



# Data Protection Policy

We recognize that the privacy of your personal information is important to you. The purpose of this policy is to let you know our practices for the collection and management of personal information. As used in this policy, terms such as “we” or “our” and “Company” refer to Optum Health & Technology (UK) Limited and its current and future affiliate entities, including our parent company UnitedHealth Group.

## Our Practices

We collect and hold personal information as part of providing and managing customer services and administering our business. We maintain reasonable administrative, technical and physical safeguards designed to protect personal information. The following are the kinds of personal information that may be collected and held:

### Customer Information

Personal information related to the identity of individuals that seek services, such as name, address, date of birth, email address, telephone number, or username. Customer information is collected via telephonic, face-to-face, or online interactions with a Counsellor, Consultant, or Wellbeing staff. Information may be captured in a customer’s case file notes, session plans, assessment reports, assessment results, consulting and training documentation, and critical incident documentation.

### Case Information

Personal information related to the psychological or wellness services provided to a customer by a Counsellor or Consultant or Wellbeing services provided by Wellbeing staff. Case information may include sensitive information, such as health information. Case information is collected via telephonic, face-to-face, or online interactions with a Counsellor or Consultant and via health and wellness events with Wellbeing staff. Case Information may be captured in customer’s case file notes, session plans, assessment reports, assessment results, consulting and training documentation, and critical incident documentation.

### Client Contact Information

Personal information related to contacting clients that would like to learn more about available products and services or for the administration of contracts and payments. Client contact information includes information such as name, email address, telephone number, or fax number. Client contact information is collected via telephonic, face-to-face, or online interactions and is held in administrative systems and files.

### Service Provider Information

Personal information related to Counsellors, Consultants, or other providers that provide services to our business. Service provider information includes information such as name, address, email address, or telephone number. Service provider information may be captured in a customer’s case file notes, session plans, assessment reports, assessment results, consulting and training documentation, critical incident documentation, and administrative systems.



We use and disclose personal information as part of providing and managing customer and client services and administering our business, which may include the following:

**Case Management**

Set up, triage, and ongoing administration of cases, including determination of eligibility and identification of customer requirements and appropriate services. Case management information may be shared with assigned Counsellors or Consultants.

**Wellbeing Management**

Conducting health and wellness events. Wellbeing management information may be shared with the customer about whom it relates or to the client organisations with the consent of the customer.

**Quality Management**

Ensuring the quality of service delivery, including call monitoring and recording, case consultations, and service feedback. Call recording is performed and quality monitoring is performed by senior members of the psychological staff. De-identified personal information may be shared with a supervisor or senior member of the psychological staff in order to provide consultation on customer cases.

**Client Reporting**

Provision of aggregate statistical reports to client organisations related to overall service delivery information, trends within and across organisations, and anonymized customer satisfaction and feedback information.

**Client Requests**

Responding to requests for more information about products and services.

**Business Administration**

Responding to requests for more information about products and services.

**Accreditation and Legal Requirements**

Compliance with legal and accreditation requirements.

We will not use or disclose personal information for purposes other than those for which the personal information was collected unless the individual has provided consent for such a use or disclosure or a legal exemption applies. For example, consent is not required for a secondary use or disclosure for situations such as serious threats to life, health or safety or to public health or safety.

When seeking our services, customers have the ability to limit the amount of personal information they provide. Limiting the amount of personal information may impact our ability to provide customers with comprehensive services.

**Accuracy**

We make all reasonable efforts to ensure that personal information collected, used and disclosed for its intended purpose is accurate and complete.

**Access and Correction**

Individuals have the right to request access to personal information held about them and the right to correct it unless a legal exemption applies.

Requests for access to or correction of personal information should be directed to the below. Requests should be submitted in writing. An appointment may be made with an individual, where necessary, to clarify a request for access or correction. Before granting a request for access or correction, we must verify that the request is made by the individual concerned, or by another person who is authorised to make a request on their behalf, for example, as a legal guardian or authorised agent. The Company is entitled to set a small fee to cover the administrative cost of actually providing the information related to a request for access. In certain circumstances we may deny access to information and/or refuse to correct information held. If a request is denied, the Company will explain this decision in writing.

<b>How to Submit a Request for Access or Correction</b>	
Email	complaints@ppcworldwide.com
Post	Optum Health & Technology (UK) Limited C/O Customer Relations Team 4200 Nash Court John Smith Drive Oxford Business Park Oxford OX4 2RU, United Kingdom
Telephone	+44 (0)1865 787370

## Complaints

Concerns about any aspect of the management of personal information should be directed to the below.

<b>How to Submit a Complaint</b>	
Email	complaints@ppcworldwide.com
Post	Optum Health & Technology (UK) Limited C/O Customer Relations Team 4200 Nash Court John Smith Drive Oxford Business Park Oxford OX4 2RU, United Kingdom
Telephone	+44 (0)1865 787370

## Security

We maintain reasonable administrative, technical and physical safeguards designed to protect personal information against loss or unauthorised destruction or modification.

## Retention

Personal information is retained for as long as reasonably necessary for the purpose for which it is collected, subject to a longer period if the information is relevant to an access request or legal challenge.



## Online Communication Practices

We may send electronic newsletters, notification of account status, satisfaction surveys, and other communications, on a periodic basis. We may also send email communications regarding topics such as general health benefits, satisfaction surveys, website updates, health conditions, and general health topics. We obtain appropriate consent, whether express or implied, for such communications and offer opt out or unsubscribe mechanisms as required by law.

## International Partners

We partner with affiliates within our Company or third-parties to provide services or to support our business. Some of these partners are located in a jurisdiction outside of your home country and may be subject to different data protection laws. We have contracts with third-parties to maintain the confidentiality and protection of personal information and contracts, when required by law, to transfer data to other jurisdictions. The following provides more information about our international partners:

- Our Live Well portal, operated on our behalf by United Behavioral Health, a company in the UnitedHealth Group family of companies, is located on computer servers within the United States of America. However, specific web pages that provide you with an opportunity to submit personal information, for example when you register for an account or complete a form, are operated on computer servers located in United Kingdom or Australia. This means that your personal information is processed in the United Kingdom or Australia and information relating to you will only be transferred to the United States of America in aggregate or other non-personally identifiable form.

## Effective Date

The Effective Date of this Privacy Policy is July 28, 2014.

## Changes to this Policy

We may make changes to this Data Protection Policy. If we do so, such change will appear on this page of our website and may be available via other distribution mechanisms. We will also provide appropriate 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 Data Protection Policy to learn of any updates.