

AGRIN HEALTH, LLC
PRIVACY POLICY
LAST REVISED ON: JUNE 17, 2018

Introduction

Agrin Health, LLC ("**Company**", "**Us**" or "**We**") respects your privacy and is committed to protecting it through our compliance with this policy. This Privacy Policy explains what information we collect, how information is collected, how we use that information, what information is shared with whom, and how we protect your information when you use our products and services ("**Services**"). Please read our Terms of Use (www.AgrinHealth/terms) for additional terms and conditions applicable to the Services.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Services. By accessing or using our Services, you agree to this privacy policy. This policy may change from time to time. Your continued use of our Services after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Children Under the Age of 18

Our Services are not intended for children under 18 years of age. No one under age 18 may provide any personal information to us. We do not knowingly collect personal information *from* children under 18. If you are under 18, do not use our Services or register for an adult account with us, make any purchases with us, or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any user name you may use. If we learn we have collected or received personal information from a non-emancipated child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at Support@AgrinHealth.com.

Information We Collect About You

We collect several types of information from and about the registered Members of our Services ("**Members**"), including information:

- by which you may be personally identified, such as name, postal address, e-mail address or telephone number ("**Personal Information**");
- designated as Protected Health Information ("**PHI**") which is your Personal Information that is protected under the U.S. Health Insurance Portability and Accountability Act of 1996 ("**HIPAA**");
- that is about you but individually does not identify you, such as demographic information and your occupation; and/or
- about your technology that, by itself does not individually identify you, such as browser type, operating system, technical data, internet connection, the equipment you use to access our Website or Services and usage details.

How We Collect Information

We collect information in the following way:

- **Information You Provide to Us.** In order to provide our Services to you, we must collect certain information. We do this when (1) you register for an Agrin Health account and use our Services, (2) you fill out a form on our Website, submit a request to us, or interact with us including our Support and Helpdesk agents, (3) we create records and copies of your correspondence (including e-mail addresses) if you contact us, and (4) you respond to a survey that we might ask you to complete for research purposes.
- **Information from Care Team Members.** Some of our Services allow you to designate members of your Care Team and interact with them. Depending on the access you give a Care Team member, they may input or edit a variety of information regarding your health and wellness including, but not limited to, Care Plan instructions, messages, or medical bill.
- **Information from Business Partners and Sponsoring Organizations.** When you are referred to our Services by a Business Partner or Sponsoring Organization, they may provide us with PHI such as your name, date of birth, gender, mailing address, health coverage details, and medical record information, among other things to facilitate the provision of our Services.
- **Information from Other Sources.** We may obtain information about you from affiliates, partners, and other third parties. This information may be used to provide our Services to you and to provide analysis about you in comparison to people who are statistically similar to you. We may combine the information we obtain from third parties with other information that we have collected about you.
- **Information We Get from Your Use of Services.** We may collect information about the Services that you use and how you use them. This information includes:
 - **Computer, Tablet, or Mobile Telephone information.** We may collect device-specific information (such as your hardware model, operating system version, unique device identifiers, device sensors and mobile network information including phone number) and device sensors and related data. We may associate your device identifiers or phone number with your Agrin Health Account. We will comply with the usage/license restrictions and requirements applicable to the device from which the information comes.
 - **Information From Apps, Services and Wearables.** When you connect your health or wellness app, electronic service (such as a calendar) or wearable device (such as a fitness tracker, heart rate monitor, or pedometer) with our Services, we collect the information gathered about you and your behavior by that app, service or device (such as your steps, fitness activities, exercise frequency, sleep, calorie intake, physician appointments, nutritional statistics, blood pressure, and other biometric data, etc.). We may link this information with other information we have collected about you to facilitate the provision of our Services to you. When these services or devices are administered by a third party, the information practices and policies for those apps, services or devices are the responsibility of that third party.

- **Log information.** When you use our Services or view content provided by Agrin Health, we may automatically collect and store certain information in server logs. This may include: details of how you used our service; Internet protocol address; device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL; and cookies that may uniquely identify your browser or your Agrin Health Account.
- **Location information.** When you use a location-enabled Service, we may collect and process information about your actual location, like GPS signals sent by a mobile device. We may also 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 Services 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 that service or when that service periodically contacts our servers, such as for automatic updates.
- **Local storage.** We may collect and store information (including personal information) locally on your device using mechanisms such as browser web storage (including HTML 5) and application data caches.
- **Cookies and anonymous identifiers.** We use various technologies to collect and store information when you use our Services, and this may include sending one or more cookies, web beacons or anonymous identifiers to your device. We may also use cookies, we beacons and anonymous identifiers when you interact with Services we offer to our partners, such as Agrin Health features that may appear on other sites.

How We Use Your Information

We use your information to deliver and improve our Services. We may use information, including Personal Information, to:

- **Provide and improve our Services.** We use information, including Personal Information, for internal and service-related purposes and may provide it to third parties as necessary to allow us to facilitate or improve our Services, or for any other purpose with your consent.
- **Customize your experience.** We use information we collect through our Services to customize and improve your experience.
- **Organize and analyze your health information.** When you share information or we receive it from others, our employees and service providers may review that information to categorize and organize it for you.
- **Communicate with you.** We may send email to the email address you provide us to verify your account and for informational and operational purposes, such as account management, customer service, system maintenance, or to provide information we think may be of interest to you. We may also communicate with you through our Services or other means enabled by our Services, such as through text messages, push notifications, or in-app messaging. You may adjust your communications preferences in your account

settings at any time or by unsubscribing from our marketing emails using the link provided at the bottom of those emails.

- **Communicate with others at your request.** If you choose to use our Services to share information with others, we may require Personal Information such as names, email addresses, fax numbers, or other contact information.
- **Fulfill Your Request.** If you request Agrin Health to perform an action or Service on your behalf, we may need to utilize your information to fulfill that request.

Disclosure of Your Information

We take your privacy seriously. You retain full ownership of your Member Content. We do not sell your information to any third parties, and all information disclosed is the minimum amount necessary to fulfill the legitimate business purpose.

We are invested in making healthcare better for everyone. Since our Services have the potential to identify anonymous healthcare trends which may benefit the healthcare community (such as a reaction to a medication not previously documented as a side effect), we may disclose aggregated information about our Members, and information that does not identify any individual, without restriction. Additionally, we may share aggregated, non-personally identifiable information publicly and with our partners to evaluate the effectiveness, value, and analytic trends of our Services.

We do not share personal information with companies, organizations and individuals outside of Agrin Health except in the following circumstances:

- **With your consent.** We may share your Personal Information with companies, organizations or individuals outside of Agrin Health when we have your consent to do so such as your Care Team members. We are not responsible for the privacy practices or actions of any third party with whom you choose to share information.
- **As Part of a Program.** We may further limit the way we share your information according to the direction of your Sponsoring Organization and any privacy policy that they may ask us to comply with.
- **When Necessary to Provide Our Services.** Some of our Services require interaction with various healthcare industry organizations, individuals and third party vendors. These interactions may require Agrin Health to exchange your Personal Information with the following:
 - **Enterprise Organization.** Under U.S. laws, we may share PHI with your health plan for the administration of your plan.
 - **Healthcare Providers.** If you participate in a program or Service which involves one or more of your healthcare providers, we may share information with your healthcare providers and any clinics or organized healthcare organizations with whom they are associated.
 - **Your Employer.** We will not share your PHI with your employer for employment-related purposes. If you participate in a program involving your employer, we may only share the information needed to for your employer to

deliver the program. For example, we may share completion status of a wellness plan requirement but not the actual results of the required action.

- **Third-Party Service Providers.** We may disclose your PHI to our business associates, who perform various functions on our behalf, but Agrin Health requires these third parties to agree in writing to safeguard your PHI appropriately and in accordance with the law. Agrin Health does not sell or rent your PHI to third parties. Agrin Health does not use your PHI to market, sell, or otherwise promote goods or services that are not health-related benefits provided by your health plan, employer, or provider.
- **For External Services.** We provide Personal Information to our affiliates or other trusted businesses or persons who provide services to you or us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.
- **For sponsored Services.** We may disclose Personal Information to sponsors of Services provided to you in compliance with law and applicable confidentiality and security measures.
- **For legal reasons.** We will share Personal Information with companies, organizations or individuals outside of Agrin Health if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:
 - meet any applicable law, regulation, legal process or enforceable governmental request;
 - enforce applicable Terms of Use, including investigation of potential violations;
 - detect, prevent, or otherwise address fraud, security or technical issues; or
 - protect against harm to the rights, property or safety of Agrin Health, our users or the public as required or permitted by law.
- **In connection with a merger, sale, or other asset transfer.** If Agrin Health is involved in a merger, acquisition, financing, reorganization, or other substantial corporate transaction, or in the unlikely event of bankruptcy, any information we possess, including Personal Information, may be shared, sold, or transferred as part of such a transaction as permitted by law and/or contract. In this event Agrin Health will continue to ensure the confidentiality of any Personal Information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Control who sees your information.** Each time you add a Care Team member, you get to decide what types of information the person can access. You can change these setting at any time. We share information with third parties only at your request and with your specific authorization.
- **Control your connections.** You control which apps, services and devices are connected to your account, and you can change this setting at any time.

- **Modifying your account information.** You can review the information you or others have shared by logging into your account. You can modify or delete any information that you have provided us at any time. You may also request deletion of information that others have shared with you by contacting us at Support@AgrinHealth.com.
- **Closing your account.** If you no longer desire to use our Services, you may close your account by sending us an email to Support@AgrinHealth.com. After you close your account, you will not be able to sign in to our website or access any of your information. However, you can open a new account at any time. If you close your Agrin Health account, we have no obligation to retain your information and may delete any or all of your account information without liability. We may retain and use your information as described in “Data Retention” below. Please note: if you have provided or shared information to third parties, retention of that information will be subject to those third parties’ policies and practices.
- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of our Website may then be inaccessible or not function properly

Your California Privacy Rights

Residents of the State of California, under certain provisions of the California Civil Code, have the right to request from companies conducting business in California a list of all third parties to which the company has disclosed certain personally identifiable information as defined under California law during the preceding year for third party direct marketing purposes. The company is not required to provide the above-described lists if it adopts and discloses its policy of not disclosing personal information to third parties for their direct marketing purposes unless the customer first affirmatively agrees to the disclosure.

We do not share information with third parties for their direct marketing purposes unless you affirmatively agree to such disclosure -- typically by opting-in to receive information from a third party. To prevent disclosure of your personal information for use in direct marketing by a third party, do not opt-in to such use when you provide personal information on our website. California customers may request further information about our compliance with this law by e-mailing Support@AgrinHealth.com.

California Do Not Track Notice. 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.

Data Security and Retention

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. In particular:

- We comply with HIPAA’s security rule
- We encrypt many of our Services using SSL.

- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We restrict access to personal information to Agrin Health employees, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

Unfortunately, the transmission and storage of information cannot be completely secured. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information stored on cloud servers, or transmitted through our Services or via electronic communications such as email. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained in our Services or related to communications sent through the internet.

We will retain your Member Content, including your information, for as long as either your account is active (plus a five-day hold period), as needed to provide our Services, or as legally required, whichever is longest (“Retention Period”). After the Retention Period, We will permanently and irreversibly purge your Member Content. We will retain and use your information as necessary to comply with our legal obligations, prevent fraud or abuse, resolve disputes, enforce our agreements, or take other actions permitted by law. Anonymous or aggregated information that does not identify you personally may be retained indefinitely.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat your information, we may notify you directly. The date the privacy 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 e-mail address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at: Support@AgrinHealth.com.