



Web Privacy Policy - Travis Software, Inc

Travis software, Inc. operates the following websites:

1. Travissoft's Corporate ("Website") located at travissoft.com and;
2. Our application called T-COBRAWEB ("Service") located at webcobra.com.

This page is used to inform website visitors regarding our policies with the collection, use, and disclosure of Personal Information if anyone decided to use our Service, the T-COBRAWEB website or views/request information about our products and services via our corporate website.

Our Website is used to show information regarding our corporation and our products and services. We may collect information you enter to reach respond to queries for information. Our Service is a password protected application used to facilitate the administration of COBRA eligible members.

Our Service focuses on managing and processing COBRA and/or other Billing Administration Services or Benefit Administration Services. Our Service collects and manages participant information for the purpose of compliance with COBRA Act of 1985, the management of COBRA state specific continuation laws, or retiree services.

The Consolidated Omnibus Budget Reconciliation Act (COBRA) is a law that mandates an insurance program which gives some employees the ability to continue health coverage after leaving employment. Our Service stores ePHI and must meet or exceed compliance with the Health Insurance Portability and Accountability Act of 1996 ("HIPAA").

Electronic protected health information (**ePHI**) refers to any protected health information (PHI) that is covered under Health Insurance Portability and Accountability Act of 1996 (HIPAA) security regulations and is produced, saved, transferred or received in an electronic form.

If you choose to use our Service, then you agree to the collection and use of information in relation with this policy. The Personal Information that we collect are used for providing and improving the Service. We will not use or share your information with anyone except as described in this Privacy Policy.

The terms used in this Privacy Policy have the same meanings as in our End User License Agreement (EULA), which is accessible within the Service, unless otherwise defined in this Privacy Policy.

Information Collection and Use

Information required in processing COBRA for individuals:

- Personally Identifiable Information (PII) such as email addresses, phone numbers, and addresses.
- Healthcare plan and carrier information (PHI)
- Employer Information
- Payment Information
- Information used to customize the End User's portal and experience.

Why we collect Personal Data

- Establish identity
- Perform necessary identity and security verifications
- Process transactions and conduct business
- Deliver products and services
- Provide customer support and services
- Provide ongoing service delivery
- Provide you with information
- Improve products, services and service delivery
- Better understand your needs, interests and suitability for various products and services
- Recommend specific products and services that may meet your needs
- Respond to issues, questions and queries
- Protect you against errors or fraud; and

Co-operate with law enforcement and legal authorities, where required, to comply with applicable laws and with court orders.

Survey data:

We periodically collect survey information from our Partners and End Users. We use this information to improve our service to our End-users. We may contact you to further understand what you liked or disliked within our Service.

For security purposes:

We may require you to provide us with certain personally identifiable information, including but not limited to your name, phone number, and postal address. The information that we collect will be used to contact or identify you.

Examples of this may be:

- 1) You are the administrator for your organization; or
- 2) If you are a Privacy Officer or Security Office as defined by HIPAA

Log and Security Data

We want to inform you that whenever you visit our Service, we collect information that your browser sends as well as security data called Log Data. We use this Log Data for performance evaluation of our Service and to ensure proper use of the Service and the data contained within.

This Log Data may include information such as:

- Your computer's Internet Protocol ("IP") address;
- Your User ID;
- Browser version;
- Operating System version;
- Other statistics and metrics
- Which pages of our Service that you visit
- The time and date of your visit, the time spent on those pages;
- What information was viewed, queried, or edited.

The information is transmitted via SSL Encryption and our encrypted database using AES 256-bit encryption.

Cookies Use

Cookies are files with small amount of data that is commonly used an anonymous unique identifier. These are sent to your browser from the website that you visit and are stored on your computer's hard drive.

Our Services and Website uses "cookies" to collect information to provide the service and/or for sales and marketing purposes. Most browsers offer the option to either accept or refuse these cookies, and know when a cookie is being sent to your computer. If you choose to refuse our cookies, you may not be able to use some portions of our Website or Service.

Service Providers

We may employ third-party companies and individuals due to the following reasons:

- To facilitate our Service, such as Cloud Service providers; or
- To perform Service-related services, such as a CRM tool; or
- To assist us in analyzing how our Service is used
- To facilitate our Website;

We want to inform our Website and Service users that these third parties may have access to Personal Information to perform the tasks assigned to them on our behalf. However, they are obligated not to disclose or use the information for any other purpose. Where applicable, BAA and contract limits are in effect.

Travisoft periodically reviews service providers for their security and privacy posture. We expect our vendors to be **at least** equivalent to our posture.

Retention and Disposal

We keep information only for so long as it is needed for the efficient and effective delivery or fulfillment of the software, products, or services. We will either destroy or remove information when it is no longer needed.

Security

We follow Best Practices of this Policy and our internal Security Policies to facilitate data access that promotes and protects Privacy and Security of the Personal Information. We are required to meet or exceed industry standards as related to the Health Insurance Portability and Accountability Act of 1996 ("HIPAA").

We value your trust in providing us your Personal Information and strive to use commercially acceptable means of protecting it.

Travis Software employees complete annual HIPAA and Computer Security Awareness trainings to continue to inform and raise awareness. Employees are also limited in access to what is required for their role within in supporting our customers or the Service.

All data submitted or access via our Service is encrypted with Secure Socket Layer (SSL). Data is encrypted using Transmit Layer Security (TLS) using an Advanced Encryption Standard (AES). When the data is stored, at rest, data is encrypted at the database level with AES-256 encryption. Data is backed up periodically and stored in as AES-256 encrypted data.

We perform many types of security tests on our Service, including but not limited to, security code scans, authenticated penetration testing, network penetration testing, vulnerability scanning and scan cypher testing. Our data centers are protected by biometric man-traps, 24/7 security, reinforced buildings, with redundant power and cooling systems. We have monitoring systems in place to monitor for possible attacks.

Despite the physical, technical, or organizational safeguards in place, no transmission over the internet or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security.

It is your responsibility to protect the security of your login information, make sure not to share it and keep it private. Please note that emails, instant messaging, and similar means of communication with other entities are generally not encrypted. We strongly advise you to only communicate sensitive information via encrypted technologies approved for the transmission of PHI.

Links to Other Sites

Our Website and/or Service may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites. We have no control over, and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

Children's Privacy

Our Website does not address anyone under the age of 13. We do not knowingly collect personal identifiable information from children under 13. In the case we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to take necessary actions.

Our Service may be used to collect and manage information of persons under the age of 13. This data is used to provide health plan coverage as required under the COBRA Act. The information is stored and protected per HIPAA guidelines, as is all ePHI our Service retains

Data Subjects' Rights

You are entitled at any time to obtain confirmation of the existence of Personally Identifiable Information and to be informed of their contents and origin, to verify their accuracy, or request that such data be supplemented, updated or rectified.

You have the right to request erasure, anonymization or blocking of any data that is processed in breach of the law as well as to object in all cases to processing of the data.

Changes to This Privacy Policy

We may update our Privacy Policy from time to time. Thus, we advise you to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page. These changes are effective immediately, after they are posted on this page.

Governing Law and Venue

This website is hosted and administered in **Mississauga, Ontario, Canada**. Our Service is hosted in **Houston, TX and US-based** Amazon Web Services. We will disclose Personal Data without your permission when required by law, or in good-faith-belief that such action is necessary to investigate or protect against harmful activities to our company, associates, or property (including this website), or to others.

Contact Us

If you have any questions or suggestions about our Privacy Policy, do not hesitate to contact us Privacy@Travisoft.com.