



## INTELLIAIDE, LLC PRIVACY POLICY

**Last Updated: November 17, 2017**  
**Effective Date: November 17, 2017**

IntelliAIDE, LLC (“IntelliAIDE” or “we”) provides this Privacy Policy to inform you of our policies and procedures regarding the collection, use and disclosure of personal information we receive from users of our website, accessible at [intelliaide.com](http://intelliaide.com) (“Site”), and our mobile and web applications (collectively, “IntelliAIDE App”). This Privacy Policy applies to your access to and use of the Site and the IntelliAIDE App and by choosing to use them, you consent to the collection, transfer, processing, storage, disclosure and other uses of your information described in this Privacy Policy. If you disagree with any portion of this Privacy Policy, your sole recourse is to discontinue your use of and access to the Site and the IntelliAIDE App.

### **I. DEFINITIONS.**

- a. As used in this policy, the terms “using” and “processing” information include using cookies on a device, subjecting the information to statistical or other analysis and using or handling information in any way, including, but not limited to collecting, storing, evaluating, modifying, deleting, using, combining, disclosing and transferring information within our organization or among our affiliates within the United States or internationally.
- b. As used below, the term “Personal Information” is used to indicate any piece of information or data that can be used to identify any individual, as well as medical statistics, health data, and private health information you voluntarily provide to us. Personal Information may relate to you as an account holder, or it may relate to the individual that is the subject of any Profile that you create.
- c. Any other defined term that is not defined in this Privacy Policy has the meaning given that term in the IntelliAIDE Terms of Service or any Additional Terms of Service, as applicable.

**II. MODIFICATIONS.** IntelliAIDE reserves the right, at its sole discretion, to modify this Privacy Policy at any time. If we modify this Privacy Policy, we will post the modified Privacy Policy and alert you to the modified Privacy Policy on the Site and the IntelliAIDE App or will otherwise provide you with notice of the modification at least seven (7) days before the modified Privacy Policy takes effect. We will also update the “Effective Date” at the top of this Privacy Policy. By continuing to access or use the Site and the IntelliAIDE App on or after the Effective Date, you are indicating that you agree to be bound by the modified Privacy Policy. If the modified Privacy Policy is not acceptable to you, your only recourse is to cease using the Site and IntelliAIDE App. Information we collect will remain subject to the Privacy Policy in effect at the time of collection unless and until you consent to the application of any modified Privacy Policy to such information.

### **III. INFORMATION WE COLLECT.**

#### **a. Personal Information.**

- i. You may browse the Site and download the IntelliAIDE App without expressly providing any Personal Information that expressly identifies you; however, to make full use of our services as made available via the Site and/or the IntelliAIDE App, you will be required to register for an account. When you register with us to create an account and become an account holder, we will ask you for certain Personal Information. In order to set up your account, you need to provide your email address or mobile number and you will need to select a password. If you elect to add any other Personal Information to your Account we will collect that information and use it and share it as set forth below.
- ii. As an account holder, you may also set up one or more Profiles within the IntelliAIDE App. The Profile may be personal to you and your healthcare or the subject of the Profile may be a third-party for whom you have authorization to collect data and monitor their healthcare. When you set up a Profile, we will ask you to provide Personal Information about the individual that is the subject of the Profile, whether yourself or a third-party. When you set up a Profile in the IntelliAIDE App, we will collect and store any Personal

Information that you may elect to provide to us as part of your Account Holder Content, which may include but is not limited to medication information, gender, date (or year) of birth, personal contacts, photographs and files, notes on your symptoms and other journal information, medical treatment instructions, and your doctor's contact information. In the event you set up a Profile that relates to someone other than yourself, you are solely responsible for ensuring that you have any and all consents and permissions to share that Personal Information with us and to use that information as part of the IntelliAIDE App.

- iii. You may provide us with Personal Information of a third-party, as contemplated by the IntelliAIDE Terms of Service, to access a Profile that you create. If you elect to invite any third-party to access a Profile connected to your account, we will ask you for such third-party's name and email address. We will send the third-party an email or text message inviting him or her to register for the IntelliAIDE App. The third-party may contact us at [support@intelliaide.com](mailto:support@intelliaide.com) to request that we remove this information from our database. We cannot control whether such third-party will elect to register for the IntelliAIDE App.
- b. **Non-Personal Information.** We also collect the following information any time you visit our Site or the IntelliAIDE App, as applicable. This information may not necessarily identify you, but if we have your Personal Information, or you otherwise set up an Account with us, we may link any of the below non-personal information with your Personal Information in our records:
  - i. *Browser Log Data.* When you visit the Site, whether as a Subscriber or a non-registered user just browsing the Site, our servers automatically record information that your browser sends whenever you visit a website ("Browser Log Data"). This Browser Log Data may include information such as your device's Internet Protocol ("IP") address, browser type, operating system or the webpage you were visiting before you came to our Site, pages of our Site that you visit, the time spent on those pages, access times and dates, and other statistics. We use this information to monitor and analyze use of the Site and for the Site's technical administration, to increase our Site's functionality and user-friendliness, and to better tailor it to our visitors' needs. For example, we use this information to verify that visitors to the Site meet the criteria required to process their requests. We do not treat Browser Log Data as Personal Information or use it in association with other Personal Information, though we may aggregate, analyze and evaluate such information for the same purposes as stated above regarding other Non-Identifying Information.
  - ii. *Cookies.* The Site uses "cookies" to collect information. A cookie is a small data file that we transfer to your device for record-keeping purposes. We use cookies for two purposes. First, we utilize persistent cookies to save your login information for future logins to the Site. Second, we utilize session ID cookies to enable certain features of the Site, to better understand how you interact with the Site and to monitor aggregate usage by users and web traffic routing on the Site. Unlike persistent cookies, session cookies are deleted from your device when you log off from the Site and then close your browser. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from websites you visit. If you do not accept cookies, however, you may not be able to use all portions or functionalities of the Site.
  - iii. *App Usage Data.* When you use the IntelliAIDE App, whether as a Subscriber or a non-registered user, our servers automatically record information that your mobile device sends whenever you use an Internet service. ("App Usage Data"). This App Usage Data may include information such as your device's IP address, device model and version, device identifier, operating system, time zone, name of your mobile operator or Internet Service Provider ("ISP"), application performance measurements, and error conditions. It may also include a record of when specific features of the IntelliAIDE App or IntelliAIDE Service are used. We use this information to monitor and analyze use of the IntelliAIDE App for its technical administration, to increase its functionality and user-friendliness, and to better tailor it to our subscribers' needs. For example, we use this information to measure the popularity of different features and to more effectively resolve customer issues. We may aggregate, analyze and evaluate such information for the same purposes as stated above regarding other Non-Identifying Information.
  - iv. *Location Information.* The App, with your consent, may access your location. IntelliAIDE will only access your location services while you are using the App. You may choose to

allow IntelliAIDE to access your location by granting the App access to your device's location, when prompted by the App, or through your device's location services settings. IntelliAIDE uses the Google Places API(s) for location searches and as a result is using the Google Maps/Google Earth API(s). Pursuant to the Google Maps/Google Earth APIs Terms of Service, use of this location feature is also subject to the Google privacy policy, which can be found at <http://www.google.com/privacy.html>, and is incorporated with this reference.

#### IV. HOW WE USE YOUR INFORMATION

- a. We may use information we collect about you to:
  - i. Administer your account;
  - ii. Provide you with access to particular tools and services;
  - iii. Respond to your inquiries and send you administrative communications;
  - iv. Obtain your feedback on our sites and our offerings;
  - v. Statistically analyze user behavior and activity;
  - vi. Provide you and people with similar demographic characteristics and interests with more relevant content and advertisements;
  - vii. Conduct research and measurement activities;
  - viii. Send you personalized emails or secure electronic messages pertaining to your health interests, including news, announcements, reminders and opportunities; or
  - ix. Send you relevant offers and informational materials on behalf of our sponsors pertaining to your health interests.
- b. We may combine Personal and Non-Personal Information collected about you, and may combine this information with information from external sources. Third parties may also use Non-Personal Information in order to display advertising that reflects the interests and preferences of our user community.
- c. We may contact you in various ways including, but not limited to, email, Inbox in the app, telephone, cell phone, and SMS/text messages.
- d. We may anonymously aggregate and combine all Personal Information that we receive through your Subscriber Accounts and your Profiles with the information of other Subscribers and Profiles. We use this anonymous information to attempt to provide you with a better experience, to improve the quality and value of our services and to analyze and understand how our Site and the IntelliAIDE App are used.
- e. Personal Information such as medical statistics, health data, and health information may be de-identified (meaning, removed of all personally identifiable information such as your name and specific contact information) and provided to third-parties for research and health data compilation purposes.

#### V. INFORMATION SHARING AND DISCLOSURE.

- a. **Third-party Users.** In the event that a third-party user registers for access to the IntelliAIDE App pursuant to an invitation issued by your Account, we will provide them with access to all Profiles related to such Account. We cannot control how any third-party user may use or disclose or otherwise exploit any Personal Information or other Profile Content that you may elect to make available to such third-party. You expressly release IntelliAIDE from any responsibility and liability resulting from any third-party access to any Personal Information or Account Holder Content that you may permit. Which information, if any, you choose to provide and make available to third parties via the IntelliAIDE App should be carefully considered by you prior to disclosure. Do not disclose anything you wish to remain strictly private.
- b. **Other Third Parties.** If you elect to use or otherwise take advantage of some of the other third-party services that we may provide and make available to you, such as research, we will share certain of your information with such third-party and will disclose to you at the time what information would be necessary to share with such third-party.
- c. **Service Providers.** We will disclose Personal Information to the third-party service providers that we engage to assist us in making the Site, IntelliAIDE App and IntelliAIDE Services available. These service providers consist of our datacenter provider, storage provider, customer support system provider, email service providers, and software development contractors. These third parties

have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

- d. **Compliance with Laws and Law Enforcement.** While IntelliAIDE maintains information regarding your health on your behalf, IntelliAIDE is not a covered entity under the Health Insurance Portability and Accountability Act (HIPAA). However, we take the protection of your private health information very seriously. In the event that we receive any subpoena or similar request from a court, government or law enforcement official, we will only disclose any Personal Information about you or other information in our custody or control as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), to protect the property and rights of IntelliAIDE or a third-party, to protect the safety of the public or any person, or to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, unethical or legally actionable activity. Given the sensitivity of the Personal Information within your Profiles, it is our policy to carefully review any such request for information in our systems and we will decline to comply with any such request in our discretion.
- e. **Business Transfers.** IntelliAIDE may sell, transfer or otherwise share some or all of its assets, including your Personal Information and related account, Profiles and Account Holder Content, in connection with a merger, acquisition, reorganization or sale of assets or in the event of bankruptcy.

**VI. CHANGING OR DELETING YOUR INFORMATION.** All account holders may review, update, correct or delete their account information and any associated Personal Information or Account Holder Content by contacting us or by accessing the IntelliAIDE Platform. If you would like to close your Account or delete any Profile from your Account, please contact us at [support@intelliaide.com](mailto:support@intelliaide.com). We will use commercially reasonable efforts to honor your request. We will retain an archived copy of your records as set forth below.

**VII. DATA RETENTION.** We will retain the information you provide via our Site or the IntelliAIDE App for as long as your account is active or as needed to provide you with the IntelliAIDE Services. We will also retain and use the information you provide via our Site or IntelliAIDE App, as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. If you delete your Account or any Profile, any Personal Information associated with the same is moved out of our active databases, but will still be retained in our systems pursuant to our data backup and retention policies. If we sell your de-identified Personal Information in accordance with Section IV(e), such third-party purchasers may have different data retention policies and your de-identified Personal Information may be kept indefinitely by them.

**VIII. DO NOT TRACK SIGNALS AND AD NETWORKS.** Our Site does not have the capability to respond to “Do Not Track” signals received from various web browsers.

**IX. SECURITY – HOW WE PROTECT YOUR DATA.** We use commercially standard data protection measures to protect your Personal Information. All communications between you and the Site, and between the App and the Site, are encrypted using the highest level encryption supported by your device. Data stored in the app and on the Site is encrypted at rest using industry-standard AES encryption. Our storage and servers are redundant, so if something fails we can recover quickly. In case of disaster, data is continuously backed up in off-site storage. Our application servers are on a private network, isolated from the Internet. We keep up-to-date with security patches for the software we use. In addition to protecting against external threats, we’ve adopted policies and procedures to avoid exposing your data even inside IntelliAIDE. Of course, we must comply with valid legal requests, such as a court order, but otherwise, we won’t look at or disclose your data unless you tell us to or unless we sell de-identified data in accordance with Section IV(e). If you’re having a problem that requires us to access your account, we will always ask first.

**X. IDENTITY THEFT.** Identity theft is of great concern to IntelliAIDE. Safeguarding information to help protect you from identity theft is a top priority. We do not and will not, at any time, request your credit card information, your login information, or national identification numbers in a non-secure or unsolicited e-mail or telephone communication. For more information about identity theft, visit the Federal Trade Commission’s website at [www.ftc.gov](http://www.ftc.gov).

- XI. SECURITY BREACH.** The Site, IntelliAIDE App and IntelliAIDE Services rely on the Internet and mobile networks, which are not always secure. We use commercially reasonable efforts to maintain the confidentiality, availability and integrity of any information we collect, but we cannot assure that the use of the Site, IntelliAIDE App or IntelliAIDE Services are secure or that your Personal Information or any other data that we may have will be secure. In the event we become aware of a security incident, we will notify you to the extent required under applicable law.
- XII. REPORTING A PROBLEM.** If you feel your account may have been compromised, or you discover abuse or misuse of the Site or the IntelliAIDE App, please report it immediately to [support@intelliaide.com](mailto:support@intelliaide.com) and we will investigate. If you're a security researcher who's discovered an issue, please see our security response page for our reporting procedure.
- XIII. INTERNATIONAL TRANSFER.** Your information may be transferred to — and maintained on — devices located outside of your state, province, country or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to provide information to us, IntelliAIDE transfers Personal Information to the United States and processes it there. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.
- XIV. LINKS TO OTHER WEBSITES.** Our Site may contain links to other websites. If you choose to click on a third-party link, you will be directed to that third-party's website. The fact that we link to a website is not an endorsement, authorization or representation of our affiliation with that third-party, nor is it an endorsement of their privacy or information security policies or practices. We do not exercise control over third-party websites. These other websites may place their own cookies or other files on your device, collect data or solicit personal information from you. Other websites follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies or statements of the other websites you visit.
- XV. OUR POLICY TOWARD CHILDREN.** The Site and IntelliAIDE Apps are not directed to persons under thirteen (13) years of age. We do not knowingly collect personally identifiable information from children under thirteen (13). If a parent or guardian becomes aware that his or her child has provided us with Personal Information without their consent, he or she should contact us at [support@intelliaide.com](mailto:support@intelliaide.com). If we become aware that a child under thirteen (13) has provided us with Personal Information, we will delete such information from our files. If you have created a Profile for a minor under the age of 18, you represent and warrant to us at IntelliAIDE that you are the parent or legal guardian for that minor or otherwise have the right to provide us the Personal Information of that minor.

If you have any questions about this Privacy Policy, please contact IntelliAIDE at [support@intelliaide.com](mailto:support@intelliaide.com).