

PRIVACY NOTICE

What this is about: This notice explains how Advocara protects your personal information when you use our services, websites, and applications. We value your privacy and want to be transparent about how we handle your data.

SUMMARY OF KEY POINTS

- **Data Collection:** We collect personal information you provide (including medical information), information from your account usage, and data collected automatically when you use our Sites and Services.
- **No Selling of Data:** We do NOT and will NEVER sell your Personal Data to third parties for profit.
- **Data Usage:** We use your information to provide our services, communicate with you, improve our offerings, and for security and legal purposes. We may retain your data to improve and deliver our Service, including for evaluation, model training, and analysis.
- **Data Sharing:** We share your data only with Service Providers who help us deliver our services. We make reasonable efforts review the privacy policy of all Service Providers to ensure they are broadly aligned with our own guarantees. Your data is only shared when and how necessary to provide and improve our services.
- **Your Rights:** We will delete your data at your request, consistent with California and other laws that protect your personal data and to the extent technically feasible.
- **Data Protection:** We implement security measures to protect your information but cannot guarantee absolute security.
- **User Responsibility:** You are responsible for ensuring that you are authorized to provide any Personal Data you submit to Advocara, including information about others. By using our Services, you represent that you have the necessary permissions and legal authority to share such information.

This summary is provided for your convenience but does not replace the Complete Privacy Policy below, which contains additional details about how we collect, use, share, and protect your information and **is the controlling document regarding our privacy practices.**

COMPLETE PRIVACY POLICY

This Privacy Notice explains how Advocara and its affiliates (“Advocara”, “we”, “our”, and “us”) collect, use, disclose and otherwise process your personal information (also known as Personal Data) in connection with the use of Advocara’s services and applications that link to this Privacy Notice (“Sites”), our data processing platform and in the usual course of business (collectively, “Services”). It also contains information about your choices and privacy rights. Terms which are not defined in this Privacy Notice are as defined in the Terms (as defined below).

SERVICES

We provide the Services to you in accordance with our Terms of Service set forth at www.advocara.org (“Terms”). Our processing of Personal Data is governed by the Terms and this Privacy Notice. This Privacy Notice does not apply to any products, services, websites, or content that are offered by third parties or that have their own privacy notice.

PERSONAL DATA WE COLLECT ABOUT YOU

Personal Data that we collect from or about you includes information you provide, information we collect automatically and information we receive from other sources.

Personal Data You Provide

When using our Services, we may collect certain Personal Data, such as:

- Identifiers: your name, email address, phone number, and postal address to administer your Account and provide our Services to you;
- Medical/insurance information: medical conditions or problems, treatments or diagnoses, medical procedures, insurance coverage, medical billing information or other similar medical-related or insurance-related information.
- Account information: If you create an Account, we will collect your authentication information used to access the Services.
- Customer service and other interaction information: information that you provide through your interactions with us, for example if you request information about our Services, contact customer support, complete a survey, provide feedback or post comments, register for an event or take part in marketing activities.
- Commercial information: your history of transactions with us (e.g. when you signed up for a free trial).

Personal Data in Public Forums

Certain features of our Services make it possible for you to post content publicly or which are viewable by other users, such as through our public forums. Any information you post openly in these ways will be available for viewing and use by other users.

Personal Data We Collect Automatically

We use standard automated data collection tools, such as cookies, web beacons, tracking pixels, tags, and similar tools, to collect information about how people use our Sites and interact with our emails.

For example, when you visit our Sites we (or an authorized third party) may collect certain information from you or your device. This may include information about your computer or device (such as operating system, device identifier, browser language, and Internet Protocol (IP) address), and information about your activities on our Sites (such as how you came to our Sites, access times, the links you click on, browsing behavior, clicks and cursor movements, and other statistical information). We may also use web beacons and pixels in our emails. For example, we may place a pixel in our emails that notifies us when you click on a link in the email. We may also use your IP address to derive your general location information.

When you use our Services, we automatically collect information about how you are using the Services (“Usage Data”). While most Usage Data is not Personal Data, it may include information about your account (such as User ID, email address, or Internet Protocol (IP) address) and information about your computer or device (such as browser type and operating system). It may also include information about your activities within the Services, such as the pages or features you access or use, the time spent on those pages or features, search terms entered, commands executed, information about the types and size of files analyzed via the Services, and other information relating to your use of the Services. We collect Usage Data to provide, support and operate the Services, for network and information security, and to better understand how you are using the Services so as to improve our products and services.

The types of data collection tools we use may change over time as technology evolves.

Personal Data We Receive From Other Sources

We may obtain Personal Data about you from third party sources, including resellers, distributors, business partners, event sponsors, security and fraud detection services, social media platforms, and publicly available sources. Examples of Personal Data that we receive from third parties include marketing and sales information (such as name, email address, phone number and similar contact information), and purchase, support and other information about your interactions with our Services. We may combine such information with the information we receive and collect from you.

HOW WE USE YOUR PERSONAL DATA

We use your Personal Data to provide, maintain, improve and update our Services. Our purposes for collecting your Personal Data include:

- To Provide the Services:
 - to provide, maintain, deliver and update the Services;
 - to create and maintain your Account;

- to identify your Account and correctly identify your usage of our Services;
- to provide you with customer service and support.
- To Communicate with You
 - to tailor and send you newsletters, emails and other content to promote our Services (you can always unsubscribe from our marketing emails);
 - to send you notifications about the Services, including technical notices, updates, security alerts, administrative messages and invoices;
 - to respond to your questions, comments, and requests, including to keep in contact with you regarding the products and services you use;
 - to contact you to conduct surveys, receive your feedback, conduct audits, and for market research purposes.
- Personalization and Service Improvement
 - to personalize your experience when using our Services;
 - to measure your use of and improve Services, and to develop new products and services;
 - to generate and analyze statistical information about how our Sites and Services are used in the aggregate.
 - to train AI and machine learning models that are for Advocara's use, and will not be sold or exposed to others. Appropriate de-identification and other controls will be used to keep Personal Data from being learned or exposed by these models. Note that model improvements that may be partially based on your de-identified data are not removable.
- Legal and Security Purposes
 - to investigate security issues, prevent fraud or combat the illegal or controlled uses of our Services;
 - to comply with our obligations under applicable law, legal process, or government regulation.
- With Your Consent
 - We will also use your Personal Data for other purposes, where you have given consent for such uses. In particular, the Services will allow you to send medical information to a third party if authorized by you or to allow

your medical information to be downloaded and send to a human advocate.

We will NOT sell your Personal Data or otherwise use your Personal Data except as set forth herein.

De-Identified/Anonymized Information. We may de-identify or anonymize Personal Data we collect by removing identifiers such that disproportionate effort or external data sources would be needed to determine your identity and so the Personal Data cannot reasonably identify you or your device, or we may collect Personal Data that is already in de-identified or anonymized form. Except as otherwise prohibited by applicable law, our use and disclosure of de-identified and anonymized information is not subject to any restrictions under this Privacy Notice, and we may use and disclose it to others for any purpose.

HOW WE DISCLOSE YOUR PERSONAL DATA

We may disclose your Personal Data to third parties as follows:

- **Affiliates:** with entities that controls us, is controlled by us or is under common control as us for the purposes described in this Privacy Notice;
- **Service Providers:** with our Service Providers who we contract with or assist us in providing the Services, such as billing, payment card processing, customer support, and data analysis, subject to appropriate contractual prohibitions on their use of your Personal Data, often conveyed through their own Privacy and Data Use policies. We also disclose Personal Data to Service Providers who assist us with detecting and preventing fraud, security threats or other illegal or malicious behavior, after making a good faith effort to ensure those Service Providers' data handling and privacy policies are broadly consistent with the guarantees in this Privacy Policy;
- **For legal purposes:** when authorized by law or we deem necessary in good faith to comply with legal process; when required to protect and defend the rights or property of us, including the security of our Sites, products and services or when necessary to protect the personal safety, property or other rights of the public, us or our customers;
- **With your consent:** when you instruct us to do so or where you have consented to the disclosure of your Personal Data with third parties; or
- **Business transactions:** we may engage in transactions with other companies involving the sale of assets or parts of our business. We may disclose your Personal Data as part of, or in contemplation of, such transactions. If a portion or

all of our assets are transferred to a third party in connection with such transactions, your Personal Data may be among the transferred assets, including in the course of activities leading up to such transactions.

INTERNATIONAL USERS

We will not transfer your Personal Data to countries outside the United States of America. You agree not to use the Services unless you are located in the United States of America.

MISCELLANEOUS

Your Choices and Rights

We offer you choices regarding the collection, use and disclosure of your Personal Data and we will respect the choices you make in accordance with applicable law. Please note that if you decide not to provide us with certain Personal Data, you may not be able to access or properly use certain features of the Sites or use the Services.

Account Information

If you want to correct, update or delete your Account information, please log in to your Account and update your profile.

Opt Out

We may periodically send you marketing communications that promote our Services consistent with your choices. You may opt out from receiving such communications by following the unsubscribe instructions in the communication you receive. Please note that it may take us some time to process your request in accordance with applicable law, and that we may still send you important service-related communications regarding our Services, such as communications about your subscription or Account, service announcements or security information.

Your Privacy Rights

Depending upon your place of residence, you may have rights in relation to your Personal Data. Depending on applicable data protection laws, those rights may include asking for:

- Access to, or a copy of, your Personal Data (where feasible, in a portable, machine-readable form)
- Confirmation that we are processing your Personal Data
- Correction or amendment of your Personal Data

- Deletion of your Personal Data
- Transfer of your Personal Data to a third party
- Restriction or objection to certain uses of your Personal Data
- The withdrawal of consent to processing your Personal Data for certain purposes that were originally based on your consent
- Opt out of the processing of your Personal Data for profiling in furtherance of decisions that produce legal or similarly significant effects, if applicable.

If you wish to exercise any of your rights under applicable data protection laws, submit a request online by emailing Advocara at privacy@advocara.org. We will respond to requests that we receive in accordance with applicable laws. We may take certain steps to verify your request using information available to us, such as your email address or other information associated with your Account, and if needed we may ask you to provide additional information for the purposes of verifying your request. Any information you provide to us for verification purposes will only be used to process and maintain a record of your request. Depending on the laws applicable to your request, if you are not satisfied with our response to your request, you may have the ability to appeal our response.

Notice to Authorized Users

While the Services are intended for individual or persona use, where the Services are made available to you through an organization (e.g., your employer), that organization is the administrator of the Services and responsible for the accounts and/or services over which it has control. For example, administrators can access and change information in your Account or restrict and terminate your access to the Services. We are not responsible for the privacy or security practices of an administrator's organization, which may be different from this Privacy Notice. Please contact your organization or refer to your organization's policies for more information.

Data Retention

We retain the Personal Data described in this Privacy Notice for as long as you use our Services, as may be required by law (for example, to comply with applicable legal tax or accounting requirements), as necessary for other legitimate business or commercial purposes described in this Privacy Notice (for example, to resolve disputes or enforce our agreements), or as otherwise communicated to you.

Security

We are committed to protecting your Personal Data. We use a variety of technical, physical, and organizational security measures designed to protect against unauthorized access, alteration, disclosure, or destruction of information. However, no security measures are perfect or impenetrable. As such, we cannot guarantee the security of your Personal Data.

Third Party Services

Our Services may contain links to third party websites, applications, services, or social networks (including co-branded websites or products that are maintained by one of our business partners). We may also make available certain features that allow you to sign into our Sites using third party login credentials (such as LinkedIn, Facebook, Twitter and Google+) or access third party services from our Services. Any Personal Data that you choose to submit to third party services is not covered by this Privacy Notice. We encourage you to read the terms of use and privacy notices of use of such third party services before disclosing your Personal Data with them to understand how your information may be collected and used.

Children's Data

The Sites and Services are not directed to children under 18 years of age and we do not knowingly collect Personal Data from children under 18 without proper consent. If we learn that we have collected any Personal Data from children under 18, we will take steps to delete such information. If you are aware that a child has submitted us such Personal Data, please contact us immediately. However, Personal Data about minors may be submitted to us by authorized adults, for example through insurance documents or medical billing information, in the course of using our Services.

Changes to this Notice

We may change this Privacy Notice from time to time. We will post any changes on this page and, if we make material changes, provide a more prominent notice (for example, by adding a statement to the website landing page, providing notice through the Services login screen, or by emailing you). You can see the date on which the latest version of this Privacy Notice was posted below. If you disagree with any changes to this Privacy Notice, you should stop using the Services and deactivate your Account.

How to Contact Us

Please contact us at privacy@advocara.org if you have any questions about our privacy practices or this Privacy Notice. If you interact with us through or on behalf of your organization, then your Personal Data may also be subject to your organization's privacy practices and you should direct any questions to that organization.

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