



## HALO HEALTH PRIVACY POLICY

Halo clinical collaboration platform and [www.halohealth.com](http://www.halohealth.com) (the "Website") (collectively, the "Services") are operated by Halo Health, Inc., located at 312 Plum Street, Suite 1250, Cincinnati, OH 45202. We take the private nature of your personal information very seriously and this Privacy Policy describes how we treat the information we collect when you use the Services. Please read this notice very carefully.

BY USING THE SERVICES, YOU EXPRESSLY CONSENT TO THE PROCESSING OF YOUR PERSONAL INFORMATION ACCORDING TO THIS PRIVACY POLICY. YOUR PERSONAL INFORMATION MAY BE PROCESSED IN THE COUNTRY WHERE IT WAS COLLECTED AS WELL AS OTHER COUNTRIES (INCLUDING THE UNITED STATES) WHERE LAWS REGARDING PROCESSING OF PERSONAL INFORMATION MAY BE LESS STRINGENT THAN THE LAWS IN YOUR COUNTRY. BY UPLOADING PERSONAL INFORMATION TO THE SERVICES, YOU WARRANT THAT YOU HAVE THE RIGHT TO TRANSFER SUCH INFORMATION OUTSIDE YOUR COUNTRY AND INTO THE UNITED STATES.

### CHILDREN UNDER 18 YEARS OF AGE

Children under 18 years of age are not permitted to use the Services for any purpose and Halo Health does not collect personally identifiable information about children under the age of 18.

### INFORMATION WE COLLECT

#### *User Registration*

When you sign up for or use Services, you may voluntarily give us certain information about yourself, your organization and your employees. This can include name, username, profile photo, phone number, email address, city, state, gender, directory information, schedule information and any other information you provide us. If you're using the Services on your mobile device, you may also choose to provide us with location data. You agree not to provide us with any personal information regarding a third party unless you have the express informed consent of the data owner to share that information with Halo Health for the purposes of accessing or using the Services.

#### *Secure Texting*

When you use the Halo platform to send secure texts you may transmit the personal health information of yourself or a third party across Halo Health servers. Halo Health will store the content of your text messages in an encrypted format on its secure servers for the duration of your use of the Services or as otherwise agreed to by Halo Health. Halo Health will only access and unencrypt the content of a secure text message upon the written request of an organization administrator or if a customer service problem arises that requires a specific message be unencrypted.

#### *Website Access Information and Use of Cookies*

Like most website operators, Halo Health collects non-personally-identifying information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request when visitors use the Website. Halo Health purpose in collecting non-personally identifying information is to better understand how Halo Health visitors use the Services. From time to time, Halo Health may release non-personally-identifying information in the aggregate, e.g., by publishing a report on trends in the usage of its Services. Halo Health also collects potentially personally-identifying information like Internet Protocol (IP) addresses and may collect statistics about the behavior of visitors to the Services. For instance, Halo Health may monitor the Website to help identify spam.



In addition to log data, we may also collect information about the device you're using to access the Services, including the type of device, the operating system, device settings, device identifiers and crash data. Whether we collect some or all of this information often depends on what type of device you're using and its settings. To learn more about the information your device makes available to us, please review the policies of your device manufacturer or software provider.

Like many websites, the Website may use "cookies" to collect information. A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Halo Health may use cookies to help identify and track visitors, their usage of the Website, and their Website access preferences. Website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using the website, with the drawback that certain features of Website may not function properly without the aid of cookies.

#### **USE OF INFORMATION**

We use the information we collect to provide you full access and functionality of the Services. Accordingly, your information may be used for the following purposes: (i) to provide and improve our services, features and content; (ii) to administer your use of our services and accounts; (iii) to enable users to enjoy and easily navigate the Services; (iv) to better understand your needs and interests; (v) to fulfill requests or to respond to questions or comments you may make; (vi) to personalize your experience; (vii) to provide you with announcements, notifications and advertisements related to your interests and use of the Services and other communications such as electronic newsletters, promotional e-mails or similar messaging; (viii) to provide service announcements; (ix) to protect against users seeking to hack into the Services; and (x) to assess the level of general interest in the Services.

Personal Health Information or any other content sent via text message across the Halo platform is not accessed or used by Halo Health for any purpose.

#### **DISCLOSURE OF INFORMATION**

Except as otherwise provided in this policy, we disclose the potentially personally-identifying information you disclose to Halo Health only to those of our employees, contractors and affiliated organizations that (i) need to know that information in order to process it on our behalf or to provide Services, and (ii) that have agreed not to disclose it to others. Some of those employees, contractors and affiliated organizations may be located outside of your home country and by using the Services, you consent to the transfer of such information to them.

Other than to its employees, contractors and affiliated organizations or as described above, we disclose personally-identifying and personal health information only when required to do so by law, or when we believe in good faith that disclosure is reasonably necessary to protect the property or rights of Halo Health, third parties or the public at large. If you send us a request (for example via a support email or via one of our feedback mechanisms), we reserve the right to publish it in order to help us clarify or respond to your request or to help us support other users.

In addition, in some cases we may choose to buy or sell assets. In these types of transactions, user information is typically one of the business assets that is transferred. Moreover, if Halo Health or substantially all of its assets were acquired, or in the unlikely event that Halo Health goes out of business or enters bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of Halo Health may continue to use



your personal and non-personal information only as set forth in this policy. Otherwise, we will not rent or sell potentially personally-identifying and personally-identifying information to anyone.

#### *Third Party Service Providers*

You may choose to allow third-party service providers to retrieve, provide, and/or modify health and other information in your Halo Health account. Once you enable a specific third-party service provider to access your account, the service provider may continue to access your account until you affirmatively disable access. Third-party service providers include both health care providers and other entities. It is your sole responsibility to review and approve each such third-party service provider before sharing your information with such service provider through your Halo Health account or otherwise allowing such service provider access to it. Halo Health is not responsible for and does not endorse any third-party service providers or their services or content.

#### **SECURITY**

We are committed to protecting your personal information and personal health information. We regularly test our facilities and use a variety of security technologies and procedures to help protect your information from unauthorized access, use or disclosure. For more information on the security and reliability of the Halo Platform, please visit: <https://www.dochalo.com/why-doc-halo/our-technology/>.

#### **How do we make changes to this policy?**

Halo Health may change its Privacy Policy from time to time. We will post the updated policy on the Website and, if required by law, further notify you of the changes. In all cases, use of information we collect now is subject to the Privacy Policy in effect at the time such information is collected. So please check this policy frequently for updates and changes. If you continue to use the Services after those changes are in effect, your usage signifies your agreement with the revised policy.

#### **YOUR CALIFORNIA PRIVACY RIGHTS**

A business subject to California Civil Code section 1798.83 is required to disclose to its California customers, upon request, the identity of any third parties to whom the business has disclosed personal information within the previous calendar year, along with the type of personal information disclosed, for the third parties' direct marketing purposes. If you are a California resident and would like to make such a request, please send an email to [legal@dochalo.com](mailto:legal@dochalo.com).

#### **CONTACT US**

If you have any questions about this policy or our site in general, please contact us at:

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