



## Privacy Policy

Updated: March 31, 2025

**Please click [here](#) for a printable PDF version of this notice.**

### INTRODUCTION

This Privacy Policy (this “Policy”) describes how Integrated Practice Solutions LLC (dba ACOM Health) (“ACOM Health” or “we” or “our”) collects, uses, stores, and discloses information about you, including information we collect directly from you or automatically when you visit our websites, including [www.acomhealth.com](http://www.acomhealth.com) and any other websites owned by ACOM Health that link to or include this Policy including without limitation our cloud services platform (the “Cloud Services”) (collectively, the “Websites”), offline, or when you use our other products or services as described in this Policy (the Websites, products, and services are, collectively, our “Services”). Your participation in or use of any of our Services is voluntary and may be further subject to applicable subscription, support, terms, services, or other agreements between your organization and ACOM Health. ACOM Health is considered the “controller” of the information processing subject to this Policy.

**Notice to Patients:** If you are a patient of a Clinic, the Clinic and/or its practitioners control your patient information, including your contact information, billing details, and patient records, and this Policy does not apply to such information. Please contact your Clinic directly for any questions about your patient information. If a Clinic provides you access to our Services, except as you may otherwise indicate to us through your use of the Services or by withdrawing your consent as set out in this Policy, you consent to us disclosing your personal information to such Clinic, including your personal health information, for purposes of your Clinic providing you with care. See the section titled “PATIENT DATA” below for further information.

In this Policy, we use the word “you” to refer to any individual user of our Services, such as an individual using and browsing our Websites or a practitioner or staff member at a clinic or practice, and we use the word “Clinic” to refer to anyone who has subscribed to and paid for our Cloud Services (for example, a health practice, clinic, or health practitioner).

Please read this 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, your choice is not to use our Services. By accessing or using our Services, you agree to our collection of data and disclosure practices and other activities as described in this Policy.

This Policy may change from time to time (see “Changes to Our Privacy Policy” below). Your continued use of our Services after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

## **INFORMATION WE COLLECT ABOUT YOU**

We collect several types of information from and about users of our Services that is defined as personal information, personal data, or personally identifiable information under an applicable law (“personal information”). This includes information:

- **You choose to give us.** You may choose to give us personal information directly in a variety of situations. For example, you may give us your name and contact information to communicate with you, to order a product, to process an order, to register for a service, to provide you with a subscription, or to do business with us if you are a supplier or a business partner. You may also provide your credit card details to buy something from us or may share a description of your education and work experience in connection with a job opening at ACOM Health for which you wish to be considered. When you request information, download materials, enroll for a live or virtual event, request a trial, or respond to surveys, we ask you to provide your name and contact information, as well as other information in connection with your request. We use this information in connection with your request, to provide our Services and support, for marketing purposes, and to communicate with you. This information may also identify you when you visit our Websites.
- **Automatically collected when You Visit our Websites.** We automatically collect information when you visit one of our Websites which helps us provide you with access to our Websites, operate our Websites, comply with various requirements (such as but not limited to security and legal requirements), and for other purposes described in this Policy. Such information includes passwords, IP address, location, and browser settings. For example, when you visit our Websites or access our Services, we log certain information that your browser sends us, such as your IP address (including information deriving from your IP address such as your geographic location), browser type, device identifiers (such as IP address or Ad Id), internet service provider, version, language, access time, duration of access, and referring and exiting website addresses. We also collect information about the pages you view within our Websites, the time you spent on each Website, and other actions you take while visiting our Websites. We also collect information to personalize your website experience, such as recording your preferences and settings, to collect statistics to help us improve and further develop our Services including our Websites, and to use for marketing and promotional activities. In

addition, some of our Services may include tracking technologies that allow ACOM Health to collect certain information about the use of Services, and we also use such tracking technologies to determine whether you've opened an e-mail or clicked on a link contained in an e-mail. For details regarding the tracking technologies we employ, see "INFORMATION WE COLLECT THROUGH AUTOMATIC DATA COLLECTION TECHNOLOGIES" below.

- **About Your Usage.** We collect information about your use of our Services, whether through products, websites, mobile phones, or apps. We do so to enable product features to operate, improve your user experience, tailor our interactions with you, inform our clients on the overall use of the Services, provide support, provide promotional offers and messages, and improve and develop our products and services. This includes information you provide by filling in forms supplied on our Services, using our Services, and information provided on or through our Services at the time of booking a demonstration time, registering to view a piece of content (e.g., downloading a whitepaper), making online orders, posting material, making an inquiry, submitting feedback and inquiries, using our chat support feature, or requesting any other information or services. We also ask you for information when you enter a contest or promotion sponsored by us, or when you report a problem with our Services. You may be required to provide credit card or other financial information before placing an order through our Services.
- **You provide when you contact us (online or offline).** You provide us your information in connection with a request for information, to order a product or service, to provide you with support, or to participate in a forum or other social computing tool, which may be needed by us to fulfill your request, to grant you access to the product or service, to provide you with support, and to contact you. For instance, we collect your name and contact information, details about your request, your order and your agreement with us, and the fulfillment, delivery, and invoicing of your order and we may use this information to provide future marketing messages and services. When you provide your name and contact information to register in connection with such a request, the registration serves to identify when and where you visit our Websites and any other digital property or activity. We also collect records and copies of your correspondence (including email addresses and the content within such correspondence) if you contact us.
- **We collect for marketing purposes.** We collect information (online or offline) in relation to marketing activities including online and offline engagements with our customers. We combine the information we collect to develop aggregate analyses

and business intelligence for conducting our business and for marketing purposes. We also use the information we collect for promotional and advertising purposes, in aggregate and individually. When you visit our Websites, social media, or any other digital property, or when you use our Services, we collect information from you and provide you with personalized experiences based on data collected. From time to time, we also collect information that pertains to you through other sources, such as list vendors. When you register for an event, we collect additional information (online or offline) in relation to the event, and we also collect information during an event, such as participation in sessions and survey results. Events may be recorded and group photos taken. We reserve the right to use such recordings and photos for promotional use. When you provide us with your contact information (such as by handing over a business card), we use this to communicate with you. The information that we collect, either directly or indirectly, is combined to help us improve its overall accuracy and completeness, and to help us better tailor our interactions with you.

- **Related to Your Social Media Accounts.** If you use social media single sign-on, we may collect your social media identification and other information from the social media network that you have authorized to share with us.
- **About your Use of Our Services.** We collect information about your use of our Services to enable product features to operate, improve your user experience, tailor our interactions with you, inform our clients on the overall use of the services, provide support, provide promotional offers and messages, and improve and develop our products and services.
- **Provided by Third Parties.** We receive information that our clients, prospects, partners, or suppliers provide us in connection with our relationship with them, such as contact information (such as name, contact details, position, or title of their employees, contractors, advisors, and authorized users), for purposes such as contract management, fulfillment, delivery of products and services, provision of support, invoicing and management of the services, advertising, marketing and promoting our Services, and otherwise in furtherance of our relationship.
- **Purchased from Data Brokers.** We purchase data from data brokers to supplement the data we collect.
- **Other Information.** We also collect information related to your personal preferences such as but not limited to email and communication preferences, and other optional questions about your purchase behavior.

- **Publicly available.** We collect information that is publicly available, including information in the public domain.

## **INFORMATION WE COLLECT THROUGH AUTOMATIC DATA COLLECTION TECHNOLOGIES**

As you navigate through and interact on our Services, we use automatic data collection technologies to collect certain information about you, your devices, browsing actions, and patterns, including but not limited to:

- Details of your visits to our Websites and use of our Services, including usage and effectiveness, traffic data, location data, logs, other communication data, and the resources that you access and use on our Services.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also use these technologies to collect information about your online activities over time and across third-party websites or apps or other online services (behavioral tracking). For more information, see “Choices About How We Use and Disclose Your Information.”

The information we collect automatically may be aggregated or de-identified data but may also include personal information, and we maintain it or associate it with other personal information we collect in other ways or receive from third parties. It helps us to improve our Services and to deliver a better and more personalized service, including but not limited to enabling us to estimate usage patterns, recognize you when you return to our Services, speed up your searches, and store information about your preferences which enable us to customize our Services.

The technologies we use for this automatic data collection include:

- **Cookies (or browser 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.
- **Flash Cookies.** Certain features of our Services may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Services. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about

managing your privacy and security settings for Flash cookies, see “Choices About How We Use and Disclose Your Information” below.

- **Web Beacons or Tracking Pixels.** Pages of our Services and our e-mails 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 email and for other related Services statistics (for example, recording the popularity of certain content and verifying system and server integrity).

We may tie this information to information about you that we collect from other sources or that you provide to us. Some content or applications, including advertisements, are served by third parties, including advertisers, ad networks and ad servers, content providers, and application providers. These third parties may use cookies, alone or in conjunction with web beacons or other tracking technologies, to collect information about you when you use our Services. The information they collect may be associated with your personal information, or they may collect information, including personal information, about your online activities over time and across different websites, apps, and other online services websites. We use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control third parties’ tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see “Choices About How We Use and Disclose Your Information” below.

## **HOW WE USE YOUR INFORMATION**

We use information that we collect about you or that you provide to us for business and commercial purposes in accordance with the practices described in this Policy. Our business purposes for collecting and using information include:

- **To present our Services and their contents to you.** We use information collected on your use of the ACOM Health Services to allow us to: establish statistics about the usage and effectiveness of our Services; improve and personalize your use and experience of Services; tailor our interactions with you; inform our clients on overall use of our Services; and improve and develop our Services.
- **To Provide Support.** We use your information to support products or services you have obtained from us, such as notifying you of a product update or fix. We combine your information with information from other interactions with you to provide you

with more valuable suggestions in relation to product support. We also provide “Chat” sessions and forums among our Services to assist you while you are navigating through our sites and where problems can be raised and solutions proposed. In the course of providing technical support to you, we have access to data that you provide to us or data that is located on your system. This data may contain information about you, your organization’s employees, customers, partners, or suppliers. The handling and processing of this data is further subject to the applicable agreements or terms of use between you or your company and ACOM Health. In the event of any conflict between those agreements or terms of use and this Policy, the agreement or terms of use will control.

- **To market, advertise, or promote our products, services, promotions, contests, and other activities.** The information you provide to ACOM Health, as well as the information we have collected about you automatically, is used by ACOM Health for marketing purposes, i.e., to keep you informed about events, products, services and solutions that ACOM Health sells and which may complement an existing product portfolio. We also may use the information we have collected from you to enable us to display advertisements to our advertisers’ target audiences. Some of our offerings or events may be co-branded or sponsored by ACOM Health and third parties, such as business partners and solution providers, that use, resell, or complement ACOM Health products or services. If you sign up for these offerings or events, be aware that your information is also collected by and shared with those third parties. We encourage you to familiarize yourself with those third-party privacy policies to gain an understanding of the manner in which they will handle information about you. If you have the ability to and choose to “Email This Page” to a friend or colleague, we may ask for their name and email address. You are required to obtain any necessary consent required to supply this information to us.
- **To fulfill any purpose for which you provide it.** If you request something from ACOM Health, for example, a product or service, a callback, or specific marketing materials, we will use the information you provide to fulfill your request and to provide you with information, products, or services that you request from us. To help us do this, we may share information with others, for instance, ACOM Health’s business partners, financial institutions to process your payments, clearinghouses, insurance companies, shipping companies, or postal or government authorities involved in fulfillment.
- **To contact you as part of our customer satisfaction** surveys or for other research purposes, including focus groups and other surveys.

- **To Personalize your Experience on our Websites.** We use the information we collect about you to provide you with a personalized experience on our Services including our Websites, such as providing you with content you may be interested in and making navigation on our sites easier. We also may use this information to improve our Services including our Websites.
- **To Recruit.** In connection with a job application or inquiry, whether advertised on a ACOM Health website or otherwise, you will be asked to provide us with information about yourself, such as a resume. We use this information throughout ACOM Health in order to address your inquiry or consider you for employment purposes.
- **To Monitor or Record Calls, Chats, and Other Interactions.** Certain online transactions may involve you calling us or us calling you. They may also involve online chats. Please be aware that ACOM Health may monitor and record such interactions for staff training or quality assurance purposes or to retain evidence of a particular transaction or interaction.
- **To Prevent Fraud.** We use information about you to prevent and address fraud, breaches of our policies or terms, and threats or harms.
- **To Protect the Rights and Property of ACOM Health and Others.** We may also use or share your information to protect the rights or property of ACOM Health, our business partners, suppliers, clients, or others when we have reasonable grounds to believe that such rights or property have been or could be affected. In addition, we reserve the right to disclose your information as required by law, and when we believe that disclosure is necessary to protect our rights, or the rights of others, to comply with a judicial proceeding, court order, or legal process served on our Websites.
- **For Contractual purposes.** We use your information to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- **For Notifications to You.** We may use your information to notify you about changes to our Services or any products or services we offer or provide through our Websites, technical notices, updates, security alerts, information regarding changes to our policies or agreements, and other administrative messages.
- **As Described.** We use your information in any other way we describe when you provide the information to us.
- **Consent.** We use your information for any other purpose with your consent.



Notwithstanding the above, we may use information that does not identify you (including information that has been aggregated or de-identified) for any purpose except as prohibited by applicable law. For more information, see “Choices About How We Use and Disclose Your Information” below.

## **DISCLOSURE OF YOUR INFORMATION**

Notwithstanding elsewhere in this Policy, we may disclose aggregated or de-identified information about our users, and information that does not identify any individual, without restriction except as prohibited by applicable law. We may disclose information that we collect or that you provide as described in this Policy:

- To our subsidiaries and affiliates, including where they act as our service providers or for their own internal purposes.
- To service providers, partners, and other parties we use to support our business or to help us provide you, or the organization you work for, the Services, products or services, joint-marketing activities, or to fulfill your requests.
- To an actual or prospective buyer, third party, or successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or any change of control, whether by operation of law or otherwise, or any other sale or transfer of some or all of ACOM Health’s assets or stock, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding. Such a transaction may involve the disclosure of information to prospective or actual purchasers, or the receipt of such information from prospective or actual sellers.
- To vendors for analytics and to provide you with customized content, targeted offers, and advertising via email or push notification, or across our Websites, other websites, mobile applications, social media, or online services.
- To Clinics in connection with the services we provide to them. For example, we share information with a Clinic in order to facilitate your order, maintain and administer your accounts, respond to your questions, comply with your requests, market and advertise to you, and otherwise comply with the law. The Clinics we work with are independent entities and their processing of information is subject to their own privacy policies.
- To market our Services or third-party products or services to you either directly by us or by third parties whom we retain to assist with advertising, marketing, and promotional services (such as email marketing, mail campaigns, and other programs) if you have not opted out of these disclosures. For more information, see

“Choices About How We Use and Disclose Your Information” below. If you do opt out, we may share your information with the relevant third parties in order that they may suppress your information (for example, in order to stop sending you emails).

- To audience matching services to reach people (or people similar to people) who have visited our Website or are identified in one or more of our databases (“Matched Ads”). This is done by us uploading a customer list to another party or incorporating a pixel or SDK from another party into our own Website, and the other party matching common factors between our data and their data or other datasets. For instance, we may incorporate the Meta pixel on our Service and may share your email address with Meta as part of our use of Facebook Custom Audiences. For more information, see “Choices About How We Use and Disclose Your Information” below.
- To social media platforms. If you interact with us on social media platforms, the platform may be able to collect information about you and your interaction with us. If you interact with social media objects on our Services (for example, by clicking on a Facebook “like” button), both the platform and your connections on the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform.
- To fulfill the purpose for which you provided it.
- To run our promotions, which may be jointly sponsored or offered by other parties. When you voluntarily enter a promotion, we share information as set out in the official rules that govern the promotion as well as for administrative purposes and as required by law (e.g., on a winners list). By entering a promotion, you agree to the official rules that govern that promotion, and may, except where prohibited by applicable law, allow the sponsor and/or other entities to use your name, voice, and/or likeness in advertising or marketing materials.
- To provide you with opportunities from third parties such as influencers. If you provide your information through our Website in order to download or otherwise access a podcast, webinar, white paper, or other content, we may share your information with third party influencers who may use your information to market to you their own, or other third party, products and services.
- To facilitate any information you choose to make public through the Services, such as information in your profile or that you post on public boards. Please think carefully before making information public as you are solely responsible for any information you make public. Once you have posted information, you may not be

able to edit or delete such information, subject to additional rights set out in the “YOUR RIGHTS AND CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION” section below.

Please be aware that in certain circumstances, your information may be subject to disclosure to government agencies pursuant to judicial proceeding, court order, or legal process. We may also share your information to protect the rights or property of ACOM Health, our business partners, suppliers or clients, and others when we have reasonable grounds to believe that such rights or property have been or could be affected. We also share information with notice to you and your consent.

## **YOUR RIGHTS AND CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION**

We have created mechanisms to provide you with the following control over your information:

- **Accounts.** You may access, update, or remove certain information that you have provided to us through your account by visiting your account settings. Please note that we will retain and use information about you as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.
- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe’s website. If you disable or refuse cookies, please note that some parts of our Services including our Websites may then be inaccessible or not function properly.
- **Promotional Offers from Us.** If you do not wish to have your email address or contact information used by us to promote our products or services, you can opt-out of receiving promotional emails at the time of providing data. If we have sent you a promotional email, you may click on the “unsubscribe” link or other opt-out or do-not-subscribe instructions in the email footer to be omitted from all future email distributions. Please note that this opt-out does not apply to non-promotional emails sent by us, such as a result of a product purchase, servicing, our ongoing business relations, or other similar transactions.
- **Text Messages and Calls.** You can opt-out of receiving text messages or calls to your phone number at any time by (i) for text messages, texting “STOP” in response to any text message you receive from us or contacting us as set out in the “CONTACT INFORMATION” section below and specifying you want to opt-out of text messages; and (ii) for calls, requesting opt-out during any call you receive from us or contacting

us as set out in the “CONTACT INFORMATION” section below and specifying you want to opt-out of calls.

- We use Google analytics. You can learn about Google’s practices by going to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). Google also provides tools to allow you to opt out of the use of certain information collected by Google Analytics at <https://tools.google.com/dlpage/gaoptout> and by Google Analytics for Display Advertising or the Google Display Network at <https://www.google.com/settings/ads/onweb/>.
- To opt out of us sharing your data with a third party as part of a customer list for Matched Ads, please contact us as set forth in the “CONTACT INFORMATION” section below and specify that you wish to opt out of Matched Ads. We will remove your data from any subsequent lists shared with third parties for Matched Ads. Alternatively, you may directly contact the applicable party to opt out. Where we use Facebook Custom Audiences to serve Matched Ads on Facebook services, you should be able to hover over the box in the right corner of such Facebook ads and find out how to opt-out. We are not responsible for such technology service’s failure to comply with your opt-out instructions.

Our website is designed to honor Global Privacy Control signals; however, like many other sites, our Services do not currently honor “do not track” requests. For more information on “Do Not Track,” visit <https://www.allaboutdnt.com>. You can also find information on how to opt out of many websites and applications through participating ad networks at the following sites:

- Network Advertising Initiative (NAI) at [optout.networkadvertising.org](http://optout.networkadvertising.org), and
- Digital Advertising Alliance (DAA) at [www.aboutads.info/choices](http://www.aboutads.info/choices).

Please note that opting out via the NAI or DAA does not prevent you from seeing our online advertisements. Further, your opt out will only apply to the specific browser or device from which you opt out. We are not responsible for the effectiveness of, or compliance with, any opt-out options or programs offered by the NAI or DAA, or the accuracy of any other entities’ statements regarding their opt out options or programs.

## **TERMS OF SERVICE FOR SMS COMMUNICATIONS**

### **Types of SMS Communications**

If you have consented to receive text messages from ACOM Health, you may receive text messages related to our products and services.

## **SMS Messaging Disclosures**

- Messaging frequency may vary.
- Message and data rates may apply.
- To opt out at any time, text STOP.
- For assistance, text HELP or visit our website at <https://www.acomhealth.com/>.

## **PATIENT DATA**

We provide products and services to Clinics, and collect and process information about their individual patients (including through tracking technologies) at the direction of the Clinics (“**Patient Data**”). Patient Data has historically included contact data, billing data, protected health information, demographic data, content, service use data, device data, and location data, among other information. Our processing of Patient Data is governed by the terms of our service agreements with the Clinics, and not this Policy. We are not responsible for how Clinics treat the information we collect on their behalf, and we recommend you review their own privacy policies, including their HIPAA Privacy Notices, and your agreements with your respective Clinic(s).

## **DATA SECURITY**

We have implemented physical, administrative, and technical safeguards designed to help us protect your personal information from unauthorized access, use, and disclosure. Unfortunately, the transmission of information via the internet is not completely secure. Although we endeavor to protect your personal information, we cannot guarantee the security of your personal information transmitted via our Services. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained in the Services.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

## **THIRD PARTY LINKS**

We may provide you with general links to non-ACOM Health websites. These third parties independently collect information from you and your use of these links and applications is

subject to the third parties' privacy policies, and you should become familiar with the third-party sites' privacy policies before using the links or applications.

To allow you to interact with other websites on which you may have accounts (such as Facebook and other social media sites) or join communities on such sites, we may provide links or embed third-party applications that allow you to login, post content, or join communities from our websites.

ACOM Health is not responsible for the privacy practices or the content of any other websites.

## **MINORS**

The Services are intended for general audiences, and not directed to children. We do not knowingly collect personal information (as defined by the U.S. Children's Privacy Protection Act, or "COPPA") from children. If you are a parent or guardian and believe we have collected personal information in violation of COPPA, contact us

at [privacy@acomhealth.com](mailto:privacy@acomhealth.com). We will remove the personal information in accordance with COPPA. We do not knowingly "sell," as that term is defined under the California Consumer Privacy Act of 2018, the personal information of minors under 16 years old who are California residents.

If you are a California resident under 18 years old and registered to use the Services, you can ask us to remove any content or information you have posted on the Services. To make a request, email us at the email address set out in "CONTACT INFORMATION" section below with "California Under 18 Content Removal Request" in the subject line, and tell us what you want removed. We will make reasonable, good faith efforts to remove the post from prospective public view, although we cannot ensure the complete or comprehensive removal of the content and may retain the content as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **INTERNATIONAL TRANSFER**

We are based in the U.S. and the information we collect is governed by U.S. law. If you are accessing the Services from outside of the U.S., please be aware that information collected through the Services may be transferred to, processed, stored, and used in the U.S. and other jurisdictions. Data protection laws in the U.S. and other jurisdictions may be different from those of your country of residence. Your use of the Services or provision of any information therefore constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of information about you in the U.S. and other jurisdictions as set out in this Policy.

## **CHANGES TO OUR PRIVACY POLICY**

We may amend or otherwise update this Policy at any time. We encourage you to periodically review this page for the latest information on our policy. If we make any material changes to this Policy, we will notify you via notification on our Websites, or as otherwise required by applicable law.

## **CONTACT INFORMATION**

To ask questions or comment about this Privacy Policy and our privacy practices, including retrieving previous Privacy Policies, please contact ACOM Health at [privacy@acomhealth.com](mailto:privacy@acomhealth.com).

In cases where you may have the ability to view or edit your personal information online but the information is not accessible online, and if you wish to obtain a copy of particular information you provided to ACOM Health, or if you become aware the information is incorrect and you would like us to correct it, contact us at [privacy@acomhealth.com](mailto:privacy@acomhealth.com).

This Policy has been designed to be accessible to people with disabilities. If you experience any difficulties accessing the information here, please contact us at [legal@acomhealth.com](mailto:legal@acomhealth.com).

If you no longer wish to receive marketing e-mails from ACOM Health, please follow the unsubscribe instructions included in each marketing email.

## **ADDITIONAL NOTICE FOR CANADIAN RESIDENTS**

Notwithstanding anything herein to the contrary, if you are a resident of Canada, the following provisions shall apply (and prevail over all conflicting provisions in this Policy):

- We may modify this Policy from time to time and we will provide you with notice of any such changes.
- Your access to our Services may be provided by a Clinic. If your access to our Services is provided by a Clinic, except as you may otherwise indicate to us through your use of the Services or by withdrawing your consent as set out in this Policy, you consent to us disclosing your personal information to such Clinic, including your personal health information, for purposes of your Clinic providing you with care.
- We may share such information with members of our corporate family for the following purposes: for their own internal purposes; supporting our business or to help us provide you, or the organization you work for, the Services, products or services, joint-marketing activities, or to fulfill your requests; in the event of a merger, divestiture, restructuring, reorganization, dissolution, or any change of

control, whether by operation of law or otherwise, or any other sale or transfer of some or all of ACOM Health's assets or stock, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding; to facilitate any information you choose to make public through the Services, such as information in your profile or that you post on public boards; and to fulfill the purpose for which you provide it. The information that we share with our subsidiaries and affiliates is subject to our privacy policies and practices described in this Policy.

- We will not send you any commercial electronic message (including any text message, online newsletter, or email marketing communication) unless you expressly consent to receive such newsletters or communications from us.
- Prior to receiving any such newsletter or email marketing communications, you will be given the opportunity to consent to receive such communications from us. If you opt-in to receive such communications, we may use the information to communicate with you regarding our products, services, and promotions, to provide you with other information that you request, and/or to improve our product and service offerings.
- You will always have the opportunity to “unsubscribe” from receiving marketing e-mails or other marketing communication at any time. You can unsubscribe by clicking on the “unsubscribe” link or other opt-out or do-not-subscribe instructions in the text message or email footer to be omitted from all future marketing distributions, or by contacting us at [marketing@acomhealth.com](mailto:marketing@acomhealth.com). You can also “unsubscribe” from promotional communications. We will endeavor to respond to your opt-out request promptly, but we ask that you please allow us a reasonable time to process your request. Please note that if you opt-out from receiving marketing-related communications, we may still need to send you communications about your use of our products or services, or other matters.
- Please be aware that we are headquartered in, and many of our third-party service providers are located within, the United States, and as a result, in addition to Canada, your information will be stored, processed and transferred to the United States. Other jurisdictions may have different data protection rules than Canada. While your personal information is outside of Canada, it is subject to the laws of the country in which it is located. Those laws may require disclosure of your personal information to authorities in that country.
- Please note that you may opt-out of interest-based (behavioral) advertising or other targeted content by contacting us at [marketing@acomhealth.com](mailto:marketing@acomhealth.com).



- You may also challenge the accuracy or completeness of your personal information in our records. If you successfully demonstrate that your personal information in our records is inaccurate or incomplete, we will amend the personal information as required.
- We may require that you provide sufficient identification to fulfill your request to access or correct your personal information. Any such identifying information will be used only for this purpose.
- Although we would rather you speak to us first, if you believe that your personal information protection rights may have been violated, you always have the right to lodge a complaint with the applicable supervisory authority, or to seek a remedy through the courts.
- If you reside in the province of Quebec, in certain circumstances, you may also have: i) the right to request that we cease disseminating your personal information, ii) the right to request that we de-index any hyperlink attached to your name that provides access to information by a technological means; iii) the right to request that we re-index a link providing access to information; or iv) the right to request that we communicate to you, as well as to any person or body authorized by law to collect such information, any computerized personal information collected from you in a commonly used technological format.
- We do not directly advertise to any children under the age of 18, including, without limitation, any children under the age of 18 living in Quebec.
- All comments, questions, concerns, or complaints regarding your personal information or our privacy practices should be sent to our Data Privacy Officer by sending an email to [privacy@acomhealth.com](mailto:privacy@acomhealth.com).

## **ADDITIONAL STATE SPECIFIC NOTICES**

The California Consumer Privacy Act of 2018 (“CCPA”) and certain other US state laws including the Texas Data Privacy and Security Act create various privacy rights. ACOM Health’s Privacy Policy addresses required disclosures about your personal information, and this notice provides an overview of the additional information required by these laws and also provides instructions on how to exercise applicable rights granted by them. The rights granted under these laws are not absolute, and ACOM Health reserves all of its rights in that regard.

If personal information about you has been processed by us as a service provider on behalf of a Clinic as Patient Data (as defined in the Privacy Policy) and you wish to exercise any

rights you have with respect to such Patient Data, please inquire with the Clinic directly. If you wish to make your request directly to us, please provide the name of the Clinic on whose behalf we processed your Patient Data. We will refer your request to that Clinic, and will support them to the extent required by applicable law in responding to your request.

### **What Personal Information We Collect**

Under the CCPA, California residents have the right to know what categories of personal information we have collected in the past 12 months and our business purposes for that collection. We make this information available to consumers in the following sections of our Privacy Policy: “INFORMATION WE COLLECT ABOUT YOU” and “INFORMATION WE COLLECT THROUGH AUTOMATIC DATA COLLECTION TECHNOLOGIES.”

In the past 12 months, we have collected the following categories of personal information, as described in the CCPA:

- **Identifiers**, including name, postal address, email address, and online identifiers (such as IP address).
- **Customer records**, including phone number, billing address, and credit or debit card information.
- **Characteristics of protected classifications under California or federal law**, including race and gender.
- **Commercial or transactions information**, including records of products or services purchased, obtained, or considered.
- **Internet activity**, including browsing history, search history, and interactions with a website, email, application, or advertisement.
- **Geolocation data**.
- **Employment and education information**.
- **Inferences drawn** from the above information about your predicted characteristics and preferences.

We may collect personal information that is considered “sensitive” under the CCPA, such as payment card or other financial information and account login information such as username and password. In the context of our careers page, we may collect information such as race and ethnicity data that you voluntarily provide, which we use for equal employment purposes. When we collect sensitive personal information, we use such information only for lawful purposes in compliance with applicable privacy laws, such as to

perform the Services, to resist malicious, deceptive, fraudulent, or illegal actions, or for equal employment purposes.

### **How We Use Your Personal Information**

You have the right to know how personal information is collected, how it is used, and our business and commercial purposes for that use. We make this information available to consumers in the following sections of our Privacy Policy: “HOW WE USE YOUR INFORMATION” and “YOUR RIGHTS AND CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION.”

### **How We Disclose Your Personal Information**

We disclose personal information to Service Providers, as defined by the CCPA, to perform services specified by written contract. In addition, we may disclose personal information to third parties for other notified purposes, as permitted by the CCPA. We make this information available to consumers in the following sections of our Privacy Policy: “DISCLOSURE OF YOUR INFORMATION” and “YOUR RIGHTS AND CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION.” We disclose the following categories of personal information for commercial purposes: identifiers, characteristics, commercial or transactions information, internet activity, geolocation data, and inferences drawn.

### **“Sale,” “Sharing,” and “Targeted Advertising”**

When you use our Websites, our authorized partners and service providers may collect information through their own cookies and similar technologies and use this information for their own purposes. This activity may qualify as a “sale,” “sharing,” or “targeted advertising” under applicable US state privacy laws including the CCPA. We have “sold” or “shared” information within the following categories defined by the CCPA:

- Identifiers like IP address and unique identifiers associated with a particular cookie
- Internet activity information relating to your interactions with our Websites
- Inferences about your consumer preferences

### **Rights in Your Personal Information**

Residents of certain US states, including California and Texas, may have the right to request:

- Access to personal information collected about you and information regarding the source of that information, the purposes for which we collect it, and the third parties and service providers with whom we share it.

- Deletion of the personal information we have collected from you.
- Correction of the personal information we have collected from you.
- That we limit our use of your sensitive personal information to certain purposes allowed by law.
- To opt-out of the use of your personal information for purposes of profiling.
- To opt-out of the “sale” or “sharing” of your personal information or the use of such information for “targeted advertising.”

To make a request and obtain information about exercising your rights as described above, use our webform, submit a request to [privacy@acomhealth.com](mailto:privacy@acomhealth.com). Before helping you with your inquiry, we may ask you to verify your identity by providing us with current government issued identification or the identity of your authorized agent. We do this by asking you to provide personal information we can match against information we may have collected from you previously and confirm your request using the email account stated in the request. We will respond to your request consistent with applicable law.

In the event we deny your privacy rights request, you may have the right to appeal our decision by emailing us at [privacy@acomhealth.com](mailto:privacy@acomhealth.com).

### **Authorized Agent**

You can designate an authorized agent to submit requests on your behalf. However, we will require written proof of the agent’s permission to do so and verify your identity directly.

### **Non-Discrimination**

We will not discriminate against you for exercising your rights under the law. We are permitted by law to provide differing levels or quality or different prices where we can demonstrate that the difference is reasonably related to the value of your personal information.

### **Retention of Your Personal Information**

We will retain your personal information for as long as is necessary to complete the purposes for which it was collected, or as may be required by law.

### **Shine the Light**

Customers who are residents of California may request (i) a list of the categories of personal information disclosed by us to third parties during the immediately preceding calendar year for those third parties’ own direct marketing purposes; and (ii) a list of the

categories of third parties to whom we disclosed such information. To exercise a request, please write us at the email or postal address set out in “How to Contact Us” below and specify that you are making a “California Shine the Light Request.” We may require additional information from you to allow us to verify your identity and are only required to respond to requests once during any calendar year.

### **How to Contact Us**

If you have any questions about this notice, or if you would like to make a request and obtain information about exercising your rights as described above, you may submit a request to [privacy@acomhealth.com](mailto:privacy@acomhealth.com).