

FAQ- Choose Well Security, Privacy and Available Alternatives

Choose Well is a voluntary wellness program that gives you many physical and non-physical options for earning your health incentive. You can choose to focus on things like physical activity, eating well, sleep habit, reducing stress, personal finances, relationships and spirituality.

But we understand you may have privacy concerns or individual health situations. Your privacy is important to us and we hope the following FAQs address any privacy concerns. In addition, our goal is to improve and promote health and wellness –not make it difficult for you because of your health. Virgin Pulse will work with you to develop a program that is right for you.

Privacy and Security

Is this program secure and private?

Absolutely! Your privacy and data security are extremely important, and protections are in place to keep your information safe. When we partnered with Virgin Pulse, the technology and security protocols were vetted by our risk and integrity team. Virgin Pulse is a global company that has never experienced a data breach and adheres to strict international data security regulations, including complying with the EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield Framework. You may view their security standards found in their [privacy notice here](#). You may contact Virgin Pulse directly with any privacy related concerns at privacy@virginpulse.com.

There is a sign-in feature called Multi-factor Authentication (MFA) that will provide an extra layer of security when you sign into the Virgin Pulse Platform. When you sign in with your username and password, a message will open on your screen requesting a security code. The code will be sent to you by SMS (text) or email. Simply enter the code into the field provided and you'll be able to access your account.

In order to receive the code on your phone, you must have a United States or Canadian phone number. Please be sure your number is up-to-date and verified in your member profile. Alternatively, the security code can be sent to your email. If you need to update your email, you can do so by calling member support.

What information about me does Virgin Pulse share with my employer?

No individual personal health information is shared by Virgin Pulse. The only information shared with your employer is de-identified statistics on the whole program to prevent any individual identification. This information is shared only with a select few individuals in Total Rewards and Employee Health solely to evaluate the program and identify health and wellness tools that will specifically be valuable to our caregivers.

Virgin Pulse will also share with Total Rewards a secure file of the caregiver names and program level completions in order to process the health incentives so that you receive your health incentive. Your employer will not see information you track, challenges, measurements, health statistics, goals or other information you chose to enter.

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What personal information is shared by my employer with Virgin Pulse?

As a HIPAA compliant partner, Virgin Pulse receives an encrypted file of caregivers' basic information so that when a caregiver or spouse enrolls in Choose Well on the Virgin Pulse platform, the technology can identify them as an employed caregiver or eligible spouse. This information includes basic demographics such as names, employee IDs, place of work, benefit status, and date of birth. No other confidential or personal health information from the medical plan or any other data source is shared with Virgin Pulse. Caregivers can choose to voluntarily track health metrics such as their weight and activity, but that is an optional part of the program.

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Is my information sold to 3rd parties?

Absolutely not! Virgin Pulse has committed to never sell any information that they have with any third parties. In fact it is mandated in our contract that they never sell any of our information or caregiver data.

Why does the Data Consent state that Virgin Pulse can use my personal health information if I provide it?

When individuals enroll, they have the option to connect their favorite tracking devices such as a Fitbit or smart scale or to 3rdparty applications such as MyFitnessPal for nutrition tracking. The data these devices and apps collect is then shared with Virgin Pulse. The Virgin Pulse technology uses this information in order to provide a personalized experience that is most relevant to that particular caregiver's data. For example, if a caregiver is sharing information in the program around a weight management goal, then the program would be able to recommend tips and resources for that person to support them better in reaching their goal.

However, sharing personal health information with Virgin Pulse is **completely voluntary** and caregivers can simply use the technology without inputting any of their personal well-being metrics and still achieve points towards their financial incentive.

Why does Virgin Pulse say they may share my information with 3rd parties?

The data sharing agreement and privacy notice that Virgin Pulse asks participants to agree to is written to cover all of the employers they serve globally. Some employers work with Virgin Pulse to administer disease prevention or health coaching programs. In those instances, Virgin Pulse would need to share participant's program information with those 3rdparties in order for them to be effective. However, we do not use those additional services through Virgin Pulse, so those statements in the agreements do not apply to our caregivers' personal information.

Choose Well Security, Privacy, and Available Alternatives - Continued

Is this program legally compliant?

Yes. Wellness programs are required to comply with various laws including the Health Insurance Portability and Accountability Act (HIPAA), the Americans with Disabilities Act (ADA) and the Genetic Information Nondiscrimination Act (GINA). The program complies with all of these laws and does not discriminate against caregivers based on disability or health status. Participation is voluntary, there are many ways to earn points and accommodations can be requested confidentially by contacting Virgin Pulse, directly at 844-930-1238.

Available Alternatives

How do people with a condition which may interfere with physical activity use this program?

The Choose Well program is specifically designed to be relevant and useful for a wide variety of people with varying abilities. Tracking physical activity is just one option of many ways to earn points for other activities (such as viewing healthy recipes, tracking sleep or tracking food) in the program. Individuals who are limited in their ability to walk or exercise can still easily participate and earn points in order to earn their full incentive. However, if a caregiver has a condition that makes participation in tracking activities not feasible, a reasonable alternative will be provided.

How can I get an alternative to earn my health incentive?

We are committed to helping you achieve your best health. Incentives for participating in the program are available to all benefits-eligible caregivers. If you think you might be unable to complete the program activities, you may qualify for an opportunity to earn the health incentive by different means. **Contact Virgin Pulse at 1-844-930-1238** and they will work with you (and, if you wish, your doctor) to find a wellness program that is right for you in light of your health status.

This process is completely confidential. Virgin Pulse will not share any information about your alternatives with your employer. Your employer will not even know if you requested an accommodation.

Am I required to participate?

Participation in the Choose Well program is fully voluntary and not required. However, caregivers who are eligible for the health incentive will need to participate and earn points in the program or request an alternative in order to qualify for their health incentives.

What if I don't feel comfortable with the program and don't want to enroll?

There is no requirement to enroll and participate in the program. The well-being program is offered to you as a benefit to support personal well-being and as a way to earn the health incentive; however, it is completely voluntary.

Is this program designed to be hard for caregivers to earn their incentive so that my employer can save money?

No. The Choose Well program has been designed to be mindful of caregivers of all capabilities and their diverse levels of participation. Our desire would be for 100 percent of caregivers to choose to enroll and be successful at earning 100 percent of their incentives. For caregivers who don't wish to engage with Choose Well on a daily basis and still be successful, the program includes some custom large point activities.

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How does this program accommodate caregivers who are too busy and don't have time to participate?

As mentioned above, the program has been designed with many bonus point options that support caregivers who are not ready to focus daily on their personal well-being through the Choose Well program. Caregivers who feel that their time is too limited to engage daily can complete the bonus point activities to be able to reach level 4 in the program for their full health incentive.

The Health Check (health assessment) questions are too personal. Do I have to answer them in order to earn my incentive?

No. Completion of the Health Check (health assessment) is completely optional and not required. There are many other point earning options and opportunities throughout the year. The health assessment is just one way to earn points in the program.

I don't have a personal fitness tracker and can't afford one. How can this program still work for me?

The program is designed with many well-being tracking options. Caregivers with smartphones can usually turn on the step tracking function directly in their phone. This will make the phone act like a step tracker if the caregiver wants to carry it in their pocket during the day. For those with older phones and no fitness tracker, there is another option of manually entering fitness activity. This is something that caregivers can do daily or even once a week. They can go into the program and track the past seven days-worth of activity all at once if they don't want to login daily. Manually entered steps also earn points similarly to those uploaded from fitness tracking devices.