

LIVINGWELL BY MASSMUTUAL APP PRIVACY POLICY

This privacy policy (the “Policy”) describes the information collection, use, and sharing practices of Massachusetts Mutual Life Insurance Company and its subsidiaries (“MassMutual,” “we,” “our,” or “us”) applicable to the LivingWELL by MassMutual App (“WELL App”). The “WELL App” refers to the mobile application used to track and calculate certain benefits provided under a rider (the “WELL Rider”) to one or more life insurance products issued by MassMutual. By using the WELL App, you accept and agree to this Policy. Please review this Policy carefully before using the WELL App. **IF YOU DO NOT AGREE TO ALL OF THESE TERMS AND CONDITIONS WITHOUT MODIFICATION, THEN YOU MAY NOT USE THE WELL APP.** This Policy applies only to certain data collected via the WELL App and not other products and services we provide, which are governed by other policies.

- 1) **INFORMATION WE COLLECT THROUGH THE WELL APP.** We may collect information you provide or authorize us to obtain through the WELL App, including the following:
 - a. **MassMutual Account Information.** You will use your MassMutual online account (“MassMutual Account”) credentials to log in to the WELL App. By connecting your MassMutual Account to the WELL App, we may access MassMutual Account related data, including your name, contact information, financial information, policy details, and any other information available within your MassMutual Account.
 - b. **Third Party App Data.** You may choose to connect one or more third-party applications and devices (“Third Party Apps”) such as mobile phones, connected wearable fitness trackers, and activity tracking apps. By connecting Third Party Apps to the WELL App, you may authorize the Third-Party Apps to share certain data (“Fitness Data”) with us. Some Third-Party Apps may allow you to select the types of Fitness Data you wish to share with the WELL App. Fitness Data shared through the WELL App may include data relating to your fitness or health levels, such as your physical activities, fitness levels, sleep patterns, and weight and measurements.
 - c. **Payment Information.** You must provide a valid U.S. bank account (“Bank Account”) to receive benefits under the WELL Rider. By linking a Bank Account, you agree that we or our service providers may store your Bank Account information, including account numbers, routing numbers, and account owner details for the purpose of paying benefits earned under the WELL Rider.
 - d. **Device and Browser Information.** We may use (or authorize third parties to use) cookies, web beacons, pixel tags, scripts, e-tags and other technologies (“Tracking Technologies”) on our websites or mobile applications, including the WELL App, to collect information about you, your online behavior, your computer, and your mobile device to optimize the WELL App functionality and collect statistics. The information collected through Tracking Technologies may include the type of browser and operating system you are using, the domain name of your Internet service provider, your geographic location, and the unique number assigned to your server or Internet connection. We may combine this automatically collected information with other information we collect about you. For example, we may link your name or e-mail address with information collected through Tracking Technologies.
- 2) **LINKED DATA.** We may link the information that we collect through the WELL App with other information, including personally identifiable information, (i) that you have provided to us through your MassMutual Account or interactions with us or our affiliates as a customer (such as information you provided during the application process to purchase our or our affiliates’ products and services), (ii) that we obtain we obtain through other means (for example, information we receive from third parties), and (iii) statistical or analytical data we have created about you based on the foregoing. By using the WELL App, you consent to MassMutual linking information we collect through the WELL App with the information described in (i) – (iii) above, to create Linked Data. Information collected through the WELL App and Linked Data are collectively “Personal Information”.

3) HOW WE USE YOUR INFORMATION

- a. **Responding to Your Requests.** We may use Personal Information to respond to your requests. For example, if you request information about the terms and conditions of the WELL App, we may use personal information such as your name and email address, to respond to your request.
- b. **Business Purposes.** We will use Personal Information for the following business purposes:
 - i. to administer the WELL Rider, including recording activities and calculating benefits;
 - ii. to conduct research and analyze data, including research related to the Fitness Data of the WELL App/WELL Rider participants. We may use Personal Information and research and analytical results derived therefrom to refine our products and services offerings;
 - iii. For general internal business purposes, including maintaining internal business records, such as accounting, document management and other similar activities; enforcing our policies and rules; management reporting; auditing; IT administration of our network, intranet, and other technologies; and IT security management and tasks;
 - iv. For legal, safety or security reasons such as complying with legal, reporting, and similar requirements; investigating and responding to claims against the Company, its personnel, and its customers; for the establishment, exercise or defense of legal claims; protecting Company, your, our customers', and other third parties' safety, property or rights; detecting, preventing, and responding to security incidents; and protecting against malicious, deceptive, fraudulent, or illegal activity;
 - v. In connection with a corporate transaction, such as if we acquire, sell or transfer all or a portion of our business or assets.
- c. We will not use any data obtained through the WELL App for post-issue underwriting for the MassMutual product to which the WELL Rider is attached or any other current or future MassMutual product, in relation to your employment with us or our affiliates, or to market additional products and services to you. In addition, Personal Information collected from the Google Health Connect application will adhere to the Health Connect Permissions Policy, including the Limited Use requirements.

4) HOW WE DISCLOSE YOUR INFORMATION.

We may disclose Personal Information with third parties, including the categories of recipients set forth below. We do not sell information collected through the WELL App (including Fitness Data). However, information (including Linked Data) collected under separate policies (such as our Online Privacy Notice) will be treated in accordance with such policies.

- a. Affiliates and subsidiaries, including parent entities, corporate affiliates, subsidiaries, business units, and other companies that share common ownership;
- b. Professional consultants, such as accountants, lawyers, financial advisors, and audit firms;
- c. Vendors providing services to MassMutual (including vendors providing services related to the WELL App and WELL Rider);
- d. Law enforcement, government agencies, and other recipients for legal, security, or safety purposes, such as when we share information to comply with laws or legal requirements, to enforce or apply our Terms of Use and other agreements or policies and to protect our, our customers', or third parties' safety, property, or rights;
- e. Other entities in connection with a corporate transaction, such as if we, or some or all of our assets, are acquired by another entity, including through a sale in connection with bankruptcy or other forms of corporate change;
- f. Entities to which you have consented to the disclosure.

5) TRACKING TECHNOLOGIES.

The WELL App (and authorized third parties) use cookies and other tracking technologies to collect information about you, your device, and how you interact with our WELL App.

- a. We may use the following tracking technologies:

- i. Cookies, which are a type of technology that install a small amount of information on a user's computer or other device when they visit a website. Some cookies exist only during a single session and some are persistent over multiple sessions over time.
 - ii. Pixels, web beacons, and tags, which are types of code or transparent graphics that contain a unique identifier. These technologies provide analytical information about the user experience and help us customize our marketing activities. In contrast to cookies, which are stored on a user's computer hard drive, pixels, web beacons, and tags are embedded invisibly on web pages.
 - iii. Session replay tools, which record your interactions with the WELL App, such as how you move throughout the WELL APP and engage with our webforms. This information helps us improve the WELL APP and identify and fix technical issues visitors may be having with the WELL APP.
 - iv. Embedded scripts and SDKs, which allow us to build and integrate custom apps and experiences, some of which may be developed by a third party.
- b. We and authorized third parties use these technologies for purposes including:
- i. Personalization, such as remembering user preferences, login details and browsing behavior; tracking your activity across online properties and The WELL APP over time to better understand your preferences and interests; and personalizing your online content;
 - ii. Improving performance, such as maintaining and improving the performance of the WELL APP;
 - iii. Analytics, such as analyzing how the WELL APP is used.
- c. These tracking technologies collect data about you and your device, such as your IP address, cookie ID, device ID, AdID, operating system, browser used, browser history, search history, and information about how you interact with the WELL APP (such as pages on the WELL APP that you have viewed, including your specific movements, page clicks, and other session replay information).
- d. We may disclose information to third parties or allow third parties to directly collect information using these technologies on the WELL APP such as companies that facilitate session replay recordings and analysis, companies that provide analytics including ad tracking and reporting, security providers, and others that help us operate our business and The WELL APP.
- e. Some of the third parties we work with participate with the Digital Advertising Alliance ("DAA") and Network Advertising Initiative ("NAI"). The DAA and NAI provide mechanisms for you to opt out of interest-based advertising performed by participating members at <http://www.aboutads.info/choices/> and <https://optout.networkadvertising.org/>.
- f. You can also refuse or delete tracking technologies using your browser or device settings. If you refuse or delete tracking technologies, some of the WELL App functionality may be impaired. Please refer to your browser's or device's instructions to learn more about how to manage cookies and the use of other tracking technologies. If you change computers, devices, or browsers; use multiple computers, devices, or browsers; or delete your cookies, you may need to repeat this process for each computer, device, or browser. Opting out of interest-based advertising will not opt you out of all advertising, but rather only interest-based advertising from us or our agents or representatives.
- g. Some browsers have incorporated Do Not Track ("DNT") preferences. We do not currently honor such signals.
- 6) **TERMINATION AND DATA RETENTION.** You may stop sharing Fitness Data with the WELL App by 1) deauthorizing the WELL App's access to Fitness Data in your device's data settings, 2) deleting the WELL App from your device, or 3) terminating the WELL Rider from within the WELL App. If you terminate the WELL Rider, you will not be able to reinstate it and you will no longer be able to share Fitness Data with the WELL App or earn benefits under the WELL Rider. Consult the WELL Rider for additional information.

Upon termination of the WELL Rider, Personal Information collected through the WELL App will be retained solely to the extent necessary to comply with our legal obligations, administer the WELL Rider and associated MassMutual financial products, resolve disputes, and enforce agreements. Personal Data collected through the WELL App that is used to calculate benefits under the WELL Rider is not subject to deletion.

- 7) **OTHER WEBSITES.** The WELL App may include links or other options to connect to Third Party Apps and other websites, applications or devices that are not owned or operated by us (collectively, “Linked Apps”). You may be able to log-in to Linked Apps from the WELL App and share your Personal Information with Linked Apps. We do not have any control over Linked Apps. Your use of the Linked Apps is subject to the privacy policies and terms of use of the Linked Apps and you should read and understand them before using any Linked Apps or sharing any personal information with Linked Apps.
- 8) **SECURITY.** We have implemented administrative, technical, and physical safeguards to help prevent unauthorized access, use, or disclosure of personal information in our custody or control. However, we cannot guarantee that these safeguards will prevent the unauthorized access, use or disclosure of your personal information.
- 9) **PERSONS UNDER AGE 18.** We do not knowingly collect or allow the collection of personal information from persons under 18 years of age through the WELL App. If you are the parent or guardian of a person under 18 and believe that the person has provided us with personal information, you may [contact us](#) and request that it be removed from our information systems.
- 10) **CHANGES TO THIS POLICY.** We may revise this Policy from time-to-time in our sole discretion. Before making any material changes to this Policy, we will provide notice to you by posting a notice on the WELL App or via email. Please visit the WELL App and review our Policy periodically for changes. By continuing to access or use the WELL App after changes become effective, you agree to be bound by the terms of the revised privacy policy.

All information subject to this Policy is processed pursuant to the applicable laws of the United States.

Effective Date: April 10, 2024