

EEOC NOTICE REGARDING WELLBEING PROGRAM

The Live Well program is a voluntary wellbeing program available to all employees. The program is administered according to federal rules permitting employer-sponsored wellbeing programs that seek to improve employee health or prevent disease, including the Americans with Disabilities Act of 1990, the Genetic Information Nondiscrimination Act of 2008, and the Health Insurance Portability and Accountability Act, as applicable, among others. If you choose to participate in the wellbeing program you may have the opportunity to complete a voluntary wellbeing assessment, the Health Check Assessment, that asks a series of questions about your health-related activities and behaviors, and health condition, which will include total cholesterol, HDL, LDL, triglycerides, glucose, blood pressure, and BMI (or waist measurement), and whether you have or had certain medical conditions (e.g., diabetes or heart disease).

You are not required to complete the wellbeing assessment to participate in the wellbeing program.

If you choose to participate in various aspects of the wellbeing program, including completing a wellbeing assessment and/or participating in certain health-related activities, you may be eligible to earn various incentives. If you are unable to fully participate in this wellbeing program because of a disability or medical condition, you may be entitled to a reasonable accommodation. Visit support.virginpulse.com and search Medical Exceptions or call Virgin Pulse at 1-888-671-93595 to request a reasonable accommodation.

The information from your wellbeing assessment and the results from your health screening will be used to provide you with information to help you understand your current health and potential risks and may also be used to offer you services through the wellbeing program, such as health coaching. You also are encouraged to share your results or concerns with your own doctor.

Protections from Disclosure of Medical Information

We are required by law to maintain the privacy and security of your personally identifiable health information. Although the wellbeing program may be administered by a third-party vendor, and Assurant may use aggregate information it collects to design a program based on identified health risks in the workplace, the third-party vendor will never disclose any of your personal information either publicly or to the employer, except as necessary to respond to a request from you for a reasonable accommodation needed to participate in the wellbeing program, or as expressly permitted by law. Medical information that personally identifies you that is provided in connection with the wellbeing program will not be provided to your supervisors or managers and may never be used to make decisions regarding your employment.

Your health information will not be sold, exchanged, transferred, or otherwise disclosed except to the extent permitted by law to carry out specific activities related to the wellbeing program, and you will not be asked or required to waive the confidentiality of your health information as a condition of participating in the wellbeing program or receiving an incentive. Anyone who receives your information for purposes of providing you services as part of the wellbeing program will abide by the same confidentiality requirements. The only individual(s) who may receive your personally identifiable health information are registered nurses, health coaches and other vendor representatives in order to provide you with services under the wellbeing program.

In addition, all medical information obtained through the wellbeing program will be maintained separate from your personnel records, information stored electronically will be encrypted, and no information you provide as part of the wellbeing program will be used in making any employment decision. Appropriate precautions will be taken to avoid any data breach, and in the event a data breach occurs involving information you provide in connection with the wellbeing program, we will notify you immediately.

You may not be discriminated against in employment because of the medical information you provide as part of participating in the wellbeing program, nor may you be subjected to retaliation if you choose not to participate.

If you have questions or concerns regarding this notice, or about protections against discrimination and retaliation, please begin a chat with [ERIN](#) — our Employee Resource and Information Network. If ERIN is unable to help, use “Request Assistance” directly in the tool.

Last Updated: 10/6/2023