# GLBA Required Information Security Purpose

This document summarizes Rewarding HealthyHabits, LLC dba HealthyHabits comprehensive written Information Security Program mandated by the Federal Trade Commission’s Safeguards Rule and the Gramm – Leach – Bliley Act (“GLBA”). In particular, this document describes the Program elements pursuant to which the Institution intends to (i) ensure the security and confidentiality of covered records, (ii) protect against any anticipated threats or hazards to the security of such records, and (iii) protect against the unauthorized access or use of such records or information in ways that could result in substantial harm or inconvenience to customers. The Program incorporates by reference the Institution’s policies and procedures enumerated below and is in addition to any institutional policies and procedures that may be required pursuant to other federal and state laws and regulations, including, without limitation, FERPA, HIPAA, GLBA, GDPR, FTC – Red Flag Policies.

# Designation of Representatives

Rewarding HealthyHabits, LLC dba HealthyHabits Chief Information Officer is designated as the Chief Information Security Officer (CISO) who shall be responsible for coordinating and overseeing the Program. The Program Officer (CISO) may designate other representatives of the Company to oversee and coordinate particular elements of the Program. Any questions regarding the implementation of the Program or the interpretation of this document should be directed to the CISO or his or her designees.

# Policy Statement

The Program applies to any record containing nonpublic financial or health information about a consumer who has a relationship with the Rewarding HealthyHabits, LLC dba HealthyHabits whether in paper, electronic or other form, that is handled or maintained by or on behalf of the Company or its affiliates. For these purposes, the term nonpublic financial or health information shall mean any information (i) a consumer provides in order to obtain a financial or health service from the Company, (ii) about a consumer resulting from any transaction with the Company involving a financial or health service, or (iii) otherwise obtained about a consumer in connection with providing a financial or health service to that person.