

**PRIVACY POLICY  
OF THE  
DRUG BENEFIT, DRUG PENSION AND GENERAL SALES PENSION FUNDS**

**Effective May 20, 2021**

**I. INTRODUCTION**

The Southern California Drug Benefit Fund, Southern California United Food and Commercial Workers Unions and Drug Employers Pension Fund and General Sales Employers and United Food and Commercial Workers Unions Pension Fund (“Funds”) value the trust and privacy of its participants and beneficiaries and other users of this website. This Privacy Policy sets forth the Funds’ practices on this website regarding what personal information we may collect about you online arising from your use of the website and provides some additional information for users of the website.

We will use your information to respond to you based on the reason you contacted us. We only share your information with authorized business partners related to performing necessary business functions. We may contact you with messages related to the respective Fund; you may request not to receive these communications.

**II. DEFINITIONS**

As used in this Privacy Policy, the following terms have the meanings indicated below:

- A. The term “we” or us” means the Funds.
- B. The term "you" means a participant or beneficiary or any other person who uses this website.
- C. The term "personally identifiable information" means individually identifiable information about an individual user collected online by us and maintained in accessible form, including any of the following:
  - (1) a first and last name;
  - (2) a home or other physical address;
  - (3) an e-mail address;
  - (4) a telephone number;
  - (5) any other identifier that permits the physical or online contacting of a specific individual; and
  - (6) information concerning a user that the website collects online from the user and maintains in personally identifiable form in combination with an identifier described above.

D. The term "Funds' website" means this website only.

### III. Consent

We will not voluntarily share your information with a third party without your prior authorization, except:

- With an affiliate or agent of the Funds,
- With your written authorization,
- To enforce our privacy policy, to comply with applicable laws and regulations, other legal processes or to protect the rights, property or safety of us or others,
- With a government regulator or law enforcement agency or personnel when legally required,
- In emergency situations,
- To protect against misuse or unauthorized use of this website or the Funds' services, or
- To detect or prevent criminal activity or fraud.

### IV. Account Information and Accountability

Access to certain areas and information on this website is limited to participants in the Funds and their covered spouses, domestic partners, dependents and beneficiaries (collectively "Covered Persons") and the Funds' providers and requires that such Persons establish an account in accordance with the instructions at [www.ufcwndf.org](http://www.ufcwndf.org) ("Account"). By agreeing to establish and use an Account, you are authorizing us to act on instructions received under your username and password, and we are entitled to act on such instructions. You are responsible for keeping your username and password and applicable security question information confidential. Please do not disclose your username, password, or applicable security question information to anyone.

You understand that you may be required to change your username, password and/or applicable security question information from time to time in accordance with the Funds' security policies and procedures and/or specific concerns of the Funds. Notify us at once if you believe another person has improperly obtained your account username, password or applicable security question information, if you believe someone has accessed or used your Account without your permission, or if you suspect any fraudulent activity on your Account.

We offer you the ability to review and change or update your Account registration, verification of your identity and contact information by logging into your Account and entering in the new information yourself [or by contacting the Funds office at (323) 666-8910]. You must promptly update such information if it changes or is inaccurate.

The Funds have appointed Cynthia D. Fields as its Privacy Officer and David Pidloan as its Security Officer, who are responsible for the protection of information.

## V. PERSONAL INFORMATION COLLECTED

At the present time, information you voluntarily provide to us through use of this website, for example, contained in emails you send to us, shared via the website, or other direct contact with the Funds' personnel, may be retained by the Funds and used to further contact you and/or forwarded and shared by the Funds with third parties but only as necessary to perform their respective business functions.

Please note:

- Transactions over the internet involving information are encrypted.
- We will not sell or rent this information to anyone.
- We restrict access to your information in our database to authorized users.
- the Funds are the respective owners of information collected on this website or through these Services.
- Personal health information we collect may be protected health information ("PHI") within the meaning of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). To the extent applicable, the Funds comply with HIPAA and the rules issued pursuant to HIPAA.

## VI. "Cookies"

A "cookie" is a small summary text file that is stored by your mobile (for example, iPhone or Android) or by your browser (for example, Firefox, Safari, Chrome, Edge). "Cookies" allow a website to recognize a user and respond appropriately.

The website utilizes "cookies" to ensure basic functionality for authenticated users, including but not limited to initiating and terminating valid sessions. The Funds' website may use "cookies" to collect, on an anonymous basis, usage statistics to track site utilization. Identifiable visitor usage information may also be stored in the Funds' internal log files. We use this information to troubleshoot issues, improve our online services, and for analytical purposes, such as analyzing trends, administering the website, tracking user movement and gathering broad demographic information.

## VII. ADDITIONAL INFORMATION FOR USERS ABOUT EXTERNAL LINKS

This Privacy Policy applies only to the Funds' website. It does not cover any websites that may be linked to or from it to other websites ("linked-site"). The Funds are not responsible for the operation or your use of linked-sites. These linked-sites will have their own policies and practices that may be different from the Funds' website. We encourage you to familiarize yourself with the policies and practices of the linked-sites especially if you provide personal information to them. For example, please be aware that if you link to a third party's website and sign up for a particular service, the third party will receive your email address. The third party may share that information with other parties who assist in operating the service or program and/or use the information for other purposes.

## VIII. Email and Similar Communications

If you wish to opt out of receiving email, text, SMS, and similar communications from us, simply follow the instructions or links contained in the communication, go to your [Profile Settings](#) for this Site and opt-out of such communications or contact Web Services at (323) 666-8910 or WebsiteHelp@ufcwdf.org. You understand that if you opt out of receiving these communications, it may affect our ability to provide you important information about your benefits and related information, services and materials. Further, with respect to a request to opt-out of e-mail communications, please note that if you later send an e-mail message to the Funds' office or initiate a website request which requires an e-mail response (e.g., username/password change or reminder request), we may respond to such message or request via e-mail. We may also reach out to you via the last e-mail address provided by you to verify your current preferred contact information in the event other contact information you provided the Funds Office may be outdated.

## IX.. Children's Privacy

We recognize the importance of protecting the privacy of children, and this website is not intended for use by children. For this reason, we do not knowingly collect personally identifiable information from children under the age of 13.

## X. EFFECTIVE DATE, AMENDMENTS, AND CONSENT TO THIS PRIVACY POLICY

- This Privacy Policy is effective May 20, 2021. The Funds retains the right to amend or otherwise update this Privacy Policy at any time for any reason. By using the website, you consent to the collection, use, and sharing of personal information as described above. If the Funds amend or update their Privacy Policy, they will post the changes online on this website so that you are always aware of the current practices for this website. You may also contact the Funds at ufcwdf.org or contact Web Services at (323) 666-8910 at any time to request an up-to-date hard copy version of the Privacy Policy. We will not provide individual notice to you of changes to our privacy policy, but when we make updates to our privacy policy, we will update the date in this section.

## XI. CONTACT US

- You may opt out of communication with us at any time.
- You can contact us to:
  - Find out what data we maintain about you, if any.
  - Change/correct any data we have about you.
- If you feel that we are not abiding by this privacy policy, you should contact us immediately.

If you have any questions regarding this Privacy Policy, you can contact us at ufcwdf.org or the Funds physical address, 2220 Hyperion Ave., Los Angeles, California 90027. The Funds are

committed to resolving any complaints about your privacy and our collection or use of your personal information. If you have any questions or complaints regarding this Privacy Policy, please contact us.