

Privacy Policy

Effective Date: August 1, 2026

AWM (“AWM,” “we,” “us,” or “our”) is a third-party administrator that provides employee benefit administration services to employers, plan sponsors, participants, and other clients. We recognize the importance of protecting the personal information entrusted to us and are committed to maintaining appropriate privacy and security practices.

This Privacy Policy explains how we collect, use, disclose, maintain, and protect personal information obtained through our website and in connection with the benefit administration services we provide.

1. Information We Collect

In the course of providing third-party administration services, AWM may receive personal information directly from individuals or from employers, plan sponsors, insurance carriers, financial institutions, payroll providers, benefits platforms, and other authorized parties.

Depending on the services being provided, information we collect or process may include:

- Name, mailing address, email address, and telephone number
- Date of birth
- Employer and employment information
- Employee or Participant Identification Information
- Benefit eligibility and enrollment information
- Dependent and beneficiary information
- Benefit election and contribution information
- Account and reimbursement information
- Claims and expense documentation
- COBRA or continuation coverage information
- Information necessary to administer Flexible Spending Accounts (FSAs), Health Savings Accounts (HSAs), Health Reimbursement Arrangements (HRAs), COBRA, and other employee benefit programs
- Communications and information submitted to our customer service or administrative teams

- Other information necessary to provide contracted benefit administration services

The specific information AWM receives depends upon the benefit program and services we administer for a particular employer or plan sponsor.

2. How We Use Personal Information

AWM uses personal information primarily to provide benefit administration services on behalf of employers, plan sponsors, and participants.

These activities may include:

- Establishing and maintaining participant accounts
- Administering FSA, HSA, HRA, COBRA, and other benefit programs
- Processing elections, contributions, claims, reimbursements, and other benefit transactions
- Determining or verifying eligibility based on information provided by the employer or plan sponsor
- Processing participant demographic and enrollment changes
- Administering benefit payment cards, where applicable
- Communicating with participants, employers, plan sponsors, carriers, financial institutions, and service providers
- Providing customer service and responding to inquiries
- Maintaining records relating to benefit administration
- Preventing fraud, unauthorized access, and misuse of our systems or services
- Meeting contractual, legal, regulatory, audit, and compliance obligations

AWM does not use personal information for purposes unrelated to its legitimate business and benefit administration functions except as permitted or required by law.

3. Information Provided by Employers and Plan Sponsors

AWM frequently receives personal information from employers and plan sponsors for the purpose of administering employee benefit programs.

Employers and plan sponsors are responsible for providing accurate information to AWM and for having the appropriate authority to provide such information.

AWM processes this information in accordance with its agreements with the applicable employer or plan sponsor and applicable legal requirements.

Participants who believe information provided by their employer is incorrect may need to contact their employer or plan administrator to have the information corrected.

4. Benefit Administration Service Providers

To provide our services, AWM may work with third-party organizations that perform functions related to benefit administration.

These organizations may include:

- Benefits administration technology providers
- Insurance carriers
- Financial institutions and HSA custodians
- Debit and payment card providers
- Claims and payment processors
- Payroll and eligibility vendors
- COBRA-related service providers
- Banking and electronic payment providers
- Information technology, hosting, and cybersecurity providers
- Professional advisers, auditors, and other service providers

AWM may provide these parties with information that is reasonably necessary for them to perform their respective functions.

We expect service providers that receive personal information from us to maintain appropriate safeguards and to use information for authorized purposes.

5. Sale of Personal Information

AWM does not sell personal information.

We do not sell participant, employee, dependent, employer, or client personal information to third parties for monetary consideration.

6. Sensitive Information

Because of the nature of employee benefit administration, some information processed by AWM may be considered sensitive personal information under applicable law.

This may include financial information, benefit information, dependent information, claims documentation, or other information necessary to administer an employee benefit program.

AWM limits access to sensitive information to individuals and service providers who require access to perform authorized business or administrative functions.

7. Health Information and HIPAA

Certain benefit programs or services may involve information that is subject to the Health Insurance Portability and Accountability Act (“HIPAA”) or other federal or state privacy requirements.

Whether particular information is protected by HIPAA depends on the benefit plan, the parties involved, and the capacity in which AWM receives or processes the information.

When AWM performs services involving Protected Health Information (“PHI”) on behalf of a HIPAA-covered entity or health plan and is acting as a Business Associate, AWM handles that information in accordance with applicable HIPAA requirements and the applicable Business Associate Agreement.

This website Privacy Policy is not intended to replace any Notice of Privacy Practices, Business Associate Agreement, plan document, or other privacy notice that may apply to a particular health plan or benefit program.

8. COBRA Administration

When AWM provides COBRA or other continuation coverage administration, we may receive and process information necessary to administer notices, elections, eligibility, payments, coverage periods, qualifying events, beneficiaries, and related continuation coverage requirements.

Information may be exchanged with employers, plan sponsors, participants, qualified beneficiaries, insurance carriers, and other service providers as reasonably necessary to administer continuation coverage.

9. HSA Administration

When AWM provides services related to Health Savings Accounts, certain account services may be provided in conjunction with a financial institution, custodian, or other financial services provider.

Information necessary to establish, fund, maintain, or administer an HSA may therefore be shared with the applicable financial institution, custodian, payment processor, or other authorized provider.

The privacy policies and legal requirements applicable to those organizations may also apply to information they maintain.

10. Website Information and Cookies

When you visit our website, certain technical information may be collected automatically. This may include:

- IP address
- Browser type
- Device information
- Date and time of access
- Pages visited
- General website usage information

Our website may use cookies and similar technologies for functionality, security, performance, and analytics.

You may be able to control cookies through your browser settings. Disabling certain cookies may affect website functionality.

11. Online Portals and Third-Party Platforms

AWM may provide access to benefit administration services through online portals, mobile applications, or technology platforms provided or supported by third-party vendors.

These platforms may have additional privacy notices, terms of use, security practices, or policies that apply to information processed through those systems.

Users should review applicable notices presented through those platforms.

12. Data Security

AWM maintains administrative, technical, and physical safeguards designed to protect personal information against unauthorized access, disclosure, alteration, destruction, or misuse.

Our security practices may include access controls, authentication procedures, secure systems, employee confidentiality requirements, vendor oversight, and other safeguards appropriate to the nature of the information being processed.

Although we take reasonable measures to protect personal information, no electronic communication, network, or data storage system can be guaranteed to be completely secure.

13. Data Retention

AWM retains personal information for the period reasonably necessary to:

- Provide contracted benefit administration services
- Maintain appropriate business and benefit records
- Meet legal and regulatory requirements
- Satisfy contractual obligations
- Respond to audits or inquiries
- Resolve disputes
- Protect legal and business interests

Retention periods may vary depending upon the type of information, benefit program, contractual requirements, and applicable law.

When information is no longer required, it may be securely deleted, destroyed, anonymized, or otherwise disposed of in accordance with applicable requirements and our information management practices.

14. Disclosure Required by Law

AWM may disclose personal information when we reasonably believe disclosure is necessary to:

- Comply with federal, state, or local law
- Respond to a subpoena, court order, governmental request, or other legal process
- Cooperate with regulatory or law enforcement authorities
- Investigate suspected fraud or unauthorized activity
- Protect the security of our systems

- Protect the rights, safety, or property of AWM, our clients, participants, service providers, or others

15. Individual Privacy Requests

Depending on applicable law and the capacity in which AWM maintains information, individuals may have certain rights regarding their personal information.

Because AWM frequently processes information on behalf of an employer, plan sponsor, health plan, or other client, certain requests may need to be directed to that organization.

If we receive a request concerning information controlled by one of our clients, we may refer the individual to the appropriate employer, plan sponsor, or other responsible party.

16. Children's Privacy

AWM's website and services are not intended to independently solicit personal information from children.

However, AWM may process information concerning dependent children when that information is provided by an employer, plan sponsor, participant, parent, guardian, insurance carrier, or other authorized party and is necessary for benefit administration.

17. Third-Party Links

Our website may contain links to websites, portals, financial institutions, insurance carriers, or other services operated by third parties.

AWM is not responsible for the privacy, security, content, or data practices of websites or services operated by third parties.

We encourage users to review the privacy policies and terms applicable to any third-party website or service they access.

18. Changes to This Privacy Policy

AWM may revise this Privacy Policy periodically to reflect changes in our services, technology, business practices, or applicable legal requirements.

The current version will be posted on our website and identified by the effective date shown at the top of the policy.

19. Contact Us

Questions regarding this Privacy Policy or AWM's privacy practices may be directed to:

AWM

P O Box 165

Chelsea AL 35043

service@awm.cc

800.723.8908

Effective Date: August 1, 2026