

VHEDA HEALTH'S PRIVACY POLICY

Effective Date: December 1, 2013.

At Vheda, Inc. ("Vheda Health"), we are committed to ensuring your privacy. This commitment guides our decisions about how, where, and when to collect and share your personally identifiable information. Our goal is to provide you with clear, easy-to-read explanations about our information practices in one place. This information applies throughout our businesses and across our websites, mobile apps and social media presences ("Our Sites"). We welcome your questions and feedback about our Privacy Policy or our privacy commitments, and invite you to [Contact Us](#).

As part of our privacy commitment to you, we want to share with you the basic components of our Privacy Policy:

- **Transparency.** We will make our privacy commitments easy to find and easy to read.
- **Notice.** We will notify you of changes to our Privacy Policy before they take effect.
- **Choice.** You have choices about what information you provide to Vheda Health and how Vheda Health will use your information for marketing purposes.
- **Security.** We will use industry standard security safeguards to protect your privacy and the data entrusted to us.
- **Control.** We will not sell your personal information to anyone, for any purpose. And when we share information with our subsidiaries or trusted service providers, they must comply with our privacy commitments.
- **Accessibility.** We will listen to your feedback and answer your questions about our Privacy Policy, commitments, and practices.

We recognize the trust you place in us to safeguard your privacy. Our privacy commitments are and will remain a fundamental part of our business, and will apply to everyone who has a relationship with Vheda Health, including patients, customers, and visitors to Our Sites. These commitments may expand as our business grows and we develop new ways to interact with you. We will keep you informed about these changes through our updated policies.

The Scope of this Privacy Policy

The Vheda Health Sites and Mobile App are owned and operated by the Vheda Health.

This Privacy Policy describes the choices you can make about the way your information is collected and used. Our Privacy Policy applies to the information collected on Our Sites and to any other information that Vheda Health collects about you.

Your Consent to Use Our Sites

By using Our Sites, you signify your consent to our collection, use, and disclosure of your personal information in accordance with this Privacy Policy. If you do not agree with the practices described in this Privacy Policy, please do not use Our Sites.

The Information We Collect About Customers and Users

Vheda Health may collect or access different types of personal or other information when you visit Our Sites, when you place orders with us, when provided to us by physicians or other health care providers or by insurers or by other third party payors, and in other circumstances described in this Privacy Policy. Some examples of the information we collect or access include:

- Contact and Identifying Information, which we use for contacting you regarding your orders, for confirming your identity, or for services which may be of interest to you;
- Billing Information as necessary for your financial relationship with us, including payment method data you may store with us in connection with processing of orders or offers;
- Personal Health Information necessary for communicating with your physician or other health care provider, processing your medical records for you or for your physician or other health care provider, or for other purposes, including monitoring your health in connection with treatment plans prescribed for you. This information may include data such as treatment regimes, glucose levels, vital signs, electronic medical records, insurer claims data, or other similar information;
- Technical Information relating to your use of our Sites or mobile apps.

How We Collect Information About Customers and Users

Vheda Health collects information in four primary ways:

- When you provide us with information when you purchase or interact with us about products or services offered by Vheda Health;
- When you register as a user of a Vheda Health Site;

- When we collect technical information automatically when you visit Our Sites; and
- When we obtain information about you from your physician or health care plan in connection with medical care.

How We Use Information About Customers and Users

Vheda Health may use the information we collect in a variety of ways to enhance our customers' experiences, including to:

- Process your requests or your health care provider's requests for services;
- Improve customer services;
- Respond to your questions;
- Deliver you customized content;
- Monitor and ensure Site integrity and security;
- Investigate, prevent, or take action relating to illegal activities, violations of our Terms of Service, End-User License Agreement or Privacy Policy; and
- Aggregate non-identifiable information for business or other analysis.

Online Activity Tracking and Advertising

- We may collect information about your activity on Our Sites and through our advertisements using technologies such as cookies, including third-party cookies, web beacons and server log files.
- We and our third party business partners may use this automatically generated information, as well as other information that we or they have, to provide you with an optimal website experience. This includes measuring the effectiveness of our promotions and your interactions them, and tailoring offers and advertisements to you for products or services you may find helpful on Our Sites or third-party sites.
- Our Sites may also contain third-party cookies from advertising partners who help serve ads for Vheda Health and other third parties on Our Sites and elsewhere on the web. To opt-out of these type of cookies, visit the Network Advertising Initiative (NAI) website by clicking [here](#).
- Because an industry-standard Do-Not-Track protocol is not yet established, Vheda Health's information collection and disclosure practices, and the choices it offers to consumers, will continue to operate as described in this Privacy Policy regardless of choices made regarding the use of "do not track" technologies. Vheda Health does not

collect personally identifiable information about your online activities over time across third-party Web sites or online services. We may use certain technologies, however, to monitor technical information about the use of Our Sites. We do not permit third parties to track consumer behavior over time across third party sites or services when you use Our Sites.

How We Share Personal Information

Vheda Health will only share your personal information in manners described within this Privacy Policy.

- We do not sell your personally identifiable information to anyone for their marketing purposes.
- *With Health Care Providers.* Vheda Health will share your personally identifiable information with your doctors, hospitals and other third-party healthcare providers.
- *With Third Party Companies and Service Providers:* Vheda Health may share your personally identifiable information with third party companies to provide you with technologies, services, or content that may be of interest to you, or to assist us in fulfilling your orders. In all instances in which Vheda Health shares your personally identifiable information, we require that the recipient agrees to protect it in a manner consistent with this privacy policy.
- *In Other Circumstances:* Vheda Health may share your information in other limited circumstances, including:
 - Responding to requests from law enforcement officials or judicial authorities or to otherwise cooperate with authorities pursuant to a legal matter;
 - Responding to matters of personal or public safety;
 - In litigation, investigations, and other legal matters where the data is pertinent;
 - To investigate security incidents;
 - In the event of the sale or transfer of Vheda Health or of some of our assets or lines of business, or in the context of similar business negotiations.
- We do not sell your personal information to anyone for marketing purposes.

Anonymous and Aggregate Information

- Vheda Health may remove personally identifiable information to create anonymous data, which we may later aggregate.

- This data cannot be used to identify any individual, and we will not attempt to re-identify later or allow others to do.
- Vheda Health uses and shares this data for historical, statistical, or business purposes.
- We also collect technical, non-personal information about Site users.

Our Online Privacy Policy for Children

Our Sites are intended for users of all ages who wish to improve their health. When we collect personal information from children under the age of thirteen on Our Sites, we take additional steps to protect children’s privacy, including:

- Notifying parents of our information practices with regard to children, including the types of personal information we may collect, the uses to which we may put that information, and whether and with whom we may share that information;
- Obtaining consent from parents, in accordance with applicable law, for the collection of personal information from their children or for sending information directly to their children relating to our products and services;
- Limiting the collection of personal information from children to no more than is reasonably necessary to provide our services;
- Giving parents access or the ability to request access to personal information we have collected from their children and the ability to request that the personal information be changed or deleted.

Our Data Protection and Security Policy

- We maintain industry standard security measures, including SSL encryption, to protect sensitive data such as when it is stored by Vheda Health and when you send it to us.
- We ask all third parties acting on our behalf to protect your information in accordance with this Privacy Policy and to implement comparable data protection and security policies.
- We maintain personal information for registered Site users in accordance with our records retention policies or as required by law, and you have the right to access or modify you’re the information we maintain regarding you at any time.

Vheda Health Customer Privacy Choice and Control

- You have the ability to review, modify, or request the removal of personal information we collect about you. Certain information may be retained, however, to satisfy legal obligations.

- We may in some circumstances provide you with the ability to choose to limit the types and frequency of communications you receive from Vheda Health.
- You may choose to end your relationship with Vheda Health at any point.

Changes to this Privacy Policy

- Any changes in our Privacy Policy will be prominently posted on the Privacy Policy page linked from each of Our Sites so that you are aware of any changes in the data we collect and how we use it.
- If you register and provide us with a valid email address, we will notify you by email of any significant changes to this Privacy Policy. You will be given the opportunity to opt in to any significant new uses of personal information if that information was collected prior to the change in this policy. If you do not opt in to any significant new uses of your personal information, that information will continue to be governed by the policy in effect at the time your information was collected.
- If you do not register, we will not have your email address and cannot provide you with any notifications of Privacy Policy changes.

Your California Privacy Rights

Under California Civil Code Section 1798.83, California customers are entitled to request information relating to whether a business has disclosed personal information to any third parties for the third parties' direct marketing purposes. As explained elsewhere in this Privacy Policy, Vheda Health will not sell or transfer your personal information with third party companies for their direct marketing purposes without your consent. California customers who wish to request further information about our compliance with this statute or who have questions more generally about our Privacy Policy and our privacy commitments to our customers and Site users should not hesitate to [Contact Us](#), or call us at 1-443-364-8394.