

I. Introduction

The Patient Offer (“TPO”, “we”, “our”, “us”) is a software platform designed to help patients make payments to their health care providers. This Privacy Policy sets forth the principles that govern how we treat and protect the personal information of our visitors, users, employees, and customers (“you” or “your”). This Privacy Policy tells you how we handle the information, including health information, that we collect from or about you in order to provide you with payment services on behalf of your healthcare provider.

This Privacy Policy is distinct from your health care provider’s HIPAA Notice of Privacy Practices, which describes how your health care provider uses and discloses your individually identifiable health information (“Information”). As your health care provider’s business associate, TPO has agreed that its collection, use, and disclosure of your Information on behalf of your health care provider will be done in accordance with your health care provider’s HIPAA Notice of Privacy Practices.

Reading this Privacy Policy and your health care provider’s HIPAA Notice of Privacy Practices (which is provided to you by your health care provider) will help you understand how any Information we collect from you through the Platform or directly from your health care provider is used and/or disclosed. If there is any inconsistency between this Privacy Policy and your health care provider’s HIPAA Notice of Privacy Practices, your health care provider’s HIPAA Notice of Privacy Practices shall govern.

In general, a reference to the “Platform” in this policy means the software platform that allows you to elect to receive reminders and submit payments to your health care provider. When you use the Platform, you are accessing TPO’s back-end system. Information will be stored on this system and not on your mobile device. Note that our website may contain links to other websites that are not covered by this Policy, and we are not responsible for the privacy practices or the content of these other websites.

We are committed to fair information practices and the protection of your privacy and employees and those with whom we share personal information must adhere to this Privacy Policy. By using the Platform, you agree to accept the practices described in this Privacy Policy. If you do not agree to all the terms of this Privacy Policy, please do not use the Platform.

II. Information we Collect and Receive

We receive and use various types of personal information in order to conduct our day-to-day business activities. We aim to only collect information that is necessary and by fair means and providing notice and requiring consent when necessary.

We may collect personal information from and about the sources highlighted below:

- Third-party vendors
- Recruitment or talent agencies
- Our website, services, or social media pages
- Our business partners (non-vendors)
- Joint marketing partnerships

- Publicly available non-government and government data
- Contractors (e.g., consultants, agents, and representatives)
- Consumer reporting agencies
- Covered individuals' email accounts, chat logs, social media accounts
- Covered individuals' devices
- Directly from covered individuals
- From other individuals, such as friends or family
- Third parties (e.g., data brokers)
- Computers or devices used to access the Platform

Some of this data may be collected when:

- You apply for an account, or to do business, with us
- We establish a contractual employment or commercial relationship
- You provide us with any type of service as a vendor
- When we provide you with any type of service, product or support
- When you browse, or use our website, services, or social media pages

Categories of Personal Information Collected	Examples
A. Personal Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, contact information, or other similar identifiers.
B. Personal information categories	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
C. Protected classification characteristics under applicable state or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth, and related medical conditions), sexual orientation, veteran or

	military status, genetic information (including familial genetic information).
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
G. Geolocation data.	Physical location or movements.
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.
I. Professional or employment related information.	Current or past job history or performance evaluations.
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
L. Health Services Information	You or your healthcare provider may provide us with information about the services you have received, your insurance information, and the payments due.
M. Billing & Other Information	We or our third-party payment processors may collect and store billing information such as billing address, credit card or debit card number, bank account information, or other payment account information (e.g., Paypal or similar payment services as applicable).

N. Automatically Collected Data (Log data)	Our servers automatically record some information about your interactions with the Platform, such as number of log-ins, time and date of payments and visits to the Platform, the type of device you are using, your operating system, your Internet Protocol address, sites or apps visited before and after coming to our Platform, and data from online cookies and similar technologies, which may be collected over time and across different websites and apps.
O. Other Third Party Information	We may supplement or enhance the data we have about you with information from various third party information sources.

Types of Tracking Technologies We May Use: We may collect personal information using a variety of tracking technologies, such as cookies, web beacons, embedded scripts, browser fingerprinting, GPS, recognition technologies and location-identifying technologies (collectively "Tracking Technologies"), which may set or modify settings or configurations on your device. A "cookie" is a data file placed on your device when you visit a website that keeps a record of your use of the website. This technology can make the website more convenient for you in many ways, including by keeping you logged in even when you close the website and remembering your preferences across separate visits. We may use Tracking Technologies for a variety of purposes, including when strictly necessary to allow you to use and access the website, to assess the performance of the website, to improve the website's functionality and to deliver relevant content to you, including advertisements.

Tracking Technologies Choices and Consent: We obtain your consent to our collection of your personal information through using Tracking Technologies by providing you with transparent information in this Privacy Policy and providing you with the opportunity to make a choice to disable cookies as set forth above, unless such cookies are necessary for the services to function properly. Please note that we are not required to obtain your consent to our use of Tracking Technologies identified above that are strictly necessary. We are giving you detailed notice of the Tracking Technologies and your limited choices regarding them so that your consent is meaningfully informed.

Do Not Track: Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. Do Not Track is a technology that enables users to opt out of tracking by websites they do not visit. Currently, we do not monitor or take any action with respect to Do Not Track technology. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

Disabling Tracking Features: Regular cookies may generally be disabled or removed by tools that are available as part of most commercial browsers, and in some but not all instances can be blocked by selecting certain settings. Each browser you use will need to be set separately and different browsers offer different functionality to perform such functions. Please be aware that if you disable or remove these technologies, some parts of our website may not work and that when you revisit this website your ability to limit browser-based Tracking Technologies is subject to your browser settings and limitations.

III. Uses & Purposes for which Personal Information is Collected

The purposes for which we collect and use your personal information may vary depending on the type of relationship you have with us, such as if you are one of our employees, customers, or a website user.

Generally, we collect, use, and disclose your personal information to provide you products and services and as otherwise related to the operation of our business. For more specific detail on our disclosures of personal information, see the next section "Sharing and Disclosures to Third Parties." Subject to restrictions and obligations of applicable laws, we may use your personal information for some or all of the following business purposes:

- Processing interactions and transactions between you and us
- Managing such interactions and transactions
- Performing Services (as defined in any agreement between us and you, or as identified or included on our websites), including customer support services
- Research and development
- Fulfilling regulatory requirements and performing quality assurance
- Security
- Debugging
- Providing, understanding, and improving the Platform
- Investigating and preventing fraud and abuse
- Performing analytics

In addition, we may collect, use, and disclose your personal information for the following additional operational business purposes for which we are providing you notice as permitted by applicable law:

- **Employees and candidates:** If you apply for a job with us, we use your personal information to consider you for employment. If you have an employment or commercial relationship with us, we use your personal information to develop our contractual relationship, to conduct performance evaluations, and to comply with legal obligations, including tax and labor regulations.
- **Customers:** if you are our customer, we use your information to maintain our commercial relationship, to ensure the proper operation of the day-to-day business, to comply with tax and other regulations, and to administer sales, support, and marketing activities.
- **Patients of our customers:** We provide support services to patients that use our health care products and services or who interact with customers that use our products and services, when required.
- **Prospective customers:** Information from prospective customers is used to respond to requests for information and for sales and marketing activities.
- **Vendors and suppliers:** If you have a business or professional relationship with us, we will use your information to develop and conduct our business relationship with you, and to comply with tax and other regulations.
- **Visitors to Solutionreach facilities:** Our facilities employ physical access controls and video surveillance systems for security purposes.
- **Website and social media users:** We collect personal information from visitors and users of our website and social media pages. We may use the information to manage your account registration, to

store your preferences and settings, for marketing to you, and to analyze how you use our website and online services.

We will use personal information for the purposes disclosed above. To the extent required by law, we will inform you in advance if your personal information will be used for an additional purpose, and if required you will be given a mechanism to provide your consent.

As permitted by applicable law, we do not treat de-identified data or aggregate customer information as personal information and we reserve the right to convert, or permit others to convert, your personal information into de-identified data or aggregate consumer information. We have no obligation to re-identify such information to respond to your requests.

In addition, we may collect, use, and disclose your personal information as required or permitted by applicable law.

IV. Sharing & Disclosures

At times, we engage third-party contractors, service providers, and other vendors to help us accomplish our business objectives. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. There are other circumstances where we are required by law to disclose personal information to third parties such as public authorities.

We may disclose the information that we collect: (a) as and when authorized by your health care provider, for purposes of your health care provider's treatment, payment health care operations and other purposes permitted by applicable law; (b) to our service providers and affiliates who work on our behalf and have agreed to adhere to the rules set forth in this Privacy Policy and contracts required by applicable law and our agreements with your healthcare provider; (c) to law enforcement, governmental entities or other third parties pursuant to appropriate legal process; or (e) otherwise with your consent in accordance with our agreement with your healthcare provider and applicable law.

We may buy or our business or a portion of our business or assets may be bought by other businesses or entities. In such event, we may transfer or assign the information we have collected as part of such merger, acquisition, sale change of control or other disposition of assets. In such transactions, your information may be included in the transferred business assets. Also, in the unlikely event of our bankruptcy, insolvency, reorganization, receivership or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how your information is treated, transferred, or used and your personal information may be included in the transferred assets.

We may share aggregate or de-identified information, such as statistical information, with third parties.

You may update billing information, including settings for recurring payments, by logging in to your account. If your contact information changes, please both inform your health care provider and update the information in your account. If you no longer wish to receive communications from Cedar, please inform your health care provider. You also have the rights set forth in your healthcare provider's notice of privacy practices.

a. Categories of personal information that may be disclosed for business purposes or sold:

- Personal Identifiers
- Personal Information Records
- Protected Classifications
- Commercial Information
- Biometric Information
- Internet Usage Information
- Geolocation Data
- Sensory Data
- Professional or Employment Information
- Non-public Education Information
- Inferences from Personal Information Collected

For clarification, while we do not sell personal information as it relates to patient data, we may share personal information related to our customers for business purposes.

b. Who we share personal information with:

We may disclose your personal information for a business purpose to the following:

- Third parties to whom you authorize us to disclose your personal information in connection with the products or services we provide to you
- Customers
- Business partners
- External auditors
- Internal employees, including executives / board of directors
- Public authorities / government bodies
- Service providers and vendors, such as for advertising or marketing purposes, internet service providers, data analytic providers, operating systems and platforms, and social networks
- Our subsidiaries and affiliates

We engage with third-party contractors, service providers, and other vendors for certain services. If the engagement involves the transmission of personal information, a contract to protect the personal information is executed before any data is disclosed, and we direct the service provider to treat that data consistent with legal requirements.

In certain circumstances, we may be required to disclose personal information when required by law, when required to protect our legal rights, or in an emergency situation where the health or security of an individual is endangered.

We may also disclose certain personal information in the context of any sale or transaction involving all or a portion of the business.

c. Personal information of children:

Our services are not directed to children. If a parent or guardian becomes aware that his or her child has provided us with personal information without their consent, please contact us.

V. Security

We are committed to the security, confidentiality, and integrity of personal information in accordance with legal requirements. We take commercially reasonable precautions to keep personal information secure against unauthorized access and use, and we periodically review our security measures. We are committed to processing your data in a secure manner and have put in place specific safeguards to prevent the personal information we hold from being compromised.

We secure the connection between our websites and your browser with website security certificates. Please be aware that these protection tools do not protect information that is not collected through our website, such as information provided to us by email.

We also conduct risk assessments, train our staff to understand the importance of protecting personal information, and responsibly manage access rights within our company. We include both physical security and IT security in our overall data security approach. In addition, we are diligent in selecting vendors that also ensure appropriate technical and organizational measures are undertaken to protect data.

You must promptly notify us about any security incidents of which you become aware, such as if your username or password is lost, stolen or used without permission or if you become aware of operational or security failures, incidents, system problems, concerns, or other security-related incidents impacting our website or services.

Regulatory Authorities:

We will cooperate with inquiries made by any legitimate government regulatory authority.

Changes to this Privacy Policy

We reserve the right to change this Privacy Policy from time to time by posting a new Privacy Policy to this page. You are advised to check this Privacy Policy regularly for any changes. By continuing to use the Platform after such changes have been made, you agree to those changes. If we make any material changes to this Privacy Policy, we will either notify you or place a prominent notice on our website and mobile app.

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Contact Information.

If you have any privacy concerns or questions about how your personal information is used, please feel free to contact us at:

The Patient Offer

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Attn: Legal and Compliance

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