

Hicuity Health Website Privacy Policy

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1. Who’s This Policy For And What Does It Cover?

At Hicuity Health, Inc., we take everyone’s privacy seriously. This Privacy Policy (“Policy”) is for users of our website (the “Site”). It describes how we may collect, use, and share your Personal Information (defined below). It also explains related rights and choices you may have.

By using this Site, you acknowledge that your Personal Information will be processed pursuant to the terms in this Privacy Policy. If you do not agree with the processes or practices in this Privacy Policy, please do not provide us with your Personal Information or otherwise interact with the Site.

You may see other privacy notices when we collect your Personal Information for certain purposes. Those notices supplement this Policy.

This Policy does not apply to our processing of patient data on behalf of hospitals, health systems or other organizations who are our customers. That processing is governed by the policies of those organizations and our contracts with them.

2. What is “Personal Information”?

When we say “Personal Information,” we mean information that can reasonably be linked to a particular individual or their household. Generally speaking, your Personal Information includes your unique identifiers (full name, phone number, email address, user name, etc.), and information about your characteristics, conditions or behavior that is associated with one of your identifiers or could otherwise reasonably be linked to you.

“Non-Personal Information,” on the other hand, has been anonymized, aggregated or de-identified such that it cannot reasonably be linked to a particular individual or their household.

3. Personal Information We Collect And How We Collect It

Categories

The categories of Personal Information that we collect about you depends on how you interact with us, and they may include:

- **“Identifiers,”** such as first and last name, address, email address, phone number, IP address, cookie ID and similar information.
- **“Demographic Information,”** such as age or gender. Demographic Information may include legally protected classifications. Cookies in google that collect the information. Deidentified
- **“Commercial Information,”** such as products purchased, obtained or considered (for example, if you fill out a form on our Site to inquire about specific services).
- **“Professional or Employment Information,”** such as job title and business or employer name (if, for example, you interact with us on behalf of an organization that is our customer, vendor or business partner).
- **“Internet or Network Activity,”** such as device or browser type and configuration, comments or other content posted to our Site or shared with us via email, browsing activity, social media content, interactions with our Site, and interactions with marketing communications sent on our behalf. Deidentified about type of browser, mobile, etc
- **“Geolocation Data,”** such as your approximate location when you access our Service
- **“Audio, Electronic, Visual or Similar Information,”** such as a profile picture or other electronic data you may choose to send us or upload to our Site
- **“Profile Information,”** which means inferences about you drawn from other Personal Information we collect

Collection Sources

From You When You Provide It. We may collect Identifiers, Professional or Employment Information, Commercial Information or other Personal Information from you directly when you fill

out a form on the Site; join our mailing list; participate in our surveys, special events, sweepstakes or promotions; visit our office; interact with us at an event; or otherwise communicate with us.

Automatically From Your Device. Like most online services, our Site automatically collects some information from users' devices in order to make features function correctly, customize or improve the user experience, understand how the Site is being used, measure the effectiveness of marketing efforts, or deliver personalized advertising or content. If you consent, some of this data may be collected through the use of browser cookies, pixel tags or similar online tracking technologies used by us or our marketing partners, which are explained [below](#). In some cases, we limit this type of collection to Non-Personal Information. However, this data may include Personal Information such as online Identifiers, Internet Activity, Geolocation Data and Commercial Information.

From Third Party Sources. We may obtain information about you from other sources. For example, we may collect Identifiers, Professional or Employment Information, or Internet Activity that you have chosen to share on social media platforms. (To the extent you disclose such information through widely distributed media or on a public platform, we may not be required to treat it as Personal Information under applicable law.)

We may combine information collected from other sources with information collected from you or your device. To the extent the information, alone or in combination, constitutes Personal Information, we will treat it as Personal Information as described in this Policy.

4. How We Use Personal Information

We use Personal Information for the following purposes:

- To provide the content and information you request.
- To contact you regarding products, services, programs, promotions or special events we believe may be of interest to you.
- To operate, maintain, and provide to you the best possible features, products, services, content and functionality of the Site
- To analyze visits to the Site and learn about the interests, preferences, demographics and behaviors of our visitors in the aggregate and also on a personal level, so we can improve our products, services and programs and deliver to you the type of content, features, products, services, programs and promotions that you are most interested in.
- To respond to your questions, requests, comments or complaints.
- .
- To notify you about changes to the Site.
- To compare and review your Personal Information for errors, omissions and accuracy.
- To prevent, detect or investigate any fraudulent, abusive or illegal act.
- To comply with our legal obligations.
- In any other way we may describe at or around the time we collect the information.
- For any other purpose with your consent.

We may use Non-Personal Information for any purpose.

5. How We Disclose Personal Information

We will not disclose your Personal Information to a third party except in the following circumstances:

Vendors

We may share Personal Information with contractors, service providers, and other vendors who assist or support us in providing the Site. Examples of these third party services may include hosting our Site, storing data, performing analytics, or sending marketing communications on our behalf. Our agreements with vendors prohibit them from retaining, using or disclosing the Personal Information we share with them for any purpose other than providing services to us.

Analytics or Marketing Partners

We may share your Personal Information with analytics providers or marketing partners to measure performance of our Site or marketing efforts and to deliver personalized content. If you consent, this sharing may involve the use of browser cookies and similar technologies placed through our Site by our partners, as explained [here](#). For example, if you choose to accept our partners' cookies, your browser will automatically send a request to our partner's server and provide our partner with your IP address, other Identifiers, and Internet Activity. (Some of these partners may have a vendor agreement with us that restricts how they use such information.)

Mandatory Disclosures And Legal Proceedings

We may have a legal obligation to disclose Personal Information to government authorities or other third parties pursuant to a valid regulatory request, subpoena or court order. We may also need to disclose and otherwise process your Personal Information in accordance with applicable law to prevent physical harm or financial loss, protect the vital interests of a person, enforce our various policies or terms of use, protect our property, services and legal rights, prevent fraud, support auditing, compliance and corporate governance functions, or comply with applicable law.

Business Acquisition or Transfer

We may transfer your information in the event of the sale of assets of our business to a third-party or in the event of a corporate merger, consolidation, acquisition or reorganization. However, in such event, any acquirer will be subject to the provisions of our commitments to you or we will not disclose your information.

With Your Direction Or Consent

We will share your Personal Information with other third parties as you may direct or otherwise consent.

6. Children's Privacy

Our Site is not directed to children (individuals under the age of 18). We do not knowingly collect, maintain, or process children's Personal Information unless the child's parent or guardian consents and provides the information. If we determine that we have received a child's Personal Information from a source other than the child's consenting parent/guardian, we will immediately delete the information.

7. Cookies And Online Tracking

What Are Cookies?

A browser cookie is a small piece of data that a website stores in your device's browser. It holds information that the site uses to function properly, remember your preferences, or personalize your experience. A typical cookie contains a cookie ID, which is a unique string of characters used to identify your browser during the browsing session, or in some cases, during subsequent browsing sessions. Cookies, cookie ID's and similar pieces of data may be considered Personal Information (Identifiers or Internet Activity) under applicable law.

Other online technologies, similar to cookies, may allow users to be identified and tracked across multiple browsing sessions, and in some cases tracked across different websites and online services for marketing or advertising purposes. Some may be used to measure your interaction with marketing communications sent on our behalf. These technologies include, but are not necessarily limited to, pixels, web beacons and scripts (collectively with browser cookies, "Cookies").

How Cookies May Be Used On Our Site

Our Site uses "first party" Cookies, which are set by our web domain. Our Site also uses some "third party" Cookies, which are set by other web domains associated with our vendors or partners. This means that, when you visit our site, your browser may automatically connect to our vendor's web server, as well as ours, and provide them with access to your online identifiers and information about how you use our site.

Both First Party and Third Party Cookies may be used on our Services for the following purposes:

- Essential: Essential Cookies are necessary for site security and to enable you to move around our site and use its features.
- Preferences. Preference Cookies allow us to remember your preferences on the Service during a browsing session or across browsing sessions.

- Analytics: Analytics Cookies allow us to analyze use of our Site or Service to evaluate and improve performance or marketing efforts.
- Targeting: Targeting Cookies are used to deliver personalized ads or content based on your activity on our Site or other sites.

Non-Essential Third Party Cookies will not be placed on your device through our Site unless you first choose to accept those Cookies.

Your Choices For Cookies

You can also block, disable or delete cookies at any time by changing the settings in your browser. However, blocking, disabling, or deleting cookies may limit your ability to view all the pages of our site or other sites. You can find more information about cookies and other options you may have for restricting them at www.cookiesandyou.com/, and www.aboutads.info/choices.

“Do Not Track” Signals

Our website does not honor browser-based “Do Not Track” signals because there is no consensus on how such signals should be interpreted. However, tracking Cookies will not be placed on your device through our Site unless you first consent to them.

8. Your Rights And Choices

You may ask to review, update or make changes to the Personal Information we maintain about you at any time by sending a request to the phone number, email address or postal address set out below. We will handle such requests in accordance with applicable law.

You may opt-out of our marketing emails by using the unsubscribe link provided in the email or sending a written request to the postal or email address set out below.

See [Section 7](#) for options to change Cookies preferences.

If you reside in [California](#), you may have additional rights and choices.

9. Links To Third Party Sites

Our Services may contain links to third-party websites, products or services. If you use these links, you will leave our site. Such links do not constitute or imply an endorsement, sponsorship or recommendation by us of the third party, the third-party website or the information contained

therein, and we shall not be responsible or liable for your use thereof. Such use shall be subject to the terms of use and privacy policies applicable to those sites.

10. Security & Retention

The security of your Personal Information is important to us but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially reasonable means to protect your Personal Information, we cannot guarantee its absolute security.

We generally retain Personal Information as long as necessary to complete the purposes for which it was collected. We may retain Personal Information for a longer period if applicable law allows or if we are under a legal obligation to do so.

11. California Residents

California “Shine the Light” law permits users who are California residents to request and obtain from us a list of what Personal Information (if any) we have shared with third parties or corporate affiliates for those entities’ direct marketing purposes in the preceding calendar year, and the names and addresses of those third parties. Requests may be made only once a year and are free of charge.

The rest of this statement makes additional disclosures to California residents (*i.e.*, “consumers”), and describes rights they have, under the California Consumer Privacy Act of 2018, as amended (the “CCPA”). You can learn more about the CCPA here: <https://oag.ca.gov/privacy/ccpa>

This statement doesn’t cover our California job applicants and employees. We provide separate disclosures to those individuals when required to do so.

Collection Of Personal Information

The categories of Personal Information we have collected about consumers in the past 12 months include the categories listed in [Section 3 of our Privacy Policy](#).

“Sale,” “Sharing” Or Disclosure Of Personal Information

Under the CCPA, you can request to opt-out of the “Sale” of your Personal Information—which the CCPA defines very broadly to include some transactions or arrangements that do not involve the exchange of data for money—and the “Sharing” of your personal information, which the CCPA defines as sharing with third parties for purposes of cross-site targeted advertising. We do not Sell or Share Personal Information, and we do not knowingly Sell or Share Personal Information of consumers under the age of 16. For example, we do not permit third parties to

access your Personal Information through our Site for advertising or other commercial purposes unless you first consent by accepting their Cookies.

Within the past 12 months, we disclosed categories of Personal Information listed in [Section 3 of our Privacy Policy](#) to our vendors or analytics partners for a business purpose.

Your Rights As a Californian

California residents have the right to make the following requests to covered businesses. The requests may be made by a consumer, by a consumer on behalf of the consumer's minor child, or by a person authorized by the consumer to act on the consumer's behalf.

Right To Request Information About Collection, Disclosure, Sale or Sharing

You have the right to request that a business disclose to you: (i) the categories and specific pieces of Personal Information the business has collected about you within the past 12 months, (ii) the categories of sources from which the Personal Information is collected, (iii) the business or commercial purposes for collecting, Selling or Sharing Personal Information, and (iv) the categories of third parties to whom the business discloses Personal Information.

If a business Sells or Shares Personal Information, or discloses it for a business purpose, you also have the right to request that the business disclose the following with respect to the 12-month period preceding your request: (i) the categories of Personal Information that the business Sold or Shared about you and the categories of third parties to whom the Personal Information was Sold or Shared, and (ii) the categories of Personal Information that the business disclosed about you for a business purpose.

This type of request may be referred to as a "Request to Know." Before we can honor a Request to Know, we need to verify that the person making it is the consumer whose Personal Information we have. Our method for verifying any particular request weighs information we receive as part of the request, the sensitivity of the consumer information at issue, and the risk of harm to the consumer from unauthorized disclosure.

Right to Request Deletion

You have the right to request that a business delete any Personal Information that the business has collected from you. This type of request may be referred to as a "Request to Delete."

Before we can honor a Request to Delete, we need to verify that the person making the request is the consumer whose Personal Information we have. Our method for verifying any particular request weighs information we receive as part of the request, the sensitivity of the consumer information at issue, and the risk of harm to the consumer from unauthorized deletion.

We are not required to delete Personal Information if we still need it in order to complete the transaction for which the information was collected, perform a contract with you, comply with a legal obligation, or accomplish any other objective recognized as an exception to the right to deletion under applicable law.

Right to Request Correction

You have the right to request that we correct inaccurate Personal Information about you. This type of request may be referred to as a “Request to Correct.” By visiting your account settings, you can correct and change certain Personal Information associated with your account.

Right to Opt-Out of Sale or Sharing

You have the right to direct a business that Sells or Shares Personal Information about you to third parties not to Sell or Share your Personal Information. This type of request may be referred to as a “Request to Opt-Out.”

Right to Limit Use and Disclosure of Sensitive Personal Information

If a business collects Sensitive Personal Information* for the purpose of inferring characteristics about you, you have the right to request that the business limit its use and disclosure of your Sensitive Personal Information to that use and disclosure which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests such goods and services. (Hicuity Health does not collect Sensitive Personal Information for the purpose of inferring characteristics about you.)

*Sensitive Personal Information includes social security number; driver’s license or state identification number; complete account log-in credentials; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; the contents of a consumer’s mail, email and text messages (unless the business is the intended recipient of the communication); genetic data; biometric information; health information; and information concerning sex life or sexual orientation.

Right to Non-Discrimination

You have the right not to receive discriminatory treatment by a business for the exercise of your privacy rights under the CCPA.

How to Submit a Request To “Know,” “Delete” or “Correct”

You can submit a Request to Know, Delete or Correct to privacy@hicuityhealth.com, or by calling us at (855) 442-8489. The request must state “CCPA Request” and include:

- your first and last name;
- an email address at which you can be reached for purposes of the request;
- the city or county in which you reside;
- for a Request to Know, the disclosure(s) you are requesting;
- for a Request to Delete, a clear statement that you want us to delete your Personal Information; and
- the reason(s) you believe we have collected, disclosed or sold your Personal Information, specifically, within the past 12 months (for example, you registered an account with us or received a communication from us)

If you are submitting a request on behalf of another consumer as their authorized representative, you must include the foregoing information about the consumer and provide proof of permission from the consumer to make the request.

After confirming receipt of your request, we'll contact you if we need more information in order to verify it. If we can't verify a request, we may deny it.

12. Changes To This Policy

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Site after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy. If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our Site.

13. Contact Us

Call: 855-442-8489

Email: privacy@hicuityhealth.com

Send mail to:

Compliance Officer

Hicuity Health, Inc.

One City Place Drive

Suite 570

Saint Lous, MO 63141