

Notice Regarding Wellness Program

The Marquette University wellness program is a voluntary program available to all employees. The program is administered according to federal rules permitting employer-sponsored wellness programs that seek to improve employee health or prevent disease, including the Americans with Disabilities Act of 1990, the Genetic Information Nondiscrimination Act of 2008, and the Health Insurance Portability and Accountability Act, as applicable, among others.

As part of the wellness program, you have the option to enroll in the Virgin Pulse Program. Virgin Pulse collects, processes and uses personal information that you actively input as you use the Program.

If you choose to share it, the information that Virgin Pulse may collect, process and use includes:

- Name
- Gender
- Date of birth
- Address
- Phone numbers
- Email address
- Password
- Heart rate
- Height
- Weight
- Body fat
- Blood pressure
- Glucose
- Cholesterol levels
- Triglycerides
- Waist circumference
- Steps made
- Active minutes
- Foods consumed
- Calories consumed & burned
- Duration of certain exercises
- Walking distance

Virgin Pulse also offers an online health risk assessment that provides a Heart Age score based on your heart health and a Lifestyle Score based on the healthy choices you make each day. If you choose to take the health risk assessment, you will be asked to answer a series of questions about your nutrition, activity, sleep, and health history. You may also have access to Health Stations on campus. Health Stations allow you to measure your blood pressure and weight and input that information in the Program.

You also have the option to complete a voluntary onsite biometric screening conducted by Aurora Health Care, which will include a blood test for cholesterol, blood pressure, glucose, triglycerides and nicotine. You may also submit biometric results from your Primary Care Physician to Aurora Health Care. The results from your biometric screening will be shared with Virgin Pulse so that you can receive information to help you understand your current health and potential risks and to offer you services through the Virgin Pulse platform. You are also encouraged to share your results or concerns with your own provider.

You are not required to participate in the wellness program by enrolling in the Virgin Pulse Program and completing a biometric screening (or other medical examinations). However, employees who choose to participate in the wellness program can receive incentives by earning up to 15,000 points for completing qualifying wellness activities which include but are not limited to completion of the biometric screening and online health risk assessment or achieving the following ideal or improved health outcomes:

- A1C
- Body fat levels
- Body mass index
- Blood pressure
- Cholesterol (HDL, LDL and total)
- Glucose (fasting)
- Glucose (non-fasting)
- Triglyceride
- Waist Circumference

Other qualifying wellness activities include tracking healthy habits, participating in Marquette University sponsored GROW, meditation and group exercise classes, tracking your activity with a fitness device, or participating in health coaching to name a few. A complete list of activities can be found at:

http://www.marquette.edu/wellness/employees/documents/MarquetteUniversity_InfoSheet_Raffle_v2.pdf

For individuals who enroll in the Co-pay Health Plan (CPHP), the incentive is a Health Care Flexible Spending Account (FSA) contribution of up to \$125 for Single coverage or up to \$250 for non-Single (Employee+1 or Family) coverage. For AHDHP or EHDHP participants, the incentive is a Health Savings Account (HSA) contribution of up to \$250 for Single coverage or up to \$500 for non-Single coverage.

We recognize that it may be difficult for some individuals to fully participate and earn points in the program due to medical conditions or disabilities. To ensure all employees have equal opportunity to earn points and benefit from the program, there is a reasonable alternative to earn points. This applies to individuals who are unable to achieve ideal targets due to a current or chronic medical condition or who are unable to take measurements and/or track physical activity because of a disability. We also have a Short-Term Limited Participation program available to provide an alternate way to continue to earn points in the event that you have, or are affected by, a short-term condition (e.g., temporary injury, pregnancy, etc.) that makes it unreasonably difficult or inadvisable for you to participate in the Virgin Pulse program. You may request a reasonable accommodation or an alternative standard by reaching out to the Virgin Pulse Member Services team via chat or phone (888-671-9395), and they will provide you with the appropriate form(s). You will need to print and fill out the form according to the instructions. Once the form has been received, it has been verified, and approved, an exception will be applied to your account and a confirmation email will be sent to you with further instructions.

Protections from Disclosure of Medical Information

We are required by law to maintain the privacy and security of your personally identifiable health information. Although the wellness program and Marquette University may use aggregate information it collects to design a program based on identified health risks in the workplace, the Marquette University wellness program will never disclose any of your personal information either publicly or to the employer, except as necessary to respond to a request from you for a reasonable accommodation needed to participate in the wellness program, or as expressly permitted by law. Medical information that personally identifies you that is provided in connection with the wellness program will not be provided to your supervisors or managers and may never be used to make decisions regarding your employment.

Your personally identifiable health information will only be shared with approved wellness vendor partners to provide you with services under the wellness program. As a global company, Virgin Pulse has offices and subsidiaries around the world. Virgin Pulse has office locations in the United States, the United Kingdom, Canada, Bosnia, Switzerland, Singapore, Brazil and Australia. Employees at these locations may be required to access your personal information to provide you with quality services, including Member support services through the Virgin Pulse Call Center. Virgin Pulse employees are obligated to respect the confidentiality of your personal information and are only authorized to access your personal information as necessary to provide you with services or support. In the event that Virgin Pulse would (a) undergo reorganization, or (b) that Virgin Pulse is sold to a third party, any personal information they hold

about you may be transferred to the re-organized entity or third party, in accordance with applicable laws. In the event that such acquisition occurs, the new entity will continue to use your personal information within the limits of the Virgin Pulse Privacy Policy, to ensure continuation of service.

Virgin Pulse may use or disclose your personal information to allow your participation in additional third-party provided wellness services and programs. Virgin Pulse will only use or share your personal information for the following general purposes:

- To coordinate enrollment in such additional services;
- To enhance your program experience;
- To provide you with information about the services available to you through the program and platform, or provided to you by a program partner or a third-party provider;
- To ensure that you receive appropriate rewards for participation in our services and other similar services provided by your program sponsor or third-party providers;
- To evaluate the overall quality and effectiveness of the program(s) you may participate in; and
- To assess your eligibility for other programs that your program sponsor or third-party provider may offer.

These program partners are industry leading wellness providers selected to enhance your experience. In certain instances, the use of such program partners may require you to provide additional personal information and data to these program partners. If you choose to use program partner services or you provide additional personal information and data to these program partners, you will be subject to the program partner's privacy policy and terms of use. The complete Virgin Pulse Privacy Policy is available for review at <https://www.virginpulse.com/privacy-policy/>

All medical information obtained through the wellness program will be maintained separate from your personnel records, information stored electronically will be secured, and no information you provide as part of the wellness program will be used in making any employment decision. Appropriate precautions will be taken to avoid any data breach, and in the event a data breach occurs involving information you provide in connection with the wellness program, we will notify you.

You may not be discriminated against in employment because of the medical information you provide as part of participating in the wellness program, nor may you be subjected to retaliation if you choose not to participate.

If you have questions or concerns regarding this notice, or about protections against discrimination and retaliation, please contact the Marquette University Human Resources Department at (414) 288-7305.

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