

NOTICE OF PRIVACY PRACTICE ACKNOWLEDGMENT

I. Introduction to Privacy Policy

This Online and Privacy Policy (“Privacy Policy”) explains how information is collected, used and disclosed by Treatspace (“Treatspace”), and applies to information we collect when you use or access our website (www.treatspace.com) products, services (collectively, “Treatspace Services” and “Services”), or when you otherwise interact with us.

There are many different ways Treatspace Services can be used. Further, we provide our Services to both healthcare professionals and patients of healthcare professionals. Treatspace users gain access to Treatspace Services based on their level of access governed by their subscription level. As you use our Services, we want you to be clear how we’re using information and the ways in which you can protect your privacy.

Our Privacy Policy explains:

- What information we collect and why we collect it
- How we use that information
- The choices we offer, including how to access and update information

We’ve tried to keep it as simple as possible, but if you’re not familiar with terms like cookies, IP addresses, pixel tags and browsers, then read about these key terms first. Your privacy matters to Treatspace and if you have any questions, please email privacy@treatspace.com.

II. Information We Collect

We collect information to enable our platform to provide the Services offered to our subscribers and to understand how users are interacting with our Services so that we can continuously improve our platform.

We collect information in several ways:

Information you give us: For example, some of our Services require you to sign up for a Treatspace Account. When you do, we’ll ask for personal information, like your name, email and birthday in order to complete your account activation. We also offer products that work best with positive verification of your identity. These products currently require a government issued photo identification to confirm your identity. In the future, we may automate this further by using an automated identity verification service. For certain premium Services, we may offer the ability to pay for these Services using a credit card in which case we would collect additional information such as phone number, billing address and credit card data. IN ALL CASES, you are in control of the information you choose to provide Treatspace.

Information Provided to Us by Your Healthcare Provider:

Healthcare providers contract with Treatspace for referral management services and may choose to provide Treatspace with patient demographic data to facilitate referrals from one healthcare provider to another. Treatspace does not disclose your personal demographic or

clinical data to any outside parties other than your healthcare providers – for the sole purpose to transitioning your care from one setting/provider to another. If you do not wish to have your referrals sent using Treatspace, you should notify your healthcare provider or contact Treatspace directly at support@treatspace.com.

Information we get from your use of our services: We collect information about the products that you use and how you use them, like when you visit particular website pages, or when you interact with website content. This information includes:

Device information – We collect device-specific information (such as your hardware model, operating system version and unique device identifiers).

Log information – When you use our products or view content provided by Treatspace, we automatically collect and store certain information in server logs. This includes:

- details of how you used our service, such as your search queries
- Internet protocol address
- device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL
- cookies that may uniquely identify your browser or your Treatspace Account

Location information – When you use Treatspace services, we may collect and process information about your actual location. We use various technologies to determine location, including IP address.

Local storage – We may collect and store information (including personal information) locally on your device using mechanisms such as browser web storage (including HTML5) and application data caches.

Cookies and anonymous identifiers – We use various technologies to collect and store information when you visit Treatspace Services, and this may include sending one or more cookies or anonymous identifiers to your device. Treatspace uses cookies to make interactions with the websites easy and meaningful. When you visit the website, Treatspace's servers may send a cookie to your computer. Standing alone, cookies do not personally identify you; they merely recognize your Web browser. Unless you choose to identify yourself, either by responding to a promotional offer, opening an account, or filling out a web form, you remain anonymous. We use cookies to help us recognize you across different Services, learn about your interests both on and off our Services, improve your experience, increase security, and measure use and effectiveness of our Services. You can control cookies through your browser settings and other tools. By visiting our Services, you consent to the placement of cookies and beacons in your browser and HTML-based emails in accordance with this Privacy Policy. Please note that if you disable your Web browser's ability to accept cookies, you will be able to navigate the websites, but you may not be able to successfully use the services.

Web Beacons – Treatspace uses Web beacons alone or in conjunction with cookies to compile information about customers' and visitors' usage of the websites and interaction with emails from Treatspace. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular website tied to

the Web beacon, and a description of a website tied to the Web beacon. Treatspace uses Web beacons to operate and improve the website and email communications.

III. How We Use Information We Collect

We use the information we collect from all of our Services to provide, maintain, protect and improve them, to develop new ones, and to protect Treatspace and our users.

We may use the name you provide across certain Services we offer that require a Treatspace Account. Examples include Kudos, Treatmail™, Taking Patients and Blogs (commenting feature).

As a healthcare provider, if you have a licensed Treatspace profile, we may display all of your submitted DoctorFacts™ to include your Profile name, Profile photo and other data available on your Curriculum Vitae (CV). You may choose to edit your Treatspace Profile at any time in order to add, remove or update your information.

When you contact Treatspace, we keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming changes or improvements.

We use information collected from cookies and other technologies, like pixel tags, to improve your user experience and the overall quality of our services. We will not associate a cookie or anonymous identifier with sensitive categories, such as those based on race, religion, sexual orientation or health.

We will ask for your consent before using information for a purpose other than those that are set out in this Privacy Policy.

IV. Transparency and Account Settings

People have different privacy concerns. Our goal is to be clear about what information we collect, what information we share and how we communicate with you so that you can make meaningful choices about your privacy. For example, you can:

Visit your Treatspace “Settings” page to control how we communicate with you, if your account is linked with your Facebook or Google account and any of your personal information.

You can also opt out of any Treatspace Services at any time. All communications we send to you will contain an “Unsubscribe” link which you can click on at any time. This will take you to your Treatspace “settings” page where you can change your email settings. If you are not logged in to Treatspace, you will have to log in to make these changes.

If you want to permanently deactivate your account, please send email to support@treatspace.com with your request.

You may also set your browser to block all cookies, including cookies associated with our services, or to indicate when a cookie is being set by us. However, it’s important to remember

that some of our services may not function properly if your cookies are disabled. For example, we may not remember your language preference.

V. Information You Share

Many of our services let you share information with others. Remember that when you share information publicly, it may be indexable by search engines, including Treatspace. Our platform services allow you to send a healthcare provider “Kudos” which requires your name and email address. If you do not wish to have your name indexed by a search engine, you should not give “Kudos” to a healthcare provider. Any Treatspace service which allows you to share information about your health will not be indexed by any search engine or made public by Treatspace. This information will be sent securely to your designated healthcare provider and will be encrypted during transit and when not being viewed by your chosen provider.

VI. Accessing and Updating Your Personal Information

Whenever you use our services, we aim to provide you with access to your personal information. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. When updating your personal information, we may ask you to verify your identity and/or email address before we can act on your request.

We may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup systems).

Where we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort. We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our services, we may not immediately delete residual copies from our encrypted active servers and may not remove information from our encrypted backup systems.

VII. Information We Share

We do not share personal information with companies, organizations and individuals outside of Treatspace unless one of the following circumstances applies:

With your consent: We will share personal information with companies, organizations or individuals outside of Treatspace when we have your consent to do so. We require opt-in consent for the sharing of any sensitive personal information.

With healthcare providers: If your Treatspace Account is managed for you by a healthcare provider (for example, for referrals on the Referral Network product) then your healthcare

provider will have access to your medical information (including your email and other data). Your healthcare provider may be able to: review your medical information in order to provide medical services or satisfy applicable law, regulation, legal process or enforceable governmental request. Please refer to your healthcare provider's HIPAA and privacy policy for more information.

For Permitted or Required by Law Activities: There are situations where we may use and/or disclose your health information without first obtaining your written authorization for purposes other than for treatment or healthcare operations. Except for the specific situations where the law requires us to use and disclose information (such as reports of births to the health department or reports of abuse or neglect to social services), we have listed all these permitted uses and disclosures in this section.

For Public Health Activities: We may use or disclose health information to a public health authority that is authorized by law to collect or receive information in order to report, among other things, communicable diseases and child abuse, or the F.D.A to report medical device or product related events. In certain limited situations, we may also disclose health information to notify a person exposed to a communicable disease.

For Health Oversight Activities: We may disclose health information to a health oversight agency that includes, among others, an agency of the federal or state government that is authorized by law to monitor the healthcare system.

For Law Enforcement Activities: We may disclose limited health information in response to a law enforcement official's request for information to identify or locate a victim, a suspect, a fugitive, a material witness or a missing person (including individuals who have died) or for reporting a crime that has occurred on our premises or that may have caused a need for emergency services.

For Judicial and Administrative Proceedings: We may disclose health information in response to a subpoena or order of a court or administrative tribunal.

To Coroners, Medical Examiners, and Funeral Directors: We may release health information to a coroner or medical examiner to identify a deceased person or to determine the cause of death.

For Purposes of Organ Donation: We may disclose health information to an organ procurement organization or other facility that participates in the procurement, banking or transplantation of organs or tissues.

For Purposes of Research: We may conduct and/or participate in medical, social, psychological and other types of research. Most research projects are subject to a special approval process to evaluate the proposed research project and its use of health information before we use or disclose health information. In certain circumstances, however, we may disclose health information to people preparing to conduct a research project to help them determine whether a research project can be carried out or will be useful, so long as the health information they review does not leave our premises.

To Avoid Harm to a Person or for Public Safety: We may use and disclose health information if we believe that the disclosure is necessary to prevent or lessen a serious threat or harm to the public or the health or safety of another person.

For Specialized Government Functions: We may use and disclose health information of certain military individuals, for specific governmental security needs, or as needed by correctional institutions.

For Workers' Compensation Purposes: We may disclose your health information to comply with the workers' compensation laws or other similar programs.

For Appointment Reminders and to Inform You of Health Related Products or Services: We may use or disclose your health information to contact you for medical appointments or other scheduled services, or to provide you with information about treatment alternatives or other health-related products and services.

All Other Uses and Disclosures Require Your Prior Written Authorization.

For situations not generally described in our Notice, we will ask for your written authorization before we use or disclose your health information. You may revoke that authorization, in writing, at any time to stop future disclosures of your information. Information previously disclosed, however, will not be requested to be returned nor will your revocation affect any action that we have already taken. In addition, if we collected the information in connection with a research study, we are permitted to use and disclose that information to the extent it is necessary to protect the integrity of the research study.

If Treatspace is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

VIII. Information Security

We work hard to protect Treatspace and our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold. In particular:

We encrypt many of our services using SSL and at-rest encryption technology. We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems. We restrict access to personal information to Treatspace employees, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

IX. When This Privacy Policy Applies

Our Privacy Policy applies to all of the services offered by Treatspace Inc. and its affiliates, and services offered on other sites, but excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you in search results, sites that may include Treatspace services, or other sites linked from our services. Our Privacy Policy does

not cover the information practices of other companies and organizations who advertise our services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

X. Compliance and Cooperation With Regulatory Authorities

We regularly review our compliance with our Privacy Policy. We also adhere to several self regulatory frameworks. When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

XI. Information Regarding Children

Persons must be of Minimum Age to use Treatspace. Treatspace does not collect information from children under the age of 13. If you are a parent or legal guardian of a minor child, you may, in compliance with the Terms of Use, use the Site or Services on behalf of such minor child. Any information that you provide while using the Site or Service on behalf of your minor child will be treated as Personal Information as otherwise provided herein.

Treatspace and its members agree to comply with the requirements of COPPA (Children's Online Privacy Protection Act), which severely restricts what information can be collected from children under the age of 13. Children under the age of 13 in the United States are prohibited from using the site. The site is not directed at children and Treatspace does not knowingly collect any information from individuals under the age of 13. We will use that information only to respond directly to that child (or a parent or legal guardian) to inform him or her that he or she cannot use the services and subsequently we will delete that information from our own servers.

XII. Changes

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.