# **Privacy Policy**

Dated: [09/14/2022]

We are committed to maintaining the privacy and security of your Personal Information, and we appreciate that medical information is sensitive. This Privacy Policy describes how HealthBookplus, Inc. ("HealthBook+," "we" or "us") may collect, use and share your Personal Information, including your Health Information, when you visit the HealthBook+ website at <u>www.healthbookplus.com</u> or use the HealthBook+ web application (including any mobile application) (the "Application") to access, upload, or share your Health Information (collectively, the "Services").

The Application is a personal health and wellness information retrieval and management service that allows individuals to consolidate certain health and wellness information ("Health Information") through the Application and share information with others (including family members, doctors and other third-party providers). The Application is provided to you by HealthBook+ as an aid to assist you in organizing and managing your Health Information.

"Personal Information" is any information that directly or indirectly identifies you, such as your name, email address, or other identifying information about you, or that would, when combined with other information you provide or that is broadly available, be likely to identify you. This Privacy Policy does not address Personal Information that you provide to us in other contexts (for example, through a business relationship unrelated to the Services). This Privacy Policy is also subject to our End User Terms of Service ("Terms"), available at [https://healthbookplus.com/wp-content/uploads/2021/12/HealthBook-Terms-of-Use.pdf]. Capitalized words not defined in this Privacy Policy will have the meaning assigned to them in our Terms.

### Acceptance of Privacy Policy

By using our Services, you are agreeing to the terms of this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use the Services. Your continued use of the Services after we make changes to this Privacy Policy will mean that you agree to those changes.

# Collection of Personal Information

#### Through our Website

We collect your Personal Information through our website when you choose to provide that information, such as when you:

- submit information to our website,
- register on our website,
- respond to our communications (for example, when you respond to an email from us), or
- participate in another one of our website features

The Personal Information that we collect will depend on the context of our interaction with you. For example, when you sign up or register on our website, we may ask you for your name, email address,

mailing address, phone number or other information, but you may still visit our website without providing that information.

#### Through the Application

Our Application collects your Personal Information when you create a new account, including your name, date of birth, gender, address, phone number, and email address.

In addition, we collect and keep your Health Information and sync your Health Information from your Providers or other authorized third-party sources.

#### Automatically Collected Information & Anonymous Information

Aggregated Data. We collect aggregate inquiries for internal reporting and also count, track, and aggregate each visitor's activity into our analysis of general traffic flow at our website. To make sure this happens, we may merge information about you into aggregated group data. In some cases, we may remove personal identifiers from Personal Information and maintain it in aggregate form that may later be combined with other information to generate anonymous, aggregated statistical information. That anonymous group data may be shared with our affiliates, business partners, service providers and/or vendors as described more fully below; if it is shared, we will not disclose your individual identity.

Web Server Logs and IP Addresses. An Internet Protocol ("IP") address is a number that automatically identifies the computer/machine you have used to access the Internet. The IP address enables our server to send you the web pages that you want to visit, and it may identify the server owned by your Internet Service Provider. We may use IP addresses to conduct website analyses and performance reviews and to administer our website.

Location information. When you access the Services on a location-enabled device, we may collect and process information about your actual location, like GPS signals sent by a mobile device. We also may use various technologies to determine location, such as sensor data from your device that may, for example, provide information on nearby Wi-Fi access points and cell towers.

Unique application numbers. Certain versions of the Application may include a unique application number. This number and information about your installation (for example, the operating system type and application version number) may be sent to us when you install or uninstall an application or utilize that or when that application periodically contacts our servers, such as for automatic updates.

Local storage. We may collect and store information on your device using mechanisms such as browser web storage (including HTML 5) and application data caches.

Cookies and Web Beacons. Cookies are pieces of information that a website transfers to a user's computer for purposes of storing information about the user's preferences. Many websites use cookies as a standard practice to provide useful features when a user visits the website, and most web browsers are set up to accept cookies. We use cookies to improve your online experience when visiting the website. You can set your browser to refuse cookies, but some portions of our website may not work properly if you refuse cookies. Some of our website's web pages may use web beacons along with cookies to compile aggregate statistics about website usage. A web beacon is an electronic image (also referred to as an "action tag," "single-pixel," or "clear GIF") that is commonly used to track the traffic

patterns of users from one web page to another in order to maximize web traffic flow and to otherwise analyze the effectiveness of our website. Some web beacons may be unusable if you elect to reject their associated cookies.

# Use of Personal Information

We take your privacy seriously. We use the information that we collect about you to provide, maintain, and improve the services and products that we provide to you. We do not sell information that can be used to identify you to any third parties and only use it for legitimate business purposes.

We use your Personal Information for the following purposes, or may use it for these purposes in the future:

- To respond to questions that you may have.
- To provide products or services you request.
- To inform you of updates regarding HealthBook+ or services or products that may be of interest to you.
- To provide administrative notices or communications applicable to your use of the Services.
- To manage your participation in events and other promotions where you have signed up for such events and promotions.
- To operate, evaluate and improve our business and the products and services we offer.
- To analyze and enhance our marketing communications and strategies.
- To analyze trends and statistics regarding visitors' use of the Services including mobile applications and social media assets.
- To protect against and prevent fraud, unauthorized transactions, claims and other liabilities.
- To improve our customer service.
- To respond to and support customers regarding their use of the Services.
- To comply with all applicable legal requirements.

We also may use the information we obtain about you in other ways for which we provide notice at the time of collection. We may ask for your consent before using information for a purpose other than those set out in this Privacy Policy.

# Sharing Personal Information

#### With Our Vendors/Contractors

In using your Personal Information for the above purposes, we may disclose your Personal Information to our vendors and other contractors who perform various functions on our behalf. We require these third parties to agree in writing to safeguard your Personal Information against improper disclosure and in accordance with applicable laws.

#### Health Information

When you use the Application, you may authorize us to share Health Information with your Providers or other Authorized Individuals. You control how this Health Information is shared. Please view our Terms for information about the types of access you may grant to others.

#### Account Information

Certain areas and features of our website are available to you without registration. However, other features of our website or the Services may require registration, which involves giving us your email address, a password and a username (the "Account Information"). In order to fully benefit from our Services, you also must provide your third-party health portal credentials ("Portal Credentials") to allow us to access your health data at those other healthcare providers' organizations ("Portal Information") for your use.

#### Other Disclosures

We also may provide information about you to other third parties with your consent or for one of the purposes above, e.g., following a subpoena or other legal process, or to a regulatory agency in order to protect against fraud or investigate a criminal or civil matter, or when we believe in good faith that disclosure is reasonably necessary to protect our rights and interests, third parties, or the public at large.

#### **Business Transfers**

If we or any of our affiliates is involved in a merger, acquisition, asset sale, joint venture or other, similar transaction, your information may be transferred to, or accessed by, a successor or other entity and may be subject to that entity's privacy policies, which may vary from this Privacy Policy. We may transfer or allow access to Personal Information as part of the transaction and in review or preparation for it. More specifically, in the event HealthBook+ (i) engages in one or more asset sales or purchases, (ii) is acquired, or substantially all of its assets are acquired, (iii) engages in one or more business combinations, mergers or acquisitions, or (iv) is subject to an event of bankruptcy, you acknowledge and agree that user information comprises an asset of HealthBook+ and that the same is subject to assignment, transfer and/or acquisition by a third party. Accordingly, and notwithstanding anything to the contrary in this Privacy Policy, you acknowledge and agree that such transfers may occur, and that any acquirer of HealthBook+\_may continue to subsequently use your Personal Information, and that such subsequent use may not be consistent with this Privacy Policy.

#### **Terminated Accounts**

If your account is terminated by you or by us in accordance with our Terms, we will promptly delete the Personal Information in your account, with the exception of a disclosure log that records how you shared the information in your account with third parties. The disclosure log will be maintained only for so long as is necessary for our business purposes and will be deleted as soon as practicable, in accordance with our record retention policies. You may close your account and request deletion of your data at any time by contacting us at privacy@healthbookplus.com

#### Anonymous and Aggregated Information

We may share that anonymous and aggregated data about you for any lawful purpose, including:

• With organizations approved by us that conduct research into health;

- With users of the Services for purposes of comparison of their personal health situations relative to others; and
- To improve our Services.

# Third-Party Links to Other Webpages/Tools

The Services may contain links to webpages or tools operated by parties other than HealthBook+. We do not control such websites or tools and are not responsible for their contents or the privacy policies or other practices of such websites or service providers. Our inclusion of links to an outside website or tool does not imply any endorsement of the material on such websites or tools or any association with their operators. Further, it is up to you to take precautions to ensure that whatever links you select or software you download (whether from the Services or other websites) is free of such items as viruses, worms, trojan horses, defects and other items of a destructive nature. These websites and services may have their own privacy policies, which you will be subject to upon accessing the third party's website. We strongly recommend you review the third party's terms and policies.

### How We Protect Your Information

HealthBook+ discloses Personal Information to those of its employees, contractors, agents and affiliated organizations that need to know that information in order to process it on HealthBook+'s behalf or to provide services. Some of those employees, contractors, agents and affiliated organizations may be located outside of your state, province or country. By using the Services or providing us information, you consent to the transfer of such information to them.

We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, we may not immediately delete residual copies of Personal Information that is on our active servers and may not remove information from our backup systems. If you believe that Personal Information we maintain about you is inaccurate, subject to applicable law, you may have the right to request that we correct or amend the information by contacting us as indicated below.

HealthBook+ undertakes commercially reasonable efforts to guard against unauthorized access, use, alteration or destruction of Personal Information, which efforts you agree are sufficient, adequate and complete. In some cases, we cannot control, and are not responsible for, information that is shared about you. For example:

Information You Share. The Services permit you to share information, including your Health Information, with others. We are not responsible for any unauthorized access, use, alteration, or destruction of your information caused by these third parties (including any Providers or Authorized Individuals you permit to access your Health Information). Remember that when you share information publicly, it may be indexable by search engines or otherwise further disclosed.

Social Media Accounts. HealthBook+ maintains various social network accounts such as Facebook, Twitter or LinkedIn. Please note that comments and information that you leave in such settings are likely to be broadly visible and may not be controlled by HealthBook+. We are therefore not responsible for any information or messages you leave in such settings or for how such information may be used by others. Please review the terms of use and privacy policies of any social network platforms you use, as they will control your rights and responsibilities, and your use of those platforms is not covered by this Privacy Policy.

### Do Not Track

Some browsers have a "Do Not Track" feature that lets you tell websites and online services that you do not want to have your online activities tracked. Such browser features and industry standards are not uniform, so our websites and online services do not respond to those signals.

# Children

The Services are not intended for use by children. We do not intentionally gather Personal Information directly from individuals who are under the age of 13. We will only intentionally gather Personal Information about a child when a parent operates an account on behalf of that child. If a child has provided us with Personal Information, a parent or guardian of that child may contact us to have the information deleted from our records. If you believe that we might have any information from a child under age 13, please contact us at the email address below. If we learn that we have inadvertently collected the Personal Information of a child under 13, or equivalent minimum age depending on jurisdiction, we will take steps to delete the information as soon as possible.

### International Visitors

The Services are intended for use in the United States, and we do not target or direct the Services to users in the European Union or otherwise outside of the United States. If you are visiting from the European Union or other regions that have laws governing data collection and use that may differ from U.S. law, please note that you are transferring information about you, including Personal Information, to a country and jurisdiction that does not have the same data protection laws as the European Union, and you consent to the transfer of information about you, including your Personal Information, to the U.S., and the use and disclosure of information about you, including your Personal Information, as described in this Privacy Policy.

# Changing or Deleting Your Information

You may review and request changes to your Personal Information that we have collected.

You may also request deletion of your Personal Information from our databases in order to close your account and prevent receipt of future communications. When you choose to delete your account, all of your Personal Information associated with the account is deleted immediately, and is no longer accessible by you or HealthBook+. The only data that is not deleted is data that we keep for audit and legal purposes.

You may submit requests to change or delete your Personal Information using either of the following:

You can send your request via email to [privacy@healthbookplus.com]

You can mail your request to the following postal address:

Healthbook+

2770, Arapahoe Rd, Ste 132-525

Lafayette, CO 80026

### **Policy Updates**

HealthBook+ reserves the right to change this Privacy Policy from time to time and at any time, without notice, within the sole, independent, absolute and uncontrolled exercise of its discretion. By checking the Effective Date above, you can determine the date of our latest changes to this Privacy Policy. HealthBook+ encourages visitors to frequently check this page for any changes to its Privacy Policy. Your continued use of the Services after any change in this Privacy Policy will constitute your acceptance of, and consent and agreement to, such change.

### Questions

If you have any questions about this Privacy Policy or about our handling of your Personal Information, please contact us at: [email privacy@healthbookplus.com]