PHARMACIST INTEGRATIVE HEALTHCARE PRIVACY POLICY

This Privacy Policy is designed to inform users of the Pharmacist Integrative Healthcare Inc. ("PIHI") websites, mobile application and services (collectively, the "Service") about how we gather and use personal information collected by us in connection with your use of the Service. This Privacy Policy covers how PIHI treats your Personally Identifiable Information ("PII") and Protected Health Information ("PHI") (PII and PHI, collectively hereafter "Personal Information") that PIHI collects, receives, maintains, stores or transmits, including information you transmit or submit to our Service. Your Personal Information includes information that individually identifies you or is information about you that can be traced back to you, your IP address, or your location. It may include, but is not limited to your name, address, employer, email address, phone number, and information about your health.

"PIHI" or the terms "we" or "us" or similar terms refer to Pharmacist Integrative Healthcare Inc. "You" or "your" or similar terms refer to you as a user of our Services.

By accepting our Privacy Policy during registration, or by visiting and/or using the Site, the Mobile App or any of our Services, you (a) expressly consent to our collection, use, disclosure and processing of your PHI in accordance with this Privacy Policy, and (b) expressly acknowledge that you have read and understood our HIPAA Notice, which describes how we may use and disclose health information about you for treatment, payment or health care operations and for other purposes that are permitted or required by law, including the Health Insurance Portability and Accountability Act of 1996, as amended from time to time ("HIPAA"). Our HIPAA Notice is available at <u>www.medcarepharmacist.com/hipaa</u>. Any conflict between this Privacy Policy and the HIPAA Notice with respect to any PHI (as defined in the HIPAA Notice) shall be governed by the HIPAA Notice.

As used in this Privacy Policy, the terms "using" and "processing" information include, among other things, using cookies or embedded scripts on a computer, browser, laptop, tablet, mobile phone or other device (a "Device"), subjecting the information to statistical or other analysis, and using or handling information in any way, including without limitation collecting, storing, evaluating, modifying, deleting, using, combining, disclosing, and transferring information within our organization or among our affiliates within the United States or internationally, as well as using personal information to respond to user / applicant or sponsor (i.e., the entity or organization paying for your participation in our Services) requests and to provide the requested products and services.

PROTECTED HEALTH INFORMATION

We are dedicated to maintaining the privacy and integrity of protected health information that we receive as part of your application for or participation in the Services ("PHI"). PHI is Personal Information that we receive as part of your application for or participation in our program that relates to (a) your past, present, or future physical or mental health or condition, (b) the provision of health care to you, or (c) your past, present, or future payment for the provision of health care, which is created, received, transmitted, or maintained by the Company. This Privacy Policy describes how we protect your privacy as a visitor to, or general user of our Site, our Mobile App and Services. You have additional rights under federal and state law with respect to the access to, use, and disclosure of Personal Information that constitutes PHI. For a more complete description of your rights with respect to PHI, please refer to our HIPAA Notice, which provides important

information to you about how we may use and disclose your PHI. Our HIPAA Notice is available here: <u>www.medcarepharmacist.com/hipaa</u>

INFORMATION COLLECTION AND USE

PIHI collects Personal Information when you register with PIHI or when you use PIHI's Services. It is always your choice whether or not to provide us with such information. If you choose not to provide the requested information you may not be able to use certain features or functions of our websites, mobile application or services. Your information will be stored in our cloud hosting provider's data centers within the United States. Below is a list of the Personal Information PIHI collects and how we use it with your consent. You may be asked additional questions regarding items on this list to ensure we have your consent to collect and use your Personal Information for specific purposes.

- 1. <u>Registration</u>— When you register for the Service, we collect your Personal Information as part of the registration process, including but not limited to your email address, name, address, location, sponsoring provider and program preferences.
- 2. <u>Self-Reported Health-Related Information</u>— We collect the information that you enter during the course of using the Service, such as information regarding your health and/or medical condition and related behaviors.
- 3. <u>Provider-Reported Health-Related Information</u>— We collect the information about you that is submitted with your permission by your healthcare provider during the course of using the Service, such as information regarding your health and/or medical condition, including information that is protected under the HIPAA privacy and security regulations.
- 4. <u>Communications with a Health Professional</u>— We collect communications that take place through the Service between you and your healthcare provider, health manager or health coach.
- 5. <u>Demographic Information</u>— We may also collect demographic information, such as age, gender and geographic location, as part of your profile in the Service.
- 6. <u>Automatically Tracked Health-Related Information</u>— We may use automated methods to track data from fitness wearables and other biometric monitoring devices for use in the app that you have allowed to communicate with the app.
- 7. <u>Product Improvement</u>— PIHI may utilize your demographic and health information, information about your device, and data derived through your utilization of our service to help improve the PIHI product. We may also send this information to your healthcare provider or sponsor to help them improve their products or services.
- 8. <u>Surveys and User Research</u>— From time to time, we may send you survey questions or contact you with questions related to your experience to provide us with feedback on our Service. We collect any responses that you provide. Participation in surveys or research tasks is elective and does not necessarily impact your access to the Service. We may provide this information to your healthcare provider or sponsor to help them improve their products or services.
- 9. <u>Usage Reports</u> We may use various methods or technologies to store or collect your Usage Information, including your visits to or interactions with our Site, Mobile App and Services ("Tracking Technologies"). We may use these Tracking Technologies for a variety of purposes, including but not limited to uses deemed to be necessary or useful to assess the performance of our Site, Mobile App and Services (including as part of our analytic practices or otherwise to improve our Site, Mobile App and Services) or uses required to offer you enhanced functionality

when accessing our Site, Mobile App and Services (including identifying you when you sign in to the Site or the Mobile App or keeping track of your specified preferences).

- 10. <u>Marketing Communication</u>— We occasionally may contact you via email about new product and features. You may remove your name from our mailing lists to stop receiving these emails. We may receive a confirmation when you open an email from us if your computer supports this type of program. We use this confirmation to help us make emails more interesting and helpful. When you receive an e-mail from us, you can opt out of receiving further e-mails by following the included instructions to unsubscribe. However, by opting out of further email communications after you enroll in the Services, you may limit program reminders and other valuable program content and components.
- 11. <u>Mobile Devices</u>— If you are accessing the Service through a program whereby you receive a sponsored PIHI-enabled mobile device, we will collect and manage your data and other telephonic information as part of the device provision and maintenance.
- 12. <u>Cookies</u> Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your browser to enable our systems to recognize your browser and tell us how and when pages in our Site are visited and by how many people. We use cookies to enhance visitors' experiences by understanding how visitors and / or users engage with and navigate our Site. Regular cookies may generally be disabled or removed by tools that are available as part of most commercial browsers and in some but not all instances can be blocked in the future by selecting certain settings. Each browser that you use will need to be set separately, and different browsers offer different functionality and options in this regard. Also, these tools may not be effective with regard to certain types of cookies (e.g., Adobe Flash or HTML5 cookies). Please be aware that if you disable or remove cookies on your Device, some parts of our Site or Services may not function properly and when you revisit our Site or Services your ability to limit cookies is subject to your browser settings and limitations.
- 13. <u>Embedded Scripts.</u> An embedded script is programming code that is designed to collect information about your interactions with the Site, Mobile App and Services, such as the links that you click on. The code is temporarily downloaded onto your Device, is active only while you are connected to the Site or Mobile App, and is deactivated or deleted thereafter.
- 14. Web Beacons. Small graphic images or other web programming code called "web beacons" (also known as "1×1 GIFs" or "clear GIFs") may be included in pages and messages of our Site, Mobile App and Services. Web beacons may be invisible to you, but any electronic image or other web programming code inserted into a page or e-mail can act as a web beacon. Web beacons or similar technologies may be used for a number of purposes, including to count visitors to the Site, Mobile App and Services, to monitor how users navigate the Site, the Mobile App and Services, to count how many sent e-mails were actually opened or to count how many particular articles or links were actually viewed.
- 15. <u>Social Sharing</u>. Your Personal Information may be disclosed in connection with your social sharing activity, such as if you log into your PIHI account from your social media account. By connecting your PIHI account and your social media account, you authorize us to share information with your social media account provider, and you understand that the use of the information we share will be governed by the social media site's privacy policy.
- 16. <u>Legal Requirements.</u> PIHI may share Personal Information if necessary or appropriate, in our good faith judgment, to comply with laws or regulations or in response to a valid subpoena, order, or government request, or to protect the operations, privacy, safety, property or rights of PIHI or others.

- 17. <u>Business Transfer.</u> In the event of a sale or merger of PIHI or any of our businesses, Personal Information and other information PIHI has collected as described in this policy maty be among the transferred business assets.
- 18. <u>Other Disclosure</u>. PIHI also may share information about you as described at the point of collection or otherwise pursuant to your consent.

We take great efforts in protecting your privacy; however, we cannot control, and expressly disclaim any responsibility for, whether or how users will subsequently use or disclose posted or previously disclosed information. If you do not consent to the disclosure of this information, you should not access or use the Site, the Mobile App or the Services. The Services include the ability for users to share Personal Information, including information regarding your medical condition. Any information you choose to provide or upload to the group Sites or the Mobile App, including Personal Information about your medical condition, will be visible to your health coaches, administrators, and other users. As your information will be viewable to the other users of the Site, the Mobile App and the Services, you should provide only the information you feel comfortable disclosing.

If you submit any Personal Information relating to other people to PIHI, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

DE-IDENTIFIED INFORMATION

In addition to the uses of Personal Information above, we may remove the identifiable parts of your information to create de-identified forms ("De-identified Information"). De-identified Information may be compiled with other data in aggregated forms. We use this aggregated or non-aggregated data in the following ways:

- 1. <u>Product Improvement</u>— We may use De-identified Information for product improvement including the Service as well as third-parties to evaluate their products or services.
- 2. <u>Research</u>— We may use De-identified Information for research whether scientific, marketing, or business in nature. This research may be made public through publication such as within a scientific journal.

INFORMATION SHARING AND DISCLOSURE

PIHI does not rent, sell, or share your Personal Information with other people or non-affiliated companies, except to provide products or services you have requested, when we have your authorization to share such information, or when we provide the information to companies or consultants working on our behalf under confidentiality agreements. These companies and consultants do not have any independent right to share your Personal Information.

We may also be required to disclose your Personal Information in response to a legal process, for example, in response to a court order or a subpoena to comply with its applicable legal and regulatory reporting requirements. We also may disclose your Personal Information in response to a law enforcement agency's request, or where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our <u>End User License Agreement</u>, or to verify or enforce compliance with the policies governing our products and services and with applicable

laws, or as otherwise required or permitted by law or consistent with legal requirements. In addition, we may transfer your Personal Information to an entity or individual that acquires, buys, or merges with PIHI, or our other business units.

Messaging Services: We may provide functionality to permit you to send messages, including instant messages, to other users through the Site. Please note that if you use such functionality to send such a message to another user, your screen name will be disclosed to that user, as well as administrators. Further, if a message you send using such functionality contains Personal Information, we cannot control how the Personal Information will be used or disclosed by the recipient of your message. We urge you to exercise discretion and caution when deciding to disclose your Personal Information, or any other information, in any message, and to be careful about the people to whom you send such messages.

IN THE CASE OF YOUR USE OF MESSAGING SERVICES, AS DESCRIBED ABOVE, WE ARE NOT RESPONSIBLE FOR THE USE BY OTHERS OF ANY INFORMATION, INCLUDING PERSONAL INFORMATION, THAT IS DISCLOSED BY YOU OR ON YOUR BEHALF BY YOUR SYSTEM IN SUCH FORUMS, DISCUSSION BOARDS, CHAT ROOMS AND MESSAGING SERVICES. BY DISCLOSING ANY OF YOUR INFORMATION VIA MESSAGING SERVICES, YOU ACKNOWLEDGE AND ACCEPT ANY RISK AND DAMAGE ARISING FROM DISCLOSURE OF SUCH INFORMATION.

With Your Consent: Except as set forth above, you will be notified when your Personal Information may be shared with third parties, and will be able to control the sharing of this information.

YOUR CALIFORNIA PRIVACY RIGHTS

Under California's Shine the Light law, Cal. Civ. Code § 1798.83, California residents have the right to request and obtain, once per year, information regarding PIHI's disclosure of personal information to third parties for their own direct marketing purposes. To request a list of the categories of information PIHI has shared, and the names and addresses of such third parties, please send your request to:

Pharmacist Integrative Healthcare, Inc., 21704 Devonshire Street #330, Chatsworth, CA 91311

CALIFORNIA DO NOT TRACK DISCLOSURE

Do Not Track is a privacy preference that users can set in their web browsers. When a user turns on the Do Not Track signal, the browser sends a message to websites requesting them not to track the user. At this time, we do not respond to Do Not Track browser settings or signals. For information about Do Not Track, please visit: www.allaboutdnt.org.

CONFIDENTIALITY AND SECURITY

We have taken reasonable and necessary steps to ensure that all Personal Information collected will remain secure. We have put in place appropriate physical, electronic, and administrative procedures in an effort to safeguard and help prevent unauthorized access, maintain data security, and correctly use the Personal Information that we collect.

We employ industry standard administrative, physical, and technical measures designed to safeguard and protect information under our control from unauthorized access, use, and disclosure. In addition, when we collect, maintain, access, use, or disclose your Personal Information, we will

do so using systems and processes consistent with information privacy and security requirements under applicable federal and state laws, including, without limitation, HIPAA.

Furthermore, your individual user account is protected by a password for your privacy and security. To ensure that there is no unauthorized access to your account and Personal Information, we suggest that you safeguard your password appropriately and limit access to your computer and browser by signing off after you have finished accessing your account.

We exercise great care to protect your personal information. However, we cannot ensure or warrant the security and confidentiality of any information that you transmit to us or receive from us via the Services offered through our Site and Mobile App, by Internet or wireless connection, including email, or the appropriateness of the measures we use to safeguard such information. Unauthorized entry, access, or use; loss; hardware or software failure; and other factors, may compromise the security of your information at any time. This is especially true for any information that you transmit to us via email or text message, since we have no way of protecting that information until it reaches us. E-mail and text message and the communication lines they travel over do not have the security features that are built into our Site and Mobile App and may not be secure. In addition, by downloading the Mobile App from a digital distribution platform such as the Apple App Store or Google Play (a "Mobile App Provider"), the Mobile App Provider and its agents may be able to identify you as a user of our Services. If you have reason to believe that your data or your interactions with us are no longer secure, you may contact us at the email address, mailing address or telephone number listed at the end of this Privacy Policy. In addition, if you have privacy or data security related questions, please feel free to contact the office identified at the end of this Privacy Policy.

PIHI is not responsible for and will not be a party to any transactions between you and a thirdparty provider of products, information or services. PIHI does not monitor such interactions to ensure the confidentiality of your Personal Information, including credit card information. Any separate charges, data records or obligations you incur in your dealings with third parties linked to or in conjunction with PIHI's Service are solely your responsibility.

THIRD PARTY LINKS

The Site may contain links to third party websites. This privacy policy does not apply to the linked sites, and PIHI does not control, nor are we responsible for, the content or privacy and security practices of those sites. Any personal information you provide to a linked site is provided directly to a third party and is subject to such third party's privacy policy. PIHI encourages you to learn more about such third party's privacy and security practices and policies before providing any of your personal information.

ACCESSING, CHANGING, AND DELETING YOUR INFORMATION

You may request access, changes, or deletions to your Personal Information and request information about our collection, use and disclosure of such information by contacting us at <u>info@medcarepharmacist.com</u>. We use best efforts to keep our records as accurate and complete as possible. You can help us maintain the accuracy of your information by notifying us of any changes to your Personal Information as soon as possible. Your rights to access, change, or delete your Personal Information are not absolute. We may deny you such rights when required by law or if the request would likely reveal Personal Information about a third party.

PRIVACY WITH RESPECT TO CHILDREN

PIHI does not knowingly collect Personal Information from children under the age of 13, and our Service is not directed at users under the age of 13. If we find that Personal Information has inadvertently been collected for an individual under the age of 13, we will immediately delete it.

RECOURSE MECHANISM

PIHI commits to resolve complaints about your privacy and our collection or use of your Personal Information. PIHI will respond to the inquiry or complaint within forty-five (45) days.

CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time by posting a new version online. If we make any material changes that affect you as determined by PIHI we will notify you by posting the revised Privacy Policy on our websites. We may request you to agree to the new terms, otherwise your continued use of the Service, and/or continued provision of Personal Information to us, will be subject to the terms of the then-current Privacy Policy.

TERMINATION

PIHI reserves the right to decide, at its sole discretion, to no longer offer you the Service. If PIHI decides to terminate your account, PIHI will either return or permanently destroy any copies it maintains of your Personal Information in accordance with its obligations under applicable law.

QUESTIONS AND SUGGESTIONS

If you have questions or suggestions, or wish to correct your Personal Information, please email PIHI at <u>info@medcarepharmacist.com</u> or write to us at:

ATTN: Privacy Officer Pharmacist Integrative Healthcare Inc. 21704 Devonshire Street #330 Chatsworth, CA 91311 USA