

Privacy Policy

Last Updated: July 15, 2023

Employee Network Inc. ("eni" or "we") is committed to protecting the privacy of individuals and complying with all applicable laws, regulations, and standards, including those established under the Health Insurance Portability and Accountability Act (HIPAA) in the United States. This Privacy Policy covers all eni products and services that are provided through our platforms including mobile apps and websites.

Our Privacy Policy aims to safeguard the privacy of consumers, clients, members and visitors to this website and associated mobile apps throughout our relationship. It outlines the information we collect, how we use it, and how consumers, clients, members and visitors to this website can verify and update the information provided on this site. We will periodically update this Privacy Policy to ensure the protection of your personal information. We encourage you to regularly review this Privacy Policy to stay informed about how we use and protect your information. To ensure you are up to date on the latest changes, we will include a date on this Privacy Policy in the title. If there are any changes to the Privacy Policy, this date will be updated. By using the platform, you agree to the terms of this Privacy Policy.

What information do we collect?

To access our services and this platform, your employer, organization, school, association, or group must be registered with eni. We may collect certain information through interactive features such as online surveys, contact and registration forms, and the use of cookies, as explained below. "Certain information" includes information (1) provided by consumers; (2) collected via technology; (3) personal information; and (4) sensitive information or personal health information. For information collected by technologies, the information collected depends on your browser settings. For instance, if you visit this platform to read or download information about health conditions or eni's products, we may collect certain anonymous, non-personal information from your computer, such as the type of web browser software used, the links you click, traffic data, your Internet domain name, the Internet address used to access the platform, location data, the pages you visit on the platform, web logs, and other communication data. Depending on the features you choose to use in our platform (e.g., Coaching, Counseling, Health Advocacy, Assessments), with your explicit consent (if required by law), eni may collect and process certain types of personal information, which may include:

- Name
- SSN or last 4 SSN
- Date of birth
- Email address
- Physical/ mailing address
- Telephone number
- Personal health information or sensitive information

How will your personal information be used?

Your employer will not have access to your personal data stored on eni systems.

eni will limit the collection, use, and retention of a consumer's personal information. The information collected will be limited to only what is (1) necessary to provide the services or goods requested by the consumer; (2) necessary for eni's internal business operations; or (3) necessary to comply with eni's legal obligations.

You can expect eni. to collect and process your personal information fairly and in compliance with applicable laws.

Your personal data may be aggregated, anonymized, or de-identified and used for statistical analysis and reporting purposes .

Your personal data may be shared with third parties as described in "Who do we share your information with" below.

Who do we share your information with?

We do not generally share your personal data with your employer. However, if your employer offers an incentive plan that rewards completion of eni's online programs, we may share your personal information with your employer, including your name, employee identification, and details of the online programs you have completed (excluding scores and responses) as part of the incentive plan, provided you provide explicit consent if required by law.

We do not sell your email address, other identifying information, or non-identifying information to third parties. However, we may share your information with companies affiliated with eni or third parties selected by eni to fulfill the objectives outlined in this Privacy Policy.

We may disclose information about you to others when we have a good faith belief that we are required to respond to claims or legal processes, or to protect the rights, property, or safety of eni or others.

What information may be required to be disclosed?

Under certain circumstances, eni may be required to disclose personal data as mandated by applicable law.

What are your rights?

You have certain rights regarding your personal information collected and maintained by eni. We offer you choices regarding the collection, use, and communication of your personal information:

- You can choose not to provide personal information to eni by refraining from using features and programs that request such information.
- You can opt not to have a unique cookie identification number assigned to your computer.
- You may provide consent to release some or all of your personal information to individuals or organizations. Otherwise, your personal data will not be released unless there is a legal obligation to do so.
- You can withdraw any consents previously provided to eni or, on legitimate grounds, object at any time to the processing of your personal information or specific categories of data that you consider sensitive.
- You have the right to data portability, enabling you to retrieve and reuse your personal information for your own purposes.
- You have the right to request the correction of any errors in your personal information collected and processed by eni.
- You have the right to lodge complaints with supervisory authorities.
- Under certain circumstances, you have the right to invoke binding arbitration to resolve disputes regarding the collection, processing, retention, and/or release of your personal information.
- Subject to local law requirements, you may have the right to (1) request access to and receive information about the personal information collected and maintained by eni, (2) update and correct inaccuracies in your personal information, and (3) have your personal information blocked or deleted, as appropriate.
- You have the right to ask eni. to no longer collect your personal information for information purposes (e.g., sending information via email or SMS, soliciting opinions on eni products and services) by withdrawing your consent. You can exercise your right to withdrawal at any time by contacting eni.

Security of your data

Your personal data will be secured through technical and organizational security measures to prevent unauthorized access by third parties. When transmitting highly sensitive data or information, it is recommended to use postal services as complete data security cannot be guaranteed via email.

eni maintains appropriate administrative, technical, and physical safeguards to protect your personal information in accordance with applicable laws. Our platform utilizes industry-standard encryption. However, please note that the transmission of information over the Internet is not entirely secure. While we strive to protect your personal data to the best of our abilities, we cannot guarantee the security of any data transmitted to the platform; any transmission is at your own risk.

eni does not evaluate the secure handling of your personal information on any computer, tablet, or other mobile device used to access our services. We disclaim any liability for any loss resulting from security and data protection issues arising from your own electronic devices.

Data storage duration

Your personal data will be stored by us for the duration of your use of the platform, or in the case of information, services, or support provided, until the expiry of the applicable statutory storage period.

Any other questions or concerns

If you have any questions or concerns about our Privacy Policy or the collection of your information, please feel free to contact us by sending an email to info@employeenetwork.com or using the following mailing address:

Employee Network Inc.
1040 Vestal Parkway east
Vestal, NY 13850
Attn: DPO
Telephone: 1-800-327-2255
e-mail: DPO@eniweb.com

Jurisdiction and Applicable Law

This Privacy Policy is governed by the laws of the State of New York to the extent not overruled by local law. By using this platform, you irrevocably consent to the jurisdiction of the courts located in the County of Broome, State of New York, USA, for any actions arising from or related to this Privacy Policy, unless local law grants you the right to apply to your local court. You may access this site from anywhere in the world. If using any benefits offered by this platform conflicts with the laws of your region, we kindly request that you refrain from using this platform. You are responsible for understanding and complying with the laws of your region.