

Sydney Administrators

Privacy Statement

This Privacy Statement describes our privacy and data protection principles with respect to your personal information.

Throughout this Privacy Statement, “Sydney Administrators,” “we”, “us”, and “our” refer to Sydney Administrators LLC, a Florida limited liability company, and its subsidiaries, divisions, branches, or affiliates, or other companies under its control, and “you” and “your” refer to any individual who accesses [Connect.sydneytpa.com](https://connect.sydneytpa.com) and SydneyAdministrators.com (together, “Connect by Sydney”).

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use Connect by Sydney. By using Connect by Sydney, you agree to the collection, storage, use, processing, and transmission of your personal information as explained in this Privacy Statement.

Scope of this Privacy Statement:

This Privacy Statement covers our information practices, including how we collect, store, use, process, and transmit your personal information that we maintain on Connect by Sydney.

As a third-party administrator, we act on behalf of insurance policies and employee benefit plans (each a “Benefit Plan”) to process premium and claims payments and perform administrative functions. Your Benefit Plan is ultimately responsible for establishing policies and procedures to protect your personal financial and health information. Any information that you submit through Connect by Sydney, and any information that you receive through Connect by Sydney, will be subject to the privacy and other requirements of your Benefit Plan, to the extent those requirements apply. Your Benefit Plan, not Sydney Administrators, is responsible for complying with Employee Retirement Security Act, the Health Insurance Portability and Accountability Act and other privacy laws, and other applicable law.

We may provide links to one or more Benefit Plan or other third-party sites for your convenience and information. If you access those links through Connect by Sydney, you will leave Connect by Sydney. We do not control third-party sites or their privacy practices, which may differ from our practices. We do not endorse or make any representations about third-party sites. The personal information you choose to provide or that is collected through these third-party sites is not covered by this Privacy Statement. We encourage you to review the privacy statement or policy of any sites before submitting your personal information.

Connect by Sydney is not directed at or targeted at children. No one who has not reached the age of eighteen may use the websites unless supervised by an adult. By accessing Connect by Sydney you represent and warrant that you are eighteen years old or older.

We will not be liable for any unsolicited information that you provide. You consent to our use of such information as described in this Privacy Statement.

Personal information collected by us:

On behalf of Benefit Plans, we may collect your personal information such as:

- your first and last name
- your mailing and/or residence address
- your email address
- your phone number
- your social security number and/or employee ID
- your job title and the name of your employer, union, or affiliated organization
- your personal health information
- your financial information, including salary or other benefits and compensation information
- the premium paid for your coverage
- claim payments made under your coverage
- your credit card or other payment card information

On behalf of Benefit Plans, we receive this information from several sources:

- We may collect personal information directly from you. For example, we may collect personal information from you when you fill out forms on or raise a query through Connect by Sydney, or send emails, call us, or write to us.
- If we process premium and claims payments on behalf of your Benefit Plan, we may maintain that information on Connect by Sydney so that you can access it and manage your coverage.
- Connect by Sydney may receive and maintain information that you provide to third parties such as your broker, Benefit Plan, employer, or union. We may maintain this information on Connect by Sydney to help you access information about your coverage and manage that coverage. Here are some examples of the type of information we may receive from third parties and maintain on Connect by Sydney:
 - ⇒ Your Benefit Plan, broker, Benefit Plan, employer, or union may send us information that you provide when you apply for or enroll in coverage.
 - ⇒ If you enroll in coverage through your employer or union, they may send us information about your salary and/or other compensation, benefits, and job title.
 - ⇒ Your Benefit Plan, broker, union, or other third parties may send us information about the type of insurance coverage you have and about your dependents who are covered under that coverage.
 - ⇒ Your Benefit Plan, your broker, or other third parties may send us premium and claims payment information.
- In some instances, we automatically collect your personal information when you visit Connect by Sydney. We may use automated technologies, including cookies, to collect your personal information. The collection of this information will allow us to improve the effectiveness of Connect by Sydney. Please see the section on Cookies below for further details.

- If you access Connect by Sydney on your mobile device, we may collect your personal information such as your first name, last name, e-mail address, job title, organization name, country, city, phone number, IP address and device details. When you provide us your mobile phone number, you consent to the use of your mobile phone number for the purposes identified in this Privacy Statement. If you choose to refrain from receiving any text notifications from us on your mobile device, we will not be using your mobile number for such purposes unless required to meet legal requirements or legitimate business purposes.

How we use your data:

On behalf of Benefit Plans, we may use the personal information we collect to:

- provide you with online access to your premium payment and claims payment information, and provide other information and services as you request
- assess queries, requirements, and process requests for services
- enable you to download documents and information from Connect by Sydney
- communicate with you and provide billing and administration services and other services to you and to Benefit Plans and other third parties that provide products and services to you through us
- conduct data analysis
- assess websites performance and usage analysis
- provide better services
- conduct processing necessary to fulfill other contractual obligations for you or for your Benefit Plan or other third parties that provide products and services to you through us
- perform other functions that we may describe when you provide the information
- carry out any other purpose with your consent.

We do not maintain credit card or other payment card data on Sydney Connect or otherwise. If you enter your credit card or other payment card data on Sydney Connect, we immediately transfer it to a third party payment processing company, and do not maintain a copy.

Sharing of personal information the third parties:

We do not share personal information about you with Benefit Plans, agents, affiliates, or other third parties entities except to act on behalf of Benefit Plans to provide products or services you've requested, or when we have your permission or under the following circumstances:

- We may share your personal information with our affiliated entities/subsidiaries/branch offices for legitimate business purposes.
- We may provide your personal information to trusted entities who work on behalf of us or your Benefit Plan. These entities may use your personal information to help us provide services or for other legitimate business purposes. For example, we transfer any credit card or payment card

information you enter on Sydney Connect to a third-party payment processing company, which processes your payment on behalf of your Benefit Plan.

- We may share your personal information with government institutions, law enforcement agencies, or other bodies as required to comply with law.
- We may use your personal information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims.
- We may share your personal information where we reasonably determine it is necessary in order to investigate, prevent, or take action against any illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or as otherwise required by law.
- We may share your personal information where we reasonably determine it is necessary in order to protect or enforce our rights, usage terms, or intellectual or physical property, or to secure our safety.
- We may share your personal information if we are acquired by or merged with another company, after ensuring such company offers at least an equivalent level of protection for personal data.

Preferences:

We take reasonable steps to keep your personal information accurate and complete. You can access or update your personal information in the following ways:

Profile

For an account profile created on Connect by Sydney, you can update your profile information by contacting us at cs@tpasvcs.com.

Mobile Devices

If you previously chose to receive notifications from us on your mobile device but no longer wish to receive them, you can manage your preferences by emailing us at cs@tpasvcs.com.

Cookies and other technologies:

Cookies are text files containing information that Connect by Sydney sends to -- and stores on -- your computer or mobile device. We use cookies to identify your computer or mobile device as you use Connect by Sydney. The unique string of letters and numbers in a cookie may store user preferences and other information, but may not read your data or information from your hard drive or read other saved cookie files from other websites.

We use cookies to operate Connect by Sydney, to verify your identity, and to maintain privacy and security. You can learn more about our use of cookies and your ability to block cookies [here](#).

Anti-Spam policy:

We have taken reasonable measures to minimize the transmission and effect of spam emails (i.e. unsolicited bulk emails) in our computing environment. All emails received by us are subject to spam check. Any email identified as spam will be rejected with sufficient information to the sender for taking necessary action. With this measure, along with other technical spam reduction measures, we hope to minimize the effect of spam emails. We reserve the right to reject any suspicious emails and/or report any suspicious emails to government authorities for necessary action.

Data Protection and Confidentiality:

We have implemented physical, technical, and administrative security measures to protect personal information from loss, misuse, alteration, or destruction.

We disclose your personal information to third parties only for legitimate purposes.

As required by the policies and procedures of your Benefit Plan, we will take reasonable steps to ensure that all dealings in your personal information shall:

- be processed fairly and lawfully
- be obtained only with the consent of the information provider
- be collected only as we reasonably consider necessary for a lawful purpose connected with our services
- be available for your review as and when reasonably requested
- be kept secure against unauthorized or unlawful processing and against accidental loss, destruction, or damage, as required by law

Your rights with respect to your personal information:

We respect your rights with respect to our collection, possession, processing, use, and transmission of your personal information as may be required under applicable law. Your rights may differ depending on local law and other applicable law and on the policies and procedures of your Benefit Plan. As required by applicable law, you may have the right to:

- withhold personal information that we seek to collect, ask us to delete your personal information, restrict how we use your personal information, or withdraw consent that you have previously given*
- ask us to update your personal information if it is incorrect or incomplete
- know what personal information we maintain about you
- access your personal information
- receive a copy of your personal information in a structured, commonly used, and machine-readable format on request
- object to the processing of your personal information

****Denying or restricting our access to your personal information may impact your access to our services.***

If you have an account with Connect by Sydney, you can correct or update the personal information in our account profile by contacting us at cs@tpasvcs.com.

If we have received your information from your Benefit Plan or another third party, you may be required to process the correction or update through that Benefit Plan or third party.

If you wish to exercise any of your rights with respect to our collection, possession, processing, use, and transmission of your personal information or would like more information about these rights, you may contact us at privacy@tpasvcs.com.

We will respond to your requests to correct inaccuracies in your personal information in accordance with our procedures, as required by law.

Retention of personal information:

We will retain your personal information for as long as we reasonably determine is necessary to provide the services on behalf of your Benefit Plan and as directed by your Benefit Plan, or for other essential purposes such as performance of a contract, legal compliance, dispute resolution, and enforcement of our operating policies.

Disclosure of information:

We may share your personal information with your consent, as disclosed in this Privacy Statement, or where the disclosure is necessary for compliance with law. As required by law, we will take steps in accordance with our procedures to ensure that information that we transfer to a third party is not further disclosed by it in violation of applicable law.

Authenticity:

We are not responsible for the authenticity of the personal information supplied to us by you or any third party.

Grievance Redressal:

Any grievance or complaint in relation to processing of personal information should be sent to us in writing. contacting us at privacy@tpasvcs.com.

Changes to this Privacy Statement:

This Privacy Statement is subject to change from time to time. Any revised Privacy Statement will be accessible through this page or otherwise on Connect by Sydney. Your continued use of Connect by Sydney after we make changes is deemed to be your acceptance of those changes, so please check this Privacy Statement periodically for updates.

This Privacy Statement was last updated on September 17, 2024.

Contact Us

You can contact us by emailing us at cs@tpasvcs.com or via mail at Sydney Administrators, 690 Main Street #346, Safety Harbor, FL 34695. Please include your current contact information, any information you are interested in accessing and your requests with regard to the same, if any. We will endeavor to respond to your request, subject to reasonable limitations provided by law, unless it infringes on the privacy of other individuals.

If we are unable to grant your request, we will provide you with the reason for our determination.

If you have any questions or comments regarding this Privacy Statement or processing of your personal information, contact us at cs@tpasvcs.com.

Sub-Processor

The table below identifies the list of sub-processors used by Sydney Administrators.

Sub-Processor	Services Provided	Data Location
Amazon Web Services	Cloud Storage	Unites States
CheckFlo	Manual Check Vendor	Canada
Click2Mail	Mailing Vendor	Unites States
Files	sFTP Vendor	Unites States
Kydatech	IT Managed Security Services Provider	Unites States
Microsoft O365	Business Application Suite	Unites States
Nextiva	Internet Phone Provider	Unites States
OFAC.API	and Insureds receiving payments.	Unites States
Plaid	Bank Account Verification	Unites States
Stripe	Credit Card Processing	Unites States
TBB	IT Development Team	Unites States

Effective Date:

This Privacy Statement is effective from September 17, 2024 and it supersedes all existing polices on the subject matter.