# OHDA WEBSITE AND WEB APPLICATION PRIVACY POLICY

This privacy policy sets out how OHDA uses and protects any information that you give to us when you use the websites, applications, tools, platforms and systems (referred to as "Site") belonging to OHDA and its affiliated companies and business partners on or through which its services are made available to you.

We are committed to treating your personal information responsibly and ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this Site, then you can be assured that it will only be used in accordance with this privacy statement.

We may change this policy from time to time by updating this page. You should check this page from time to time to familiarize yourself with any changes.

# What we may record

We may store the following information:

- Login Information;
- Contact Information (e.g., name, phone number, address, and email address);
- Social Insurance Number or Social Security Number, and other government identification numbers (e.g., Passport Number, Driver's License Number or Employer Identification Number);
- Date of Birth;
- Demographic Information (e.g., age, race, ethnicity, gender, marital status);
- Preferences and interests, information relevant to training and education;
- Other information relevant to customer surveys and/or offers (e.g., income, education, and employment);
- Health Information (e.g., health insurance status and financial information related to payment for healthcare services);
- Geo-Location Information;
- Website, Mobile Application, and Email Usage Data (e.g., interactions with the website, application or advertisement);
- Device Information (e.g., internet protocol (IP) address, device type, unique identifier, app version, operating system, network data, and phone state);

## What we do with the information we gather

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- To provide access to the Site services and administer your account.
- To improve the Site's products and services, conduct internal quality improvement or business analysis.
- To send you product or service information, newsletters, text messages or email communication, or to respond to your questions and concerns or customer service requests.

- To pay for the platform or other services we provide.
- To pay medical providers for your own medical bills and prescription refills.
- On your explicit request and permission, to communicate your health information to relevant health care providers treating you.
- On their explicit request and permission, to communicate to you the health information of others you are authorized to act on behalf of.
- Internal record keeping for your own sake, as a support to your health status.

# **Sharing of information**

OHDA is not sharing your personal information with 3rd parties.

#### **Private Medical Records**

OHDA allows members to upload to the Site their private medical records. These are held in secure servers in accordance with OHDA Terms & Conditions. The information which a user chooses to upload is not accessible by any third party.

## Security

We are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure we have put in place suitable physical, electronic and operational procedures to safeguard and secure the information we collect online.

## Cookies in general

A cookie is a small file which asks permission to be placed on your computer's hard drive. The file is added and the cookie helps analyze web traffic or customize your website experience. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. Overall, cookies help a website to provide you with a better website experience by enabling the website to monitor which pages you find useful and which you do not.

#### How we use cookies

We strive not to use cookies at all. In case we need to, we notify you in advance by requesting your consent. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies at any time. Declining necessary cookies may prevent you from taking full advantage of the Site or its processes.

## Payment and payment information

Some functions of the Site can be activated via online payment. Payor information together with the bank card information are requested from you in the payment processor's data form. The form is embedded in the Site but belongs to the payment processor. Your payment information is not shared with us but, along with the availability funds information, directly cleared through

the payment processors' servers. Once you successfully paid for a service on the Site, we are notified of the event by the payment processor. We register the notification in a data package, which is a standard indicator for the system to identify that you are an eligible user of the paid-for service. Payment processors normally use cookies and their policy and procedures are governed by their own terms and conditions.

## Site monitoring

Traffic logs are anonymized pieces of meta information which we only use for statistical analysis purposes. We use traffic logs to identify which pages or functions are being used and whether they are working properly. In no way are we able to access your computer or device and read any information on them. Traffic log information helps us analyze data about web page traffic and improve the Site in order to tailor it to customer needs. Traffic log data is continuously removed from the system.

#### Links to other websites

The Site may contain links to other websites of interest. However, once you have used these links to leave the Site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

# **Controlling your personal information**

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. If OHDA is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on the Site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information. If you have given us permission to do so, we may also use your personal information to send you promotional information about third parties which may be of interest to you.

If you believe that any information we are holding on you is incorrect or incomplete, please write or email us as soon as possible. We will promptly correct any information found to be incorrect.

You may choose to restrict the collection or use of your personal information by emailing us at the service(at)ohda(dot)com.

If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at the service(at)ohda(dot)com.

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