

**SF Healthcare DBA SHOPMD
PRIVACY POLICY**

February 2022

This is the privacy policy, as updated from time to time (this “**Privacy Policy**”), of SF Healthcare DBA SHOPMD, Inc.

(“**We**” “**Us**” “SF Healthcare” or “ShopMD”). You agree to be bound by this Privacy Policy. Capitalized terms used but not defined in this Privacy Policy have the meanings specified in the SHOPMD Terms of Use https://shopmd.us/static/shopMD_Terms_of_Use.pdf . We respect your privacy and are committed to protecting your personal information. We will comply with this Privacy Policy and applicable U.S. privacy law when we gather information from users of the Services (as defined in the Terms of Use). If you have any questions, feel free to contact us at info@ShopMD.us. Thank you so much for choosing SHOPMD.

BY USING THE SERVICES, YOU AGREE TO THE PRACTICES AND POLICIES OUTLINED IN THIS PRIVACY POLICY AND YOU HEREBY CONSENT TO THE COLLECTION, USE, AND SHARING OF YOUR INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY, YOU CANNOT USE THE SERVICES. IF YOU USE THE SERVICES ON BEHALF OF SOMEONE ELSE (SUCH AS YOUR CHILD) OR AN ENTITY (SUCH AS YOUR EMPLOYER OR CLIENT), YOU REPRESENT THAT YOU ARE AUTHORIZED BY SUCH INDIVIDUAL OR ENTITY TO ACCEPT THIS PRIVACY POLICY ON SUCH INDIVIDUAL’S OR ENTITY’S BEHALF.

1. INFORMATION WE COLLECT

1.1 Personal Information

Some of the Services require us to know more about you so that we can best meet your needs. When you access these Services, we may ask you to voluntarily provide us certain information that personally identifies (or could be used to personally identify) you or the person you represent (“**Personal Information**”).

Personal Information includes (but is not limited to) the following categories of information:

- (a) contact data (such as your e-mail address and phone number);
- (b) demographic data (such as your gender, your date of birth and your zip code);
- (c) insurance data (such as your insurance carrier, insurance plan, member ID, group ID and payer ID);
- (d) medical data (such as the doctors, dentists or other health care providers (“**Healthcare Providers**”) you have visited or are interested in visiting, your reasons for visit, your dates of visit, your medical history and other medical and health information you choose to share with us;
- (e) Credit or debit or other payment information, if applicable;
- (f) other information that you voluntarily choose to provide to us, including without limitation SSN, unique identifiers such as passwords, and Personal Information in emails or letters that you send to us; and
- (g) Similar information from you on behalf of Healthcare Providers, including their contact information, demographics and applicable certifications and licenses.

You may still access and use some of the Services if you choose not to provide us with any Personal Information, but the features of the Services that require your Personal Information will not be accessible to you.

1.2 Traffic Data

(a) We also may automatically collect certain data when you use the Services, such as (1) IP address; (2) domain server; (3) type of device(s) used to access the Services; (4) web browser(s) used to access the Services; (5) referring webpage or other source through which you accessed the Services; (6) geolocation information; and (7) other statistics and information associated with the interaction between your browser or device and the Services (collectively, “**Traffic Data**”).

(b) Depending on applicable law, some Traffic Data may be Personal Information as defined in Section 1.1.

1.3 Other Data

(a) We may also collect additional information, as otherwise described to you at the point of collection or pursuant to your consent.

(b) Some of the additional information collected may be Personal Information or Traffic Data as defined herein.

2. HIPAA AND PHI

2.1 Under federal law that includes the Health Insurance Portability and Accountability Act as well as the related Health Information Technology for Economic and Clinical Health Act collectively, "**HIPAA**"), shopmd does not ask for the demographic, health and/or health-related information that may be considered "protected health information" or "**PHI**". However, if you provide SHOPMD identifiable health-related information about you or a person you represent, this information may be considered PHI. HIPAA provides specific protections for the privacy and security of PHI and restricts how PHI is used and disclosed. SHOPMD may only use and disclose your PHI in the ways permitted by your Healthcare Provider(s) and/or consistent with HIPAA.

3. HOW WE COLLECT INFORMATION

3.1 We collect information (including Personal Information and Traffic Data) when you use and interact with the Services and, in some cases, from third-party sources. Such information includes:

(a) When you use the Services' interactive tools and services, such as searching for Healthcare Providers, or clicking through any of the navigation features;

(b) When you voluntarily provide information in free-form text boxes or forms through the Services and through responses to surveys, questionnaires and the like;

(c) If you download and install certain applications and software we make available, we may receive and collect information transmitted from your computing device for the purpose of providing you the relevant Services, such as information that lets SHOPMD know when you are logged on and available to receive update or alert notices;

(d) If you download our mobile application, we may receive information about your location and mobile device;

(e) Through cookies, web beacons, website analytics services and other tracking technology (collectively, "**Tracking Tools**"), as described below;

(f) When you use the "Contact Us" function on the Site, send us an email or otherwise contact us; and

(g) When you provide Posted Information as defined in the Terms of Use.

4. TRACKING TOOLS AND "DO NOT TRACK"

4.1 Tracking Tools

We may use tools outlined below in order to better understand users.

(a) Cookies: "**Cookies**" are small computer files transferred to your computing device that contain information such as user ID, user preferences, lists of pages visited and activities conducted while using the Services. We use Cookies to help us improve or tailor the Services by tracking your navigation habits, storing your authentication status so you do not have to re-enter your credentials each time you use the Services, customizing your experience with the Services and for analytics and fraud prevention.

(b) We may use a type of advertising commonly known as interest-based or online behavioral advertising. This means that some of our business partners use Cookies to display ShopMD ads on other websites and services based on information about your use of the Services and on your interests (as inferred from your online activity). Other Cookies used by our business partners may collect information when you use the Services, such as the IP address, mobile device ID, operating system, browser, web page interactions, the geographic location of your internet service provider and demographic information, such as gender and age range. These Cookies help ShopMD learn more about our users' demographics and internet behaviors. For more information on cookies, visit <http://www.allaboutcookies.org>.

(c) Web Beacons: "**Web Beacons**" (a.k.a. clear GIFs or pixel tags) are tiny graphic image files imbedded in a web page or email that may be used to collect anonymous information about your use of our Services, the websites of selected advertisers and the emails, special promotions or newsletters that we send you. The information collected by Web Beacons allows us to analyze how many people are using the Services,

using the selected advertisers' websites or opening our emails, and for what purpose, and also allows us to enhance our interest-based advertising.

(d) Website Analytics: We may use third-party website analytics services in connection with the Services, including, for example, to register mouse clicks, mouse movements, scrolling activity and text that you type into the Site. These website analytics services generally do not collect Personal Information unless you voluntarily provide it and generally do not track your browsing habits across websites which do not use their services. We use the information collected from these services to help make the Services easier to use and as otherwise set forth in Section 6 (Use of Information).

(e) Mobile Device Identifiers: Mobile device identifiers are data stored on your mobile device that may track mobile device and data and activities occurring on and through it, as well as the applications installed on it. Mobile device identifiers enable collection of Personal Information (such as media access control, address and location) and Traffic Data. As with other Tracking Tools, mobile device identifiers help SHOPMD learn more about our users' demographics and internet behaviors.

4.2 Options for Opting out of Cookies and Mobile Device Identifiers

(a) Some web browsers (including some mobile web browsers) allow you to reject Cookies or to alert you when a Cookie is placed on your computer, tablet or mobile device. You may be able to reject mobile device identifiers by activating the appropriate setting on your mobile device. Although you are not required to accept SHOPMD's Cookies or mobile device identifiers, if you block or reject them, you may not have access to all features available through the Services.

(b) You may opt out of receiving certain Cookies and certain trackers by visiting the Network Advertising Initiative (NAI) opt out page or the Digital Advertising Alliance (DAA) consumer opt-out page. When you use these opt-out features, an "opt-out" Cookie will be placed on your computer or tablet indicating that you do not want to receive interest-based advertising from NAI or DAA member companies. If you delete Cookies on your computer or tablet, you may need to opt out again. For information about how to opt out of interest-based advertising on mobile device identifiers, please visit <http://www.applicationprivacy.org/expressing-your-behavioral-advertising-choices-on-a-mobile-device>. Please note that even after opting out of interest-based advertising, you may still see ShopMD's advertisements that are not interest-based (i.e., not targeted toward you). Also, opting out does not mean that SHOPMD is no longer using Tracking Tools — ShopMD still may collect information about your use of the Services even after you have opted out of interest-based advertisements and may still serve advertisements to you via the Services based on information it collects via the Services.

4.3 How SHOPMD Responds to Browser "Do Not Track" Signals

Some web browsers (including Safari, Internet Explorer, Firefox and Chrome) incorporate a "Do Not Track" (DNT) or similar feature that signals to websites that a visitor does not want to have his/her online activity and behavior tracked. If a website operator elects to respond to a particular DNT signal, the website operator may refrain from collecting certain Personal Information about the browser's user. Not all browsers offer a DNT option and there is currently no industry consensus as to what constitutes a DNT signal. For these reasons, many website operators, including SHOPMD, do not take action to respond to DNT signals. For more information about DNT signals, visit <http://allaboutdnt.com>.

5. USE OF INFORMATION

5.1 We use your information, including Personal Information, to provide the Services to you and to help improve them, including to:

- (a) provide you with the products, services and information you request and respond to correspondence that we receive from you;
- (b) provide, maintain, administer or expand the Services, perform business analyses, or for other internal purposes to support, improve or enhance our business, the Services, and other products and services we offer;
- (c) notify you about certain resources or Healthcare Providers we think you may be interested in learning more about;
- (d) send you information about SHOPMD or our products or Services;
- (e) contact you when necessary or requested, including to remind you of an upcoming

appointment;

(f) customize and tailor your experience of the Services, which may include sending customized messages or showing you Sponsored Results that may be of interest to you based on information collected in accordance with this Privacy Policy;

(g) send emails and other communications that display content that we think will interest you and according to your preferences;

(h) combine information received from third parties with the information that we have from or about you and use the combined information for any of the purposes described in this Privacy Policy;

(i) use statistical information that we collect in any way permitted by law, including from third parties in connection with their commercial and marketing efforts; and

(j) prevent, detect and investigate security breaches and potentially illegal or prohibited activities.

5.2 We may use information that is neither Personal Information nor PHI (including non-PHI Personal Information that has been de-identified and/or aggregated) to better understand who uses SHOPMD and how we can deliver a better healthcare experience (for example, testing different kinds of emails has helped us understand when and how patients prefer to get Wellness Reminders for preventive care), or otherwise at our discretion.

6. DISCLOSURE OF INFORMATION

6.1 We may disclose certain information that we collect from you:

(a) We may share your Personal Information with Healthcare Providers who you either view and/or with which you choose to contact through the Services. For example, if you complete a Shop for Me Form using the Services in advance of an appointment, we may share your Form with Healthcare Provider or Providers.

(b) We do not sell email addresses to third parties. We may share your email address with our business partners to enable them to help SHOPMD customize our advertising.

(c) We may share your Personal Information and Traffic Data with our business partners who perform core operational services (such as hosting, billing, fulfillment, data storage, security, insurance verification, or Website analytics set forth in Section 4.1 (Tracking Tools)) and/or by making certain features available to our users.

(d) We may transfer your information to another company in connection with a merger, sale, acquisition or other change of ownership or control by or of SHOPMD (whether in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

(e) We also may need to disclose your Personal Information or any other information we collect about you if we determine in good faith that such disclosure is needed to: (1) comply with applicable law, regulation, court order or other legal process; (2) protect the rights, property or safety of SHOPMD or another party; (3) enforce the Agreement or other agreements with you; or (4) respond to claims that any posting or other content violates third-party rights.

(f) We may disclose information that is neither Personal Information nor PHI (including non-PHI Personal Information that has been de-identified and/or aggregated) at our discretion.

(g) We store and process your information on our servers in the United States and abroad. We maintain industry standard backup and archival systems.

7. PUBLIC INFORMATION

7.1 Any information that you may reveal in a review posting or online discussion or forum is intentionally open to the public and is not in any way private. We recommend that you carefully consider whether to disclose any Personal Information in any public posting or forum. What you have written may be seen and/or collected by third parties and may be used by others in ways we are unable to control or predict.

8. STORAGE AND SECURITY OF INFORMATION

(a) The security of your Personal Information is important to us. We endeavor to follow generally-accepted industry standards to protect the Personal Information submitted to us,

both during transmission and in storage. For example, when you enter sensitive information on our Site, we encrypt that information using secure socket layer technology or similar industry standard technology.

(b) Although we make good faith efforts to store Personal Information in a secure operating environment that is not open to the public, we do not and cannot guarantee the security of your Personal Information. If we become aware that your Personal Information has been disclosed in a manner not in accordance with this Privacy Policy, we will use reasonable efforts to notify you of the nature and extent of the disclosure (to the extent we know that information) as soon as reasonably possible and as permitted or required by law.

9. CONTROLLING YOUR PERSONAL INFORMATION

9.1 If you are a registered user of the Services, you can modify some of the Personal Information you have included in your profile or change your username by logging in and accessing your account.

If you wish to close your account, please email us at info@ShopMD.com. SHOPMD will delete your account and the related information at your request as soon as reasonably possible.

Please note, however, that ShopMD reserves the right to retain information from closed accounts, including to comply with law, prevent fraud, resolve disputes, enforce the Agreement and take other actions permitted by law.

9.2 You must promptly notify us if any of your account data is lost, stolen or used without permission.

10. INFORMATION PROVIDED BY OR ON BEHALF OF CHILDREN

10.1 The Services are not intended for use by children and children are prohibited from using the Services. SHOPMD does not knowingly collect any information from children under the age of majority, except for certain information collected only with the consent and/or supervision of the child's parents or guardians, nor are the Services directed to children.

10.2 By accessing, using and/or submitting information to or through the Services, you represent that you are not younger than age 13. If we learn that we have received any information directly from a child under age 13 without his/her parent's written consent, we will use that information only to respond directly to that child (or his/her parent or legal guardian) to inform the child that he/she cannot use the Services and subsequently we will delete that information.

10.3 If you are between age thirteen (13) and the age of majority in your place of residence, you may use the Services only with the consent of or under the supervision of your parent or legal guardian. If you are a parent or legal guardian of a minor child, you may, in compliance with the Agreement, use the Services on behalf of such minor child. Any information that you provide us while using the Services on behalf of your minor child will be treated as Personal Information as otherwise provided herein.

11. LINKS TO OTHER WEBSITES

11.1 The Services contain links to third-party websites and phone numbers with which SHOPMD has no affiliation. A link to a non-SHOPMD website does not mean that we endorse that website, the quality or accuracy of information presented on the non-SHOPMD website or the persons or entities associated with the non-SHOPMD website. If you decide to visit a third-party website, you are subject to the privacy policy of the third-party website as applicable and we are not responsible for the policies and practices of the third-party website. If you contact anyone using the information presented on SHOPMD, we are not responsible for the information you disclose or receive. We encourage you to ask questions before you disclose your information to others.

12. SPECIAL NOTE TO INTERNATIONAL USERS

12.1 These Services are intended for and directed to users in the United States. If you are a user accessing the Services from another region with laws or regulations governing personal data collection, use, and disclosure that differ from United States laws, please be advised that through your continued use of the Services, which are governed by United State laws, this Privacy Policy, and our Terms of Use, you are transferring your personal information to the United States (or any other country in which we, our affiliates maintain facilities) and you expressly consent to that transfer and consent to be governed by California law for these purposes.

13. UPDATES AND CHANGES TO PRIVACY POLICY

13.1 The effective date of this Privacy Policy is set forth at the top of this webpage. We will notify you of any material change by posting notice on the top of this webpage and updating the effective date. Your continued use of the Services after the new effective date constitutes your acceptance of the amended Privacy Policy. We encourage you to periodically review this page for the latest information on our privacy practices. The amended Privacy Policy supersedes all previous versions. **IF YOU DO NOT AGREE TO FUTURE CHANGES TO THIS PRIVACY POLICY, YOU MUST STOP USING THE SERVICES AFTER THE EFFECTIVE DATE OF SUCH CHANGES.**

14. CONTACTS

If you have any comments, concerns or questions about this Privacy Policy, please contact us at info@ShopMD.us.