

## TigoHealth Privacy Policy

**Last Updated:** [4-22-2020]

TigoHealth, Inc. and its affiliates (“TigoHealth,” “we,” “our,” and/or “us”) value the privacy of individuals who use our website, mobile app, and related services (collectively, our “Services”). This privacy policy (the “Privacy Policy”) explains how we collect, use, and share information from or about TigoHealth users (“Users”) or their devices. By using our Services, you agree to the collection, use, disclosure, and procedures this Privacy Policy describes. Beyond the Privacy Policy, your use of our Services is also subject to our Terms of Service.

### **INFORMATION WE COLLECT**

We may collect a variety of information from or about you or your devices from various sources, as described below.

If you do not provide your information when requested, you may not be able to use our Services if that information is necessary to provide you with our Services or if we are legally required to collect it.

#### **A. Information You Provide to Us.**

**Registration and Profile Information.** When you sign up for an account, register to use our Services, sign up for notifications or updates, or participate in our surveys, we ask you for your [name, email address, phone number, home address, birthday, ethnicity, and gender], and any other information we collect.

[**Payment Information.** When you [add a credit card or payment method to your account / make a purchase] [we will collect that payment card information / a third party service provider that handles payments for us will receive your payment card information].]

**Communications.** If you contact us directly, we may receive additional information about you. For example, when you contact our Customer Support Team, we will receive your name, email address, phone number, the contents of a message or attachments that you may send to us, and other information you choose to provide. [If you subscribe to our newsletter, then we will collect certain information from you, such as your email address.] [When we send you emails, we may track whether you open them to learn how to deliver a better customer experience and improve our Services.]

#### **B. Information We Collect When You Use Our Services.**

**Location Information.** When you use our Services, if you allow us, we will receive your precise location information when you trigger the emergency services in our app.

[We may also collect the precise location of your device when the app is running in the foreground or background / when the app is closed.] We also infer your more general location information (for example, your IP address may indicate your more general geographic region).

**Device Information.** We receive information about the device and software you use to access our Services, including internet protocol (IP) address, web browser type, operating system version, phone carrier and manufacturer, application installations, device identifiers, mobile advertising identifiers, and push notification tokens.

**Usage Information.** To help us understand how you use our Services and to help us improve them, we automatically receive information about your interactions with our Services, like the pages or other content you view, the searches you conduct, your comments, and the dates and times of your visits.

**Information from Cookies and Similar Technologies.** We and third party partners collect information using cookies, pixel tags, or similar technologies. Our third party partners, such as analytics and advertising partners, may use these technologies to collect information about your online activities over time and across different services. Cookies are small text files containing a string of alphanumeric characters. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to our Services.

Please review your web browser's "Help" file to learn the proper way to modify your cookie settings. Please note that if you delete or choose not to accept cookies from the Service, you may not be able to utilize the features of the Service to their fullest potential.

### **C. Information We Receive from Third Parties.**

**Other third parties.** We may receive additional information about you, including health and medical information and records, from third parties such which may include medical providers, as well as information from data or marketing partners, and combine it with other information we have about you. If we receive any information we receive from a medical provider, such medical provider is responsible for complying with applicable laws, such as the Health Insurance Portability and Accountability Act (HIPAA) and obtaining all necessary consents and/or authorizations in order to share such information with us.

### **HOW WE USE THE INFORMATION WE COLLECT**

We use the information we collect:

- To provide, maintain, improve, and enhance our Services;
- To communicate with you, provide you with updates and other information

relating to our Services, provide information that you request, respond to comments and questions, and otherwise provide customer support;

- For marketing purposes, such as developing and providing promotional and advertising materials that may be useful, relevant, valuable or otherwise of interest to you;
- To personalize your experience on our Services such as presenting tailored content;
- To send you text messages and push notifications;
- To de-identify and aggregate information collected through the Services and use it for any lawful purpose, which may include the sale of de-identified data to a third party in accordance with applicable law;
- To find and prevent fraud, and respond to trust and safety issues that may arise;
- For compliance purposes, including enforcing our Terms of Service or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency; and
- For other purposes for which we provide specific notice at the time the information is collected.

## **HOW WE SHARE THE INFORMATION WE COLLECT**

**Affiliates.** We may share any information we receive with our affiliates for any of the purposes described in this Privacy Policy.

**Vendors and Service Providers.** We may share any information we receive with vendors and service providers retained in connection with the provision of our Services.

**Analytics Partners.** We use analytics services such as Google Analytics to collect and process certain analytics data. These services may also collect information about your use of other websites, apps, and online resources. You can learn about Google's practices by going to <https://www.google.com/policies/privacy/partners/>, and opt-out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

**[Advertising Partners.** We work with third party advertising partners to show you ads that we think may interest you. These advertising partners may set and access their own cookies, pixel tags and similar technologies on our Services and they may otherwise collect or have access to information about you which they may collect over time and across different online services. Some of our advertising partners are members of the Network Advertising Initiative (<http://optout.networkadvertising.org/?c=1#!/>) or the Digital Advertising Alliance (<http://>

[optout.aboutads.info/?c=2&lang=EN](http://optout.aboutads.info/?c=2&lang=EN)). If you do not wish to receive personalized ads, please visit their opt-out pages to learn about how you may opt out of receiving web-based personalized ads from member companies. You can access any settings offered by your mobile operating system to limit ad tracking, or you can install the AppChoices mobile app to learn more about how you may opt out of personalized ads in mobile apps.]

**As Required By Law and Similar Disclosures.** We may access, preserve, and disclose your information if we believe doing so is required or appropriate to: (a) comply with law enforcement requests and legal process, such as a court order or subpoena; (b) respond to your requests; or (c) protect your, our, or others' rights, property, or safety. For the avoidance of doubt, the disclosure of your information may occur if you post any objectionable content on or through the Services.

**Merger, Sale, or Other Asset Transfers.** We may disclose and transfer your information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our business or assets.

**Consent.** We may also disclose information from or about you or your devices with your permission.

## **YOUR CHOICES**

**Location Information.** You can prevent your device from sharing precise location information at any time through your device's operating system settings. However, location is core to our Services and without it, you may not be able to successfully use our Services.

**Marketing Communications.** You can unsubscribe from our promotional emails via the link provided in the emails. Even if you opt-out of receiving promotional messages from us, you will continue to receive administrative messages from us.

**Do Not Track.** There is no accepted standard on how to respond to Do Not Track signals, and we do not respond to such signals.

If you choose not to provide us with information we collect, some features of our Services may not work as intended.

## **THIRD PARTIES**

Our Services may contain links to other websites, products, or services that we do not own or operate. We are not responsible for the privacy practices of these third parties. Please be aware that this Privacy Policy does not apply to your activities on these third party services or any information you disclose to these third parties. We

encourage you to read their privacy policies before providing any information to them.

## **SECURITY**

We make reasonable efforts to protect your information by using physical and electronic safeguards designed to improve the security of the information we maintain. However, as our Services are hosted electronically, we can make no guarantees as to the security or privacy of your information.

## **CHILDREN'S PRIVACY**

We do not knowingly collect, maintain, or use personal information from children under 18 years of age, and no part of our Services are directed to children. If you learn that a child has provided us with personal information in violation of this Privacy Policy, then you may alert us at [info@tigohealth.com](mailto:info@tigohealth.com).

## **YOUR CALIFORNIA PRIVACY RIGHTS**

If you reside in California and have provided your personal information to us, you may request information once per calendar year about our disclosures of certain categories of personal information to third parties for their direct marketing purposes. Such requests must be submitted to us in writing at [info@tigohealth.com](mailto:info@tigohealth.com).

## **INTERNATIONAL VISITORS**

Our Services are hosted in the United States and intended for visitors located within the United States. If you choose to use the Services from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your personal information outside of those regions to the United States for storage and processing. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Services. By providing any information, including personal information, on or to the Services, you consent to such transfer, storage, and processing.

## **UPDATE YOUR INFORMATION**

You can update your account and profile information or close your account through your profile settings.

## **CHANGES TO THIS PRIVACY POLICY**

We will post any adjustments to the Privacy Policy on this page, and the revised version will be effective when it is posted. If we materially change the ways in which we use or share personal information previously collected from you through the

Services, we will attempt to notify you through the Services, by email, or other means.

**CONTACT INFORMATION**

If you have any questions, comments, or concerns about our processing activities, please email us at [info@tigohealth.com](mailto:info@tigohealth.com) or write to us at:

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