

TreatAnyone, Inc. Privacy Policy
Effective Date: 8/1/2020
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INTRODUCTION

TreatAnyone, Inc. (“TreatAnyone”, “we”, or “us”) respects your privacy and is committed to protecting personal data we may collect from visitors and any other individual or entity (“User” “you”, or “your”) through our compliance with this privacy policy (“Privacy Policy”). This Privacy Policy applies to data collection by TreatAnyone and shall apply to your use of the publicly accessible portions of this web site at <https://www.treatanyone.com> (the “Site”) and other TreatAnyone-related sites, applications, software, communications, capabilities and services (“Services”). We have established and implemented this Privacy Policy to inform you, the User of the Site, of the type of information collected by us and how we use and protect such information.

PLEASE READ THIS PRIVACY POLICY CAREFULLY TO UNDERSTAND OUR POLICIES AND PRACTICES REGARDING YOUR INFORMATION AND HOW WE WILL TREAT IT. IF YOU DO NOT AGREE WITH OUR POLICIES AND PRACTICES, YOU MAY CHOOSE NOT TO USE OUR SITE. BY ACCESSING OR USING THIS SITE, YOU AGREE TO THIS PRIVACY POLICY. THIS POLICY MAY CHANGE FROM TIME TO TIME. YOUR CONTINUED USE OF THIS WEBSITE AFTER WE MAKE CHANGES IS DEEMED TO BE ACCEPTANCE OF THOSE CHANGES, SO PLEASE CHECK THE POLICY PERIODICALLY FOR UPDATES.

Irrespective of which country you live in, you authorize us to transfer, store, and use your information in the United States, and any other country where we operate. In some of these countries, the privacy and data protection laws and rules regarding when government authorities may access data may vary from those in the country where you live. Learn more about our data transfer operations in the “Storage and Transfer of Information” section below. If you do not agree to the transfer, storage and use of your information in the United States, and any other country where we operate, please do not use the Sites or Services.

WHEN THIS PRIVACY POLICY APPLIES

Our Privacy Policy applies to all of the Services offered by TreatAnyone, and Services offered on our Site, but excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you, or other sites linked from our Services. Our Privacy Policy does not cover the information practices of other companies and organizations who advertise on our Services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

THE INFORMATION WE COLLECT

When you use our Site or Services, we may collect personal information about you.

Website

We collect certain information, including personal information that you choose to provide us about yourself, including your name and email address. You may choose to share this personal information with us, including, but not limited to, when you visit our Site, fill out a form on our Site, and in connection with other services, features or resources we make available on our Site. You can visit this Site without telling us who you are or revealing any personal information about yourself.

Services and Platform

In addition to the above information, when you use our platform, an online payment card transaction may be required. During this process, you may provide us with the first and last name of the payment card owner, credit card billing address, payment card number, payment card expiration date, card verification value ("CVV"), phone number and email address.

Information We Obtain from Your Use of Our Site and Services

We collect certain information automatically, such as your operating system version, browser type, and internet service provider. When you use our Site, we automatically collect and store this information in service logs. This includes: details of how you used our Site; Internet protocol address; and cookies that uniquely identify your browser. The information we collect automatically is statistical data and may or may not include Personal Information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties.

Cookies and Similar Technologies

We and our customers use various technologies to collect and store information when you visit our Site or the Services, and this may include using cookies or similar technologies to identify your browser or device. We also use these technologies to collect and store information when you interact with Services on behalf of our customers, such as analytics services.

Our third party analytics partners include Google, Amazon, Penzo and similar partners, as well as advertising tracking companies, advertising agencies, mobile advertising platforms, advertisers, including app developers and publisher, mobile publishers, and analytics platforms.

The technologies we use for this automatic data collection may include:

Cookies

A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Services. Unless you have adjusted your browser

setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Services.

Web Beacons

Pages of our Services or our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an e-mail and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

Please note that if you do not provide us with personal information, your ability to use certain aspects of our Site and the Services may be limited.

THE INFORMATION WE PROCESS ON BEHALF OF CUSTOMERS

TreatAnyone customers engage us to deliver Services to their employees and other users. Customer information, and information about our customers' contacts and archival information (each defined below) are governed by this Privacy Policy, the Terms and Conditions and any other services agreements between TreatAnyone and the applicable customer.

TreatAnyone Customer Information. We collect information about individuals within our customers' organizations ("Customer Information"). Customer Information may include information related to the customer's account, name, work e-mail address, work phone number, job title or similar kinds of information. We use Customer Information to support the customer account, maintain our business relationship with the customer, respond to customer inquiries, or perform accounting functions. TreatAnyone customers may update personal information and password by logging into the TreatAnyone Platform and updating their account. TreatAnyone customers may contact TreatAnyone support in order to delete their Personal Data. In some cases, we may not be able to delete Customer Information, and in such cases we will tell you why.

Information about our Customers' Contacts. We collect information about any contacts, such as patients, insured parties, and others, that may be uploaded into the TreatAnyone Platform ("Information about our Customers' Contacts"). Information about our Customer's Contacts may include name, e-mail address, phone number, job title, or similar kinds of information. We use Information about our Customer's Contacts for the purposes of providing Services to such contacts. TreatAnyone customers may update or delete Information about their contacts in the TreatAnyone Platform. TreatAnyone customers may also contact TreatAnyone support in order to update and delete such information.

TreatAnyone may, in our capacity as a business associate, collect public health information ("PHI") at the direction of our customers. TreatAnyone has no direct relationship with the individuals whose PHI it processes. If you are a client of a TreatAnyone customer and would no longer like to be contacted by that customer, please directly contact the customer with whom you interact. TreatAnyone will only use or disclose such information as permitted by the controlling business

associate agreement or as otherwise permitted by law. In addition, TreatAnyone handles all PHI in strict accordance with applicable laws and regulations.

To the extent we receive protected health information from customers that are Covered Entities under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), we may use such information to provide data aggregation services and to create de-identified data in accordance with 45 C.F.R. 164.514(a)-(c) retaining any and all ownership claims relating to the de-identified data we create from protected health information. TreatAnyone may use during and after this agreement, all aggregate non-identifiable information and de-identified data for purposes of enhancing the Site, technical support and other business purposes, all in compliance with HIPAA and its implementing regulations.

Archival Information. We collect User information for archival purposes on behalf of, and as directed by, our TreatAnyone customers for the purpose of improving health management. This information may include User Personal Data, User communications with customers, among other forms of data or electronic communications (“Archival Information”). Our TreatAnyone customer’s privacy policies or practices apply to Archival Information, the purposes for which the TreatAnyone customer collects Archival Information, how the TreatAnyone customer may use Archival Information and what choices the individual may have with respect to Archival Information. Individuals must contact the applicable TreatAnyone customer in order to correct, amend, or delete their information, or to opt out of any collection, uses or disclosure of their information by our TreatAnyone customer.

Automatically Collected Information. We collect information automatically about how our TreatAnyone customers use our services (“Automatically Collected Information”). We do this via data collection technologies such as cookies, web beacons, gifs or other tracking technologies. We collect this information in order to monitor, support and improve our services or to provide TreatAnyone customers with certain customized features. We may use Automatically Collected Information to tell us how our TreatAnyone customers use our services, to improve our services or develop new products, services or features. We may combine this information with other information we collect.

We treat Customer Information, Information about our Customer’s Contacts, Archival Information and Automatically Collected Information as the confidential and proprietary information of our TreatAnyone customers, subject to the terms of the TreatAnyone Terms and Conditions and any other service agreement between TreatAnyone and the customer. We do not share Customer Information, Information about our Customer’s Contacts, Archival Information or Automatically Collected Information with third parties unless directed to do so by our Customer, as may be necessary to provide services to the customer, to our advisors, affiliates, representatives, agents, service providers, in connection with a business transaction (such as a merger or sale), as allowed under the terms of our agreement with our customer, or in response to a court order, subpoena, warrant or to comply with a legal requirement or to cooperate with an investigation. We may disclose Customer Information, Information about our Customer’s Contacts, Archival Information or Automatically Collected Information for the aforementioned reasons, or in order to protect our

rights or the rights of our affiliates, TreatAnyone customers, business customers or service providers.

We will retain Customer Information we process on behalf of our TreatAnyone customers for as long as needed to provide services to our customer, or for the period of time requested by a particular customer.

HOW WE USE INFORMATION WE COLLECT

We use your personal data in ways that are compatible with the purposes for which it was collected or authorized by you, including for the following purposes:

- To inform you about services available from TreatAnyone;
- To authorize access to our Sites and Services;
- To provide you with Services;
- To personalize the User experience;
- To run a promotion, contest, survey or other Site feature;
- To administer content or other Site features;
- To communicate about our Services and to deliver pertinent emails;
- To comply with all applicable legal requirements;
- To investigate possible fraud or other violations of our Terms of Use or this Privacy Policy and/or attempts to harm our Users.

We use the information we collect from our Site to provide, maintain, and improve the Site, to develop new services, and to protect our Company and our Users.

We use information collected from cookies and other technologies, to improve your user experience and the overall quality of our Services. We can then develop statistics that help us understand how our visitors use our Site and how to improve it. We may also use the information we obtain about you in other ways for which we provide specific notice at the time of collection.

We will ask for your consent before using information for a purpose other than those set out in this Privacy Policy.

DO WE SHARE THE INFORMATION WE COLLECT?

We may disclose your personal information to third parties in order to comply with law, to law enforcement or other governmental agencies, to enforce or protect our rights in or otherwise with respect to, or the safety of, our Site, to protect the safety or rights of other users of our Site.

We provide non-identifiable, aggregated information to our affiliates or other trusted businesses or customers to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. These third parties may include

business-related service providers. It is our policy to only share personal information with contractors, service providers and other third parties who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them. Under certain circumstances, you may avoid having us share your information with our business customers and vendors by not granting us permission to share your information. Not granting us permission to share your information with our business customers or vendors may limit your access to their services through the Site. We do not share personal information with third parties for their own marketing purposes.

We may compile and share your information in aggregated form (i.e., in a manner that would not personally identify you) or in de-identified form so that it cannot reasonably be used to identify an individual (“De-Identified Information”). We may disclose such De-Identified Information publicly and to third parties, for example, in public reports about exercise and activity. TreatAnyone may also disclose De-Identified Information for general research purposes and in research collaborations with third parties, such as universities, hospitals or other laboratories to determine the prevalence of particular conditions among Users or to determine whether a User might be suitable for research or clinical trials.

If we establish a new related entity, are acquired by or merged with another organization, or if substantially all of our assets are transferred to another organization, personal information about our Users is often a transferred business asset. In the event that TreatAnyone itself or substantially all of our assets are acquired, personal information about our Users may be one of the transferred assets.

YOUR CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

We strive to provide you with choices regarding the personal information you provide to us. Whenever you use our Services, we aim to provide you with choices about how we use your personal data. We also aim to provide you with access to your Personal Data. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. Subject to applicable law, you may obtain a copy of personal information we maintain about you or you may update or correct inaccuracies in that information by contacting us. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to the information. In addition, if you believe that personal information we maintain about you is inaccurate, subject to applicable law, you may have the right to request that we correct or amend the information by contacting us as indicated in the How to Contact Us section below.

By providing an email address on the TreatAnyone Site, you agree that we may contact you in the event of a change in this Privacy Policy, to provide you with any service-related notices, or to provide you with information about our events, invitations, or related educational information.

For purposes of this Privacy Policy, “opt-in” is generally defined as any affirmative action by a user to submit or receive information, as the case may be.

We currently provide the following opt-out opportunities:

- At any time, you can follow a link provided in offers, newsletters or other email messages (except for e-commerce confirmation or service notice emails) received from us to unsubscribe from the service.
- At any time, you can contact us through email at support@treatanyone.com or the address or telephone number provided below to unsubscribe from any services or to opt-out of our right per your consent under the terms of this Privacy Policy to share your Personal Information.

Notwithstanding anything else in this Privacy Policy, please note that we always reserve the right to contact you in the event of a change in this Privacy Policy, or to provide you with any service related notices.

THIRD-PARTY SITES

The Sites may contain links to webpages operated by parties other than TreatAnyone. We do not control such websites and are not responsible for their contents or the privacy policies or other practices of such websites. Our inclusion of links to such websites does not imply any endorsement of the material on such websites or any association with their operators. Further, it is up to the User to take precautions to ensure that whatever links the User selects or software the user downloads (whether from this Site or other websites) is free of such items as viruses, worms, trojan horses, defects and other items of a destructive nature. These websites and services may have their own privacy policies, which the user will be subject to upon linking to the third party's website. TreatAnyone strongly recommends that each User review the third party's terms and policies.

STORAGE AND TRANSFER OF INFORMATION

We may, directly or indirectly through third-party entities around the world, process, store, and transfer all of the information you provide, including your personal information, as described in this Privacy Policy. Specifically, the information and personal information that we collect from you may be transferred to, and stored in a country with laws which are different, and potentially not as protective, as the laws of your own country. By submitting your information and personal information and using the Site, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Policy.

RIGHTS TO ACCESS AND CONTROL YOUR PERSONAL INFORMATION

Where provided under applicable law, you may request a copy of the personal information about you that we hold, and you may ask about all recipients of the information, the purpose of the processing, request the correction of incorrect information, and request the blocking and deletion of such information by contacting us at support@treatanyone.com. You may have the right, where provided under applicable law, to ask us not to process your personal information.

You may have the right, where provided under applicable law, to ask us not to process your personal information for direct marketing purposes. You can also exercise the right at any time by contacting us support@treatanyone.com.

We will retain your personal information for as long as needed to provide you with any services which you request. We will retain and use your personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

YOUR CALIFORNIA PRIVACY RIGHTS

California Civil Code Section § 1798.83 permits Users of our Site that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please write to us at the address listed in the How to Contact Us section below. We do not disclose personal information to third parties for the third parties' direct marketing purposes.

Your Rights With Respect to Personal Data

Some data protection laws, including some U.S. state laws, provide you with certain rights in connection with Personal Data you have shared with us. You may have the following rights:

- *The right to be informed.* You are entitled to be informed of the use of your Personal Data. This Privacy Policy provides such information to you.
- *The right of access.* You have the right to request a copy of your Personal Data which we hold about you.
- *The right to be forgotten:* You have the right to request us, at any time, to delete your Personal Data from our servers and to erase your Personal Data when it is no longer necessary for us to retain such data. Note, however, that deletion of your Personal Data will likely impact your ability to use our Site or Services.
- *The right to object (opt-out):* You have the right to opt-out of certain uses of your Personal Data at any time.
- *The right to data portability:* You have the right to a “portable” copy of your Personal Data that you have submitted to us. Generally, this means your right to request that we move, copy or transmit your Personal Data stored on our servers / IT environment to another service provider's servers / IT environment.

HOW WE PROTECT PERSONAL INFORMATION

TreatAnyone maintains administrative, technical and physical safeguards designed to protect the User's Personal Data and information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. We implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, taking into account technological reality, cost, the scope, context and purposes of processing weighted against the severity and likelihood that the processing could threaten individual rights and freedoms. For example, we use

commercially reasonable security measures such as encryption, firewalls, and transport layer security (TLS) or hypertext transfer protocol secure (HTTPS) to protect Personal Data.

CHILDREN UNDER THE AGE OF 16

The Site is not intended for use by children. We do not intentionally gather Personal Data about visitors who are under the age of 16. If a child has provided us with Personal Data, a parent or guardian of that child may contact us to have the information deleted from our records. If you believe that we might have any information from a child under age in the applicable jurisdiction, please contact us at privacy@maximiliandigital.net. TreatAnyone customers may collect Personal Data of children under the age of 16, TreatAnyone has no direct relationship with the individuals. If we learn that we have inadvertently collected the personal information of a child under 16, or equivalent minimum age depending on jurisdiction, we will take steps to delete the information as soon as possible.

CHANGES TO THIS PRIVACY POLICY

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services or programs, email notification or privacy policy changes).

HOW TO CONTACT US

If you have any specific questions about this Privacy Policy, you can contact us via email or by writing to us at the address below:

Send e-mail to: support@treatanyone.com.

Send mail to our address:

TreatAnyone
Attn: Privacy Policy Inquiry
1245 B Street, Suite 100
Hayward, CA 94541
U.S.A.