

Finwell Benefits Website Privacy Policy

Last updated: July 13, 2026

Finwell, Inc. d/b/a Finwell Benefits and its related companies, as applicable (collectively, “**Finwell**,” “**Company**,” “**we**,” “**our**,” or “**us**”) respect your privacy and are committed to protecting it through our compliance with this policy. This policy describes how we collect, process, retain, and disclose personal information about you when you visit <https://www.finwellbenefits.com/>, [www.finwellbenefits.com], or any other website where this policy is posted (collectively, the “**Site**”), use our products or services, communicate with us, or otherwise interact with us (collectively with the Site, our “**Services**”).

This policy is intended to serve as a general website and services privacy. Customers who purchase financial products or services from us may receive an additional privacy notice describing how we collect, use, disclose, and protect nonpublic personal information in connection with financial products or services. That notice may apply to customers regardless of whether they use this website, and it may be provided separately from this Website Privacy Policy. If there is any conflict between that separate financial privacy notice and this Website Privacy Policy with respect to information covered by that notice, the separate financial privacy notice will control.

This policy applies only to information we collect:

- Through the Site;
- When you register for, enroll in, access, or use the Services;
- In communications, including email, text message, telephone, online form, and other electronic messages, between you and the Services or Finwell;
- Through third-party platforms that we use to provide or support the Services; and
- From service providers, business partners, employers or benefits sponsors, financial institutions, analytics providers, advertising technology providers, and other third-party sources, where applicable.

This policy does not apply to information collected by:

- Us through any other website or service that does not link to this policy.
- Third-party websites, applications, financial institutions, custodians, brokers, advisers, benefits providers, or technology platforms that we do not own or control, except to the extent those parties process personal information for us as our service providers or contractors.

Please read this policy carefully to understand our policies and practices regarding your information and how we treat it. By interacting with our Site or other Services or providing us with your information, you agree to the collection, use, and sharing of your information as described in this policy. If you do not agree with this policy, please do not use the

Services. This policy may change from time to time. Your continued use of the Services after we make changes as described here means that you have acknowledged the updated policy, to the extent permitted by law.

Children's and Minors' Data

The Site and Services are not directed to children under the age of 13, and we do not knowingly collect personal information from children under 13. If we learn that we have collected personal information from a child under 13 without required parental consent, we will delete that information as required by law. If you believe we may have collected information from a child under 13, please contact us at membership@finwellbenefits.com.

We do not knowingly sell or share personal information of consumers under 16 years of age.

The Personal Information That We Collect or Process

"Personal information" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. Personal information does not include deidentified information, aggregated information, or information excluded from the definition of personal information under applicable law.

Depending on how you interact with us, we may collect or process the following categories of personal information:

Category	Examples
Identifiers	Name, alias, postal address, email address, telephone number, account username, IP address, device identifiers, and similar identifiers.
Customer records information	Contact information, account information, billing information, financial account information, and information described in California Civil Code Section 1798.80.
Protected classification characteristics	Age, gender, marital status, or similar information, where voluntarily provided or reasonably necessary to provide the Services.
Commercial information	Records of products or services requested, obtained, considered, or purchased; membership or service history; customer support history.
Financial and benefits-related information	Net worth, assets, income, bank account information and balances, investment-related information, benefits information, and similar information used to provide the Services.

Internet or other electronic network activity information	Browser type, operating system, pages viewed, links clicked, referring URLs, access times, session activity, interactions with emails, and information collected through cookies, pixels, tags, and similar technologies.
Geolocation data	Approximate location derived from IP address or device settings and, where enabled, more precise location information.
Audio, electronic, or visual information	Voicemails, call recordings if used, photographs, profile images, or electronic communications.
Professional or employment-related information	Employer, job title, employment status, work contact information, benefits eligibility, or similar information.
Sensitive personal information	Government identifiers, financial account information, account credentials, precise geolocation, and other information treated as sensitive under applicable law.
Inferences	Preferences, characteristics, behavior, or service interests inferred from the information described above.

We collect and use sensitive personal information only as reasonably necessary to provide the Services you request, to maintain and improve the functionality and security of our Services, to comply with law, or as otherwise permitted by applicable law. We do not use or disclose sensitive personal information to infer characteristics about you unless we provide notice and any required rights under applicable law.

We may also collect statistical, aggregated, deidentified, or technical information. If we combine or connect non-personal statistical, aggregated, deidentified, or technical information with personal information so that it directly or indirectly identifies an individual, we treat the combined information as personal information.

How We Collect Your Personal and Other Information

Information You Provide to Us

We collect information about you when you interact with our Services, such as when you register for, enroll in, access, or use the Services; create or update an account; complete forms or questionnaires; upload documents; request support; communicate with us; or otherwise provide information to us.

Automatically Through Our Services

As you navigate through and interact with our Site or other Services, we and our service providers may use automatic data collection technologies such as cookies, web beacons, pixels, tags, local storage, software development kits, and similar tracking technologies to collect information that may include personal information.

Information collected automatically may include usage details, IP address, device identifier, operating system, browser type, referring URLs, pages viewed, links clicked, search terms, time spent on pages, session activity, traffic data, activity logs, and information about your interactions with emails or advertisements.

You can typically set your browser to refuse or remove cookies. If you refuse or remove cookies, some parts of the Site or Services may not function properly. You may also be able to use industry or provider-specific opt-out tools offered by analytics and advertising providers.

From Business Partners, Service Providers, and Other Sources

We may receive personal information about you from other sources and combine it with information we collect directly from you. These sources may include service providers, employers or benefits sponsors, financial institutions, benefits providers, advisers, custodians, brokers, account aggregation providers, third-party platforms used to provide or support the Services, analytics providers, advertising technology providers, public sources, and other sources with your consent or as permitted by law.

Some information we collect or receive in connection with financial products or services may be nonpublic personal information subject to the Gramm-Leach-Bliley Act (“**GLBA**”) and related federal or state financial privacy laws. Where GLBA applies, those laws may limit how we use and disclose that information and may exempt that information from certain requirements under state privacy laws.

How We Use Your Information

We use information that we collect about you or that you provide to us, including personal information, to:

- Operate, provide, administer, maintain, and improve the Site and Services.
- Create, authenticate, maintain, and secure user accounts.
- Provide financial wellness, benefits-related, educational, advisory, administrative, or other services you request.
- Process enrollment, membership, account, support, billing, and service-related requests.
- Communicate with you about the Site, Services, account activity, transactions, updates, security alerts, support messages, and administrative notices.
- Respond to your questions, comments, requests, and customer service inquiries.
- Personalize your experience and improve the relevance of content, features, and communications.
- Analyze Site and Services usage, measure performance, debug errors, improve functionality, and develop new products and services.
- Send marketing communications, newsletters, educational content, event information, and promotional messages, where permitted by law.
- Administer surveys, promotions, events, and similar activities.
- Detect, investigate, prevent, and respond to fraud, security incidents, unauthorized activity, illegal activity, or violations of our terms or policies.

- Protect the rights, property, privacy, safety, or security of Finwell, our users, our personnel, third parties, or the public.
- Comply with applicable laws, regulations, legal process, regulatory requests, and internal compliance obligations.
- Evaluate or conduct a merger, financing, acquisition, reorganization, bankruptcy, sale, transfer, or other business transaction involving all or part of our business or assets.
- Fulfill any other purpose for which you provide the information.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may use usage information, whether connected to your personal information or not, to improve our Services and deliver a better and more personalized experience, including by estimating audience sizes and usage patterns, storing preferences, customizing the Services, improving navigation, and recognizing you when you return to the Services.

If you opt out of receiving marketing communications, we may still send you service-related or transactional messages regarding your account, enrollment, requested Services, security updates, legal notices, or other important administrative matters.

We use sensitive personal information only for purposes permitted by law, including to provide requested Services, verify and secure accounts, process transactions, detect security incidents, prevent fraud, comply with law, and maintain the quality and safety of the Site and Services.

Who We Disclose Your Information To

We may disclose aggregated, deidentified, or anonymized information that does not identify any individual and cannot reasonably be used to identify any individual, subject to applicable law.

We may disclose personal information that we collect or you provide as described in this policy:

Recipient Category	Purpose of Disclosure
Affiliates and related companies	To support our business operations and provide the Services.
Service providers and contractors	Hosting, cloud storage, analytics, customer support, email delivery, security, payment processing, data processing, document storage, and other business support services, and vendors supporting AI-enabled functionality.
Third-party platforms used for the Services	Account access, document upload, financial data collection, account aggregation, benefits administration, and other functions used to deliver the Services.

Financial institutions, benefits providers, advisers, custodians, or other business partners	To provide or support Services you request, complete transactions, administer benefits, or facilitate financial wellness or related services.
Employers or benefits sponsors	To administer employer-sponsored or group benefits or services, where applicable and permitted by law.
Advertising, analytics, and technology providers	To measure Site performance, understand user interactions, improve Services, and, where enabled, deliver or measure advertising.
Professional advisers	Lawyers, auditors, accountants, insurers, consultants, and other professional advisers.
Government authorities, regulators, courts, and law enforcement	To comply with law, legal process, regulatory obligations, subpoenas, court orders, investigations, or lawful requests.
Transaction parties	In connection with an actual or proposed merger, acquisition, financing, reorganization, bankruptcy, sale, transfer, or similar business transaction.
Other parties with your direction or consent	When you direct us to disclose information or otherwise consent to a disclosure.

We may also disclose your personal information to enforce or apply our terms of use, terms of service, and other agreements, including for billing and collection purposes, or if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Finwell, our users, customers, personnel, or others.

The categories of personal information we may disclose include identifiers, customer records information, protected classification characteristics, commercial information, financial and benefits-related information, internet or other electronic network activity information, geolocation data, audio/electronic/visual information, professional or employment-related information, sensitive personal information, and inferences.

Sale, Sharing, and Targeted Advertising

We do not sell personal information.

We do not share personal information for cross-context behavioral advertising. We may disclose personal information to service providers and technology vendors that support the operation, security, administration, and functionality of our Services.

We do not sell sensitive personal information or share sensitive personal information for cross-context behavioral advertising unless expressly disclosed and permitted by law.

Your Rights and Choices About Your Information

This section describes mechanisms you can use to control certain uses and disclosures of your information and rights you may have under state law, depending on where you live.

Advertising, Marketing, Cookies, and Other Tracking Technologies Choices

- **Cookies and Other Tracking Technologies.** You can set your browser to refuse all or some browser cookies or other tracking technology files, or to alert you when these files are being sent. If you disable or refuse cookies or similar tracking files, some Services features may be inaccessible or may not function properly.
- **Promotions by the Company.** If you do not wish us to use your information to promote our own products or services, you may opt out by following the unsubscribe instructions in our marketing emails or by contacting us at membership@finwellbenefits.com. We will process your request in accordance with applicable law.
- **Targeted Advertising by the Company.** We do not currently deliver interest-based or targeted advertising using cookies or similar tracking technologies.
- **Disclosure of Your Information for Third-Party Advertising.** We do not sell personal information. We do not share personal information with advertising or analytics partners for cross-context behavioral advertising or targeted advertising purposes.

Location Data Choices

We may use general location information, such as your country or region inferred from your IP address or browser settings, to operate, secure, and improve the Services. Where enabled and permitted, we may process more precise location information in connection with the Services. You may be able to adjust location permissions through your browser or device settings.

Meeting and Appointment Reminders

If you schedule a meeting or appointment with us, you may receive automated text message reminders through Calendly or another third-party scheduling platform we use. These messages are intended solely to facilitate scheduling and appointment management. We do not send marketing or promotional text messages.

Your State Privacy Rights

Depending on your state of residency, you may have certain rights related to your personal information, including:

- **Access and Data Portability.** You may confirm whether we process your personal information and access a copy of the personal information we process. To the extent feasible and required by state law, data will be provided in a portable format.
- **Correction.** You may request that we correct inaccuracies in your personal information that we maintain, taking into account the information's nature and processing purpose.
- **Deletion.** You may request that we delete personal information about you that we maintain, subject to certain exceptions under applicable law.
- **Opt Out of Certain Processing Activities.** Depending on applicable law, you may have the right to opt out of certain processing activities, including the sale of personal information, sharing for cross-context behavioral advertising, targeted advertising, or profiling.

- **Limit Use or Disclosure of Sensitive Personal Information.** Depending on your state, you may have the right to limit certain uses or disclosures of sensitive personal information.
- **Non-Discrimination.** We will not discriminate against you for exercising privacy rights available to you under applicable law.

The exact scope of these rights varies by state. There are also exceptions where we may not have an obligation to fulfill your request. To exercise any of these rights, please contact us at **membership@finwellbenefits.com**. To appeal a decision regarding a consumer rights request, reply directly to our denial or contact us and include "Privacy Request Appeal" in the subject line.

Nevada provides its residents with a limited right to opt out of certain personal information sales. Residents who wish to exercise their sale opt-out rights may submit a request to **membership@finwellbenefits.com**. However, please know we do not currently sell data triggering that statute's opt-out requirements.

If you are a California resident, additional information applies to you. To access our supplemental California privacy statement and learn more about California residents' privacy rights, see **Privacy Notice for California Residents Addendum**.

AI and Automated Technologies

We may use artificial intelligence, machine learning, generative AI, automated tools, and similar technologies ("AI Technologies") for internal business purposes and to provide, support, personalize, and improve customer-facing features of the Services.

For internal purposes, these uses may include helping us draft, summarize, organize, classify, analyze, or improve internal workflows; support customer service and account administration; detect fraud or security risks; improve the quality and efficiency of our Services; and generate or review internal business records.

For customer-facing features, AI Technologies may support tools that help generate educational content, summarize information you provide, organize or classify uploaded materials, assist with customer support, provide financial wellness or benefits-related insights, personalize your experience, or otherwise support the Services you request. If you use an AI-enabled feature, the information you submit — including prompts, questions, uploaded documents, account information, financial or benefits-related information, and other content you provide — may be processed by AI Technologies to generate, support, or improve the feature or response. We may also process outputs generated by AI Technologies, such as summaries, recommendations, classifications, support responses, or other AI-generated content, as part of providing and improving the Services.

AI-generated content may be incomplete, inaccurate, or not appropriate for your particular circumstances. AI-enabled features are intended to support, and not replace, your own judgment or professional advice. Unless we expressly state otherwise, AI-generated content is informational and should not be treated as financial, investment, tax, legal, benefits, or other professional advice.

When we use AI Technologies, we use closed-tenant or similar enterprise-controlled AI environments configured so that personal information, confidential information, financial information, benefits-related information, and other information input into those tools is not used by the AI provider to train, fine-tune, or improve its general AI models.

We may process personal information through AI Technologies only as reasonably necessary to provide, maintain, secure, support, personalize, analyze, and improve the Services; respond to your requests; comply with law; protect against fraud, unauthorized activity, or security incidents; and support our internal operations. We do not use AI Technologies to make decisions that have a legal or similarly significant impact, such as decisions affecting your eligibility for, access to, or terms of a product, service, benefit, or other important opportunity, unless we provide any notices, rights, and choices required by applicable law.

We may disclose personal information to vendors that provide or support AI Technologies, including cloud, software, analytics, security, and technology providers. When these vendors process personal information for us, we require them to process the information only as permitted by our agreements and applicable law.

Depending on where you live and how an AI-enabled feature is used, you may have rights to access, correct, delete, or opt out of certain processing of personal information, including profiling or automated decision-making, as described in this policy and as required by applicable law.

How We Protect Your Personal Information

We use commercially reasonable administrative, physical, and technical measures designed to protect personal information from accidental loss or destruction and from unauthorized access, use, alteration, and disclosure. These safeguards may include access controls, user authentication, encryption or secure transmission where appropriate, monitoring, vendor diligence, employee training, and policies governing the handling of personal information.

No website, mobile application, system, electronic storage, or online service is completely secure, and we cannot guarantee the security of your personal information transmitted to, through, using, or in connection with the Services. In particular, email, texts, and chats sent to or from the Services may not be secure, and you should carefully decide what information you send to us through those communications channels. Any transmission of personal information is at your own risk.

The safety and security of your information also depends on you. You are responsible for maintaining the confidentiality of your account credentials and for notifying us promptly if you believe your account or information has been compromised.

How We Retain Your Personal Information

We retain personal information for as long as reasonably necessary to fulfill the purposes described in this policy, including to provide the Services, maintain accounts, operate our organization, comply with legal and regulatory obligations, resolve disputes, enforce agreements, prevent fraud, maintain security, and protect our legitimate business interests.

The criteria we use to determine retention periods include:

- The nature and sensitivity of the personal information.
- The purposes for which the information was collected and used.
- The length of our relationship with you.
- Whether retention is reasonably necessary to provide the Services.
- Legal, regulatory, tax, accounting, audit, and reporting requirements.
- Applicable statutes of limitation and dispute-resolution needs.
- Security, fraud prevention, and compliance needs.
- Whether the information can be retained in aggregated or deidentified form.

At the end of the applicable retention period, personal information will be deleted, destroyed, or deidentified. Where required by law, we will provide additional category-specific retention disclosures or retention criteria in the applicable notice at collection.

If you are a California resident, see the Privacy Notice for California Residents Addendum and Notice at Collection for California Residents below for additional information about the retention criteria that apply to the personal information categories we collect.

Third-Party Platforms and Links

We may use third-party platforms to support enrollment, account access, document transfer, financial data collection, financial account aggregation, benefits administration, customer support, analytics, communications, and other Services-related functions.

When a third-party platform processes personal information for us as a service provider or contractor, we require it to process the information only as permitted by our agreement and applicable law. When you choose to interact directly with an independent third party, that third party's own privacy policy and terms may apply.

The Site or Services may include links to third-party websites, applications, or services. We are not responsible for the privacy practices of third parties that we do not own or control. We encourage you to review the privacy notices of any third-party services you use.

Changes to Our Privacy Policy

We may update this policy from time to time, and we will provide notice of any such changes to the policy as required by law. The date the privacy policy was last updated is identified at the top of the page.

We will notify you of changes to this policy by updating the "Last updated" date and posting the updated policy on the Services. If we make material changes, we may provide additional notice as required by law, such as by email, account notice, or a prominent notice on the Site. You should check our Services periodically to see the current policy and any changes we have made to it.

Your continued use of the Site or Services after the revised policy becomes effective means that you have acknowledged the updated policy, to the extent permitted by law.

Notice to EU Residents

This website is intended for visitors located in the United States, and we do not offer our products or services to residents in the European Union.

Contact Information

To exercise your rights or ask questions or comment about this privacy policy or our privacy practices, contact us at:

Finwell, Inc. d/b/a Finwell Benefits

Email: membership@finwellbenefits.com

Mailing Address: **330 Franklin Rd. Ste 135A-525 Brentwood, TN 37027**

Privacy Notice for California Residents Addendum

The following provisions supplement our Privacy Policy and apply to California residents.

California's Shine the Light Law

California Civil Code Section 1798.83 permits California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. We do not share personal information with third parties for their own direct marketing purposes.

California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA)

If you are a California resident, you have certain rights under the California Consumer Privacy Act of 2018 (CCPA) and the California Privacy Rights Act of 2020 (CPRA). These rights are designed to give you more control over your personal information. Here is a summary of your rights:

- **Right to Know.** You have the right to request that we disclose information about our collection and use of your personal information over the past 12 months, including:
 - The categories of personal information we have collected about you.
 - The categories of sources from which personal information is collected.
 - Our business or commercial purpose for collecting, sharing, or selling that personal information.
 - The categories of third parties with whom we share that personal information.
 - The specific pieces of personal information we have disclosed.
 - For companies that sell personal information, the categories of personal information sold about you and the categories of third parties to which the personal information was sold, by category or categories of personal information for each third party to which the personal information was sold.

Note that we have provided the information described in the first five bullet points above in this Privacy Policy. With respect to the last bullet point, note that we do not sell personal information as defined by the CCPA.

- **Right to Delete.** You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions.
- **Right to Correct.** You have the right to request that we correct inaccurate personal information that we maintain about you.
- **Right to Opt-Out of Sale or Sharing.** California residents have the right to opt out of the sale of personal information and the sharing of personal information for

cross-context behavioral advertising. We do not currently sell personal information or share personal information for cross-context behavioral advertising. If you have questions about our data sharing practices, please contact us at **membership@finwellbenefits.com**.

- **Right to Limit Use of Sensitive Personal Information.** You have the right to limit the use and disclosure of your sensitive personal information, such as social security numbers or financial account information. We do not use or disclose sensitive personal information for purposes that would require offering a right to limit its use under the California Privacy Rights Act (CPRA).
- **Right to Non-Discrimination.** You have the right not to receive discriminatory treatment by us for exercising any of your CCPA or CPRA rights. This means we will not deny you goods or services, charge you different prices, or provide a different level of quality based on your exercising these rights.

How to Exercise Your Rights

To make a California privacy request, please contact us by:

- Emailing us at **membership@finwellbenefits.com**.

To verify you are the person about whom we have collected personal information, we may request additional information that we will use only for verification purposes. You may also designate an authorized agent to make a request on your behalf, consistent with applicable law.

If we deny your privacy request and applicable law gives you a right to appeal, you may appeal by contacting us at **membership@finwellbenefits.com** and including "Privacy Request Appeal" in the subject line. We will review and respond to appeals as required by applicable law.

Do Not Track

Some browsers offer "Do Not Track" signals. There is not currently a uniform industry standard for responding to browser Do Not Track signals. We do not respond to browser Do Not Track signals unless required by law. This statement does not limit our obligation to process legally recognized opt-out preference signals where required by the CCPA.