



CPN, INC. PRIVACY POLICY

Effective/Updated as of 9/01/2020

CPN, Inc. (the, “Company”) is committed to protecting the privacy of certain data that is collected from you and that you submit when you access this website or websites and applications under our operation and control (collectively, the “Site”). We recognize the sensitive nature of much of the information with which we are entrusted on a daily basis, and we are committed to the high standards of privacy and security. The nature of our business requires that at times we gather information that is of a personal nature and that you wish to keep protected. This Privacy Policy (“Policy”) is intended to familiarize you with our policies for the gathering, use, maintenance and protection of personal information on the Site.

More specifically, this Policy summarizes how the Company handles the personal and other information users of the Site and services provided while accessing and using the Site. Please review this Policy carefully. The Company reserves the right to change its Policy at any time, in which event the Site will contain a notice of the change. Changes will be effective immediately upon posting to the Site. By accessing the Site, you are indicating your agreement to the Company’s Policy. If you have any questions or concerns about the Policy, please contact us using the information provided below.

Information Collected. As you are probably aware, we may collect information from a variety of sources. We collect and use this information in order to carry out our business functions and provide a high quality of service. Specifically, we collect the following information:

- We collect personal information such as your name, billing address, e-mail, and phone number when you interact with us to use our products.
- We collect both online and offline information about you through other sources such as your employer and your health plan or other services provider.
- We collect personal information to deliver or allow access to our products and services.
- We collect information about your system as it interacts with us such as your IP address and browser information.

The Company may also use web site “cookies” in the process of compiling the information mentioned above and to tailor certain pages of the Site for your browsing convenience. A cookie file can contain information such as the URL you came from, your computer’s IP address and domain type (e.g., .com or .org, etc.), your browser type, the country, state and telephone area code where your server is located, the pages of our site that were viewed during a visit, and any search terms that you entered on our site. This information generally is used for internal purposes, and we do not link your URL or IP address to any personal information unless you have logged into our Site with an established account login and password. You have the option of setting your browser to reject cookies, but our Site may not function correctly if you do. Refer to the Help feature of your browser for information on disabling cookies.

The Site is not directed to children. The Company does not knowingly collect any personal information from children. If you are concerned about your child’s use of the Site, you may use web-filtering technology to supervise or limit access to the Site.

Protected Health Information (“PHI”). Notwithstanding anything in this Privacy Policy to the contrary, when we receive PHI in the course of performing services for a HIPAA covered entity or an entity subject to state health information privacy laws, we treat and protect such PHI consistent with our obligations under HIPAA, applicable state health information privacy laws and our contractual obligations to the covered entity (e.g., a group health plan).

Use of Information. In general, we will use the information we collect about you only for the purpose it was collected, as otherwise provided in this Policy, and as permitted or required by law. For example, we might use your information to enhance our Site, or to communicate with you about the Site or our products and services.

Disclosure of Information. In general, we will not disclose your information for any purposes other than those in conjunction with the business activities requested of us unless otherwise permitted or required by law or by this Policy. During the course of our normal business activities, we may disclose collected information to both affiliates and non-affiliated entities, as we deem necessary. For example, and without limitation, the Company may need to use or disclose this information with its third-party vendors to manage its website, respond to subpoenas, defend litigation, enhance its services, and protect the Company's legal rights. We endeavor to choose affiliates and non-affiliates with similar standards to ours regarding the protection of personal information.

We summarize and de-identify or aggregate information about you and we also combine that information with that of others in a way that does not identify you personally to understand how our products are used, to deliver products and services and to help us develop new products and services. Because non-personal Information or aggregate information does not identify who you are, we do not limit the ways we may use or share non-personal information. For example, we may share non-personal information with our affiliates, suppliers, employees and agents, other businesses, and the government.

We may use service companies to help provide you products and services who are not allowed to use your information for their own purposes.

We may use and disclose information to comply with applicable laws, regulations and legal process. We reserve the right to use information to protect and enforce our rights and those of our affiliates, vendors, users or other third parties.

We may use and disclose information collected as otherwise necessary or useful for us to conduct our business, so long as such use is permitted by law. Specific examples include: Analyzing our audience and use patterns for the Site; storing information about your preferences and allowing us to direct or customize specific content to you; recognizing you when you return to this website or speeding-up your login. We may also use and disclose information for any other purpose with your consent and/or as may be disclosed in the area of this Site where the information is collected.

In no case will the Company sell or license personal information to third parties, except as required or permitted by law. In such cases, we will take appropriate steps under the circumstances and to the extent possible to ensure that the recipient agrees to provide privacy protections substantially similar to those established by this Policy.

Do Not Track. "Do Not Track" is a privacy preference that you can set in your Internet search browser that sends a signal to a website that you do not want the website operator to track certain browsing information about you. However, because our Site is not configured to detect Do Not Track signals from a user's computer, we are unable to respond to Do Not Track requests.

Safeguarding of Information. No system for safeguarding personal or other information is 100% secure. However, we take a number of steps to reasonably safeguard the security of personal information obtained through the Site. Our data centers are maintained in a secure environment with appropriate security measures. Our employees are trained to understand the importance of confidentiality and are required to adhere to our privacy policies and procedures.

Reviewing and Changing Your Information. You may be able to update certain personal information online through a web portal or by calling Participant Services. To make changes online, go to Login at www.cpnflex.com.

Right to Request Confidential Communications. You have the right to request that we communicate with you about confidential matters in a certain way or at a certain location. For example, you can ask that we only contact you at work or by mail. To request confidential communications, you must make your request in writing to the CPN Privacy Officer. We will not ask you the reason for your request. Your request must specify how or where you wish to be contacted. We will accommodate all reasonable requests.

Applicable law. This Policy is governed by the internal substantive laws of Tennessee, without regard to its conflict of laws principles. Jurisdiction for any claims arising under or out of this Privacy Policy shall lie exclusively with the state and federal courts within Tennessee. If any provision of this Policy is found to be invalid by a court having competent jurisdiction, the invalidity of such provision shall not affect the validity of the remaining provisions of this Policy, which shall remain in full force and effect.

Data Processed in United States. By providing any information to this Site, all users, including without limitation users in the member states of the European Union, fully understand and unambiguously consent to the collection, storage, forward transfer, and processing of such information in the United States of America and in accordance with such applicable state and federal laws.

Social Security Number Protection Policy. It is our policy to protect the confidentiality of Social Security numbers ("SSNs") that we receive or collect in the course of business. We secure the confidentiality of SSNs through various means, including physical, technical, and administrative safeguards that are designed to protect against unauthorized access. It is our policy to limit access to SSNs to that which is lawful, and to prohibit unlawful disclosure of SSNs.

Contact Us. If you have any questions regarding this Policy or our policies in the event of a compromise of your information, you may contact us at:

Corporate Planning Network, Inc.
989 Cordova Station Avenue
Cordova, TN 38018
1-800-737-0125
alan@cpnflex.com