

Web Privacy Policy

This Web Privacy Policy (this “Policy”) describes the information that CareTalk Health (“CTH,” “we,” “our,” or “us”) collects about you on or through our website (<https://www.caretalkcares.com>) (the “Site”), and the Services (the “Service”). Additionally, we may also collect information about the type of device you use when accessing our Service, the location of your device you use when accessing our Service and your device’s location based on the IP address used and how frequently you visit our website. By accessing and/or using the Service, you signify that you have read, understood, and agree to our privacy practices described in this Policy and the CareTalk Health Terms of Service (the “Terms”).

1. The information we collect on the Site:

- **User-provided Information.** When you use the Service, we collect what is generally called “personally identifiable information,” or “personal information,” which is information that specifically identifies an individual/provider/entity. You may provide us with personal information of various types and in various ways on the Service, including, without limitation, when you register for an account, use the Service, post or share User Content (as defined in the Terms), make a purchase on the Service, interact with other users of the Service through communication or messaging features, send us customer service-related requests, or otherwise communicate with us. We may also collect additional information when you continue to use the Service, including without limitation, your mailing address, a username, and password and other information that may identify you, such as, gender, age, social security number, driver’s license number, geographic area, preferences, payment information (such as your payment card number, expiration date, and billing address), and insurance information. We may also receive health information from you or on your behalf such as information or records relating to your patient’s medical or health history, health status and laboratory testing results, diagnostic images, and other health-related information. Please remember that CTH may, but has no obligation to, monitor, record, and store User Content in order to protect your safety or the safety of other users, to assist with regulatory or law enforcement efforts, or to protect and defend our rights and property. By using the Service, you consent to the recording, storage, and disclosure of such communications you send or receive for these purposes.
- **“Cookies” Information.** When you use the Service, we, and our third-party partners, may send one or more cookies – small text files containing a string of alphanumeric characters – to your device. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to the Service. Please review your web browser “Help” file to learn the proper way to modify your cookie

settings. Please note that if you delete, or choose not to accept, cookies from the Service, you may not be able to utilize the features of the Service to their fullest potential.

- **“Automatically Collected” Information.** When you use the Service, read our emails, or otherwise engage with us, we, and our third-party partners, may automatically collect certain information from your device by using various types of tracking technology, including “clear gifs” or “web beacons.” This “automatically collected” information may include your IP address or other device address or identifier, web browser and/or device type, the web pages or sites that you visit just before or just after you use the Service, the pages or other content you view or otherwise interact with on the Service, and the dates and times that you visit, access, or use the Service, and your language preferences. We also may use these technologies to collect information regarding your interaction with email messages, such as whether you opened, clicked on, or forwarded a message. This information is gathered from all users. When you access our Service from a mobile device, we may collect unique identification numbers associated with your device or our mobile application (including, for example, a UDID, Unique ID for Advertisers (“IDFA”), Google AdID, or Windows Advertising ID), mobile carrier, device type, model and manufacturer, mobile device operating system brand and model, phone number, and, depending on your mobile device settings, your geographical location data, including GPS coordinates (e.g., latitude and/or longitude) or similar information regarding the location of your mobile device, or we may be able to approximate a device’s location by analyzing other information, like an IP address. We and our third-party partners may also use cookies and tracking technologies for advertising purposes. For more information about tracking technologies, please see “Third Party Tracking and Online Advertising” below.
- **Third Party Web Beacons and Third-Party Buttons.** We may also implement third-party content or advertising on the Service that may use clear gifs or other forms of web beacons, which allow the third-party content provider to read and write cookies to your browser in connection with your viewing of the third-party content on the Service. Additionally, we may implement third-party buttons (such as Facebook “like” or “share” buttons) that may allow third parties to collect information about you through such third parties’ browser cookies, even when you do not interact with the button. Information collected through web beacons and buttons is collected directly by these third parties, and CTH does not participate in that data transmission. Information collected by a third party in this manner is subject to that third party’s own data collection, use, and disclosure policies.
- **Do Not Track Signals.** Your device operating system or browser may include settings, options, or add-on components to control the placement and presence of cookies and access to location information. We do not track our users over time and across third-party websites to provide targeted advertising and do not specifically respond to Do Not Track (“DNT”) signals. However, some third-party websites do keep track of your browsing activities, including across other websites on the Internet, which enables these websites to tailor what they present to you. If you are visiting such websites, your browser may

allow you to set a DNT signal on your browser so that third parties know you do not want to be tracked.

- **Information from Other Sources.** We may obtain information, including personal information, from third parties and sources other than the Service, such as our partners, advertisers, or Providers (as defined below). If we combine or associate information from other sources with personal information that we collect through the Service, we will treat the combined information as personal information in accordance with this Policy. We and our third-party service providers may obtain information regarding your location or the location of your device through which you access our Service. Information regarding your location may be obtained directly from you when you provide us with information as part of the registration process. In addition, we may use Google Analytics, a web analytics tool that helps operators (like CTH) understand how users (like you) engage with their applications. Google Analytics uses cookies to track your interactions with our Service and to collect information about how you use the Service. We then use the information to compile reports that help us improve the Service. Google Analytics collects, processes and creates reports about website trends without identifying individual users. For more information regarding Google Analytics visit “How Google uses data when you use our partners’ sites or apps” located at www.google.com/policies/privacy/partners. We may also work with third-party partners to employ technologies, including the application of statistical modeling tools, which permit us to recognize and contact you across multiple devices.

2. How we use the information we collect:

We use information we collect on the Service in a variety of ways in providing the Service and operating our business, including the following:

- We may use the information that we collect on or through the Service (i) to operate, maintain, enhance and provide all features of the Service; (ii) to provide services and information that you request; (iii) to respond to comments and questions and communicate with you about the Service; (iv) to verify your identity; (v) to detect, prevent, investigate and respond to fraud, intellectual property infringement, violations of our Terms, or other misuse of our Service or any other CTH websites or services; (vi) to process payment card transactions; (vii) to otherwise to provide support to users; and (viii) for any other use permitted by applicable law, including for research purposes.
- We may use the information that we collect on the Service to understand and analyze the usage trends and preferences of our users, to improve the Service, and to develop new products, services, features, and functionality.
- We may use your email address or other information we collect on or through the Service (i) to contact you for administrative purposes such as customer service, to address intellectual property infringement, right of privacy violations or defamation issues related to your User Content (as defined in the Terms) or (ii) to send communications, including updates on promotions and events, relating to products and services offered by us, by the

Providers, and by third parties we work with. Generally, you can opt-out of receiving any promotional communications as described below under “Your Choices.”

- We may use “cookies” information and “automatically collected” information we collect on the Service to (i) personalize our services, such as remembering your information so that you will not have to reenter it during your visit or the next time you visit the Service; (ii) provide customized advertisements, content, and information; (iii) monitor and analyze the effectiveness of the Service and third-party marketing activities; (iv) monitor aggregate site usage metrics such as total number of visitors and pages viewed; and (v) track your entries, submissions, and status in any promotions or other activities on the Service.
- We may access or store your information if it is necessary to detect, prevent or address fraud and other illegal activity or to protect the safety, property or rights of CTH or others.
- We may use information regarding your location or the location of your device through which you access the Service for a number of purposes, including without limitation to confirm you are located in a jurisdiction in which the Service is offered.
- We may collect, analyze, use, publish, create and sell de-identified information, for any business or other purpose not prohibited by applicable law, including for research and marketing purposes.

3. When we disclose information.

In addition to the disclosures in Section 2 of this Policy, we may disclose your information to third parties in the following circumstances when you are enrolled as a Provider or a Patient in the CTH system:

- Information on your Provider status is shared with other Providers in our system reflecting that you are a User of our CTH platform.
- Having this information will help you, as a Provider or Patient, and CTH give you the best possible assessment for care, because we will have the most up-to-date information about your patient’s health. Your privacy is very important to us, and you control the use of your patient’s information based on the permissions granted. We put important safeguards in place to make sure all medical information is safe. By agreeing to this Policy, you are agreeing to allow us to personal health information with CTH, except for information that cannot be shared including, but not limited to, certain information relating to alcohol or substance abuse treatment, and mental health.
- Protected Health Information, HIPAA and Communications. Some of the information you submit or that is created through your use of the Service may constitute “protected health information” (“PHI”) as defined by the Health Insurance Portability and Accountability Act (“HIPAA”). PHI does not include information that has been de-identified in accordance with HIPAA.
- We may disclose patient information to Providers for treatment, payment processing, or operational purposes;
- We work with third-party service providers who provide website, payment, application development, hosting, maintenance, analytics, identifying and serving targeted

advertisements, and other services for us, including, for example, Stripe and Google Analytics. These third parties may have access to or process your information as part of providing those services for us. Generally, we limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions that doesn't include PHI;

- We may disclose your information with other companies and brands owned or controlled by CareTalk Health and CTH and other companies owned by or under common ownership as CTH, which also includes our subsidiaries (i.e., any organization we own or control) or our ultimate holding company (i.e., any organization that owns or controls us) and any subsidiaries it owns. These companies will use the data/information in the same way as we can under this Policy;
- We may make certain automatically collected, aggregated, or otherwise non-personally identifiable information available to third parties or users of the Service for various purposes, including (i) compliance with various reporting obligations; (ii) for business or marketing purposes; or (iii) to assist such parties in understanding our users' interests, habits, and usage patterns for certain programs, content, services, advertisements, promotions, and/or functionality available through the Service;
- We may disclose information if required to do so by law or in the good-faith belief that such action is necessary to comply with state and federal laws (such as U.S. copyright law, HIPAA, etc...), in response to a court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies;
- We also reserve the right to disclose information that we believe, in good faith, is appropriate or necessary to (i) take precautions against liability; (ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity; (iii) investigate and defend ourselves against any third-party claims or allegations; (iv) protect the security or integrity of the Service and any facilities or equipment used to make the Service available; or (v) protect our property or other legal rights (including, but not limited to, enforcement of our agreements and Terms), or the rights, property, or safety of others;
- Information about our users may be disclosed and otherwise transferred to an acquirer, or successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets; and
- We may de-identify your patient's information and disclose such de-identified information for any business or other purpose not prohibited by applicable law.

4. Your Choices

You may, of course, decline to information with us, in which case we may not be able to provide to you some of the features and functionality of the Service. You may update, correct, or delete your profile information and preferences at any time by accessing your account preferences page on the Service. You may request that we provide to you the information we hold about you, update your information, request that we remove your name or comments from our

Service or publicly displayed content or request that we delete your information or correct any inaccuracies by emailing us at info@caretalkhealth.com with the subject heading “personal information request.” Please note that while any changes you make will be reflected in active user databases within a reasonable period of time, we may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so. We may not be able to modify or delete your information in all circumstances. You may ask us to contact you at a specific phone number or to send mail or notices to a specific mailing address or email address. If you receive commercial email from us, you may unsubscribe at any time by following the instructions contained within the email. You may also opt out from receiving commercial email from us, and any other promotional communications that we may send to you from time to time, by sending your request to us by email info@caretalkhealth.com. We may allow you to view and modify settings relating to the nature and frequency of promotional communications that you receive from us in user account functionality on the Service. Please be aware that if you opt out of receiving commercial communications from us or otherwise modify the nature or frequency of promotional communications you receive from us, it may take up to ten (10) business days for us to process your request, and you may receive promotional communications from us that you have opted out from during that period. Additionally, even after you opt out from receiving commercial messages from us, you will continue to receive administrative messages from us regarding the Service.

5. Third-Party Tracking and Online Advertising.

Interest-Based Advertising. We may participate in interest-based advertising and use third-party advertising companies to serve you targeted advertisements. We may share or we may permit third-party online advertising networks, social media companies, and other third-party services to collect information about your use of our website over time so that they may play or display ads on other websites, apps, or services, including on Facebook. Typically, though not always, the information we share is provided through cookies or similar tracking technologies, which recognize the device you are using and collect information, including clickstream information, browser type, time and date you visited the site, and other information. We and our third-party partners use this information to make the advertisements you see online more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research.

Social Media Widgets and Advertising. Our Service may include social media features. These social media companies may recognize you and collect information about your visit to our Service, and they may set a cookie or employ other tracking technologies. Your interactions with those features are governed by the privacy policies of those companies. We may display targeted advertising to you through social media platforms, such as Facebook, Twitter, Google+, and others. These companies have interest-based advertising programs that allow us to direct advertisements to users who have shown interest in our Service while those users are on the social media platform or to groups of other users who share similar traits, such as likely

commercial interests and demographics. These advertisements are governed by the privacy policies of those social media companies that provide them.

Cross-Device Linking. We, or our third-party partners, may link your various devices so that content you see on one device can result in relevant advertising on another device. We do this by collecting information about each device you use when you are logged in to our Service. We may also work with third-party partners who employ tracking technologies or the application of statistical modeling tools to determine if two or more devices are linked to a single user or household. We may share a common account identifier (such as an email address or user ID) with third-party advertising partners to help recognize you across devices. We, and our partners, can use this cross-device linkage to serve interest-based advertising and other personalized content to you across your devices, to perform analytics, and to measure the performance of our advertising campaigns.

Your Choices:

- **Cookies.** Most browsers allow you to adjust your browser settings to (i) notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. Blocking or deleting cookies may negatively impact your experience using the Service, as some features and services on our Service may not work properly. Deleting cookies does not delete Local Storage Objects (LSOs) such as HTML5.
- **Interest-based advertising.** To learn about interest-based advertising and how you may be able to opt out of some of this advertising, you may wish to visit the Network Advertising Initiative's (NAI) online resources at <http://www.networkadvertising.org/choices> and/or the DAA's resources at www.aboutads.info/choices.
- **Cross-device linking.** Please note that opting out of receiving interest-based advertising through the NAI's and DAA's online resources will only opt out a user from receiving interest-based ads on that specific browser or device, but the user may still receive interest-based ads on his or her other devices. You must perform the opt out on each browser or device you use.
- **Mobile advertising.** You may also be able to limit interest-based advertising through the settings on your mobile device by selecting "limit ad tracking" (iOS) or "opt out of interest-based ads" (Android). You may also be able to opt out of some—but not all—interest-based ads served by mobile ad networks by visiting <http://youradchoices.com/appchoices> and downloading the mobile AppChoices app.

- Some of these opt outs may not be effective unless your browser is set to accept cookies. If you delete cookies, change your browser settings, switch browsers or computers, or use another operating system, you will need to opt out again.

Google Analytics and Advertising. We may use Google Analytics to recognize you and link the devices you use when you visit our site or Service on your browser or mobile device, log in to your account on our Service, or otherwise engage with us. We may share a unique identifier, like a user ID or hashed email address, with Google to facilitate the service. Google Analytics allows us to better understand how our users interact with our Service and to tailor our advertisements and content to you. For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, review Google's site "How Google uses data when you use our partners' sites or apps" located at www.google.com/policies/privacy/partners/. You can learn about Google Analytics' currently available opt outs, including the Google Analytics Browser Ad-On here <https://tools.google.com/dlpage/gaoptout/>. We may also utilize certain forms of display advertising and other advanced features through Google Analytics, such as Remarketing with Google Analytics, Google Display Network Impression Reporting, the DoubleClick Campaign Manager Integration, and Google Analytics Demographics and Interest Reporting. These features enable us to use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick advertising cookie) or other third-party cookies together to inform, optimize, and display ads based on your past visits to the Service. You may control your advertising preferences or opt out of certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at <https://google.com/ads/preferences>, or by visiting NAI's online resources at <http://www.networkadvertising.org/choices>. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

6. Third-Party Services

The Service may contain features or links to Web sites and services provided by third parties, and the Service may allow you to display, use or make available content, data, information, applications, or materials from third parties. Any information you provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators' policies, if any, governing privacy and security, even if accessed through the Service. We are not responsible for the content or privacy and security practices and policies of third-party sites or services to which links or access are provided through the Service. We encourage you to learn about third parties' privacy and security policies before providing them with information.

7. Children's Privacy

Protecting the privacy of young children is especially important. Our Service is not directed to children under the age of 13, and we do not knowingly collect personal information from children under the age of 13 without obtaining parental consent. If you are under 13 years of age, then please do not use or access the Service at any time or in any manner. If we learn that a

person under 13 years of age has used or accessed the Service or any personally identifiable information has been collected on the Service from persons under 13 years of age, then we will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child under 13 years of age has obtained an account on or otherwise accessed the Service, then you may alert us at info@caretalkhealth.com and request that we delete that child's personally identifiable information from our systems.

8. Data Security

We use certain physical, technical, and administrative measures in an effort to protect the integrity and security of personal information that we collect and maintain. We cannot, however, ensure or warrant the security of any information you transmit to us or store on the Service that is not secured by us in our secured environment, and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or administrative measures. As part of providing you the Service, we may need to provide you with certain communications, such as service announcements and administrative messages. These communications are considered part of the Service and may occur via emails, text messages or in app messages. You acknowledge that you are aware that email and text messages are not secure methods of communication and that your communication with us is not encrypted, and that you agree to the risks including the risk that the information contained within emails or texts could be read by a third party.

9. Jurisdictional Issues

The Service is intended to be used within certain jurisdictions within the United States and is not intended to subject us to the laws or jurisdiction of any state, country or territory other than that of the United States. Any information you provide to us through use of our Websites may be stored and processed, transferred between and accessed from the United States and other countries that may not guarantee the same level of protection of personal data as the one in which you reside. However, we will handle your Personal Information in accordance with this Privacy Policy regardless of where your Personal Information is stored/accessed.

10. Changes and Updates to this Policy

Please revisit this page periodically to stay aware of any changes to this Policy, which we may update from time to time. If we modify this Policy, we will make it available through the Service, and indicate the date of the latest revision. Your continued use of the Service after the revised Policy has become effective indicates that you have read, understood and agreed to the current version of this Policy.

11. Our Contact Information

Please contact us with any questions or comments about this Policy, your personal information, our use and disclosure practices, or your consent choices by email at info@caretalkhealth.com.