

## Soleo Health Privacy Policy

**Effective Date:** August 10, 2018

**Last Updated:** December 22, 2020

This Privacy Policy (the "Policy") applies to the websites, applications, and electronic communications on which it appears (the "Platform"). The Policy describes how the Soleo Health Holdings, Inc. as well as our affiliates and subsidiaries (collectively "Soleo" or "we" or "us" or "our") uses the Personal Information that we collect, receive, maintain, and store about you. Please read this Privacy Policy carefully, by interacting with us through the Platform you consent to this Policy. For information about Soleo's collection and use of Protected Health Information (PHI), please visit our HIPAA Notice of Privacy Practices at: <https://s3.us-west-2.amazonaws.com/soleo-uploads.aws.grav-dev.com/2022/12/13220933/HIPAA-Notice-of-Privacy-Practices-Dec-2022.pdf>.

### **1. Types of Personal Information Collected**

We collect a range of Personal Information. "Personal Information" is information that identifies, relates to, describes, or is reasonably capable of being associated with or linked to an individual. When we combine Personal Information with other information (i.e. information that does not, on its own, identify you), we treat the combined information as Personal Information.

**Contact and Demographic Information** – If you register for a Soleo Connect account, sign up for our newsletter, or submit an inquiry, we may collect your contact and mailing information. This may include your email name, address, and phone number. We may also collect your age to verify your ability to purchase our products.

**Payment Information** – If you make a payment through the Platform, we will collect your payment information including your credit card information and billing address. We will also collect your purchase details.

**Employment Information** – If you apply for employment with Soleo, we will collect your employment and work history, as well as personal information related to your potential employment. This may include your education and employment history, address and contact information, demographic information, and any other information included in your resume or application.

**Account Information** – If you create a "Soleo Connect" account with us, you will create and provide us with a user name and password, and may upload other personal information through our customer portal.

**Social Media Information** – If you connect to the Platform using third party social media platforms, or connect your account with us to an account on one of those social media accounts, we may include information from that social media account, including your user name and password, as well as information from you profile or that you post within the social media account.

**Location Data** – While navigating our Platform your mobile device or browser may share you're your location data, both through WiFi and GPS. Soleo will collect this information based on the settings of your phone and browser.

## 2. Sharing Personal Information

We may share your Personal Information in the following circumstances:

- **Within Soleo** – We may share your Personal Information within our family of companies.
- **Service providers** – When we hire a service provider to help operate the Platform or our business, we may give access to Personal Information as necessary to perform the service for Soleo. This may include service providers that operate our website, send our communications, or run our promotions.
- **Business Partners** – Soleo may share Personal Information to our trusted business partners. For example, we may share your Personal Information with a company when we co-sponsor a promotion or service. These partners may use your information to, among other things, send you information or contact you about their services and products.
- **Third Parties for Marketing Purposes** – We may share your Personal Information with third parties for their marketing purposes. This may include third parties whose services we believe you may be interested or who are interested in providing you with services. These third parties may share your information with others and may use this information for their own interest based advertising.
- **Legal obligation or protection from harm** – When Soleo has a good faith belief that access, use, preservation or disclosure of the Personal Information is reasonably necessary to (a) satisfy or comply with any requirement of law, regulation, legal process, or enforceable governmental request, (b) enforce or investigate a potential violation of the Terms of Use, (c) detect, prevent, or otherwise respond to fraud, security or technical concerns, (d) support auditing and compliance functions, or (e) protect the rights, property, or safety of Soleo, its users, or the public against harm.
- **Merger or sale** - If and when Soleo is involved in a merger, acquisition, or any form of transfer or sale of some or all of its business, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding. Personal Information may be transferred along with the business. Where legally required we will give you prior notice and if you have a legal right to do so, an opportunity to object to this transfer.
- **Purposes described to you** – We may share your Personal Information for other purposes, as we describe to you.

## 3. Cookies and Other Technologies

We collect information about users over time on the Platform by using several common types of cookies and other tracking technologies including web beacons, pixels, and flash cookies. We also have third parties that collect information in this way on our behalf and for their own purposes. Cookies are small files that download when you access certain websites. For more information about cookies visit: <http://www.allaboutcookies.org/>. Web beacons, pixels, and other tracking technologies operate independent of cookies.

To assist us with analyzing our website traffic through cookies and similar technologies, we use analytics services such as Google Analytics. For more information on Google Analytics' processing of your information, please see "[How Google uses data when you use our partners' Platforms or apps.](#)" You can opt out of Google Analytics by installing [Google's opt-out browser add-on](#).

These cookies may be ones placed by us (first-party) or by a third party. These cookies may also be Flash Cookies. To learn how to manage privacy and storage settings for Flash cookies [click here](#). We may use cookies that are session-based or persistent. Session cookies expire when you close your browser or turn off your device. Persistent cookies remain on your device after you close your browser or turn off device.

We may use a variety of cookies:

Type of Cookies	Description
<b>Required</b>	Required cookies are essential for the Platform to function properly and for you to navigate our Site and use its features, such as accessing secure areas of the Platform and using our services.
<b>Performance</b>	These cookies collect information about how you use the Platform, including which pages you go to most often and if they receive error messages from certain pages. These cookies do not collect information that individually identifies you. All information these cookies collect is aggregated and anonymous. It is only used to improve how the Platform functions and performs.
<b>Functionality</b>	Functionality cookies allow the Platform to remember information you have entered or choices you make (such as your username, language, or your region) and provide enhanced, more personal features. These cookies also enable you to optimize your use of the Platform after logging in. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize.
<b>Targeting or Advertising</b>	<p>From time-to-time, we may engage third parties to track and analyze usage and volume statistical information from individuals who visit the Platform. We sometimes use cookies delivered by third parties to track the performance of our advertisements. For example, these cookies remember which browsers have visited the Platform. The information provided to third parties does not include Personal Data, but this information may be re-associated with Personal Data after we receive it.</p> <p>By way of example, as you visit the Platform, advertising cookies may be placed on your computer so that we can understand what you are interested in. Our advertising partners then enable us to present you with retargeted advertising on other sites based on your previous interaction with the Platform.</p> <p>We also contract with third-party advertising networks and similar partners that collect IP addresses and other information on our Platform, from emails, and on third-party sites. Ad networks follow your online activities over time by collecting Site Navigational Information through automated means, including through the use of cookies. They use this information to provide advertisements about products and services tailored to your interests. You may see these advertisements on other websites. This process also helps us manage and track the effectiveness of our marketing efforts.</p> <p>Third parties, with whom we partner to provide certain features on the Platform or to display advertising based upon your web browsing activity, use Flash cookies to collect and store information. Flash cookies are different from browser cookies because of the amount of, type of, and how data is stored.</p>

You can control cookies and tracking tools. Some browsers have a “do not track” feature that prevents a website from tracking you, as well as additional cookie settings. Our Platform does not currently respond to these signals. If you choose to block cookies and other trackers, certain features of the Platform may not work. Blocking or rejecting cookies will not stop all of the tracking described in this Policy. These features and options are browser and device specific and are not uniform. You can usually find these settings in the options or preferences menu of your browser. To understand these settings, the following links for commonly used browsers may be helpful, or you can use the help option in your browser for more details:

- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Chrome](#)
- [Cookie settings in Safari web](#) and [iOS](#).

To find out more on how to manage and delete cookies, visit [aboutcookies.org](#). For more details on your choices regarding use of your web browsing activity for interest-based advertising you may visit the following sites:

- [networkadvertising.org](#)
- [optout.aboutads.info](#)
- [youradchoices.com](#)
- [youronlinechoices.eu](#)

On a mobile device, you may also be to adjust your settings to limit ad tracking.

#### **4. Your Choices**

You have certain choices about how we use your Personal Information. You can opt out-out of certain marketing. To opt-out of marketing communications, please email us at [marketing@soleohealth.com](mailto:marketing@soleohealth.com) or by following the instructions included in the email or text correspondence. Please note that, even if you unsubscribe from certain correspondences, we may still need to contact you with important transactional or administrative information, as permitted by law.

If your personally identifiable information changes, Soleo Health will endeavor to provide a way to correct, update and/or remove your previously provided personal data. This can be done by emailing a request to Soleo Health at [contact@soleohealth.com](mailto:contact@soleohealth.com).

#### **5. Children Under the Age of 13**

The Platform is meant for adults and we will not knowingly collect personally identifiable information from any person under the age of 13 without permission from a parent or guardian. The Platform are not designed to attract the attention of persons under the age of 13. If you are a parent or legal guardian and think your child has given us information you can email us at [marketing@soleohealth.com](mailto:marketing@soleohealth.com). You can also write to us at the address listed in the “Contact Us” section of this Policy. Please mark your inquiries “COPPA Inquiry.”

#### **6. California Privacy Rights**

Pursuant to California’s Shine the Light statute (Cal. Civ. Code Sec. 1798.83), you can control if we share information with third parties for their marketing purposes. To opt-out of us sharing your information with third parties for such promotional purposes, email us at [marketing@soleohealth.com](mailto:marketing@soleohealth.com) or write to us in the “Contact Us” section of this Policy and include “Marketing Opt-Out” in your request.

In addition, pursuant to the California Consumer Privacy Act of 2018 (“CCPA”), California residents have certain other rights concerning their personal information. This section describes (1) the categories of personal information, collected and disclosed by Soleo, subject to California privacy law, (2) your privacy rights under California privacy law, and (3) how to exercise your rights.

When we use the term “personal information” in this section, we mean information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

*a. Personal Information we Collect.*

If you are a California consumer, please be aware that we collect, process, and maintain personal information to fulfill certain business purposes related to our Platform. We will not collect additional categories of personal information or use personal information collected for additional purposes without providing you notice. Within the preceding twelve (12) months we and our service providers have and may collect, and you may consent to provide, the categories of personal information set forth below. We disclose each of these categories of personal information with our service providers for our business purposes (to enable the service providers to provide their services) and as otherwise described in the “How We Disclose Personal Information” section above.

- Identifiers (for example, name, postal address, date of birth, email address, IP address, and online identifiers);
- Categories of personal information as defined by Cal. Civ. Code § 1798.80 (for example, name, signature, Taxpayer Identification Number, telephone number, passport number, driver’s license number, insurance policy number, account numbers);
- Protected classifications under California or federal law (for example, age, citizenship status, national origin or ancestry);
- Commercial information (for example, transaction history);
- Internet or other electronic network activity information, including information on your usage of our Sites;
- Geolocation data;
- Sensory data (for example, audio from call recordings);
- Inferences drawn from any information identified above to create a profile

*b. Your Privacy Rights.*

In accordance with the CCPA, California consumers may exercise under certain conditions the following four (4) categories privacy rights with respect to their personal information. **Please note:** you will not be discriminated against in any way by virtue of your exercise of the rights listed below, which means we will not deny goods or services to you, provide a different prices or rates for goods or services to you, or provide a different level or quality of goods or services to you.

Privacy Right	Description
Notice	You have the right to be notified of what categories of personal information will be collected at or before the point of collection and the purposes for which they will be used and shared.

Access	You have the right to request the categories of personal information that we collected in the previous twelve (12) months, the categories of sources from which the personal information was collected, the specific pieces of personal information we have collected about you, and the business purposes for which such personal information is collected and shared. You also have the right to request the categories of personal information which were disclosed for business purposes, and the categories of third parties in the twelve (12) months preceding your request for your personal information.
Data Portability	You have the right to receive the personal information you have previously provided to us.
Erasure	You can request to have your personal information deleted from our servers and we will direct our service providers to do the same. However, please be aware that we may not fulfill your request for deletion if we (or our service provider(s)) are required to retain your personal information for one or more of the following categories of purposes: (1) to complete a transaction for which the personal information was collected, provide a good or service requested by you, or complete a contract between us and you; (2) to ensure our website integrity, security, and functionality; (3) to comply with applicable law or a legal obligation, or exercise rights under the law (including free speech rights); (4) to otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.
To Opt Out	You can request to opt out of us selling your information personal information. To exercise this right please <a href="#">click here</a> and follow the instructions to submit your request.

c. *How to Exercise Your Rights.*

If you would like to exercise your rights listed above, please send (or have your authorized agent send) an email to [marketing@soleohealth.com](mailto:marketing@soleohealth.com) or call us toll-free at: 833.234.1010. You have a right not to receive discriminatory treatment by any business when you exercise your CCPA rights.

While we take measures to ensure that those responsible for receiving and responding to your request are informed of your rights and how to help you exercise those rights, when contacting us to exercise your rights, we ask you to please adhere to the following guidelines:

- ***Tell Us Which Right You Are Exercising:*** Specify which right you want to exercise and the personal information to which your request relates (if not to you). If you are acting on behalf of another consumer, please clearly indicate this fact and your authority to act on such consumer’s behalf;
- ***Help Us Verify Your Identity:*** Provide us enough information to verify your identity. For example, provide us (at a minimum) your full name, address, and phone number. Please note that if we cannot initially verify your identity, we may request additional information to complete the verification process. Any personal information you disclose to us for purposes of verifying your identity will solely be used for the purpose of verification.
- ***Direct Our Response Delivery:*** Inform us of the delivery mechanism with which you prefer to receive our response. You may specify, for example, email, mail, or through your account (if you have one with us).

Please note that you don't need to create an account with us in order to make a request to exercise your rights hereunder.

*b. How We Respond to Your Requests.*

In all cases, we will respond to your request within 45 days. However, where reasonably necessary, we may extend our response time by an additional 45 days, provided we send you notice of such extension first. We will provide the information to you via your preferred delivery mechanism. If the information is provided to you electronically, we will provide you the information in a portable format and, to the extent technically feasible, in a machine readable, readily useable format that allows you to freely transmit this information without hindrance.

Please note that we will not charge you for making a request, provided that you make no more than two (2) requests per year. If you make three (3) or more requests in any given twelve (12) month period, we may refuse to respond to such requests, if determined by us to be unfounded or excessive (e.g. repetitive in nature), or we may charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested. If we refuse to act on the request, we will provide you notice and the reason for our refusal to act.

**7. Storage, Security and Retention of Information**

Soleo has taken reasonable steps to protect the information users share with us, including, but not limited to, setup of processes, equipment and software to avoid unauthorized access or disclosure of this information. No transmission of information via the Internet can be entirely secure, however, so please always use caution when submitting Personal Information. We will retain your Personal Information in compliance with the uses described in this Policy, as well as to comply with our legal, financial reporting, or compliance obligations.

We store information only inside the United States. If you live outside of the United States, be advised that we may transfer and store your information to the United States. US law may not provide the same protections as the laws in your country. By providing us with your personal information you agree to the processing of it in the United States as permitted by US law.

**8. Links to Third Parties and their Sites**

Our Platform may include third party content and links to third party websites and services that collect Personal Information. We do not control these third parties and this Policy does not apply to their privacy practices. We are not responsible for the practices of these third parties or how they use information you provide to them. Please read the third parties' privacy policies carefully.

**9. Contacting Soleo**

If you have any questions about this Policy, or the privacy practices of Soleo, please email us at [marketing@soleohealth.com](mailto:marketing@soleohealth.com) or write to us at:

Soleo Health  
Attn: Communications Department  
2801 Network Blvd., Ste. 505  
Frisco, TX 75034

**10. Updates**

Please note that this policy may be amended from time to time. Unless otherwise indicated, any changes to this Policy will apply immediately upon posting to the Platform so please check our site periodically for updates. You can see when this Policy was last updated by reviewing the "Last Updated" legend at the top of this page. We will provide notice of material changes by updating the Policy here, and communicating with you in the manner and format in which we typically communicate with you in our regular course of business, as required by applicable law.