

Effective Date: December 6, 2022

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INTRODUCTION

Your privacy and trust are important to us at HealthCorum, and we are committed to respecting your privacy and protecting your personal data, which is any information that is capable of identifying you as an individual person. This Privacy Policy (the “**Policy**”) describes how we (“**HealthCorum**,” the “**Company**,” “**we**,” “**us**” or “**our**”) handle and protect the personal data of all of our visitors (“**Users**” or “**you**”) in connection with our [website](#) (the “**Website**”).

In order to ensure the free, informed and unambiguous consent of our Users to the collection and use of personal data, we require all Users to read this Policy and accept the terms and conditions contained herein, together with consent to release personal data subject to such terms and conditions.

OVERVIEW

This Policy addresses the following topics:

- What data do we collect?
- How do we collect your data?
- How will we use your data?
- How do we store your data?
- Data retention and deletion
- Data usage and processing
- Data sharing and disclosure
- Marketing
- Link to third party sites
- What are your data protection rights?
- What are cookies?
- How do we use cookies?
- What types of cookies do we use?
- What are our security measures?
- How to manage your cookies
- Privacy policies of other websites

- Changes to our privacy policy
- How to contact us
- How to contact the appropriate authorities

WHAT DATA DO WE COLLECT?

The Company may collect the following data on all Users:

- Personally identifiable information, including name, email address, company name, and phone number
- Information on your browser, IP address, location and device
- Information on your behavior on our website, including pages viewed, links clicked and actions taken
- Demographic information
- Location data, including User location searches
- Communications data, including messages, comments or file transmissions
- About your internet connection, the equipment you use to access the Website and usage details

Children Under the Age of 13

The Website is not intended for children under 13 years of age without parental consent. No one under age 13 may provide any information to or on the Website without parental consent. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website or through any of its features, or provide any information about yourself to us, including your name, address, telephone number, email address or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at legal@healthcorum.com.

California residents under 13 years of age may have additional rights regarding the collection and sale of their personal information. Please see Your California Privacy Rights (below) for more information.

HOW DO WE COLLECT YOUR DATA?

Users provide data directly to the Company. The Company collects data and processes data when Users:

- Voluntarily complete a survey or provide feedback through the Website or via email.
- Use or view the Website via their browser's cookies.
- Submit content to the Website, like reviews, messages or comments.
- Enable access to their device's location-tracking functionality, whether the Website is running in the foreground (Website open and on-screen) or background (Website open but not on-screen). Certain functionality may be affected while location data is turned off.
- Sign up for accounts with the Company.
- Interact with the Website. The information we automatically collect may include IP address, device identifier, web browser, and browsing information collected through cookies, web beacons, pixels, clear gifs, and other similar technologies on our Website. We may also automatically collect information about how you use the Sites, such as what you have searched for and viewed on the Website. The information automatically collected may be associated with a unique identifier as well as with any other personal data you have provided.

HOW WILL WE USE YOUR DATA?

The Company collects data from Users for the following purposes:

- To enhance the safety and security of Users
- For customer support
- For research and development
- To send marketing and non-marketing communications to Users
- In connection with legal proceedings

The Company does not sell or share user personal data with third parties for their direct marketing, except with Users' consent.

HOW DO WE STORE YOUR DATA?

The Company stores User data securely on servers leased from a reputable third-party hosting service located in the United States.

DATA RETENTION AND DELETION

Users may request deletion of their information at any time. Following such requests, the Company deletes the data that it is not required to retain for purposes of regulatory, tax, insurance, litigation or other legal requirements. For example, the Company retains location, device and usage data for these purposes for a maximum of 7 years; while it retains such data, it may also use it for purposes of safety, security, fraud prevention and detection, and research and development. In certain circumstances, the Company may be unable to delete a User's information, such as if there's an unresolved claim or dispute. Upon resolution of the issue preventing deletion, the Company will delete the information as described above.

The Company may also retain certain information, if necessary, for purposes of safety, security and fraud prevention. For example, if the Company revokes a User's access because of unsafe behavior or security incidents, the Company may retain certain information about that account to prevent that user from accessing the Website in the future.

DATA USAGE AND PROCESSING

We collect and use personal data only when we have one or more lawful grounds for doing so. Such grounds may vary depending on where our Users are located, but generally include processing personal data:

- 1. For purposes of the legitimate interests of the Company or other parties**

This includes using personal data to maintain and enhance our Users' safety and security. This also includes purposes such as combating fraud; improving our services; protecting our property, services, and legal rights; to support auditing, compliance, and corporate governance functions; and direct marketing, research and development. It also includes using personal data to the extent necessary for the interests of other people or

the general public, such as in connection with legal or insurance claims, and to protect the rights and safety of others. In addition, we may disclose or transfer your personal data in the event of a re-organization, merger, sale, joint venture, assignment, or other transfer or disposition of all or any portion of our business.

2. To fulfill the Company's legal obligations

We collect and use personal data to comply with applicable law. The Company may also share data with law enforcement regarding criminal acts or threats to public safety, or requests by third parties pursuant to legal processes.

3. With consent

The Company may collect and use personal data based on the User's consent. For example, we may collect personal data through voluntary surveys. Responses to such surveys are collected on the basis of consent and will be deleted once no longer necessary for the purposes collected. A User who has provided consent to a collection or use of personal data can revoke it at any time. However, the User will not be able to use any part of the Website that requires collection or use of that personal data.

DATA SHARING AND DISCLOSURE

The Company may share the data we collect:

1. At the User's request

This includes sharing data with:

- Other people at the User's request.
- Company business partners.

2. With the general public

Questions or comments from Users submitted through public forums such as the Company social media pages may be viewable by the public, including any personal data included in the questions or comments submitted by a User.

3. With Company service providers and business partners

The Company provides data to vendors, consultants, marketing partners, research firms, and other service providers or business partners. These may include:

- Payment processors and facilitators (as applicable)
- Background check and identity verification providers (as applicable)
- Cloud storage providers
- Marketing partners and marketing platform providers, including social media advertising services
- Data analytics providers
- Research partners, including those performing surveys or research projects in partnership with the Company or on the Company's behalf
- Vendors that assist the Company to enhance the safety and security of its apps
- Consultants, lawyers, accountants and other professional service providers
- Insurance and financing partners

4. For legal reasons or in the event of a dispute

The Company may share Users' personal data if we believe it's required by applicable law, regulation, operating license or agreement, legal process or governmental request, or where the disclosure is otherwise appropriate due to safety or similar concerns. This includes sharing personal data with law enforcement officials, public health officials, other government authorities or other third parties as necessary to enforce our policies; to protect the Company's rights or property or the rights, safety or property of others; or in the event of a claim or dispute relating to the use of our services. This also includes sharing personal data with others in connection with, or during negotiations of, any merger, sale of Company assets, consolidation or restructuring, financing or acquisition of all or a portion of our business by or into another company.

5. With consent

The Company may share a User's personal data other than as described in this notice if we notify the User and they consent to the sharing.

MARKETING

The Company may send Users information about products and services of the Company, always with the consent of the User. If you have agreed to receive such marketing materials, you may always opt out at a later

date. You have the right at any time to stop the Company from contacting you for marketing purposes.

LINK TO THIRD PARTY SITES

HealthCorum may provide links to third party websites or information as a service to our Users. If you use these links, you will leave the Website. Such links do not constitute or imply an endorsement, sponsorship, or recommendation by HealthCorum of the third party, the third party website, or the information contained therein, and HealthCorum 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.

WHAT ARE YOUR DATA PROTECTION RIGHTS?

The Company is committed to making you fully aware of all of your data protection rights. Every User is entitled to the following:

The right to access – You have the right to request from the Company copies of your personal data. We may charge you a small fee for this service.

The right to rectification – You have the right to request that the Company correct any information you believe is inaccurate. You also have the right to request the Company to complete information you believe is incomplete.

The right to erasure – You have the right to request that the Company erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request that the Company restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to the Company's processing of your personal data, under certain conditions.

The right to data portability – You have the right to request that the Company transfer the data collected to another organization, or directly to you, under certain conditions.

If you make a request, the Company has one month to respond to you. To help protect your privacy and security, we will take reasonable steps to

verify your identity, such as requiring a password and user ID, before granting access to your personal data. We will make reasonable attempts to promptly investigate, comply with, or otherwise respond to your requests as may be required by applicable law. Different laws may prevent us from providing access to your personal data or otherwise fully complying with your request depending upon the circumstances and the request, such as for example, where producing your information may reveal the identity of someone else. We reserve the right to charge an appropriate fee for complying with your request where allowed by applicable law, and/or deny your requests where they may be manifestly unfounded, and/or excessive, or otherwise objectionable or unwarranted under applicable law. If you would like to exercise any of these rights, please contact us at legal@healthcorum.com.

YOUR CALIFORNIA PRIVACY RIGHTS

[California Civil Code Section 1798.83](#) permits residents of the State of California to request from certain businesses with whom the California resident has an established business relationship a list of all third parties to which the business, during the immediately preceding calendar year, has disclosed certain personally identifiable information for direct marketing purposes. We are required to respond to a customer request only once during any calendar year. To make such a request you should contact us at the information provided below. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is covered by the California Privacy Rights requirements and only information sharing that is covered will be included in our response.

WHAT ARE OUR SECURITY MEASURES?

HealthCorum has implemented generally accepted standards of technology and operational security to protect personal data from loss, misuse, alteration, or destruction. Only authorized HealthCorum personnel and third-party service providers are provided access to personal data, and these employees and service providers are required to

treat this information as confidential. Despite these precautions however, HealthCorum cannot guarantee that unauthorized persons will not obtain access to your personal data.

WHAT ARE COOKIES?

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit the Website, we may collect information from you automatically through cookies or similar technology. For further information, visit allaboutcookies.org.

HOW DO WE USE COOKIES?

The Company uses cookies and similar technologies for purposes such as:

- Authenticating Users
- Remembering User preferences and settings
- Determining the popularity of content
- Delivering and measuring the effectiveness of advertising campaigns
- Analyzing site traffic and trends, and generally understanding the online behaviors and interests of people who interact with our services

We may also allow others to provide audience measurement and analytics services for us, to serve advertisements on our behalf across the Internet and to track and report on the performance of those.

HOW TO MANAGE YOUR COOKIES

You can set your browser not to accept cookies, and you can remove cookies from your browser. However, in a few cases, some of the Website features may not function as a result.

PRIVACY POLICIES OF OTHER WEBSITES

The Website contains links to and incorporates information from other websites. This Policy applies only to the Website. If you navigate to any other website from a link on the Website, you should review the privacy policy of such website.

CHANGES TO OUR PRIVACY POLICY

It is our policy to post any changes we make to our Policy on this page. If we make material changes to how we treat our users' personal information, we will do so through a notice on the Website home page. The date the Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this Policy to check for any changes.

HOW TO CONTACT US

If you have any questions about this Policy, the data we hold from you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us at:

HealthCorum, Inc.

55 Court St., Second Floor

Boston, MA 02203

Email: legal@healthcorum.com