

External Privacy Notice

Last Updated/Effective Date: January 1, 2023

Net Health Systems, Inc. (“**Net Health**” “**we,**” “**us,**” or “**our**”) respect your privacy. This Privacy Notice describes how we process Personal Information (defined below) that we collect via the sites, applications, social media pages, or other platforms that link to it (collectively, the “**Site**”).

We may modify this Privacy Notice at any time. All changes will be effective immediately upon posting to the Site. Material changes will be conspicuously posted on the Site or otherwise communicated to you.

1. Personal Information We Collect

We may collect a range of Personal Information. “Personal Information” means information that uniquely identifies, relates to, describes, or is reasonably capable of being associated with or linked to you.

The types of Personal Information we collect may include:

- **Contact Information** – If you submit an inquiry, create a membership account, or provide information on our Site, we may collect your contact information. This may include your name, email address, demographic information, educational records, and phone number.
- **Financial Information** – If you make any donations or purchases through our Site, we will collect your financial information, including your name and payment information.
- **Location Data** – While navigating our Site, your mobile device or browser may share your location data, both through WiFi and GPS.
- **Usage Information** – When you use our Site, our servers may automatically record information, including your IP Address, browser type, referring URLs (e.g., the site you visited before coming to our Site), domain names associated with your internet service provider, and information on your interaction with the Site.
- **Employment Information** – If you apply for employment with us, we will collect your employment and work history, as well as other Personal Information related to your application. This may include your education and employment history, address and contact information, demographic information, and any other information included in your resume or application.
- **Communication Information** – We may collect audio, electronic, or visual information, which includes screen sharing views, chat communications, data in any files uploaded, emailed or otherwise provided by you, the contents of your communications with us (for example, when sent via e-mail, social media, telephone or otherwise), and inferences we may make from other Personal Information we collect.

2. How We Collect Your Personal Information

- **We May Collect Your Personal Information Directly From You** – For example, if you create an account on the Site, or request information regarding our services.
- **We May Also Collect Personal Information From Third Parties** – For example, we may work with business partners, subcontractors, advertising networks, analytics providers, and search information providers, who may provide us with Personal Information about you.
- **Through Online Tracking Technologies** – We may use cookies, device identifiers, and similar technologies such as pixels, web beacons, and local storage to collect usage and browser

information about how you use the Site. We process Personal Information collected through such technologies to help operate certain features of the Site, to enhance your experience through personalization, and to help us better understand the features of the Site that you and other users are most interested in.

- We utilize the following types of cookies:

Strictly Necessary Cookies

These cookies are fundamental to the functionality of the Site. These cookies are essential.

Performance Cookies

This type of cookie collects information on how people use the Site, to enable us to improve how the site operates. For example, Google Analytics cookies help us understand how customers arrive at the Site, browse or use the Site and highlight areas where we can improve areas such as navigation, shopping experience and marketing campaigns.

Functionality Cookies

These cookies may remember the operations such as your preference so that we can provide you with better services and improve our operation models.

Targeting Cookies or Advertising Cookies

These cookies collect information about your browsing habits in order to make advertising more personalized to you. These cookies may remember the websites you have visited and share them with the third parties, such as advertisers.

Social networking cookies

These cookies are used to enable you to share pages and content on our websites and services through third-party social networking and other websites. These cookies may also be used for advertising purposes.

Most browsers provide you with the ability to block, delete, or disable cookies, and your mobile device may allow you to disable transmission of unique identifiers and location data. If you choose to reject cookies or block device identifiers, some features of the Site may not be available, or some functionality may be limited or unavailable. Please review the help pages of your browser or mobile device for assistance with changing your settings.

We do not respond to Do Not Track (“DNT”) signals sent to us by your browser at this time. To learn more about how DNT works, please visit <http://allaboutdnt.com/>.

- **Through Analytics** – We use analytics services, including Google Analytics, to assist us with analyzing our website traffic through cookies and similar technologies. For more information on Google Analytics’ processing of your Personal Information, please see <https://policies.google.com/technologies/partner-sites?hl=en-US>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.

3. How We Use Personal Information

To the extent permitted by applicable law, we may use Personal Information to:

- operate the Site and provide support to our business functions, and provide our services;
- fulfill member requests, such as to create an account;

- protect against criminal activity, claims and other liabilities;
- send you information about our organization, services, and promotions;
- respond to reviews, comments, or other feedback provided to us;
- support and personalize the Site and our advertising efforts;
- protect the security and integrity of the Site;
- provide user support;
- the extent required for benchmarking, data analysis, audits, developing new products, enhancing the Site, facilitating product, software and applications development, improving the Site or our services, conducting research, analysis, studies or surveys, identifying usage trends, as well as for other analytics purposes;
- meet our contractual requirements;
- comply with applicable legal or regulatory requirements and our policies;
- respond to inquiries related to employment opportunities;
- market, advertise, and provide the Site and our services;
- undertake research projects to evaluate effectiveness of our services;
- communicate with you via text message or other electronic communication; and
- the extent necessary for any other lawful purpose for which the Personal Information is collected.

4. Sharing of Personal Information

We may share your Personal Information in the following circumstances:

- **For Legal Obligation or Safety Reasons** – When we have a good faith belief that access, use, preservation or disclosure of Personal Information is reasonably necessary to (a) satisfy or comply with any requirement of law, regulation, legal process, or enforceable governmental request, (b) enforce or investigate a potential violation of the Terms of Use, (c) detect, prevent, or otherwise respond to fraud, security or technical concerns, (d) support auditing and compliance functions, or (e) protect the rights, property, or safety of Net Health, its users, or the public against harm.
- **In the Case of a Merger or Sale** – If we are involved in a merger, acquisition, or any form of transfer or sale of some or all of its business, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding. Personal Information may be transferred along with the business. Where legally required we will give you prior notice and if you have a legal right to do so, an opportunity to object to this transfer.
- **To Service Providers** – When we hire a service provider to help operate the Site or our business, we may give access to Personal Information as necessary to perform services on our behalf. This may include service providers that operate our Site, send our communications, or run our promotions.
- **To Business Partners** – We may share Personal Information with our trusted business partners. For example, we may share your Personal Information if we co-sponsor a promotion or service with another organization. These partners and affiliates may use your Personal Information to, among other things, send you information or contact you about their services.

5. How Long Do We Keep Your Personal Information

We will retain your Personal Information for as long as necessary to fulfill the purposes for which it has been collected, as outlined in this Privacy Notice, or any longer retention period required by law.

6. How We Protect Your Personal Information

We use our commercially reasonable efforts to protect the confidentiality and security of Personal Information we process. However, despite these efforts to store Personal Information in a secure operating environment, we cannot guarantee the security of Personal Information during its transmission or its storage on our systems. Further, while we attempt to ensure the integrity and security of Personal Information, we cannot guarantee that our security measures will prevent third parties such as hackers from illegally obtaining access to Personal Information.

7. Your Choices and Controls

Depending on where you live, you may have the right to exercise certain controls and choices regarding our collection, use, and sharing of your Personal Information. To opt-out of marketing or electronic communications please email us at privacy@nethealth.com or by following the instructions included in the email or text correspondence.

Please note that, even if you unsubscribe from certain correspondence, we may still need to contact you with important transactional or administrative information, as permitted by law. Additionally, if you withdraw your consent or object to processing, or if you choose not to provide certain Personal Information, we may be unable to provide some or all of our services to you.

8. International Use of the Site

This Site is hosted in the United States. If you are visiting this Site from outside of the United States, please note that your Personal Information is being transferred to, stored, collected, or processed in the United States.

9. Children's Privacy

The Site and our services are not intended for people under the age of 16. We do not knowingly collect Personal Information from or about any person under the age of 16. If you are under 16 years old and wish to ask a question or use this Site or our services in any way that requires you to submit your Personal Information, please have your parent or guardian do so on your behalf.

10. Links to Third-Party Websites

We are not responsible for the practices employed by any websites or services linked to or from the Site, including the information or content contained within them. We encourage you to investigate and ask questions before disclosing Personal Information to third parties, since any Personal Information disclosed will be subject to the applicable third party's Privacy Notice.

12. Notice for California Residents

Subject to certain exemptions, this Section applies to our collection and use of "Personal Information" if you are a resident of California, as required by the California Consumer Privacy Act of 2018 and its implementing regulations ("CCPA"), as amended by the California Privacy Rights Act ("CPRA"), where "Personal Information" has the definition set forth in the CCPA. This Section describes (1) the categories of Personal Information collected and disclosed by us, (2) your privacy rights, and (3) how to exercise your rights.

We make the following disclosures regarding the categories of Personal Information (enumerated in Section 1798.140(o)(1) of the CCPA) that we have collected within the last 12 months through our website and application:

Category of Personal Information	Collected	Category of Source from which Personal Information is Collected	Purpose of Collection	Third Parties to whom Personal Information is Disclosed for a Business Purpose	Third Parties to whom Personal Information is Sold or Shared
Identifiers	Yes	Individual and third party vendors	Marketing and advertising	None	None
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Yes	Individual and third party vendors	Marketing and advertising	None	None
Protected classification characteristics under California or federal law	No	N/A	N/A	N/A	N/A
Commercial information	Yes	Individual and third party vendors	Marketing and advertising	None	None
Biometric information	No	N/A	N/A	N/A	N/A
Internet or other similar network activity	Yes	Individual and third party vendors	Marketing and advertising	None	None

Category of Personal Information	Collected	Category of Source from which Personal Information is Collected	Purpose of Collection	Third Parties to whom Personal Information is Disclosed for a Business Purpose	Third Parties to whom Personal Information is Sold or Shared
Geolocation data	Yes	Individual and third party vendors	Marketing and advertising	None	None
Sensory data	No	N/A	N/A	N/A	N/A
Professional or employment-related information	Yes	Individual and third party vendors	Marketing and advertising	None	None
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	No	N/A	N/A	N/A	N/A
Inferences drawn from other personal information	No	N/A	N/A	N/A	N/A
Sensitive Personal Information	No	N/A	N/A	N/A	N/A

We will retain each category of your Personal Information for as long as necessary to fulfill the purposes described in the “How We Use Personal Information” section above, unless otherwise required by applicable laws. Criteria we will use to determine how long we will retain your information include whether: we need your information to provide you with products or services you have requested; we continue to have a relationship with you; you have requested information, products, or services from us; we have a legal right or obligation to continue to retain your information; we have an obligation to a third party that involves your information; our retention or recordkeeping policies and obligations dictate that we retain your information; we have an interest in providing you with information about our products or services; and we have another business purpose for retaining your information.

Subject to certain exemptions, if you are a California resident you may have the following rights:

Privacy Right	Description
Notice	The right to be notified of what categories of Personal Information will be collected at or before the point of collection and the purposes for which they will be used and shared.
Access	The right to request the categories of Personal Information that we collected in the previous twelve (12) months, the categories of sources from which the Personal Information was collected, the specific pieces of Personal Information we have collected about you, and the business purposes for which such Personal Information is collected and shared. You may also have the right to request the categories of Personal Information which were disclosed for business purposes, and the categories of third parties in the twelve (12) months preceding your request for your Personal Information.
Data Portability	The right to receive the Personal Information you have previously provided to us.
Erasure	The right to have your Personal Information deleted. However, please be aware that we may not fulfill your request for deletion if we (or our service provider(s)) are required or permitted to retain your Personal Information for one or more of the following categories of purposes: (1) to complete a transaction for which the Personal Information was collected, provide a good or service requested by you, or complete a contract between us and you; (2) to ensure our website integrity, security, and functionality; (3) to comply with applicable law or a legal obligation, or exercise rights under the law (including free speech rights); or (4) to otherwise use your Personal Information internally, in a lawful manner that is compatible with the context in which you provided it.
Correction	You have the right to request that we correct any incorrect personal information that we collect or retain about you, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see below), we will correct (and direct any of our service providers that hold your data on our behalf to correct) your personal information from our records, unless an exception applies. We may deny your correction request if (a) we believe the personal information we maintain about you is accurate; (b) correcting the information would be impossible or involve disproportionate; or (c) if the request conflicts with our legal obligations.
Automated Decision Making	You have the right to request information about the logic involved in automated decision-making and a description of the likely outcome of processes, and the right to opt out. Net Health does not currently engage in any automated decision making practices.
To Opt Out of Sales or Sharing of Personal Information	You have the right to opt-out of the sale and sharing of your Personal Information. When you opt-out of sales, we will not share your Personal Information with our advertising vendors or marketing partners, including but not limited to, mortgage providers. However, for Personal Information already shared, you will need to submit your access, deletion, and opt-out requests to each partner individually. When you opt out of sharing, we will not share your Personal Information with third parties for purposes of cross-context behavioral advertising.

Limit Use of Sensitive Personal Information	Net Health does not use or disclose Sensitive Personal Information other than to provide our services to our users. However, if we used or disclosed Sensitive Personal Information for other purposes, you would have the right to opt out.
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Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a request related to your Personal Information. You may also make a request on behalf of your minor child.

You may only make a request for access or data portability twice within a 12-month period. The request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it

We must verify your identity before fulfilling your requests. If we cannot initially verify your identity, we may request additional information to complete the verification process. We will only use Personal Information provided in a request to verify the requestor’s identity. If you are an authorized agent making a request on behalf of a California consumer, we will also need to verify your identity, which may require proof of your written authorization or evidence of a power of attorney.

We endeavor to respond to requests within the time period required by applicable law. If we require more time, we will inform you of the reason and extension period in writing.

We will deliver our written response electronically via e-mail.

We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us.

We may deny certain requests, or only fulfill some in part, as permitted or required by law. For example, if you request to delete Personal Information, we may retain Personal Information that we need to retain for legal purposes.

To exercise your California rights described in this section, please contact us at privacy@nethealth.com or call us toll-free at 1-800-411-6281.

Net Health will not discriminate against you in the event you exercise any of the aforementioned rights under CCPA, including, but not limited to, by:

- denying goods or services to you;
- charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- providing a different level or quality of goods or services to you; or

- suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

The Privacy Notice is available to consumers with disabilities. To access this Privacy Notice in an alternative downloadable format, please [click here](#).

Under California Civil Code Section 1798.83, individual customers who reside in California and who have an existing business relationship with us may request information about our disclosure of certain categories of personal information to third parties for the third parties' direct marketing purposes, if any. To make such a request, send an email with the subject heading "California Privacy Rights" to privacy@nethealth.com or write to us at:

Net Health
40 24th Street
Floor 3
Pittsburgh, PA 15222

In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is covered by these California privacy rights requirements and only information on covered sharing will be included in our response. This request may be made no more than once per calendar year.

11. Changes to this Privacy Notice

We may modify or update this Privacy Notice from time to time, so please review it periodically. We may provide you with an updated Privacy Notice if material changes are made. Unless otherwise indicated, any changes to this Privacy Notice will apply immediately upon posting to the Site.

12. Contact Us

If you have any questions about our practices or this Privacy Notice, please contact us at privacy@nethealth.com. You may also write to us at:

Net Health
40 24th Street
Floor 3
Pittsburgh, PA 15222