

Notice of Privacy Practices

Effective as of November 1, 2022

This Notice Describes How Medical Information About You May Be Used And Disclosed And How You Can Get Access To This Information. Please Review It Carefully.

The privacy practices described in this notice apply to the group dental plan and health flexible spending arrangement sponsored by Sprinklr, Inc. (referred to collectively as the “Plan”). The Plan is required by the federal law known as the Health Insurance Portability and Accountability Act (referred to as the HIPAA Privacy Rule) to make reasonable steps to ensure the privacy of your personally identifiable health information (*Protected Health Information*) and to inform you about:

- your Plan’s uses and disclosures of *Protected Health Information*;
- your privacy rights with respect to your *Protected Health Information*;
- your right to file a complaint with your Plan and to the Secretary of the U.S. Department of Health and Human Services; and
- the person or office to contact for further information about your Plan’s privacy practices.

USE AND DISCLOSURE OF PROTECTED HEALTH INFORMATION

Except as otherwise described in this notice or otherwise permitted under the HIPAA Privacy Rule, uses and disclosures of *Protected Health Information* will be made only with your written authorization subject to your right to revoke such authorization. If you provide the Plan authorization to use or disclose PHI about you, you may revoke that permission, in writing, at any time by sending a notice of revocation to the Privacy Officer at the address provided below. If you revoke your permission, the Plan will no longer use or disclose PHI about you for the reasons covered by your written authorization. The Plan will not be able to reverse any disclosures made prior to your revocation.

USES AND DISCLOSURES TO CARRY OUT TREATMENT, PAYMENT AND HEALTH CARE OPERATIONS

The HIPAA Privacy Rule permits the Plan and its respective Business Associates to use and disclose *Protected Health Information* without your consent, authorization, or opportunity to agree or object, to carry out Treatment, Payment and Health Care Operations.

- *Treatment* is the provision, coordination or management of health care and related services. For example, a Business Associate of the Plan may disclose to a treating orthodontist the name of your treating dentist so that the orthodontist may ask for your dental X-rays from the treating dentist.
- *Payment* includes but is not limited to actions to make coverage determinations and payment (including billing, claims management, subrogation, plan reimbursement, reviews for medical necessity and appropriateness of care and utilization review and preauthorizations). For example, a Business Associate of the Plan may tell a doctor whether you are eligible for coverage or what percentage of the bill will be paid by the Plan.

- *Health Care Operations* include but are not limited to quality assessment and improvement, reviewing competence or qualifications of health care professionals, underwriting, premium rating and other insurance activities relating to creating or renewing insurance contracts. For example, the Plan may use information about your claims to refer you to a disease management program, project future benefit costs or audit the accuracy of its claims processing functions.

In addition, your Plan may use or disclose enrollment information to the “Company” (Sprinklr, Inc.) as well as “summary health information” for obtaining premium bids or modifying, amending or terminating the group dental plan or health flexible spending arrangement, which summarizes the claims history, claims expenses or type of claims experienced by individuals for whom an employee of the Company has enrolled in health benefits under a group health plan, and from which identifying information has been maintained in accordance with HIPAA. Your Plan may also disclose *Protected Health Information* to the Company for treatment, payment or health care operations and plan administration purposes as permitted under HIPAA, which includes disclosing such information to Business Associates of the Plan. Note also that your Plan may not use or disclose genetic information for underwriting purposes.

Note: To the extent applicable, special rules may apply with respect to the use and disclosure of genetic and HIV testing information. You may contact the Privacy Officer for more information about these rules.

USES AND DISCLOSURES THAT REQUIRE YOUR WRITTEN AUTHORIZATION

To the extent applicable, your written authorization is generally required before the Plan will use or disclose psychotherapy notes about you from your psychotherapist, as well as most disclosures of PHI for which the Plan receives remuneration or for marketing purposes. Psychotherapy notes are separately filed notes about your conversations with your mental health professional during a counseling session. They do not include summary information about your mental health treatment. The Plan may use and disclose such notes when needed by the Plan to defend against litigation filed by you.

To the extent your Plan uses and discloses your Protected Health Information for certain marketing purposes, it will obtain your specific authorization to the extent required by law. Additionally, any disclosures that constitute the sale of your Protected Health Information will also require your specific authorization.

USES AND DISCLOSURES THAT REQUIRE THAT YOU BE GIVEN AN OPPORTUNITY TO AGREE OR DISAGREE PRIOR TO THE USE OR RELEASE

Disclosure of your *Protected Health Information* to family members, other relatives and your close personal friends is allowed if:

- the information is directly relevant to the family or friend’s involvement with your care or payment for that care; and
- you have either agreed to the disclosure or have been given an opportunity to object and have not objected.

OTHER USES AND DISCLOSURES FOR WHICH CONSENT, AUTHORIZATION OR OPPORTUNITY TO OBJECT IS NOT REQUIRED

Use and disclosure of your *Protected Health Information* is allowed without your consent, authorization or request under the following circumstances:

- When required by law.
- When permitted for purposes of public health activities, including if you have been exposed to a communicable disease or are at risk of spreading a disease or condition, if authorized by law.
- When authorized by law to report information about certain abuse, neglect or domestic violence to public authorities.
- For public health oversight activities authorized by law.
- For certain judicial or administrative proceedings.
- For certain law enforcement purposes
- To a coroner or medical examiner for the purpose of identifying a deceased person, determining a cause of death or other duties as authorized by law; and funeral directors, consistent with applicable law.
- The Plan may use or disclose *Protected Health Information* for research, subject to conditions.
- For the purpose of facilitating organ, eye or tissue donation or transplantation.
- When consistent with applicable law to prevent or lessen a serious and imminent threat to the health or safety of a person or the public.
- To the extent necessary to comply with workers' compensation or other similar programs established by law.

REQUIRED USES AND DISCLOSURES

Upon your request, your Plan is required to give you access to certain *Protected Health Information* in order to inspect and copy it. Under certain circumstances, however, the Plan may deny your request.

Use and disclosure of your *Protected Health Information* may be required by the Secretary of the Department of Health and Human Services to investigate or determine the Plan's compliance with the privacy regulations.

RIGHTS OF INDIVIDUALS

In the event any of the following rights require you to submit a written request to exercise such right, you must submit such request to the Privacy Officer, **29 West 35th Street, New York, NY 10001** or by reaching out to privacy@sprinklr.com.

RIGHT TO REQUEST RESTRICTIONS AND CONFIDENTIAL COMMUNICATIONS OF PROTECTED HEALTH INFORMATION

You may request that your Plan restrict uses and disclosures of your *Protected Health Information* to carry out Treatment, Payment, or Health Care Operations, or to restrict uses and disclosures to persons identified by you who are involved in your care or payment for your care. The Plan is not required to agree to your request.

Your Plan will accommodate reasonable requests to receive communications of *Protected Health Information* by alternative means or at alternative locations. You or your personal representative will be required to complete a form to request confidential communications of your *Protected Health Information*.

RIGHT TO INSPECT AND COPY PROTECTED HEALTH INFORMATION

You have a right to request to inspect and obtain a copy of your *Protected Health Information* contained in a “Designated Record Set,” for as long as your Plan maintains the *Protected Health Information*.

- “Designated Record Set” includes enrollment, payment, billing, claims adjudication and case or medical management record systems maintained by or for a health plan, or other information used in whole or in part by or for the Covered Entity to make decisions about individuals. Information used for quality control or peer review analyses and not used to make decisions about individuals is not in the Designated Record Set.

The requested information will be provided within 30 days. A single 30-day extension is allowed if your Plan or its Business Associates are unable to comply with the deadline. Your Plan will charge a reasonable, cost-based fee to cover the cost of providing copies.

You or your personal representative will be required to complete a form to request access to the *Protected Health Information* in your Designated Record Set. If access is denied, you or your personal representative will be provided with a written denial setting forth the basis for the denial, a description of how you may exercise those review rights and a description of how you may complain to the Secretary of the U.S. Department of Health and Human Services.

RIGHT TO AMEND PROTECTED HEALTH INFORMATION

You have the right to request your Plan to amend your *Protected Health Information* or a record about you in a Designated Record Set for as long as the *Protected Health Information* is maintained in the Designated Record Set.

The Plan has 60 days after the request is made to act on the request. A single 30-day extension is allowed. If the request is denied in whole or part, your Plan must provide you with a written denial that explains the basis for the denial. You or your personal representative may then submit a written statement disagreeing with the denial and have that statement included with any future disclosures of your *Protected Health Information*.

You or your personal representative will be required to complete a form to request amendment of the *Protected Health Information* in your Designated Record Set. Any request for an amendment must be in writing and provide a reason to support a requested amendment.

RIGHT TO RECEIVE AN ACCOUNTING OF PROTECTED HEALTH INFORMATION DISCLOSURES

Upon your written request, your Plan will also provide you with an accounting of disclosures by the Plan of your *Protected Health Information* during the six years prior to the date of your request. However, such accounting need not include *Protected Health Information* disclosures made: (1) to carry out Treatment, Payment or Health Care Operations; (2) to individuals about their own *Protected Health Information*; (3) prior to the compliance date; or (4) based on your written authorization.

If the accounting cannot be provided within 60 days, an additional 30 days is allowed if the individual is given a written statement of the reasons for the delay and the date by which the accounting will be provided. If you request more than one accounting within a 12-month period, your Plan will charge a reasonable, cost-based fee for each subsequent accounting.

RIGHT TO NOTIFICATION OF BREACH OF UNSECURED PROTECTED HEALTH INFORMATION.

In the event that a breach occurs with regard to your unsecured Protected Health Information, you have the right to be notified of the breach.

A NOTE ABOUT PERSONAL REPRESENTATIVES

You may exercise your rights through a personal representative. Your personal representative will be required to produce evidence of his/her authority to act on your behalf before that person will be given access to your *Protected Health Information* or allowed to take any action for you.

Your Plan retains discretion to deny access to your *Protected Health Information* to a personal representative to provide protection to those vulnerable people who depend on others to exercise their rights under these rules and who may be subject to abuse or neglect.

YOUR PLAN'S DUTIES

Your Plan is required by law to maintain the privacy of *Protected Health Information* and to provide participants and beneficiaries with notice of its legal duties and privacy practices. This notice is effective beginning **November 1, 2022**, and the Plan is required to comply with the terms of this notice. However, the Plan reserves the right to change its privacy practices and to apply the changes to any *Protected Health Information* received or maintained by the Plan prior to that date.

If a privacy practice is materially changed, a revised version of this notice will be provided to all participants then covered under the Plan. Any revised version of this notice will be distributed within 60 days of the effective date of any material change to the uses or disclosures, the individual's rights, the duties of your Plan or other privacy practices stated in this notice.

MINIMUM NECESSARY STANDARD

When using or disclosing *Protected Health Information* or when requesting *Protected Health Information* from another Covered Entity, the Plan will make reasonable efforts not to use, disclose or request more than the minimum amount of *Protected Health Information* necessary to accomplish the intended purpose of the use, disclosure or request, taking into consideration practical and technological limitations. However, the minimum necessary standard will not apply in the following situations:

- disclosures to or requests by a health care provider for treatment;
- uses or disclosures made to the individual or pursuant to your authorization;
- disclosures for compliance made to the Secretary of the U.S. Department of Health and Human Services;
- uses or disclosures that are required by law; and
- uses or disclosures that are required for the Plan's compliance with legal regulations.

YOUR RIGHT TO FILE A COMPLAINT WITH THE PLAN OR THE HHS SECRETARY

If you believe that your privacy rights have been violated, you may complain to your Plan in care of the following officer: Privacy Officer, by writing to **29 West 35th Street, New York, NY 10001**, emailing privacy@sprinklr.com, or or you may call 917-933-7800.



29 West 35th Street, 7th Floor
New York, NY
10001

You may file a complaint with the Secretary of the U.S. Department of Health and Human Services, Hubert H. Humphrey Building, 200 Independence Avenue S.W., Washington, D.C. 20201. Your Plan will not retaliate against you for filing a complaint.

ADDITIONAL INFORMATION

If you have any questions regarding this notice or the subjects addressed in it, you may contact the following officer: Privacy Officer, by writing to **29 West 35th Street, New York, NY 10001**, emailing privacy@sprinklr.com, or or you may call 917-933-7800.

The HIPAA Privacy Rule is set out at 45 Code of Federal Regulations Parts 160 and 164. These regulations and additional information about the HIPAA Privacy Rule are available at <http://www.hhs.gov/ocr/hipaa/>.