

SCP HEALTH

PRIVACY POLICY

At SCP Health 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. 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
“Devices”	Remote monitoring, wearable devices and other health devices that collect or transmit health, physical condition, diagnostic and other information to our Platform.
“Medical Group”	The medical group providing medical and healthcare services through our Platform.
“Personal Information”	Any information relating to an identified or identifiable individual and any information listed here .
“Platform”	Our Website and/or Software.
“Privacy Policy”	This privacy policy.
“Products”	Any products available for purchase on our Platform.
“Providers”	Healthcare providers that provide medical and healthcare services through our Platform.
our “Services”	Any services provided through our Platform.
our “Software”	Any software that we license or otherwise permit you to use as part of or in connection with the Platform.
our “Terms of Service”	Our terms of service located here .

our "Website(s)"	The website(s) where this Privacy Policy is posted, including [INSERT WEBSITE w/ HYPERLINK]
"SCP Health," "we," "us," or "our"	Medical Groups listed in Exhibit A

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, including our Website, App, and/or Software;
- You wear any Devices that connect to a mobile device running our App or other aspects of our Platform;
- We communicate in email, 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 operated either by us or by a third party, unless the website is listed above or links to this Privacy Policy. It also does not apply to any website that we may provide a link to or that is accessible from our Platform.

This Privacy Policy does not apply to information collected from users who log-in to the password-protected and secure portions of our Platform ("**Secure Platform**") in connection with utilizing telehealth services or otherwise receiving healthcare treatment, services or care coordination through our Platform. The Secure Platform allows users who obtain the Services ("**Patients**") to perform certain functions or obtain the Services (such as telehealth visits from Medical Group or Providers). All information collected and stored by us or added by Patients into such Secure Platforms is considered Protected Health Information ("**PHI**") and/or medical information and is governed by applicable state and federal laws that apply to that information, for example the Health Insurance Portability and Accountability Act ("**HIPAA**"). How we use and disclose such PHI is in accordance with the applicable Notice of Privacy Practices provided to you by the Medical Group. In the event of a conflict between the terms of this Privacy Policy and the Notice of Privacy Practices, the terms of the Notice of Privacy Practices will prevail. We will not use or disclose information collected from the Secure Platform or received from Medical Group or your Provider for advertising, marketing, or other use-based data mining purposes without your prior consent. We will not sell any PHI.

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.

II. 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 email 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, birth date, email address, shipping address, or Patient ID.
Information that identifies, relates to, describes, or is capable of being associated with a particular individual	name, username or online identifier, physical characteristics or description, shipping address, telephone number, credit card number, debit card number, or any other financial information, health or medical information, weight, body mass index (BMI), whether you are a smoker or non-smoker, medical conditions, family medical history, medications currently taking or prescribed, and similar information.
Characteristics of protected classifications under California or federal law.	Race, Color, Age, National origin, or Disability
Biometric information	Photos, video, 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 user’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	You may use your mobile device to add notes, tags, or voice memos to EKG recording you make with our Devices. For example, you may add a note to an EKG recording to describe how you were feeling at the time of the recording, what you were doing, or your diet related to specific health conditions. We will automatically transcribe any voice memos and include them with the EKG recordings.
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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 email. Additionally, we will collect information from you when you visit our Website or App and fill out forms, use our Software, wear one of our Devices, or purchase our Services.

We may also collect Personal Information in the following ways:

- **From your mobile device, smart watch and/or Devices that connect to our Platform.**
- **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, debit card or bank account numbers.
- **When You Contact Us.** When you contact SCP Health directly, such as when you contact our Patient 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.

- **Google Analytics.** We use Google Analytics, a web analytics service provided by Google, Inc. (“Google”) to collect certain information relating to your use of our Platform. Google Analytics uses cookies, to help our Platform analyze how users use our Website. You can find out more about how Google uses data when you visit our Platform by visiting “How Google uses data when you use our partners' sites or apps”, (located at www.google.com/policies/privacy/partners/). For more information, please visit Google and pages that describe Google Analytics, such as www.google.com/analytics/learn/privacy.html.
- **Other third-party tools.** We use other third-party tools which allow us to track the performance of our Platform. These tools provide us with information about errors, app and website performance, and other technical details we may use to improve our Platform and/or the Services. For more information related to these third-party analytics providers please review [How do we collect your Personal Information](#).

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 Products and Services to you, including the provision of telehealth and healthcare services, treatment and care coordination.
- Provide you with information, Products, or Services that you request from us or that may be of interest to you.
- Promote and market our Platform and/or the Services to you. For example, we may use your Personal Information, such as your email address, to send you news and newsletters, special offers, and promotions, or to otherwise contact you about Products or information we think may interest you. You can opt-out of receiving these emails at any time as described below.
- 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 or any Products 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 and reporting.
- 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.

- To administer surveys and questionnaires.
- To provide you information about goods and services that may be of interest to you, including through newsletters.
- 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, analytics and advertising 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.
- **Your healthcare providers or family.** With your consent, we may share your information, including information collected from your use of our Platform, with Medical Group(s), your health care Providers and/or family members (e.g., immediate family or friends) that you designate to receive your information.
- **Other health-focused mobile apps.** With your consent, we may share your profile information and data collected from your connected devices with other health-focused mobile applications installed on your mobile device to help you track your health and wellness information. If you share your information with these apps, your Personal Information, including your health information, will be used in accordance with privacy policies for those separate apps, not this Privacy Policy.
- **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.
- **Third Party Analytics.** We use third party analytics services (such as Google Analytics) to understand and evaluate how visitors interact with our Platform and/or the Services. These tools help us improve our Platform and/or the Services, performance, and your experience.

Your choices about how we share your Personal Information.

This section of our Privacy Policy provides details and explains how to exercise your choices. **We do not control the collection and use of your information collected by third parties.** Third parties may aggregate the information they collect with information from their other customers for their own purposes. You can opt out

of third parties collecting your Personal Information for targeted advertising purposes in the United States by visiting the [National Advertising Initiative's \(NAI\) opt-out page](#) and the [Digital Advertising Alliance's \(DAA\) opt-out page](#).

If you do not wish to have your email address used by SCP Health to promote our own products and services, you can opt-out at any time by clicking the unsubscribe link at the bottom of any email 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 SCP Health 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 and change your Personal Information by logging into our Services and visiting either the “About You” or “Health Details” sections of our Services. You may also [Contact Us](#) to inform us of any changes or errors in any Personal Information we have about you to ensure that it is complete, accurate, and as current as possible or to delete your account. 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.

III. Who may use the Services?

This Privacy Policy applies to all personal uses of our Services in the United States. SCP Health operates subject to state and federal regulations, and the Platform and/or the Services may not be available in your state. 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. Access to and use of the Platform and/or the Services is limited exclusively to users located in states within the United States where the Platform and/or the Services is available. The Platform and/or the Services are not available to users located outside the United States. 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.

IV. Children’s Privacy

Our Services are not intended for children under 18 years of age. 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.

V. Does SCP Health 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.

VI. 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.

VII. California Privacy Rights - Notice to California Residents

If you are a California resident, certain Personal Information that we collect about you is subject to the California Consumer Privacy Act (CCPA).

Please note that the CCPA does not apply to, among other things:

- Information that is lawfully made available from federal, state, or local government records;
- Consumer information that is de-identified or aggregated;
- Medical information governed by the Confidentiality of Medical Information Act (Part 2.6 (commencing with Section 46) of Division 1) (CMIA) or protected health information that is collected by a covered entity or business associate governed by the privacy, security, and breach notification rules issued by the United States Department of Health and Human Services (HHS), Parts 160 and 164 of Title 45 of the Code of Federal Regulations, established pursuant to the Health Insurance Portability and Accountability Act of 1996 (Public Law 104-191) (HIPAA); or
- A provider of health care governed by the CMIA or a covered entity governed by the privacy, security, and breach notification rules issued by HHS, established pursuant to HIPAA, to the extent the provider or covered entity maintains patient information in the same manner as medical information or protected health information under CMIA and/or HIPAA.

Collection of Personal Information.

Currently and in the last 12 months, we have collected and/or disclosed Personal Information about you when you visit our Platform and/or obtain the Services, including information about you that you provide to us, and information we automatically collect from you or your computer or devices as you use our Platform and/or the Services. Please refer to the section titled [Personal Information](#) for additional information and details.

Categories of Sources from which we have collected Personal Information.

We collect Personal Information directly from you, for example when you provide it to us, when you contact us through our Platform, when you create a SCP Health account; and indirectly from you automatically through your computer or device as you use our Platform and/or the Services. We may also collect Personal Information about you from our advertising partners and service providers.

Use of Personal Information collected from California Residents.

We do not sell your Personal Information and have not done so in the prior 12 months from the effective date of this Policy. We may use or disclose the personal information we collect for our business purposes described elsewhere in this Privacy Policy (for example, please refer to "[How do we use your Personal Information?](#)" and "[How do we share your Personal Information?](#)").

Sharing the Personal Information of California Residents.

SCP Health may disclose your Personal Information to a third party for one or more business purposes. When we disclose Personal Information for a business purpose, such as to service providers, we enter a contract that

describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract.

Disclosures of Personal Information for Business Purposes.

We may disclose your Personal Information for our business purposes, such as your contact information, other information you have provided to us, and unique identifiers that identify you to us or to our service providers, such as companies that assist us with marketing and advertising. Please refer to [“What types of Personal Information do we collect?”](#) and [“How do we collect your Personal Information?”](#) for additional information and details.

We disclose your Personal Information to certain third parties such as our health care provider partners, service providers, including companies that assist us with marketing and advertising. For additional information please refer to [“How do we use your Personal Information?”](#) and [“How do we share your Personal Information?”](#).

Access Request Rights.

California residents have the right to request that SCP Health disclose certain information to you about our collection and use of your Personal Information over the past 12 months for the above business and commercial purposes. To submit an access request, see [Contact Us](#). Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purpose for collecting that Personal Information.
- The categories of third parties with whom we share that Personal Information.
- The specific pieces of Personal Information we collected about you.
- If we sold or disclosed your Personal Information for a business purpose, two separate lists disclosing:
 - sales, identifying the Personal Information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

Deletion Request Rights.

California residents have the right to request that SCP Health delete your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless certain exceptions apply.

Exercising Access and Deletion Rights.

To exercise the access and deletion rights described above, please submit a verifiable consumer request to us by either calling us at 1-337-609-1225 or sending us an email at Privacy_Officer@SCP-Health.com.

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child. You may only make a verifiable consumer request for access twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Non-Discrimination.

We will not discriminate against you for exercising any of your CCPA rights. We will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts and other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or different level or quality of goods or services.

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 Website's homepage or 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 email to the email address specified in your account and/or through a notice on the Website's home page or 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 email address for you, and for periodically accessing the App or visiting our Website 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:

SCP Health, Inc.
 200 Corporate Blvd
 Lafayette, LA 70508
 Phone: 800.609.1225

Email: Privacy_Officer@SCP-Health.com

EXHIBIT A – MEDICAL GROUPS

Louisiana – Louisiana Telehealth Services, LLC

Texas – Telehealth Services of Texas, PA