

myCNHSA PRIVACY POLICY

Last updated January 5, 2021

Thank you for choosing to be part of our community at CNHSA ("**Company**", "**we**", "**us**", "**our**"). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact the Choctaw Nation office of privacy at 580-924-8280 ext. 4735.

When you use our mobile application (myCNHSA), as the case may be (the "**App**") and more generally, use any of our services (the "**Services**", which include the App), we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

This privacy notice applies to all information collected through our Services (which, as described above, includes our App), as well as, any related services, sales, marketing or events.

Please read this privacy notice carefully as it will help you understand what we do with the information that we collect.

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1. WHAT INFORMATION DO WE COLLECT?

Information automatically collected

In Short: *Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our App.*

We automatically collect certain information when you visit, use or navigate the App. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our App and other technical information. This information is primarily needed to maintain the security and operation of our App, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. The information we collect includes:

- ***Log and Usage Data.*** Log and usage data is service-related, diagnostic, usage and performance data our servers automatically collect when you access or use our App and is recorded in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings and information about your activity in the App (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called “crash dumps”), and hardware settings.
- ***Location Data.*** We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the App. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. Note however, if you choose to opt out, you may not be able to use certain aspects of the Services.

Information collected through our App

In Short: *We collect information regarding your mobile device, push notifications, when you use our App.*

If you use our App, we also collect the following information:

- ***Mobile Device Access.*** We may request access or permission to certain features from your mobile device, including your mobile device's calendar, camera, sms messages, storage, reminders, and other features. If you wish to change our access or permissions, you may do so in your device's settings.
- ***Push Notifications.*** We may request to send you push notifications regarding your account or certain features of the App. If you wish to opt-out from receiving these types of

communications, you may turn them off in your device's settings.

This information is primarily needed to maintain the security and operation of our App, for troubleshooting and for our internal analytics and reporting purposes. [\[top\]](#)

2. HOW DO WE USE YOUR INFORMATION?

***In Short:** We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.*

We use personal information collected via our App for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **Request feedback.** We may use your information to request feedback and to contact you about your use of our App.
- **To manage user accounts.** We may use your information for the purposes of managing our account and keeping it in working order.
- **To send administrative information to you.** We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
- **To protect our Services.** We may use your information as part of our efforts to keep our App safe and secure (for example, for fraud monitoring and prevention).
- **To enforce our terms, conditions and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.**
- **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

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3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

***In Short:** We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.*

We may process or share your data that we hold based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information for a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to

investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.[\[top\]](#)

4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short: No unless, a cookie is needed by a third-party API such as Google Maps.

We don't use cookies to store data. Our local data store used by the App uses "LocalStorage". LocalStorage is only used to hold temporary data while the user is logged into the App. Things that may be stored in LocalStorage may include but are not limited to: the contents of your prescription "Refill Cart", a list of appointments on your calendar, etc... [\[top\]](#)

5. DO WE USE GOOGLE MAPS?

In Short: Yes, we use Google Maps for the purpose of providing better service.

This App uses Google Maps APIs which is subject to Google's Terms of Service. You may find the Google Maps APIs Terms of Service [here](#). To find out more about Google's Privacy Policy, please refer to this [link](#). [\[top\]](#)

6. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

In Short: No.

Our servers are located in Oklahoma and access to the App is restricted to use from within the United States only. [\[top\]](#)

7. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than months past the termination of the user's account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. [\[top\]](#)

8. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our App is at your own risk. You should only access the App within a secure environment. [\[top\]](#)

9. WHAT ARE YOUR PRIVACY RIGHTS?

***In Short:** You may review, change, or terminate your account at any time.*

If you have questions or comments about your privacy rights, you may email us at helpdesk@choctawnation.com.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with applicable legal requirements. [\[top\]](#)

10. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice. [\[top\]](#)

11. DO WE MAKE UPDATES TO THIS NOTICE?

***In Short:** Yes, we will update this notice as necessary to stay compliant with relevant laws.*

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information. [\[top\]](#)

12. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO), by email at Janet Sharp, by email at jdsharp@cnhsa.com, by phone at 1-800-349-7026, or by post to:

Choctaw Nation of Oklahoma
Attn: Janet Sharp, Privacy Officer
One Choctaw Way
Talihina, OK 74571
United States

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13. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review to update your personal information, please submit a request via email to helpdesk@choctawnation.com. We will respond to your request within 30 days. [\[top\]](#)