



SWORD HEALTH

Privacy Policy



01 Privacy Policy

Last Updated and Effective Date: June 18, 2021

At SWORD Health, Inc. (“SWORD”, “Company”, or “We”), we take your privacy seriously. This Privacy Policy describes how SWORD collects, uses, and shares your personal information through the SWORD corporate websites (the “Corporate Websites”), not limited to, but including the website located at www.swordhealth.com.

As described in our Terms of Use, SWORD Health, Inc. operates the Corporate Websites. An associated but independent group of healthcare professionals deliver Services through a group of independently owned professional practices collectively known as SWORD Health Professionals. For information regarding SWORD Health Professionals collects and uses personal information, please see our [Privacy Notice](#).

By using the Corporate Websites, you agree that we can collect and use your personal information as described in this Privacy Policy. If you do not agree, please do not use the Corporate Websites.

Personal Information We Collect

We may collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular consumer or household (“Personal Information”) as described in the following categories below. We may collect:

- **Identifiers and Contact Information**, such as your name, address, email address or telephone number, and Internet Protocol (IP) address;
- **Internet and other electronic activity information**, such as the name of the domain and host from which you access the Internet; the browser software you use and your operating system; the date and time you access the service; and the Internet address of the website from which you directly linked to SWORD. We may combine this automatically collected log information with other information we collect about you to improve our services and communications (for further information, please see the Tracking Technologies section below);
- **Professional or employment-related information**, such as the name of your employer, company, and other professional or employment information you choose to provide to us;

- **Geolocation data**, which may be used as necessary by SWORD and/or your Internet Access Provider to enforce any of the terms of the SWORD's Terms of Use;
- Any other personal information you choose to provide to us in connection with any inquiries or communications you have with about the Corporate Websites and their contents.

If you sign up for and utilize our subscription-based services ("Subscription Services"), in addition to the categories of personal information collected above, SWORD Inc. may collect the following categories of personal information on behalf of SWORD Health Professionals:

- **Account information**, such as your account login information;
- **Transactional information**, such as your payment card information and records regarding your transactions through the Subscription Services.

De-Identified Information: We may use de-identified information created by us without restriction. When we use the term "de-identified information," we mean information that is neither used nor intended to be used to personally identify an individual.

Sources of Personal Information

We may obtain the information listed above:

- Directly from you; or
- Indirectly or automatically from you, for example through our Tracking Technologies when you use our Corporate Websites (for further information, please see the Tracking Technologies section below).

How We Use Your Personal Information

We may use the Personal Information we collect for one or more of the following business purposes:

- To provide you with requested information.
- To provide, support, personalize, and develop our Corporate Websites and related services.
- To provide you with customized services and support, including to monitor, investigate, and respond to your inquiries and concerns.

- For testing, research, analysis, and product development, including to develop and improve our Corporate Websites.
- To create de-identified information (for example, aggregated statistics) related to the use of the Corporate Websites.
- To respond to law enforcement or a government request(s) and as required by applicable law, court order, or governmental regulations and to monitor our compliance with those obligations.
- For any other purpose disclosed to you when you provide any information to us.

How We Share Your Personal Information

We may share your Personal Information to the following categories of third parties for the following purposes:

- **Service Providers:** We may share your Personal Information to service providers, such as contractors and other third parties we use to support our organization and provide us with services. It is our policy to require that these service providers keep your Personal Information confidential, that they comply with all applicable laws, and that they only use your Personal Information for the purpose of providing support and services to us.
- **Corporate Affiliates:** We may share your Personal Information to our subsidiaries, affiliates and associated organizations.
- **Other Third Parties:**
 - From time to time, we may be required to provide Personal Information to a third party in order to comply with a subpoena, court order, government investigation, or other similar legal process.
 - We may share your Personal Information to third parties such as law enforcement agencies, when we, in good faith, believe that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.
 - We may share your Personal Information to other third parties at your direction and with your permission.
- **Corporate Transaction:** If we are involved in a bankruptcy, merger, acquisition, reorganization, or sale of all or a portion of our assets, we may share or transfer your Personal Information as part of any such corporate transaction.

We do not sell personal information or share personal information for marketing.

Tracking Technologies

We may use technologies such as cookies, web beacons, tags, scripts and other storage technologies (collectively “Tracking Technologies”) to collect or receive information on the Corporate Websites. These Tracking Technologies help us save your preferences, understand how you navigate through the Corporate Websites and improve your experience.

Cookies are small data files that we transfer to your device to collect information about your use of the Corporate Websites. Cookies can be recognized by the website that downloaded them or other websites that use the same cookies. This helps websites know if your browsing device has visited them before. We use both first-party and third-party cookies on the Corporate Websites for the following purposes: to make the Corporate Websites function properly, to improve the Websites, to track your interaction with the Corporate Websites, to enhance your experience with the Corporate Websites, to remember information you have already provided, to collect information about your activities over time and across third party websites or other online services in order to deliver content tailored to your interests; and to provide a secure browsing experience during your use of the Corporate Websites. The length of time a cookie will stay on your browsing device depends on whether the cookie is a “persistent” or “session” cookie. Session cookies will only stay on your device until you stop browsing. Persistent cookies stay on your browsing device until they expire or are deleted. The following types of cookies are used on the Corporate Websites:

- Strictly Necessary Cookies. These cookies are essential because they enable you to use the Corporate Websites. For example, strictly necessary cookies allow you to access secure areas of the Corporate Websites and for us to provide the Corporate Websites. These cookies do not gather information about you for marketing purposes. This category of cookies is essential for the Corporate Websites to work and they cannot be disabled.
- Functional or Preference Cookies. We use functional cookies to remember your choices so we can tailor the Corporate Websites to provide you with enhanced features and personalized content. For example, these cookies can be used to remember your name or preferences on the Corporate Websites. We do not use functional cookies to target you with online marketing. While these cookies can be disabled, this may result in less functionality during your use of the Corporate Websites.
- Performance or Analytic Cookies. These cookies collect passive information about how you use the Corporate Websites, including webpages you visit and links you click. We use the information collected by such cookies to improve and optimize the Corporate Websites. We do not use these cookies to target you with online marketing. You can disable these cookies.

Other Tracking Technologies. We may also use tracking technologies to collect “clickstream” data, such as the domain name of the service providing you with Internet access, your device type, IP address used to connect your computer to the Internet, your browser type and version, operating system and platform, the average time spent on the Corporate Websites, webpages viewed, content searched for, access times and other relevant statistics, and assign unique identifiers to the device or other credentials you use to access the Corporate Websites for the same purposes.

Pages of the Corporate Websites and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

Managing Your Tracking Technology Preferences

You can manage and set your cookie preferences for our Corporate Websites [here](#).

In addition, many browsers allow you to manage your cookie preferences at the individual browser level. You can set your browser to reject and/or delete some or all cookies. If you reject or delete cookies, please be aware that you may not be able to use some or all portions or functionalities of the Corporate Websites.

Do Not Track: Some Internet browsers (e.g. Internet Explorer, Mozilla Firefox, and Safari) include the ability to transmit “Do Not Track” or “DNT” signals. Since uniform standards for “DNT” signals have not been adopted, the Corporate Websites currently do not process or respond to “DNT” signals.

Location Information: You may be able to adjust the settings of your device so that information about your physical location is not sent to us or third-parties by: (a) disabling location services within the device settings; or (b) denying certain websites or mobile applications permission to access location information by changing the relevant preferences and permissions in your mobile device or browser settings. Please note that your location may be derived from your WiFi, Bluetooth, and other device settings. Please see your device settings for more information.

Analytics Tools. We use tools such as Google Analytics, Facebook, and LinkedIn, and to help analyze how individuals use the Corporate Websites. Such third parties may use cookies, APIs, and SDKs in our Corporate Websites to enable them to collect and analyze user and device related data and information on our behalf. These tools use cookies to collect information such as how often users visit the Corporate Websites, what pages they visit, and what other sites they used prior to coming to the Website.

We use the information we get to improve our Corporate Websites and to tailor the Corporate Websites to you.

- We use Google Analytics to obtain information about your visits to the Corporate Websites. Google's ability to use and share information collected by Google Analytics about your visits to the Corporate Websites is restricted by Google Analytics [Terms of Use](#) and the Google [Privacy Policy](#). You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.
- Our Corporate Websites utilize the Conversion Tracking Pixel service of Facebook, Inc. ("Facebook"). This tool allows us to follow the actions of users after they click on a Facebook advertisement, and allows us to record the efficacy of Facebook advertisements for statistical and market research purposes. The collected data remains anonymous which means we cannot see the personal data of any individual user. However, the collected data is saved and processed by Facebook, and Facebook may be able to connect the data with your Facebook account and use the data for their own advertising purposes, in accordance with Facebook's Data Use Policy found at: <https://www.facebook.com/about/privacy>. Facebook Conversion Tracking also allows Facebook and its partners to show you advertisements on and outside Facebook. You can manage your preferences regarding how Facebook uses your data through your Facebook account settings.

Regarding Targeted Advertising. For more information about the collection and use of your information for online behavioral advertising generally, and how you can opt-out of having your data used for certain online behavioral advertising, please visit the Digital Advertising Alliance's opt-out tool available at <https://youradchoices.com/> and/or the Network Advertising Initiative's Opt-Out Tool available at: <https://networkadvertising.org/choices/>.

Children's Information

As we are committed to protecting the privacy of children, we do not collect personal information from anyone who is, to our knowledge, under the age of 18. If you are under the age of 18, please do not provide any information to us through the Website. If you become aware that an individual under age 18 has provided information to us, please contact us as described in the "Contact Us" section, so that we can delete the information.

Your Privacy Rights

You may have certain privacy rights with respect to the Personal Information we collect and maintain about you, such as the following:

Right to Know / Access

You have a right to request to know:

- The categories of Personal Information we collected about you.
- The categories of sources from which we have collected your Personal Information.
- Our business or commercial purpose for collecting or selling that Personal Information.
- The categories of your Personal Information that we have shared with third parties.
- The categories of third parties with whom we share your Personal Information.
- The specific pieces of Personal Information we collected about you.

Right to Request Deletion

You have the right to request that we delete the Personal Information that we have collected and maintain about you. We may deny your request under certain circumstances, such as if we your Personal Information to respond to your inquiries. If we deny your request for deletion, we will let you know the reason why.

Right to Modify

You have the right to request that we modify the Personal Information we have collected and maintain about you. To request to modify your Personal Information, email us at privacy@swordhealth.com. We may request additional information from you in order to verify your identity and update your Personal Information per your request.

How to Exercise Your Privacy Rights

You may exercise your right to know/access and your right to request deletion twice a year free of charge. To exercise your rights to know/access and request deletion, please contact us at privacy@swordhealth.com.

We will take steps to verify your identity before processing your request. We will not fulfill your request unless you have provided sufficient information for us to reasonably verify that you are the individual about whom we collected Personal Information. When submitting your request, please provide us with your name and

contact information for purposes of enabling us to begin verifying your identity. We may request additional information about you if needed for purposes of verifying your identity. Unless you have previously provided us your Personal Information for another purpose, we will only use the Personal Information provided in the verification process to verify your identity or authority to make a request, and to track and document your request to meet our obligations.

You may also use an authorized agent to submit a request to know/access or a request to delete. When we verify your agent's request, we may verify both your and your agent's identity and request a signed document from you that authorizes your agent to make the request on your behalf. To protect your Personal Information, we reserve the right to deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf.

We do not discriminate against individuals for exercising any of the above privacy rights.

Notice to California Residents

If you are a California resident, you may exercise any of the privacy rights described above in "Your Privacy Rights."

Within the preceding 12 months:

- We have collected the categories of Personal Information described above in "Personal Information We Collect" from the sources described in "Sources of Personal Information" for the purposes described in "How We Use Your Personal Information."
- We have shared all categories of Personal Information to Service Providers, Corporate Affiliates, and Other Third Parties (which as described further in "How We Share Your Personal Information").
- We have not sold your Personal Information.

External Websites

The Corporate Websites may contain links to other websites, including, but not limited to, investor relations sites, job applicant information gathering, assessment, and testing sites. These third-party sites have their own privacy practices and measures to secure and protect your information. This Privacy Policy does not apply to these third-party sites. We encourage you to review the privacy statements of any other third-party website you may visit.

Security of Your Information

We take reasonable steps to protect the Personal Information we maintain about you. Unfortunately, no system is 100% secure, and we cannot guarantee or warrant the absolute security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unintentional disclosure of your Personal Information.

Additionally, please be aware that we have no control over the information collected by your internet service provider or information that you disclose over a public network. We are not responsible for any information collected by third parties not within our control and/or how such information is used or maintained.

Changes to This Privacy Policy

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time. Please be aware that, to the extent permitted by applicable law, our use of your information is governed by the Privacy Policy in effect at the time we collect the information. If you visit the Corporate Websites after a change to this Privacy Policy is posted on the Corporate Websites, you will be bound by such change. Please refer back to this Privacy Policy on a regular basis.

Contact Us

If you have any questions or comments regarding this Privacy Policy, please contact us at:

privacy@swordhealth.com.

Terms capitalized but not defined herein have the same meanings as defined in SWORD's Terms of Use.

