and Human Services established pursuant to the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Health Information Technology for Economic and Clinical Health Act (HITECH). We will use that information only for the purposes for which we were engaged by the HIPAA covered entity.

Notice at Collection of Personal Information

We currently collect and, in the 12 months prior to the Last Updated date of this Privacy Policy, have collected the following categories of Personal Information:

- Identifiers (name, alias, postal address, online identifier, internet protocol address, email address)
- Unique personal identifiers (device identifier; cookies, beacons, pixel tags, mobile ad identifiers, or other similar technology)
- Personal information described in California’s Customer Records statute (California Civil Code § 1798.80(e)) (telephone number, insurance policy number, education, employment, employment history, as well as the categories listed in “Identifiers” category above)
- Internet or other electronic network activity information (browsing history; search history; and information regarding consumer’s interaction with website, application or advertisement)
- Geolocation data
- Professional or employment-related information (company name)
- Inferences drawn from above information to create a profile about a consumer reflecting the consumer’s preferences

The Personal Information is collected from California residents directly.

In addition to the purposes stated above in the section “**HOW WE USE YOUR PERSONAL DATA**” we currently collect and have collected the above categories of Personal Information for the following business or commercial purposes:

- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards

- Helping to ensure security and integrity to the extent the use of your Personal Information is reasonably necessary and proportionate for these purposes
- Debugging to identify and repair errors that impair existing intended functionality
- Short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of your current interaction with us, provided that your Personal Information is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside the current interaction with us
- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, or providing similar services
- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us
- Advancing our commercial or economic interests, such as by inducing another person to buy, rent, lease, join, subscribe to, provide, or exchange products, goods, property, information, or services, or enabling or effecting, directly or indirectly, a commercial transaction

Sale, Sharing, and Disclosure of Personal Information

The following table identifies the categories of Personal Information that we sold or shared to third parties in the 12 months preceding the Last Updated Date of this Privacy Policy and, for each category, the categories of third parties to whom we sold or shared Personal Information:

Category of Personal Information	Categories of Third Parties
Unique personal identifiers (device identifier; cookies, beacons, pixel tags, mobile ad identifiers, or other similar technology; customer number, unique pseudonym or user alias; telephone numbers, or other forms of persistent or probabilistic identifiers that can be used to identify a particular consumer or device)	Data broker; advertising network; data analytics provider

We sold or shared Personal Information to third parties to advance our commercial and economic interests.

The following table identifies the categories of Personal Information that we disclosed for a business purpose in the 12 months preceding the Last Updated date of this Privacy Policy and, for each category, the categories of recipients to whom we disclosed the Personal Information.

Category of Personal Information	Categories of Recipients
Name; postal address	Transportation providers
Online identifier; IP address	Marketing provider; Data analytics provider
Email Address	Marketing provider
Device identifier; geolocation data	Data analytics provider
Cookies, beacons, pixel tags, mobile ad identifiers, or other similar technology; browsing and search history; information regarding consumer’s interaction with website, application, or advertisement	Data analytics provider; Marketing provider; Advertising networks
Inferences drawn from above information to create a profile about a consumer reflecting the consumer’s preferences	Data analytics provider; Marketing provider; Advertising networks

We disclosed Personal Information for the following business or commercial purposes:

- Helping to ensure security and integrity to the extent the use of your Personal Information is reasonably necessary and proportionate for these purposes
- Debugging to identify and repair errors that impair existing intended functionality
- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, or providing similar services
- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us

We do not knowingly collect, sell, or share the Personal Information of consumers under 16 years of age. We do not use Sensitive Personal Information for purposes other than those allowed by the CCPA and its regulations.

Retention of Personal Information

We retain your Personal Information for as long as necessary to fulfill the purposes for which we collect it, such as to provide you with the service you have requested, and for the purpose of satisfying any legal, accounting, contractual, or reporting requirements that apply to us.

Your Rights

If you are a California resident, you have the following rights with respect to your Personal Information:

- (1) The right to know what Personal Information we have collected about you, including the categories of Personal Information, the categories of sources from which we collected Personal Information, the business or commercial purpose for collecting, selling or sharing Personal Information (if applicable), the categories of third parties to whom we disclose Personal Information (if applicable), and the specific pieces of Personal Information we collected about you;
- (2) The right to delete Personal Information that we collected from you, subject to certain exceptions;
- (3) The right to correct inaccurate Personal Information that we maintain about you;
- (4) If we sell or share Personal Information, the right to opt out of the sale or sharing;
- (5) If we use or disclose sensitive Personal Information for purposes other than those allowed by the CCPA and its regulations, the right to limit our use or disclosure; and
- (6) The right not to receive discriminatory treatment by us for the exercise of privacy rights the CCPA confers.

How to Submit a Request to Know, Delete, and/or Correct

You may submit a request to know, delete, and/or correct by calling us at 888-444-1189 or by emailing us at #QCCContractCompliance@mtm-inc.net.

If you are submitting a request on behalf of a California resident, please submit the request through one of the designated methods discussed above. After submitting the request, we will require additional information to verify your authority to act on behalf of the California resident.

Our Process for Verifying a Request to Know, Delete, and/or Correct

If we determine that your request is subject to an exemption or exception, we will notify you of our determination. If we determine that your request is not subject to an exemption or exception, we will comply with your request upon verification of your identity and, to the extent applicable, the identity of the California resident on whose behalf you are making such request.

We will verify your identity either to a “reasonable degree of certainty” or a “reasonably high degree of certainty” depending on the sensitivity of the Personal Information and the risk of harm to you by unauthorized disclosure or deletion as applicable. To do so, we will ask you to verify data points based on information we have in our records concerning you.

Right to Opt-Out of Sale or Sharing of Personal Information

If you are a California resident, you have the right to direct us to stop selling or sharing your Personal Information.

You may submit a request to opt out of sales or sharing by clicking [here](#). If you have enabled privacy controls on your browser (such as a plugin), we will also treat that as a valid request to opt out. Please see the “**UNIVERSAL OPT-OUT MECHANISMS**” section above for more information.

Shine the Light Law

We do not disclose personal information obtained through our Sites or Services to third parties for their direct marketing purposes. Accordingly, we have no obligations under California Civil Code § 1798.83.

10. ACCESSIBILITY

We are committed to ensuring this Privacy Policy is accessible to individuals with disabilities. If you wish to access this Privacy Policy in an alternative format, please contact us as described below.

11. HOW TO CONTACT US

To contact us for questions or concerns about our privacy policies or practices please contact us at 888-444-1189 or #QCCContractCompliance@mtm-inc.net or write us at:

Medical Transportation Management, Inc.
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Lake St. Louis, MO 63367