



EFFECTIVE November 1, 2020

Caremoat Inc. ("Caremoat" or "we" or "us"), respects the privacy of its customers and other users of its website located at <https://www.caremoat.com>, including any subdomains of such website (collectively the "Site"). This Privacy Policy explains how Caremoat collects the personal information of the users of the Site (collectively, "Users"), how Caremoat handles and protects that information, and what Users can do to help protect that information.

Caremoat may change this Privacy Policy from time to time to accurately reflect how Caremoat gathers and manages User information. If we do this, we will post the changes to this Privacy Policy on this page and will indicate the date these terms were last revised. If we make any material changes to this Privacy Policy, we will notify Users by email if possible and/or by means of a prominent notice on the Site. You should review this policy periodically, and especially before you provide any Personal Information. Any changes will become effective when posted. Your continued use of the Site after we post any modifications to the Privacy Policy will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

**By using the Site, you agree to the collection and use of information in accordance with this Privacy Policy.**

#### Collection of Information

When you engage in certain activities on this Site, such as registering for an account, utilizing Caremoat's services, contacting Caremoat or providing feedback, applying for a job, or signing up for email updates or other materials, we may ask you to provide certain information about yourself, which may include personally identifiable information such as your name, e-mail address, address, social security number, and mobile phone number (collectively "Personal Information"). We may also ask you to provide certain information about your health history and/or health plans, including member identification number, medical records, billing records, claims information, information on your medical conditions, prescribed medications, health risk status, and other health and wellness-related information ("Personal Health Information" and collectively with Personal Information, "Protected Information"). This health information may constitute "genetic information" if it includes information about your family members, such as your spouse or children. By voluntarily providing us with your Protected Information, you are consenting to our use of it in accordance with this Privacy Policy. You may email Caremoat at [Wecare@caremoat.com](mailto:Wecare@caremoat.com) to find out what Protected Information about you has been collected, and to request changes or corrections to, or deletions of, that Protected Information.

We do not currently collect or process any payments through the Site. In the event that we do so in the future, we intend to use a third party payment processor. In connection with the processing of such payments, we would not retain any financial information such as credit card numbers. Rather, all such financial information, together with any Personal Information that you provide in the payment process, would be provided directly to our third party processor. The third party processor's use of your financial

information and any other Personal Information that you provide to them in the payment process, would be governed by the processor's privacy policy.

In addition, the Site automatically collects anonymous information about Users. For example, the Site automatically gathers a User's Internet Protocol address, which Internet Service Provider the User utilizes, statistics about how Users navigate through and use the Site, and information gathered through the use of "cookies." A "cookie" is a piece of data stored on the User's computer tied to information about the User. Caremoat uses cookies and the other anonymous information to understand how Users choose the Site, and to know when Users have accessed the Site from a paid advertiser, an affiliate website, or a strategic partner website. Caremoat also compiles statistics that track the usage of the Site. These statistics are used for internal purposes only and contain no Personal Information.

Solely for the purposes of confirming valid traffic from certain pay-per-click search engines, IP addresses for such Users may be monitored, and may be compared to the records of that search engine.

#### How Caremoat Responds to Do Not Track Signals

At this time the Site does not recognize automated browser signals regarding tracking mechanisms, which may include "do not track" instructions. However, you can change your privacy preferences regarding the use of cookies and similar technologies through your browser. You may set your browser to accept all cookies, block certain cookies, require your consent before a cookie is placed in your browser, or block all cookies. Blocking all cookies may affect your online experience and may prevent you from using all of the features of the Site. Please consult the "Help" section of your browser for more information.

#### How Caremoat Protects and Uses Protected Information

Caremoat works to protect the security of Protected Information during transmission by using Secure Sockets Layer (SSL) software, which encrypts the information that is transmitted on the Site. Information is stored with an AES-256 encryption. Caremoat uses the Protected Information of a User to market its services, process payments (if any) and communicate with clients, and to respond to customer service or support questions. Caremoat may employ companies and individuals to perform functions on Caremoat's behalf. Examples may include providing marketing assistance, performing statistical analysis, providing customer service and processing payments. These companies and individuals will have access to the Protected Information only as necessary to perform their functions and may not access or use it for any other purpose.

Caremoat has appropriate security measures in place within its database and physical facilities to protect against the loss, misuse, or alteration of information that has been collected on the Site. These measures include limiting the number of people who have physical access to Caremoat's database servers, as well as electronic security systems and password protections which guard against unauthorized access. Although no method of transmission over the Internet or electronic storage is 100% secure, we follow all PCI-DSS requirements and implement additional generally accepted industry standards. Please be aware, however, that we are unable to guarantee the absolute security of the Personal Information we have collected from you.

Caremoat may also use a User's Protected Information to notify the User of Caremoat's services via periodic mailings or e-mail updates. Users may opt-out of these communications as noted below.

Some of the Protected Information is collected and used in order to report utilization on an aggregate basis, and in an anonymous manner, to the employer or group health plan with which you are associated. Caremoat will use and disclose your Personal Health Information only as permitted by our business associate agreements with your employer sponsored health plans, as required by law, or where required by the Secretary of Health and Human Services (HHS) to investigate or determine Caremoat's compliance with the HIPAA Rules.

In no event is your name or other Protected Information disclosed to your employer in this aggregate report. However, your employer may sponsor an employee incentive plan(s) or provide a disease/condition management program(s) for which you may be eligible to participate. To the extent that an employer administers part of the incentive plan or disease/condition management programs, employer may receive some individually identifiable information about you for limited plan administration purposes. However, the employer may not use such information for improper or illegal purposes. For example, you may not be discriminated against in employment because of the Personal Health Information you provide. Employer plan sponsors are also required to implement reasonable safeguards to adequately separate plan administration functions from other employer activities, and to otherwise protect the confidentiality, integrity and availability of the Personal Health Information they utilize on behalf of a group health plan.

You are not required to provide your Personal Health Information. Employers may not retaliate against employees who refuse to provide their Personal Health Information. However, employees who do provide this information may not receive an incentive or reward from the wellness program.

Caremoat will not sell Protected Information of any User. However, in the event Caremoat goes through an organizational transition, such as a merger, acquisition or other strategic relationship, certain of the Protected Information of Caremoat's Users and other clients will, in most instances, be part of the assets transferred or shared.

As a HIPAA Business Associate, Caremoat follows the HIPAA Security Rule and trains its employees on privacy and security requirements.

#### Your Options with Respect to Information

You can always opt not to disclose information to us, but keep in mind that some information may be needed to register with us or to take advantage of some of our services.

You may add, update, correct or modify information about you at any time by logging into your online account or by emailing us at [Wecare@caremoat.com](mailto:Wecare@caremoat.com). The information you can view, update, and delete may change as the Site changes. If you have any questions about viewing or updating information, we have on file about you, please contact us by email at [Wecare@caremoat.com](mailto:Wecare@caremoat.com). When you update information, however, we may maintain a copy of the unrevised information in our records.

If you wish to deactivate your account, please email us at [Wecare@caremoat.com](mailto:Wecare@caremoat.com), but note we may continue to store information about you as required or permitted by law or for legitimate business purposes. We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it.

As a Business Associate under the Health Insurance Portability and Accountability Act (HIPAA), Caremoat will ensure your right to access and amend your Personal Health Information, or to obtain an accounting of disclosures. Any questions or complaints about your Personal Health Information can be directed to Caremoat's designated privacy officer at [Wecare@caremoat.com](mailto:Wecare@caremoat.com), or the Secretary of U.S. Department of Health and Human Services (HHS) if you believe your privacy rights have been violated. No retaliatory actions will be taken against you for filing a complaint. In the event of a breach of your Personal Health Information, Caremoat will notify your employer sponsored health plan pursuant to its business associate agreement with that plan.

If you wish to opt out of our periodic mailings or e-mail updates, please email us at [Wecare@caremoat.com](mailto:Wecare@caremoat.com) with "UNSUBSCRIBE" in the subject line. Please note, however, that Users that continue to purchase products from Caremoat may continue to receive emails related to those ongoing purchases.

You have choices about the collection of information by third parties on our Site. For example, if you don't want information about your visit to our Site sent to Google Analytics, you may opt-out of Google Analytics by visiting: <https://tools.google.com/dlpage/gaoptout>. Please note that the Add-on does not prevent information from being sent to us.

In addition, if you would like to opt out of having participating entities track your online behavior for advertising purposes when you are browsing our Sites, you can opt-out of certain ad functions by visiting: <https://youradchoices.com/control>. You will be directed to an industry-developed website that allows you to choose whether each listed entity may collect and use data for interest-based advertising purposes. It may be that some of the third parties that collect interest-based information on our Site do not participate in the Website Opt Out, in which case the best way to avoid third party tracking of your online behaviors may be through your browser settings and deletion of cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of the Site.

Please note that the Website Opt Out are device specific. If you wish to opt-out from having interest-based information collected by participating entities across all devices, you need take the steps outlined above from each device.

### User Postings

Except as otherwise expressly described in this Privacy Policy, this policy only addresses the use and disclosure of Protected Information and other information we collect from you. In the course of your use of the Site, you may elect to post or otherwise disclose information about yourself on certain features that we may make available to Users now or in the future that enable Users to communicate with the public at large or with a group, such as message boards, chat areas, news groups, forums, communities, or other features. Whenever you voluntarily disclose personal information on publicly-viewable web pages, that information will be publicly available and can be collected or used by others. Such postings may also appear on other websites or when searches are executed on the subject of your posting. Such activities are beyond the control of Caremoat and this Privacy Policy. You should therefore exercise discretion when disclosing any Protected Information or other information when using the public message boards.

### Third Party Websites

Caremoat may maintain links to other websites on the Site, including social media sites. If a User chooses to visit other websites from the Site, Caremoat will not be responsible for the privacy practices or content of those other websites.

### Children's Online Privacy

The Children's Online Privacy Protection Act of 1998 ("COPPA") imposes restrictions on commercial websites. It is our policy to be compliant with the requirements of COPPA and not to solicit or collect Personal Information from children under age 16 ("Child") without parent or guardian consent. If you are a parent or guardian and you learn that your Child has provided us with Personal Information, please contact us. If we discover that a Child under 16 has provided us with Personal Information, we will delete such information from our servers.

### Legal Compliance

Although Caremoat makes every effort to preserve User privacy, Caremoat may need to disclose or provide access to Protected Information if Caremoat has a good faith belief that such action is necessary to comply with the law, such as in connection with a judicial proceeding, court order or legal process.

### Contact Information

Users that have any questions or suggestions regarding this Privacy Policy should contact Caremoat by email at [Wecare@caremoat.com](mailto:Wecare@caremoat.com).

### Notice and Authorization

By clicking "Agree" on the Site, you authorize Caremoat, if necessary, to use or disclose any health information collected by or provided to Caremoat for the purposes of your utilization of Caremoat's services. This authorization expires upon termination of your enrollment in and usage of Caremoat's services unless another date is indicated to Caremoat, or you revoke this authorization as discussed below.

You further agree, understand, and acknowledge your rights in relation to the following:

This Notice and Authorization is meant to address federal and state laws regulating the form and content of notices and authorizations for use and disclosure of health and genetic information, including, but not limited to, the Americans with Disabilities Act (ADA), the Genetic Information Nondiscrimination Act (GINA), Title 33, Tennessee Code Annotated, and the Health Insurance Portability and Accountability Act (HIPAA) and its regulations at 45 Code of Federal Regulations (CFR) Parts 160 and 164, and the federal Confidentiality of Alcohol and Substance Abuse Patient Records and its regulations at 42 CFR Part 2. The records released through this Authorization are protected by such confidentiality laws and regulations.

You may refuse to agree to this Notice and Authorization. However, if you refuse to provide this authorization, you may not be able utilize all of Caremoat's services. You acknowledge that signing this Authorization is voluntary, and you may revoke this Authorization by doing so in writing at any time; except to the extent that action has been taken in reliance on the information, and that the revocation does not affect any information that was released before the revocation.

Caremoat will ensure your rights of access, amendment and accounting with respect to the Personal Health Information it maintains about you on behalf of HIPAA covered entities.

You are entitled to a copy of this authorization upon request.

You further acknowledge that if it is necessary for Caremoat to disclose your information to an entity that is not a health plan or health care provider, some of the released information may no longer be protected by the above-named confidentiality laws and regulations.

You may ask questions about the health information collected about you or make requests about this Notice and Authorization by contacting Caremoat's Privacy Officer at [Wecare@caremoat.com](mailto:Wecare@caremoat.com). Further information is also available in the Privacy Notice (Tennessee) at [https://5fd7c505-6ed9-470b-aa36-53d7b530443c.filesusr.com/ugd/43322a\\_e2daa34ed3ac4fefba0ff30197aa61f.pdf](https://5fd7c505-6ed9-470b-aa36-53d7b530443c.filesusr.com/ugd/43322a_e2daa34ed3ac4fefba0ff30197aa61f.pdf).

You may also complain to Caremoat, your employer or group health plan, or the Secretary HHS if you believe your privacy rights have been violated, and no retaliatory actions will be taken against you for filing a complaint.