

# Voya Financial Consumer Health Data Privacy Policy

Voya Financial and its affiliates ("Company," "we," "us," or "our") are committed to protecting the privacy and security of your consumer health data. This Consumer Health Data Privacy Policy ("Policy") describes how we collect, use, and share consumer health data.

This Policy does not apply where an exception or exemption applies such as with respect to protected health information under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and data that is subject to the Gramm-Leach-Bliley Act ("GLBA").

## 1. What Is Consumer Health Data?

"Consumer health data" means personal information that is linked or reasonably linkable to you and identifies your past, present, or future physical or mental health, and which is regulated as "consumer health data" under Washington State My Health My Data Act and similar consumer health privacy laws in effect in other states ("Consumer Health Privacy Laws").

## 2. Categories of Consumer Health Data We May Collect

Consumer health data may include, but is not limited to:

- i. Individual health conditions, treatment, diseases, or diagnosis;
- ii. Social, psychological, behavioral, and medical interventions;
- iii. Health-related surgeries or procedures;
- iv. Use or purchase of prescribed medication;
- v. Bodily functions, vital signs, symptoms, or measurements;
- vi. Diagnoses or diagnostic testing, treatment, or medication;
- vii. Gender-affirming care information;
- viii. Reproductive or sexual health information;
- ix. Biometric data;
- x. Genetic data;
- xi. Precise location information that could reasonably indicate a consumer's attempt to acquire or receive health services or supplies;
- xii. Data that identifies a consumer seeking health care services; or
- xiii. Any information that a regulated entity or a small business, or their respective processor, processes to associate or identify a consumer with the data described in in (i) through (xii) that is derived or extrapolated from non-health information (such as proxy, derivative, inferred, or emergent data by any means, including algorithms or machine learning).

## 3. Sources of Consumer Health Data

We may collect Consumer Health Data from the following sources:

**From you:** when you use our products, services, websites, or mobile apps.

**Claims or Distributions:** when you request reimbursement or a distribution from our products or services.

**Inferences** — derived from your interactions with our products, services, websites, or mobile apps.

## 4. Purposes for Collecting Consumer Health Data

We collect your data (1) to the extent necessary to provide a product or service, (2) fulfill our legal, regulatory, or compliance obligations, or (3) with your affirmative consent.

## 5. Categories of Consumer Health Data We Share

We may share the following categories of Consumer Health Data with affiliates and our third party service providers:

## 6. Third Parties and Affiliates With Whom We Share Consumer Health Data

We may share consumer health data with our affiliates listed below and our third party service providers.

- **Affiliates:** Benefitfocus, Inc., Benefit Strategies, LLC, OneAmerica Retirement Services LLC, OneAmerica Investment Advisory Services LLC, Pen-Cal Administrators, Inc., ReliaStar Life Insurance Company, ReliaStar Life Insurance Company of New York, Security Life Assignment Corporation, Voya Benefits Company, LLC, Voya Capital Corporation, LLC, Voya Financial Advisors, Inc., Voya Financial, Inc., Voya Financial Partners, LLC, Voya Funds, Voya Funds Services, LLC, Voya Institutional Plan Services, LLC, Voya Institutional Trust Company, Voya Investments, LLC, Voya Investments Distributor, LLC, Voya Retirement Advisors, LLC, and Voya Retirement Insurance and Annuity Company.

## 7. Your Rights

You have the following rights regarding your Consumer Health Data:

Right	Description
<b>Right to Access/Confirm</b>	Confirm whether we are collecting, sharing, or selling your consumer health data, and access that data including a list of all third parties with whom it has been shared or sold
<b>Right to Withdraw Consent</b>	Withdraw consent to our collection and sharing of your consumer health data at any time
<b>Right to Deletion</b>	Request deletion of your consumer health data from our records and all third parties with whom it has been shared
<b>Right to Non-Discrimination</b>	We will not discriminate against you for exercising your rights under this policy

## 8. How to Exercise Your Rights

You may submit your consumer rights request at:

- Online: [Personal Data Request](#)

We will respond to your request within the time allowed by applicable law. If additional time is needed, we will notify you within the initial period and may extend the deadline as allowed by applicable law.

Responses to your request are provided free of charge up to twice per year.

## 9. Sale of Consumer Health Data

We do not sell your consumer health data as that term is defined by Consumer Health Privacy Laws.