

Privacy Policy

Title	Privacy Policy
Organization / Authority	SelfHelpWorks
Effective Date	March 15, 2018
Review Date	March 15, 2018
Business Owner	Bryan Noar
Security Owner	Toby Alfaro
Executive Sponsor	
Impacted Functions / Audience	SelfHelpWorks
Regulatory and Legal Obligations	HIPAA, GDPR, EU Privacy Shield

This document contains trade secrets and proprietary information of SelfHelpWorks. No use or disclosure of the information contained herein is permitted without the express prior written consent of SelfHelpWorks.

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Definitions

Term	Definition
GDPR	The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a regulation by which the European Parliament, the Council of the European Union and the European Commission intend to strengthen and unify data protection for all individuals within the European Union (EU). It also addresses the export of personal data outside the EU.

HIPAA	The Health Insurance Portability and Accountability Act of 1996 (HIPAA) is United States legislation that provides data privacy and security provisions for safeguarding medical information.
Personal Data	means any information, including Sensitive Data, that is: (i) about an identified or identifiable individual, (ii) received by SelfHelpWorks in the U.S. from the EU, and (iii) recorded in any form. Personal Data does not include anonymous or non-personal information (i.e., information that cannot be associated with or tracked back to a specific individual).
Sensitive Data	means Personal Data specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sex life, the commission or alleged commission of any offense, any proceedings for any offense committed or alleged to have been committed by the individual or the disposal of such proceedings, or the sentence of any court in such proceedings.

Purpose

This Privacy Policy was created to provide information on what personal information is collected, how that information is used, how the information is managed, and the user's rights concerning the use and storage of personal information collected.

SelfHelpWorks strives to maintain security standards and procedures that protect SelfHelpWorks information and technology from unauthorized access and use.

This includes physical and operational controls over information assets at all SelfHelpWorks facilities, and/or at any facility used to host SelfHelpWorks information assets.

Roles & Responsibilities

Data Protection Officer:

- Understand and follow this policy
- Provide advice and guidance to SelfHelpWorks and its employees on the requirements of the GDPR
- Monitor SelfHelpWorks compliance with GDPR
- Consult and provide guidance during Data Protection Impact Assessments
- Serve as point of contact between data subjects and between SelfHelpWorks and GDPR Supervisory Authorities

Employees:

- Understand and follow this policy

Supervisors:

- Ensure all temporary or permanent part-time or full-time employees of SelfHelpWorks and all external parties, including but not limited to SelfHelpWorks consultants and contractors, business partners, vendors, suppliers, outsource service providers, and other third-party entities with access to SelfHelpWorks data in any form are aware of and follow this policy

Exceptions

While business needs may occasionally appear to require variance from established policy and standards, no exceptions are permitted unless granted by SelfHelpWorks' Chief Technology Officer. For example, a particular business function may not be able to be performed effectively, reasonably, or cost-effectively if the Policy is followed. In these instances, the Chief Technology Officer must be notified through email to privacy@selfhelpworks.com, briefly stating the underlying business problem and recommended approach or acceptable alternatives. The Chief Technology Officer will consider the need to change the Policy or make an exception, and any potential risks or problems alternatives may cause. If a variance is granted, the affected Security policies will be updated and communicated.

Compliance

The Chief Technology Officer will employ multiple methods, tools, and audit processes to monitor and assess whether security controls and measures have been implemented and are being followed.

Non-compliance with this policy will result in notifications to the employee and management. Further consequences may include disciplinary action (up to and including termination of employment) and/or legal proceedings to recover any loss or damage to SelfHelpWorks, and possibly 3rd parties affected.

Top Layer (for Public Publication)

PRIVACY POLICY

SelfHelpWorks.com is not targeted at children. We do not knowingly collect any personally identifiable information from children under the age of 16. [Learn More](#)

SelfHelpWorks.com Inc. will ask you to provide personal information about yourself to provide you services on the SelfHelpWorks web sites. We are committed to keeping your personal information confidential and secure.

The personal information we may request and why we ask for it

The following information that you may be asked to provide is used to administer our business, optimize the user experience, provide customer service, track your progress towards meeting health goals, communicate information from SelfHelpWorks or its partners that may be of interest to you, and to confirm and fulfill your order if applicable:

- First and last name
- E-mail address
- Date of birth
- Gender
- Credit card number
- Billing address
- City, state, zip code
- Telephone number
- Bank information for automatic deposit/debits
- Health Information in the personal trackers (i.e. self-reported glucose levels)

Typically, you provide this information when you purchase or register for our products. We also obtain data from [third parties](#). The following information is usually collected using technologies like [cookies](#) and from error reports or usage data from the SelfHelpWorks site. It is analyzed in aggregate to improve the function and content of the Site.

- IP address
- Browser type
- Domain name
- [Cookies](#)

Who we share your information with

- Some business partners have provided you access to SelfHelpWorks.com as a part of the services they offer. SelfHelpWorks may be required to provide these partners data reports about the courses you enroll in and your progress towards completing them.
- We do not share personal information with business partners for the purpose of contacting you to offer products and services. We employ vendors that need to do things for us like fulfilling orders, delivering packages, sending e-mail, processing credit card payments, and providing customer service.
- We may disclose your information as required by law or to respond to some sort of legal process.

[Learn More](#)

How we protect your personal information

We take reasonable security measures, including physical, administrative, and technical safeguards to protect your personal information from misuse, disclosure, and unavailability.

[Learn More](#)

How privacy laws apply

SelfHelpWorks is enrolled in the US - EU Privacy Shield, and strives to follow the General Data Protection Regulation and Health Insurance Portability and Accountability Act (HIPAA).

[Learn More](#)

Who to contact

To use the services provided on SelfHelpWorks web sites you must agree to the terms and conditions of this Privacy Policy.

If you have questions or comments about this Privacy Policy please contact us at:

privacy@selfhelpworks.com

If you identify any inaccuracy in your personal information, or you need to make a change or would like to verify such information, please contact us at privacy@selfhelpworks.com so that we may update our records. Or you may go online, login to your assigned SelfHelpWorks website, and update your own information. We will use commercially reasonable efforts to accommodate all such requests.

Latest revision: March 15, 2018

Second Layer (for Public Publication)

Protection of Children

If we become aware that personally identifiable information regarding a child under the age of 16 has been collected at the Site, we will use such information for the sole purpose of contacting a parent or guardian of the child to obtain verifiable parental consent. If we cannot obtain consent after a reasonable period of time, or if when contacted a parent or guardian requests that we do not use or maintain such information, we will make reasonable efforts to delete it from our records. Upon request by a parent or guardian, SelfHelpWorks will provide a description of the specific types of personal information collected from a child who is under the age of 16.

Cookies

Cookies are small pieces of information that are stored on computer hard drives. We may use cookies to recognize you when you return to the Site in order to provide you with a better user experience. Our cookies do not contain any personally identifying information, such as your name, or sensitive information, such as your credit card number. We may allow third parties such as Google to collect data about your visit via advertising cookies and anonymous identifiers. We

do not control the use or contents of third party cookies. If you do not wish Google to track your activity, Google's currently-available opt-out tools are located [here](#). Web browsers often allow you to erase existing cookies from your hard drive, block the use of cookies and/or be notified when cookies are encountered. If you elect to block cookies, please note that you may not be able to take full advantage of the features and functions of the Site.

Third Parties

The Site may contain links to web sites operated and maintained by third parties over which we have absolutely no control. Any information you provide to third party web sites will be governed under the terms of each web sites' privacy policy and we encourage you to investigate and ask questions before disclosing any information to the operators of third party web sites. We have no responsibility or liability whatsoever for the content, actions or policies of third party web sites. The inclusion of third party web sites on our Site in no way constitutes an endorsement of such web sites' content, actions or policies.

Partners

SelfHelpWorks may partner with other companies to jointly offer products or services. If you purchase or specifically express interest in a jointly offered product or service from SelfHelpWorks, SelfHelpWorks may share Customer Information collected in connection with your purchase or expression of interest with those partners. SelfHelpWorks does not control our partners' use of the Customer Information, and their use of the information will be in accordance with their own privacy policies. If you do not wish your information to be shared in this manner, you may choose not to purchase or specifically express interest in a jointly offered product or service.

Security

We take reasonable and appropriate steps to ensure that the personal information we collect about you remains accurate, timely and secure. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure and while we strive to protect your personal information, we cannot guarantee or warrant its complete security. We are not responsible for harm that you or any person may suffer as a result of a breach of confidentiality in respect to your use of our Site or any information you transmit to our Site. Unless earlier deletion is requested by you, your data is retained for seven years to fulfill the contracted services and meet legal obligations.

Compliance

EU Privacy Shield

SelfHelpWorks complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States, respectively. SelfHelpWorks has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there

is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern.

SelfHelpWorks complies with the Privacy Shield Principles for all onward transfers of Personal Information from the European Union, including the onward transfer liability provisions.

With respect to Personal Information received or transferred pursuant to the Privacy Shield program, SelfHelpWorks is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission.

In compliance with the Privacy Shield Principles, SelfHelpWorks commits to resolve complaints about our collection or use of your personal information. European Union individuals with inquiries or complaints regarding our Privacy Shield policy should contact SelfHelpWorks at: privacy@SelfHelpWorks.com. In addition, SelfHelpWorks has further committed to refer unresolved Privacy Shield complaints through [JAMS](#), an alternative dispute resolution provider located in both the United States and the EU. If you do not receive timely acknowledgment of your complaint from us, or if we have not resolved your complaint, please contact or visit the [JAMS Privacy Shield Program](#) for more information or to file a complaint. The services of JAMS are provided at no cost to you.

Under certain conditions, more fully described on the [Privacy Shield website](#), you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

Click here to learn more about the [Privacy Shield program](#), and to view our certification.

GDPR

You generally have the right to access your Personal Data. Accordingly, where appropriate, we provide you with reasonable access to the Personal Data we maintain about you. We also provide you a reasonable opportunity to choose whether to receive communications from us or correct, amend, or delete the information.

SelfHelpWorks may limit or deny access to Personal Data where the burden or expense of providing access would be disproportionate to the risks to your privacy in the case in question, or where the rights of persons other than you would be violated. Other reasons for denying or limiting access include (i) interference with the execution or enforcement of the law or with private causes of action, including the prevention, investigation or detection of offenses or the right to a fair trial; (ii) disclosure where the legitimate rights or important interests of others would be violated; (iii) breaching a legal or other professional privilege or obligation; (iv) prejudicing employee security investigations or grievance proceedings or in connection with employee succession planning and corporate re-organizations; or (v) prejudicing the confidentiality necessary in monitoring, inspection or regulatory functions connected with sound management, or in future or ongoing negotiations involving the organization.

Please contact privacy@selfhelpworks.com to request access to your Personal Data or to correct, amend, or delete the Personal Data where it is inaccurate or has been processed in violation of the Privacy Shield Principles. If access will not be granted, SelfHelpWorks will respond with a reason for denying your request.

HIPAA

If you are using SelfHelpWorks as a benefit offered by your health plan or wellness provider, then your “Protected Health Information” or “PHI” (as that term is defined in HIPAA) is covered by (i) the Health Insurance Portability and Accountability Act, its implementing regulations, and amendments thereto (collectively “HIPAA”), and (ii) our contract with your health plan or wellness provider. Accordingly, and notwithstanding any statements to the contrary in these Terms of Service, your PHI will be accessed, used, disclosed and maintained solely in accordance with HIPAA and our contract with your health plan or wellness provider. For more information about your rights under HIPAA, please contact your health plan or wellness provider and ask for a copy of their Notice of Privacy Practices.

If you believe your privacy rights have been violated, or if you disagree with a decision we made about a request, you may file a written complaint with us or the Secretary of the Department of Health and Human Services (DHHS). You will not be penalized if you file a complaint about our privacy practices with us or with DHHS.

Contributors / Reviewers

Contributor	Geo / Functional Area	Reviewer	Geo / Functional Area
Bryan Noar	Business Communications	Toby Alfaro	Security

Approvals

Date Approved	Approver	Geo / Functional Area
03/15/2018	Toby Alfaro	Security

Revision History

Revision Number	Revision Date	Content Contributor	Change Description
1.0	03/15/2018	AppSec Consulting	Initial Document