

SILVUR INSURANCE PRIVACY POLICY

Effective as of: August 2026

At Silvur Insurance Services LLC (“Silvur Insurance,” “we,” “us” or “our”), we take seriously our responsibility to protect the privacy and confidentiality of information about you that uniquely identifies, relates to, describes, or is reasonably capable of being associated with or linked to you (“Personal Information”). Silvur Insurance is committed to earning and maintaining your trust by safeguarding your Personal Information and making its protection a priority. This Privacy Policy (“Policy”) describes how Silvur Insurance collects, uses, discloses, shares, and protects Personal Information that we collect about you on our website located at www.silvurinsurance.com (“Website”) and any subdomain of silvurinsurance.com., and any services which are provided, offered or made available by us through the Website, (the “Services”), including when you book an appointment with us on our Website, or when you interact in other ways with us, such as when you meet with us, sign up for or attend one of our workshops, or otherwise initiate contact with us as part of the services that we provide (“Services”). If you provide us with Personal Information related to anyone other than yourself, please note that you are responsible for complying with all privacy and data protection laws prior to providing that information to us.

Please note that certain Personal Information collected by Silvur Insurance on behalf of Medicare Advantage organizations/stand-alone drug plans (each a “Plan” and collectively, the “Plans”) and disclosed to these organizations is Protected Health Information subject to the Health Insurance Portability and Accountability Act (“HIPAA”). In these cases, Silvur Insurance must follow contractual and legal obligations under HIPAA, which may be more strict, and the terms of this Privacy Policy do not apply.

Your Acknowledgement of this Privacy Policy

Please review this Policy carefully. To the extent permitted by law, by providing us your Personal Information, you are acknowledging this Policy. If you do not agree with this Policy or our information practices, please do not use our Website, our Services or otherwise engage with us.

This Notice is available to persons with disabilities. To access this Notice in an alternative, downloadable format, please click [here](#).

We collect information about you in a range of ways, including:

- Information that you provide to us on our Website, such as when you book an appointment to meet with us.
- Information that you provide to us when you complete any of our forms.

- Information that you provide when you contact or communicate with us at one of our workshops, in-person meetings, through phone, email or otherwise.
- Information that we automatically collect about you when you interact with our Website, including cookies and similar technologies. For additional information regarding our use of these technologies, see the Cookies and Tracking Technologies section below.
- Information that your Credit Union provides to us so that we can offer you the Services for which your Credit Union has contracted with us to make available to you.
- Information from third parties, such as your family members who may wish for you to obtain our services.

Call Recordings and In-Person Meeting Notice

In order to comply with applicable federal and state laws and regulations, including Centers for Medicare & Medicaid Services (“CMS”) requirements, Silvur Insurance may record telephone calls and virtual meetings with customers, prospective customers, and other participants, and may use automated tools, including artificial intelligence-based transcription services, to generate transcripts, summaries, or related documentation from such calls and meetings for compliance, quality assurance, training, documentation, fraud prevention, and service improvement purposes. Where required by applicable law, we obtain appropriate consent prior to recording calls or virtual meetings. When calls, virtual meetings, or in-person consultations occur at or from a Credit Union branch location, Silvur Insurance shall ensure that conspicuous notice of any recording or transcription is provided to all participants, including by posted signage at the applicable location, prior to the commencement of any such recording or transcription.

We may combine information that we receive from the various sources described above, including third-party sources, and use or disclose it as permitted by applicable law for the purposes described in this Policy.

As described above, the Personal Information contained in your application for a Plan, as well as the Personal Information about you that we collect and receive from or on behalf of a Plan is Protected Health Information under HIPAA. We are subject to more strict restrictions on our uses and disclosures of your Protected Health Information and the terms of this Policy do not apply to such information. For information about how a Plan handles your Protected Health Information, please contact such organization.

Types of Personal Information We Collect

Identity and contact information, such as:

- first and last name

- unique Member ID assigned by your Credit Union
- email address
- postal address
- phone number

Other Personal Information we collect from you

- date of birth
- gender

Information collected from devices; technical or electronic network activity information, such as:

- Internet Protocol (IP) addresses (which may identify your general geographic location or company)
- browser type and browser language
- device type
- date and time you use our Services
- Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving at and after leaving our Services
- activity and online behavior while on our Services and referring websites or applications, including forms and other information submitted, your clicks on our Website pages
- data collected from cookies or other similar technologies* Please see the section below on Information Collected by Cookies and Tracking Technologies and our Cookie Notice for more information on how we use cookies and similar technologies.

Other Information Covered By HIPAA

Information that we collect, including health information, from you as part of preparing and submitting an application to a Plan is Protected Health Information subject to HIPAA. In these cases, Silvr Insurance must follow contractual obligations to the applicable Plan and legal obligations under HIPAA, which may be more strict, and the terms of this Privacy Policy do not apply to such information and our collection, use and disclosure of such Protected Health Information. Please contact the Plan for information on how HIPAA permits the Plan to use and disclose your Protected Health Information.

Information Collected by Cookies and Tracking Technologies

Like many websites, we and our service providers may use cookies, pixel tags, log files, web beacon technologies, and other automated tracking technologies (collectively, “Cookies”) to obtain certain types of information when a web browser, mobile application, or other application accesses our Platform.

A cookie is a small piece of data that we transfer to a computer’s or other device’s memory for record-keeping purposes. Pixel tags, also known as “web beacons” or “clear GIFs,” are small electronic images, often a single pixel, that may be placed on users’ hard drives. As permitted by applicable law, we and our advertising partners may use pixel tags to conduct analytics on the Platform; to provide online advertising, including targeted advertising; and to determine the effectiveness of our advertising campaigns. If you use a mobile device to access our Website, we may automatically record the Advertising ID (if you are using an Android device) or your Advertising Identifier (if you are using an iOS device) for advertising or analytics purposes. Your device settings may allow you to opt out of tracking using Advertising IDs or Advertising Identifiers.

You have the choice and ability to refuse these Cookies and tracking technologies. Please see the section below, Cookies and Other Tracking Technologies, for information about how to refuse these technologies through our Cookie Preference Center, as well as through other methods.

How We Use Your Information

In general, we collect, use, store, and process your Personal Information to provide, enhance, and improve our Website and Services, to develop new services, and to market our Services. The following are examples of how we use the Personal Information submitted, collected, received, or generated about you:

- To operate, improve, maintain, administer and further develop the Website and Services, and to operate and support our related business activities;
- To communicate with you, to allow you to book an appointment with us and to provide and deliver products and Services that you request;
- To respond to comments and questions and provide customer service and user support;
- To send information, including technical notices, updates, security alerts, and support and administrative messages;
- To provide personalized experiences and recommendations, location customization, personalized help and instructions, or other targeted improvements of the Services;
- To communicate about promotions, upcoming events, and other news about products and services offered by us;

- To protect, investigate, and deter against fraudulent, unauthorized, or illegal activity as well as to address safety, security, or technical issues;
- To better understand how users access and use the Website and Services;
- To conduct quality control and to fix technical and other errors or problems;
- To conduct market research;
- To respond to your desires and preferences;
- To comply with applicable laws, rules and regulations, and any regulatory mandate or court order;
- To protect the rights and property of Silvur Insurance, our agents, customers, and others, including enforcing our agreements, policies, and Terms of Use; and
- To use in any other manner, or for any other purpose, for which you have given your permission or consent to us.

We may also ask you whether you want to receive text messages relating to the Services. By providing your mobile phone number, you expressly consent to receive text messages from us at that number relating to the Services we are providing to you. Third-party data and message fees may apply.

If you wish to subscribe to updates, news feeds, or other materials we may distribute, we will use your name and email address to send these materials to you. You may choose to stop receiving our materials or marketing emails by following the unsubscribe instructions included in these emails or you can contact us at support@silvurinsurance.com.

We may combine the information we collect (“aggregate”) or remove pieces of information (“Anonymize”) to limit or prevent identification of any particular user or device to help with goals like research and marketing. We may perform analytics on your preferences, characteristics, use and interactions with the us to generate aggregated information. We may then analyze such aggregated information to generate derivative data as well as reports and other output. Aggregated Anonymous Information is not Personal Information and this Privacy Policy does not apply to our use of such Anonymized information.

Who may receive your Personal Information

We may disclose your Personal Information to the following parties to the extent permitted by applicable law:

- Our Silver Insurance insurance agents

- Our Affiliates, including their employees and contractors, that provide services to us, which in turn, allows us to provide the Website and the Services. For the avoidance of doubt, the Credit Union is not an Affiliate of Silvr Insurance for purposes of this Policy unless separately identified as such.
- Your Credit Union or the Credit Union facilitating your meeting with a Silvr Insurance Advisor unless you chose to opt-out of your Personal Information from being shared. We will provide you with the opportunity to opt-out prior to your Personal Information being shared. Any Personal Information shared with your Credit Union will be limited to information reasonably necessary for the Credit Union to administer the referral relationship and will be shared in a manner consistent with the Credit Union's own privacy notice commitments and applicable law, including the Gramm-Leach-Bliley Act.
- Individuals or entities with whom you designate or instruct us to share your Personal Data
- Your authorized representatives
- Third party service providers who assist with us in providing the Website and Services
- Third party service providers for fraud prevention, detection, and mitigation
- Third party service providers who assist with our information technology and security programs and our loss prevention programs
- Ad Tech Companies and Other Providers – We may share or make available limited Personal Information (such as a mobile device identifiers) with ad tech companies and other online service providers, as permitted and in accordance with applicable laws
- Our lawyers, auditors, and consultants who assist us in providing our the Services, including in compliance with applicable laws and regulations
- Partners that assist us in providing or improving our Services or help us improve our marketing or administration
- In limited circumstances, recipients of your Personal Information may also include, (1) in the event of a sale, assignment, merger, consolidation, corporate reorganization, or transfer, the buyer, assignee, or transferee; and (2) government or regulatory officials, law enforcement, courts, public authorities, or others when permitted by this Policy or required by law.

Purposes for Disclosing your Personal Information

We disclose Personal Information as described and for the purposes explained in this Privacy Policy, including for the following purposes:

- If you request, consent or chose not to opt-out of the disclosures;

- To complete a transaction or provide a Service requested by you;
- To comply with applicable laws, rules, and regulations;
- To comply with governmental and regulatory requests, court orders, and subpoenas as required or permitted by law;
- To protect our rights, property, and safety and the rights, property, and safety of our Website users and others or to prevent fraud;
- To enforce our rights arising from any contracts entered into between you and us, including the Terms of Use;
- If the disclosure is done as part of a purchase, transfer, or sale of services or assets (e.g., in the event that substantially all of our assets are acquired by another party, your Personal Information may be one of the transferred assets) or in the event of bankruptcy.

In addition, in connection with our everyday business purposes and activities, we may share your Personal Information with third parties service providers who perform services on our behalf. As described above, we disclose Personal Information to our Affiliates to help us to provide the Website and the Services, as permitted by applicable law. We may disclose Anonymized information to third parties as described in this Privacy Policy and for our commercial purposes.

Other purpose for disclosing Personal Information: Cookies and Other Tracking Technologies

We use analytics and session replay services that use cookies and other technologies that collect your Personal Information, to assist us with analyzing our Website traffic and Website usage to optimize, maintain, and secure our Website and inform subsequent business decisions (including, e.g., advertising). We may permit third parties to provide analytics services that allow us to optimize the functionality of our Website and inform our marketing activities. These third parties may use Cookies, and other technologies to collect information about your use of our Website and other websites, including your IP address, web browser, pages viewed, time spent on pages, links clicked, and conversion information. This information may be used by us and third parties to analyze and track data, determine the popularity of certain content and other websites, and better understand your online activity. Our Privacy Policy does not apply to, and we are not responsible for, third party cookies, web beacons, or other tracking technologies; and we encourage you to check the privacy policies of these third parties to learn more about their privacy practices. These third parties include, but are not limited to, the following:

- We use Google Analytics to help collect and analyze certain information for the purposes discussed above. You can [learn more about Google Analytics' data practices by clicking here](#) and opt out of the use of cookies in web browsers by Google Analytics by [clicking here](#).

- Amplitude collects and analyzes users' movements, including across platforms, while on the Website. [To learn more about Amplitude click here.](#)
- Braze manages messaging campaigns and analyzes users' actions with that messaging. [To learn more about Braze click here.](#)
- Snowflake combines user data from multiple sources for further analysis and reporting. [To learn more about Snowflake click here.](#)
- Equals provides analytics services. [To learn more about Equals click here.](#)
- Calendly provides booking analytics. [To learn more about Calendly click here.](#)

These services collect Personal Information, including information you enter on our Website, which we tie to information we have about you to provide better analytics, to optimize our Website, and to inform our advertising campaigns.

The Website may also offer you the ability to interact with plugins from social media sites such as Facebook and others that may collect, use, and share information about you from our Website as part of the operation of the plugins. These plugins are subject to the privacy practices of the respective third-party social media companies, which may differ from this Privacy Policy. For example, we use Meta pixels to track user activity on our Website and improve downstream offerings, including interest-based advertising for our Services and those of our partners and service providers. To that end, we may allow third-party service providers to display advertisements to our users on third-party websites based on your browsing history by using cookies or other tracking technologies. For example, we may use Facebook's advertising services, including Facebook's Custom Audiences service, to target our advertisements to you.

Cookie Choices – To manage your preferences with respect to these technologies, you can:

- Visit our cookie preferences page where you can opt-in to these cookies and technologies or refuse them. You can also customize your browser settings to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable certain cookies, please note that some parts of our Site may not function properly. These settings may be lost and require reconfiguration if you delete your cookies.
- Block the collection and use of your information by online platforms and ad tech companies for the purpose of serving interest-based advertising by visiting the opt out pages of the self-regulatory programs of which those companies are members: National Advertising Initiative and Digital Advertising Alliance. Please note that even if you opt out of interest-based advertising, you may still see "contextual" ads which are based on the context of what you are looking at on the websites and pages you visit.

- Review and execute any provider-specific instructions to customize your preferences or opt-out of certain processing, including interest-based advertising, by third party service providers. For example, to opt-out of this type of advertising by Google, customize your ad preferences, or limit Google's collection or use of your data, visit Google's Safety Center and Google's Ad Settings and follow Google's personalized ad opt-out instructions. Meta also offers an Ad Preferences center to customize your settings, as well as a Privacy Policy with additional information on how you can exercise your rights.

Web Browser Opt-Out. To opt out in web browsers, please visit the opt-out pages of the Network Advertising Alliance and the Digital Advertising Alliance. To help preserve the choices that you make in the DAA's WebChoices page, you can install the DAA's "Protect My Choices" extension that is available [here](#).

Security and the Protection of Your Information

Silvur Insurance is focused on protecting your Personal Information. We employ physical, technical, and administrative safeguards to keep your information secure. We use industry-standard browser encryption; store all of your Personal Information on servers in secure facilities; and implement systematic processes and procedures for securing and storing Personal Information. While Silvur Insurance follows generally accepted standards to protect the Personal Information submitted to us, both during transmission and once we receive it, no method of transmission over the Internet, or method of electronic storage, is 100% secure and we cannot guarantee its absolute security.

Links to Third-Party Websites

We are not responsible for the practices employed by any websites or services linked to or from our Website, including the information or content contained within them. We encourage you to investigate and ask questions before disclosing Personal Information to third parties, since any Personal Information disclosed will be handled in accordance with the applicable third party's privacy policy.

In some cases, we may offer links to social media platforms (like Facebook, Instagram, Pinterest, X (formerly known as Twitter)) that enable you to easily connect with us or share information on social media. Any content you post via these social media pages is subject to the Terms of Use and Privacy Policies for those platforms.

Accessing or Changing Your Information

If the Personal Information on file for you changes, or if you no longer desire to use our Services, you may update your information or inform us that you do not wish to use our Services by

contacting us at support@silvurinsurance.com .

How Long We Keep your Personal Information

We will retain copies of your Personal Information in a form that permits identification for as long as we needed to conduct business with you, to fulfill the purposes outlined in this Privacy Policy, and we will retain and use your information as necessary to comply with our legal and/or regulatory obligations, resolve disputes, and enforce our agreements.

Criteria we will use to determine how long to retain your Personal Information include the nature and length of our business relationship with you; our legal rights, obligations, and retention requirements; and if we have an ongoing business purpose for retaining your Personal Information, such as communicating with you about ongoing or prospective Services you requested.

International Visitors

Our Website and Services are hosted in the United States and are only intended for residents of the United States. If you use have accessed our Website from the European Union, Asia or any other country outside the United States with laws or regulations governing personal data collection, use, and disclosure that differ from the United States laws and regulations, and which may not be deemed to provide the same level of protection as your home country, please be advised that if you use the Website you are (i) permitting the transfer of your personal information to the United States; and (ii) permitting the use of your Personal Information in accordance with this Privacy Policy.

How We Respond to Do Not Track Signals

At this time, we do not respond to automated signals regarding tracking mechanisms, including “do not track” instructions from your browser. Please note that blocking cookies may affect your browsing experience on many sites and may limit your ability to use certain features of our Services, including many of the personalized features we provide for our users.

Children's Privacy

Children under the age of 18 are not eligible to use the Website or Services and must not attempt to use the Website or the Services and/or submit any Personal Information to us. We do not knowingly collect or solicit any Personal Information from any person who is under the age of 18. If it comes to our attention that we have collected Personal Information from a person under the age of 18, we will delete this information as quickly as possible, subject to our legal and/or regulatory obligations. If you believe we might have any Personal Information from or about a child under the age of 18, please contact us at support@silvurinsurance.com .

Changes to the Policy

We may revise this Policy from time to time in our sole discretion and without prior notice, subject to applicable law so please review this Policy periodically. When we revise this Policy, we will post the revised version on the Website. The revised Policy will be effective upon posting on the Website, unless otherwise set forth therein or as otherwise required by applicable law. You are free to decide whether or not to accept a revised version of this Policy, but if you do not agree to the terms of the Policy or any revised version of this Policy, your sole recourse is to terminate your access to and use of the Website and Services. Except as otherwise expressly stated by us, your access to and use of the Website and Services are subject to the version of this Privacy Policy in effect at the time of your access or use of the Services.

We Want to Hear From You if You Have Questions

If you have any comments, questions, or concerns about any of the information in this Policy, or any other issues relating to the collection, use or disclosure of your Personal Information by us under this Policy, please use the information below to contact us.

support@silvurinsurance.com

Silvur Insurance

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