

Healiom

PRIVACY POLICY

At Healiom your privacy is important to us. Our Privacy Policy describes the information we collect, how we collect information, and the reasons we collect information. This Privacy Policy also describes the choices you have with the information we collect, including how you can manage, update, or request to delete information.

Please take a moment to review this Privacy Policy. You may scroll through this Privacy Policy or use the headings below. It is important that you understand this Privacy Policy. By using our Platform, you are agreeing to the terms of this Privacy Policy. If you have any questions or concerns about this Privacy Policy, you may [Contact Us](#) at any time.

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I. Who is Healiom?

Healiom is an AI-based, real-time, logistics platform that enables access to real-time medical specialist care for mid-level acuity conditions and chronic condition risk assessment. Timely access to specialist care ultimately improves quality, risk scores and healthcare economics.

Healiom is not a medical group or a health care provider. Healiom provides its users with the ability to obtain a telemedicine consultation provided by independent medical practitioners including, but not limited to, [INSERT PC NAME] (“**Medical Group**”), an independent medical group with a network of United States based health care providers (each, a “**Provider**”). Medical Group (or your own medical provider if you do not use a Medical Group Provider) is responsible for providing you with a Notice of Privacy Practices describing its collection and use of your health information, not Healiom.

II. Key Terms & Definitions and Our Privacy Policy

It is helpful to start by explaining some of our key terms and definitions used in this Privacy Policy.

Key Term	Definition
our “App(s)”	Healiom, our mobile application.
“Personal Information”	Any information relating to an identified or identifiable individual and any information listed here .
our “Platform”	Holmes (our, “AI Software”) and Healiom (our, “Platform Software”)
“Privacy Policy”	This privacy policy.
our “Services”	Any services provided through our Platform.
our “Software”	Holmes, our “AI Software” and
our “Terms of Service”	Our terms of service located here.

“Healiom,” “we,” “us,” or “our”	Healiom, Inc.
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When does our Privacy Policy apply?

This Privacy Policy describes the types of information we may collect from you when:

- You visit or use our Platform, App and/or Software;
- We communicate in e-mail, text message, and other electronic messages between you and us; and
- We communicate in person, such as on the phone or through a telehealth visit.

When does our Privacy Policy not apply?

This Privacy Policy does not apply to information collected by any other website or app operated either by us or by a third party, unless the website or app is listed above or links to this Privacy Policy. It also does not apply to any website or app that we may provide a link to or that is accessible from our Platform.

Our Privacy Policy and Terms of Use.

This Privacy Policy is incorporated into our Terms of Use, which also apply when you use our Platform.

III. Personal Information

What is Personal Information?

Personal information is information from and about you that may be able to personally identify you. We treat any information that may identify you as personal information. For example, your name and e-mail address are personal information.

What types of Personal Information do we collect?

We may collect and use the following personal information (hereinafter, collectively referred to as “Personal Information”):

Categories of Personal Information	Specific Types of Personal Information Collected
Personal Identifiers	a real name, home address, driver’s license number, birth date, e-mail address, shipping address, or Patient and/or insurance ID.
Information that identifies, relates to, describes, or is capable of being associated with a particular individual	name, physical characteristics or description, telephone number, credit card number, debit card number, or any other financial information, health or medical information, medical conditions,

	and medications currently taking or prescribed
Characteristics of protected classifications under federal law.	Race, Color, Age, National origin, Sex/Sex Life (including gender, gender identity, gender expression, pregnancy, or child birth, and related medical conditions) or Disability
Biometric information	Photos, faceprint, video, fingerprint, health data, and voice
Internet or other electronic network activity information	IP address, device mode, device ID, OS version, device language, operating system, browser type, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.
Geolocation data	Physical location or movements, local time, and local time zone.
User Generated Content	Information you provide to be published or displayed (hereinafter, "Posted") on public areas of our Website or transmitted to other users of the Website or other third parties.

Health Information

Some Personal Information we collect may constitute protected health information under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Protected health information, as that term is defined by HIPAA, means individually identifiable health information that is held or maintained by a covered entity, such as your Provider, or its business associate, such as Healiom. If your Personal Information is protected health information under HIPAA, its use and disclosure will be governed by the Notice of Privacy Practices your Provider will provide you. If your Personal Information is not protected health information under HIPAA, this Privacy Policy will govern the use and disclosure of your Personal Information.

As set forth above, your Provider will provide you with a Notice of Privacy Practices describing their collection and use of your health information, not Healiom. We will only collect and use protected health information for

the purposes of providing the Services and we only collect the minimum amount necessary to fully perform and provide the Services on our Platform. We may combine your protected health information with Personal Information that we have either obtained from you or through a third-party, such as your Provider, health insurer, employee benefits program, or other health care providers. Protected health information will not be used for any other purpose, including marketing, without your consent.

How do we collect your Personal Information?

We collect most of this Personal Information directly from you. For example, when we speak to you by phone, text message, and e-mail. Additionally, we will collect information from you when you visit our App and fill out forms, use our Software, or engage with or purchase our Services.

We may also collect Personal Information in the following ways:

- **From your mobile device or smart watch.**
- **From third-party apps** you choose to connect your mobile device to, such as Apple Health or Google Fit.
- **When you make payments through the Platform.** We do not collect or store financial account information, though we may receive transaction identifiers and summary information that does not include credit card or bank account numbers.
- **When You Contact Us.** When you contact Healiom directly, such as when you contact our Customer Support team, we will receive the contents of your message or any attachments you may send to us, as well as any additional information you choose to provide.

We will also collect information automatically as you navigate through our Platform. We use the following technologies to automatically collect data:

- **Cookies.** We and our service providers may use cookies, web beacons, and other technologies to receive and store certain types of information whenever you interact with our Platform or Services through your computer or mobile device. A "cookie" is a small file or piece of data sent from a website and stored on the hard drive of your computer or mobile device. Some of the cookies we use are "session" cookies, meaning that they are automatically deleted from your hard drive after you close your browser at the end of your session. Session cookies are used to optimize performance of the Website and to limit the amount of redundant data that is downloaded during a single session. We also may use "persistent" cookies, which remain on your computer or device unless deleted by you (or by your browser settings). We may use persistent cookies for various purposes, such as statistical analysis of performance to ensure the ongoing quality of our Platform and/or the Services. We and third parties may use session and persistent cookies for analytics and advertising purposes, as described herein. On your computer, you may refuse to accept browser cookies by activating the appropriate setting on your browser, and you may have similar capabilities on your mobile device in the preferences for your operating system or browser. However, if you select this setting you may be unable to access or use certain parts of our Platform or the Services. Unless you have adjusted your browser or operating system setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Platform.

How do we use your Personal Information?

We may use your Personal Information for the following purposes:

- Operate, maintain, supervise, administer, and enhance our Platform or the Services, including monitoring and analyzing the effectiveness of content on the Platform, aggregate site usage data, and other usage of the Platform and/or the Services such as assisting you in completing the registration process.

- Provide our Services to you, in a custom and user-friendly way.
- Provide you with information or Services that you request from us or that may be of interest to you.
- To provide you notices or about your account.
- Contact you in response to a request.
- To notify you about changes to our Platform and/or the Services we offer or provide through them.
- Fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- Anonymize and aggregate information for analytics, reporting and the improvement of our Software and Platform.
- To respond to law enforcement requests, court orders, and subpoenas and to carry out our legal and contractual obligations.
- Authenticate use, detect fraudulent use, and otherwise maintain the security of our Platform and the safety of others.
- Any other purpose with your consent.

How do we share your Personal Information?

We may share Personal Information with third parties in certain circumstances or for certain purposes, including:

- **Our business purposes.** We may share your Personal Information with our affiliates, vendors, service providers, and business partners, including our data hosting and data storage partners, providers, technology services and support, and data security advisors. We may also share your Personal Information with professional advisors, such as auditors, law firms, and accounting firms. We will never sell your Personal Information.
- **Your healthcare providers or family.** With your consent, we may share your information, including information collected from your use of our Platform, with your health care providers and/or family members (e.g., immediate family or friends) that you designate to receive your information.
- **With your consent.** We may share your Personal Information if you request or direct us to do so.
- **Compliance with law.** We may share your Personal Information to comply with applicable law or any obligations thereunder, including cooperation with law enforcement, judicial orders, and regulatory inquiries.
- **Business Transfer.** We may share your Personal Information to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us about our users are among the assets transferred.
- **To enforce our rights.** We may share your Personal Information to enforce any applicable terms and conditions and Terms of Use, and to ensure the safety and security of our Services and our users.
- **De-identified information.** We may also disclose de-identified information, so that it cannot be reasonably used to identify any individual, with third parties for marketing, advertising, research, or similar purposes.

If you do not wish to have your e-mail address used by Healium to promote our own Services, you can opt-out at any time by clicking the unsubscribe link at the bottom of any e-mail or other marketing communications you receive from us or logging onto your Account Preferences page. This opt out does not apply to information provided to Healium as a result of a product purchase, or your use of our Platform and/or the Services. You may have other options with respect to marketing and communication preferences through our Platform.

How do I access and correct my Personal Information?

You can review, change, revise, or amend your Personal Information or delete your account by logging into our Platform and visiting the “Settings” sections of our Platform. We cannot delete your personal information except by also deleting your account with us. We may also not be able to accommodate your request if we believe it would violate any law or legal requirement or cause the information to be incorrect.

IV. Who may use the Services?

Healium operates subject to state and federal regulations, and the Platform and/or the Services may not be available in your state or country. You represent that you are not a person barred from enrolling for or receiving the Services under the laws of the United States or other applicable jurisdictions in which you may be located. Accessing the Platform and/or obtaining the Services from jurisdictions where content is illegal, or where we do not offer the Platform and/or the Services, is prohibited.

V. Children’s Privacy

Our Platform and our Services are not intended for individuals under the age of 18. We do not knowingly collect or sell Personal Information from children under the age of 18. If you are under the age of 18, do not use or provide any information on or to the Platform or through any of its features. If we learn we have collected or received Personal Information from a child under the age of 18 without verification of parental consent, we will delete it. If you are the parent or guardian of a child under 18 years of age whom you believe might have provided use with their Personal Information, you may [Contact Us](#) to request the Personal Information be deleted.

VI. Does Healium respond to Do Not Track signals?

Some web browsers have a “Do Not Track” feature. This feature lets you tell websites you visit that you do not want to have your online activity tracked. These features are not yet uniform across browsers. Our Platform is not currently set up to respond to those signals.

VII. Data Security

We have taken steps and implemented administrative, technical, and physical safeguards designed to protect against the risk of accidental, intentional, unlawful, or unauthorized access, alteration, destruction, disclosure, or use. The Internet is not 100% secure and we cannot guarantee the security of information transmitted through the Internet. Where you have been given or you have chosen a password, it is your responsibility to keep this password confidential.

The sharing and disclosing of information via the internet is not completely secure. We strive to use best practices and industry standard security measures and tools to protect your data. However, we cannot guarantee the security of Personal Information transmitted to, on, or through our Services. Any transmission of Personal Information is at your own risk. We are not responsible for the circumvention of any privacy settings or security measures contained on our Platform, in your operating system, or mobile device.

VIII. California’s Shine the Light Law.

California Civil Code Section 1798.83 (California’s “Shine the Light” law) permits users of our Platform and/or the Services that are California residents and who provide Personal Information in obtaining products and services for personal, family, or household use to request certain information regarding our disclosure of

Personal Information to third parties for their own direct marketing purposes. If applicable, this information would include the categories of Personal Information and the names and addresses of those businesses with which we shared your Personal Information with for the immediately prior calendar year (e.g. requests made in 2021 will receive information regarding such activities in 2020). You may request this information once per calendar year. To make such a request, please [Contact Us](#) using the information below.

IX. Changes to our Privacy Policy

We may update our Privacy Policy periodically to reflect changes in our privacy practices, laws, and best practices. We will post any changes we make to our Privacy Policy on this page with a notice that the Privacy Policy has been updated on our App's home screen. If we make material changes to our practices with regards to the Personal Information we collect from you, we will notify you by e-mail to the e-mail address specified in your account and/or through a notice on the App's home screen. The date this Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically accessing the Platform and reviewing this Privacy Policy to check for any changes.

X. Contact Us

If you have any questions, concerns, complaints or suggestions regarding our Privacy Policy or otherwise need to contact us, you may contact us at the contact information below or through the "Contact Us" page on the Platform.

How to Contact Us:

Healiom, Inc.

1764 Hamlet St.

San Mateo, CA 94403

Telephone: Add #

E-mail: Privacy@Healiom.com