

## **PRIVACY POLICY**

### **ALEDADE POPULATION HEALTH MANAGEMENT PLATFORM**

Last revised: September 2020

Aledade Inc. (“Aledade,” “we,” or “us”) takes your privacy very seriously. Please read this Privacy Policy carefully and familiarize yourself with our privacy practices regarding your personal information. This Privacy Policy applies to the Aledade Population Health Management Platform (the “Aledade Application”) only. It covers information that the Aledade Application collects regarding the users of the application. It does not cover information that application users may upload to the application relating to patients that Aledade processes in its capacity as a business associate under the Health Insurance Portability and Accountability Act (“HIPAA”). For more information on our privacy practices relating to other aspects of Aledade’s business, please see our Privacy Policy at <https://www.aledade.com/privacy-policy>.

By using the Aledade Application, you consent to our collection, permanent retention, use, and dissemination of your information as described in this Policy and to the terms of this Privacy Policy and Aledade’s Terms of Use ([aledade.com/app-tou](https://www.aledade.com/app-tou)), which are hereby incorporated. Words not otherwise defined in this Privacy Policy shall have the meanings defined in the Aledade Application’s Terms of Use. If you do not agree with these policies, do not use the Aledade Application.

#### **Changes and Updates**

We reserve the right to amend, alter, or otherwise change this Privacy Policy at our sole and absolute discretion. If we amend this Policy, we will post any changes on this page and update the date at the top; so be sure to check back periodically. Your continued use of the Aledade Application after changes have been posted will constitute your acceptance of this Privacy Policy and any changes.

#### **Personal Information We Collect and Use**

For purposes of this Privacy Policy, “personal information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. It does not include de-identified or aggregate information or public information lawfully available from governmental records.

This section describes the categories of personal information we may have collected about users of the Aledade Application in the last 12 months, and the categories of personal information we may continue to collect about them. (Please note that the types of personal information listed in each category are examples only; they are not exhaustive.)

- **Personal identifiers and contact information**, such as name, title, practice name/membership, physical and email address, telephone number and other unique identifiers

- **Internet or other electronic network activity information**, such as information about use of the Aledade Application, user ID, IP address, device identifiers and other online identifiers, data related to users' browser and operating system, and browsing and search history
- **Health care practice-related information**, such as information about the practices that participate in one of Aledade's accountable care organizations ("ACOs") and users' roles within their practices
- **Location information**, namely, practice-location information provided to us by users when setting up an account
- **Professional or employment-related information**, such as information about where users work, practice type, title
- **Inferences drawn from any of the information identified above** to create a profile reflecting a user's preferences regarding the Aledade Application
- **Other information users or others provide us**, such as information about a user's associations or place of employment that users or others communicate to us

### **Sources of Personal Information**

The categories of sources from whom we may collect personal information include the following:

- Information provided directly to us by practices that participate in our ACOs and the users of the Aledade Application, including when they choose to register for use of the Aledade Application and use the Aledade Application
- Automated collection, such as through analytic services and cookies
- Other service providers to us, which includes technology/website hosting providers, and systems administrators

### **Purposes for Which We May Use Personal Information**

We collect each of the categories of personal information above for a variety of purposes, including:

- To contact users, including to conduct surveys to measure your satisfaction with the Aledade Application, to respond to inquiries and questions, and to contact users with information about services and promotional or other information that may be of interest to them
- To operate our business and offer or provide services and products, including to alert users to new projects, features, and services
- To facilitate the management of care for patients and health care operations consistent with the Aledade Application Terms of Use
- To offer, maintain, and improve the Aledade Application and the services that we provide or make available, including troubleshooting, and to give us insights on how users utilize the Aledade Application
- For statistical, analytical, and business operations and planning purposes

- To satisfy legal and regulatory requirements, protect health and safety, defend our legal interests, or to respond to valid legal requests

### **Categories of Entities With Which We Share Personal Information.**

In the last 12 months, we may have disclosed each of the categories of personal information above with third parties for a business purpose and may continue to do so. The categories of third parties with which we share personal information include:

- Practices that participate in our ACOs and other business contacts
- Service providers and suppliers, agents, or contractors
- Law enforcement, governmental authorities, or other third-parties as required by law, in response to legal requests, to protect our rights and interests, or for the protection of others
- Third parties who may acquire all or part of our business or assets or act as successors in interest to our business or to whom we transfer any of our rights or obligations
- As described to you when collecting the information

By using the Aledade Application, you agree that, in the event of a transfer such as a merger, acquisition, or sale of assets, your personal information and any other assets may continue to be used by the acquirer or its successors in a manner consistent with this Policy.

### **Cookies and Other Online Tracking Technologies**

Aledade automatically collects information about how users use the Aledade Application and may use cookies or other similar technologies to help us collect and compile statistics. This information may include log file information such as your Internet protocol address, browser type, operating system, browser language, pages viewed, and the date and time of a user's visit. These cookies, provided by Pendo.io, Inc., may be used to help us maintain and troubleshoot the Aledade Application, improve the Aledade Application and our services, and for other purposes described above. To learn more about Pendo's privacy practices, please review Pendo's [Privacy Policy](#).

### **How We Protect Personal Information**

While we implement reasonable security measures to help safeguard your data, no security system is impenetrable. We cannot and do not guarantee the security of our servers or databases, nor can we guarantee that information you supply will not be intercepted while being transmitted over the Internet. Please use caution any time you provide information over the Internet and safeguard your credentials for the Aledade Application consistent with Aledade's Terms of Use.

### **Children Under 18**

The Aledade Application is not designed for, directed to, or intended to be used by children under the age of 18. If we obtain actual knowledge that a child under the age of 18 is using the

Aledade Application, we will take steps to delete such information as soon as possible.

### **Do-Not-Track Requests**

Some web browsers may transmit “do-not-track” signals to the websites with which the user communicates. We currently do not take action in response to these signals.

### **Third-Party Links and Websites**

The Aledade Application may contain third-party content and links to websites operated by third parties over which we have no control. We are not responsible for the content or security of third-party websites. Such third-party content and links are included solely for your convenience and do not constitute Aledade’s approval, endorsement or warranty of any third-party website or content. We are not responsible for the accuracy, completeness or reliability of the information, products or services offered or sold through any linked websites. You use them at your own risk. Should you click on a link to a third-party website, the privacy policy of that website will apply instead of our Privacy Policy. We recommend you review that website’s privacy policy and terms of use before using them.

### **California Users**

Under California Civil Code section 1798.83, California residents may request information regarding the types of personally identifiable information we share with third parties for direct marketing purposes, and the identities of the third parties with whom we have shared such information during the immediately preceding calendar year. We do not provide personal information to third parties for their direct marketing purposes.

### **Additional Rights for California Residents Under the CCPA**

Because Aledade operates as a business associate to other entities under the Health Insurance Portability and Accountability Act with respect to most of the personal information it holds, only limited categories of the personal information Aledade maintains may be subject to the California Consumer Privacy Act (“CCPA”). In addition, at this time, the CCPA includes exemptions from for certain information processed exclusively in the business-to-business context (e.g., information about an individual acting in his or her capacity as an employee of an entity providing or receiving a service from the relevant business). If you are a California resident whose information is covered by the CCPA, you may have the rights described in this section of this Privacy Policy.

#### *Right to request disclosure of information we collect and share about you*

Individuals whose personal information is covered by the CCPA have a right to request that Aledade provide the following information:

- The categories of personal information that Aledade has collected about you
- The categories of sources from which Aledade collected the personal information

- The business or commercial purposes for which Aledade collected and/or sold the personal information
- The categories of any third parties with which Aledade shared the personal information
- The specific pieces of personal information Aledade collected over the past 12 months

You can also submit a request to us for the following information:

- The categories of personal information, if any, Aledade has sold about you, categories of third parties to which Aledade sold that personal information and the categories of personal information sold to each type of third party
- The categories of personal information that Aledade has disclosed for a business purpose

#### *Right to request the deletion of personal information we have collected from you*

You also have the right to request the deletion of personal information we have collected. After receiving and appropriately verifying a request to delete your information, we will delete the personal information we have collected about you, except for situations where specific information is necessary for us to: provide you with a good or service that you requested; perform a contract we entered into with you; maintain the functionality or security of our systems; or comply with or exercise rights provided by the law. We may also retain information where another exception to the deletion requirements in California Civil Code § 1798.105(d) applies. In addition, the law permits us to retain specific information for our exclusively internal use, but only in ways that are compatible with the context in which you provided the information to us or that are reasonably aligned with your expectations based on your relationship with us.

Please note that if you or your authorized agent request that we delete your personal information, you may no longer be able to access or use certain parts of the Aledade Application.

#### *Sales of personal information*

We do not sell personal information.

#### *How to exercise your rights*

To exercise your right to request the disclosure of your personal information that we collect or share, or to ask us to delete your information, either email us at [ccpa@aledade.com](mailto:ccpa@aledade.com) or contact us at 866-252-0873. Depending on the nature of your request, we may ask you for additional information to verify your request and identity and a declaration attesting to your identity, signed under penalty of perjury, as described more fully below. We usually act on requests and provide information free of charge, but we may charge a

reasonable fee to cover our administrative costs of providing the information in certain situations.

*Our process for responding to CCPA requests*

- *Requests for Specific Pieces of Personal Information:* If you submit such a request, we may ask you for three pieces of personal information for verification purposes. Additionally, we may also ask you for a declaration attesting to your identity, signed under penalty of perjury.
- *Requests for Categories of Personal Information:* If you submit such a request, we may ask you for at least two pieces of personal information for verification purposes.
- *Requests for Deletion of Personal Information:* If you submit such a request, we may ask you for at least two pieces of personal information for verification purposes.
- *Requests for Household Information:* There may be some types of personal information that can be associated with a household. Requests for access or deletion of household personal information must be made by each member of the household.
- *Denials:* If we are unable to verify your identity with the degree of certainty required, we will not be able to respond to the request. In that case, or if we are denying your request for another reason, including because we serve as a service provider to another entity to which your request should be submitted, we will notify you.
- *Timing:* We will respond to requests for access or deletion as soon as practicable and, in any event, generally not more than within 45 days after receipt of your request. We may extend this period to 90 days in some cases.
- *Designating an Agent:* Please note that you may designate an agent to submit requests on your behalf. The agent can be a natural person or a business entity that is registered with the California Secretary of State. If you would like to designate an agent to act on your behalf, you and the agent will need to comply with our agent verification process. Please contact us at [ccpa@aledade.com](mailto:ccpa@aledade.com) or 866-252-0873 for more information.

*We are committed to honoring your rights*

We are committed to complying with the law. If you exercise any of the rights explained in this policy, we will continue to treat you fairly. Consistent with California Civil Code § 1798.125, we will not discriminate against you because you exercised any of your CCPA rights, including by denying you goods or services, charging different prices or

rates for goods or services, providing a different level or quality of goods or services, or suggesting that you will receive a different price or rate or level or quality for goods or services.

### *Accessibility*

We are committed to ensuring that our communications are accessible to people with disabilities. To make accessibility-related requests, please contact us toll free at 866-252-0873 or send an email to [disabilityaccess@aledade.com](mailto:disabilityaccess@aledade.com).

### **International Users**

The Aledade Application is hosted in the United States and is intended for access and use by individuals located in the United States only.

### **Contacting Us**

If you have any questions, concerns, or suggestions regarding this Privacy Policy, or to update any information you have provided us, please send us an email at [appsupport@aledade.co](mailto:appsupport@aledade.co)

