

PRIVACY POLICY

Last Updated: August 24, 2022

Your privacy is very important to us and we take your privacy very seriously. This Privacy Policy describes how Community Health Focus, Inc. (“Company”, “we”, “us”, or “our”) collects and uses the personal information you provide to us on our website and all other websites, mobile sites, applications, platforms and tools where this Privacy Policy appears or is linked, and through the use of our services, (collectively the “Site”). It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to various laws in the United States, and we are responsible as controller of that personal information for the purposes of those laws.

By creating an account, providing information to us (by any means, whether in correspondence, via our Site, or otherwise), or continuing to use our services, you acknowledge that you have read, understood, and consent to be bound by this Privacy Policy.

IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY OR OUR PRACTICES, YOU MAY NOT USE OUR SITE. THIS PRIVACY POLICY MAY CHANGE FROM TIME TO TIME AND YOUR CONTINUED USE OF OUR SITE CONSTITUTES YOUR ACCEPTANCE OF THOSE CHANGES. WE ENCOURAGE YOU TO REVIEW THIS PRIVACY POLICY PERIODICALLY.

1. Health Insurance Portability and Accountability Act (HIPAA)

The information provided on this Site is not intended to serve as medical or other professional advice and is not to be used for medical diagnosis or medical treatment of any condition or symptom. You acknowledge and agree that we are not covered by, and therefore are not compliant with, The Health Insurance Portability and Accountability Act of 1996 (HIPAA) and related regulations. The HIPAA privacy rules apply to health plans, health care clearinghouses to any health care provider who transmits health information in electronic form in connection with transactions for which the Secretary of Health and Human Services has adopted standards under HIPAA (the “covered entities”) and their service providers (“business associates”). You understand and agree that we are not an entity that is covered by HIPAA and we are not a medical provider and do not make clinical, medical, or other decisions related to your healthcare and any information provided on this Site does not constitute the provision or practice of medical or professional health care advice or services. This means that the information that you provide to us is not protected by the HIPAA privacy rules and regulations. You acknowledge that the Site may not be appropriate for the storage or control of access to sensitive data, such as medical or health information and “protected health information” (also known as PHI) as defined under HIPAA. We specifically disclaim any representation or warranty that the Site, as offered, complies with HIPAA. We do not

sign “business associate agreements” and you acknowledge that we are not a business associate, subcontractor, or agent of yours pursuant to HIPAA.

- 2. Personal Information We Collect About You.** As used in this Privacy Policy, “personal information” means any information relating to an identified or identifiable individual. We may collect and use the following personal information:

Category	Examples	Collected
Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	Yes
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<p>A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p> <p>Some personal information included in this category may overlap with other categories.</p>	Yes
Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related	Yes

	medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	
Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	No
Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes
Geolocation data.	Physical location or movements.	No
Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	Yes
Professional or employment-related information.	Current or past job history or performance evaluations	No
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student	No

99)).	schedules, student identification codes, student financial information, or student disciplinary records.	
Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Yes
Sensitive personal information	<p>Personal information that reveals:</p> <p>(A) A person's social security, driver's license, state identification card, or passport number.</p> <p>(B) A person's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.</p> <p>(C) A person's precise geolocation.</p> <p>(D) A person's racial or ethnic origin, religious or philosophical beliefs, or union membership.</p> <p>(E) The contents of a person's mail, email, and text messages unless the business is the intended recipient of the communication.</p> <p>(F) A person's genetic data.</p> <p>The processing of biometric information for the purpose of uniquely identifying a</p>	Yes

	<p>consumer.</p> <p>Personal information collected and analyzed concerning a consumer's health.</p> <p>Personal information collected and analyzed concerning a consumer's sex life or sexual orientation.</p>	
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This personal information is required to provide our services and product recommendations to you. If you do not provide the personal information we ask for, it may delay or prevent us from providing products and services to you.

3. Cookies and Other Tracking Technologies.

Cookies

Cookies are small text files of information stored by the Internet browser on your computer's hard drive. We may use these cookies to collect browsing data to keep track of your preferences and profile information and to collect general usage and volume statistical information. Our cookies do not collect personal or confidential information and are not spyware.

There are a number of different types of cookies, however, our Site uses:

- *Essential* – These cookies are necessary to the core functionality of our Site and some of its features, such as access to secure areas.
- *Performance and Functionality* – These cookies are used to enhance the performance and functionality of our Site. For example, we may use these cookies so that we recognize you on our Site and remember your previously selected preferences. These could include what language you prefer and your geographic location. These cookies are nonessential to the use of our Site, however, without these cookies, certain functionality may become unavailable. A mix of first-party and third-party cookies are used.
- *Advertising* – These cookies are used to make advertising messages more relevant to you. They prevent the same ad from continuously reappearing, ensure that ads are properly displayed for advertisers, and in some cases select advertisements that are based on your interests. Our Company sometimes shares online data collected through these cookies with our advertising partners. This means that when you visit another Site, you may be shown advertising based on your browsing patterns on our Site.

- *Analytics and Customization* –Our Company uses these cookies and technologies to analyze how the Site is accessed, used, or performing in order to improve your user experience and to maintain, operate and continually improve the Site. For example, we use Google Analytics on the Site to collect: page url/page title and user browser/system information, which includes browser type, referrer, language, java/flash support, IP address, and ad-serving data. For information on how Google Analytics collects and processes data, visit www.google.com/policies/privacy/partners/. To opt-out of Google Analytics, visit Google’s “How you can control the information collected by Google on these sites and apps” article available [here](#).
- *Social Media* – These are cookies used to connect our Site to a third-party social media platform. For example, these cookies enable you to share our Site’s content through third-party social networks and other websites. They remember your details after you sign in to a social media account from a website. These cookies may also be used for advertising purposes.
- *Unclassified* – These are cookies that have not yet been categorized. We are in the process of classifying these cookies with the help of their providers.

Web Beacons

Our Site contains electronic images known as web beacons (sometimes called single-pixel gifs) and are used along with cookies to compile aggregated statistics to analyze how our Site is used and may be used in some of our emails to let us know which emails and links have been opened by recipients. This allows us to gauge the effectiveness of our customer communications and marketing campaigns. We use a third party to gather information about how you and others use our Site. For example, we will know how many users access a specific page and which links they clicked on. We use this aggregated information to understand and optimize how our Site is used.

Targeted Advertising

Targeted Advertising (also known as online behavioral advertising) uses information collected on an individual’s web browsing behavior such as the pages they have visited or the searches they have made. Third parties collect this information by placing or accessing cookies in your browser when you visit this Site, or other, websites. If you would like to learn more about the third party advertisers that may be aware of the fact that you visit the Site, and to understand your choices about having such advertisers’ cookies turned off, please visit <http://www.aboutads.info/choices/>, <http://www.youronlinechoices.com/>, or <http://www.networkadvertising.org/>.

How to Manage Cookies.

You have the right to decide whether to accept or reject certain cookies. You can set your browser not to accept cookies, and the above websites tells you how to remove cookies from your browser. However, in a few cases, some of our Site features may not function as a

result. Essential cookies cannot be rejected, as they are strictly necessary to provide you with our Site.

4. Do Not Track

We do not track users across the web and therefore do not respond to web browser “do not track” signals.

Except as otherwise explicitly stated in this Privacy Policy, we do not authorize third parties to collect personal information from your visit of the Site for third party use for advertising purposes without your consent.

5. Promotional Communications. We may use your personal information to send you updates (by email, text message, telephone or post) about products and our services, including exclusive offers, promotions or new products and services.

We have a legitimate interest in processing your personal information for promotional purposes (see below “How and why we use your personal information”). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

You have the right to opt out of receiving promotional communications at any time by:

- Contacting us by using one of the methods listed in the “How to Contact Us” Section below; or
- Using the “unsubscribe” link in emails or “STOP” number in texts.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products or services in the future, or if there are changes in the law, regulation, or the structure of our business.

6. How Your Personal Information is Collected. We collect most of this personal information directly from you—in person, by telephone, text or email and/or via our Site. However, we may also collect information:

- From publicly accessible sources;
- From third parties;
- From cookies on our Site; and
- Via our IT systems, including automated monitoring of our Site and other technical systems, such as our computer networks and connections, communications systems, and email and instant messaging systems.

7. How and Why We Use Your Personal Information. Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:

- To comply with our legal and regulatory obligations;

- For the performance of our contract with you or to take steps at your request before entering into a contract;
- For our legitimate interests or those of a third party (i.e. to minimize fraud that could be damaging for us and for you, to be as efficient as we can so we can deliver the best service for you at the best price, to protect trade secrets and other commercially valuable information, to prevent and detect criminal activity that could be damaging for us and for you, to make sure that we can keep in touch with our customers about existing orders and new products, to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you, and to promote our business to existing and former customers); or
- Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

We use (process) your personal information:

- To provide our services to you.
- To prevent and detect fraud against you or us.
- To ensure business policies are adhered to, e.g. policies covering security and internet use.
- For operational reasons, such as improving efficiency, training and quality control.
- To ensure the confidentiality of commercially sensitive information.
- For statistical analysis to help us manage our business, e.g. in relation to our customer base or other efficiency measures.
- To prevent unauthorized access and modifications to systems.
- To update and enhance customer records.
- To ensure safe working practices, staff administration and assessments.
- For processing your payments
- For marketing our services and those of selected third parties to:
 - existing and former customers;
 - third parties who have previously expressed an interest in our services;
 - third parties with whom we have had no previous dealings.

We may also anonymize, aggregate or de-identify personal information so the end-product does not identify you or any other individual. For example, we may use this information to generate norms by industry, geography, level, etc., enable us to understand where our services are being utilized, conduct ongoing validation studies, compile reports, and improve the services. Such aggregated, anonymized or de-identified information is not considered personal information for purposes of this Privacy Policy and we may use it for any purpose.

8. Who We Share Your Personal Information With. We routinely share personal information with:

- Other users who may access and use our Site;
- Our affiliates;

- Service providers we use to help deliver our services to you;
- Other third parties we use to help us run our business, such as marketing agencies or website hosts;
- Third parties approved by you, including social media sites you choose to link your account to or other third parties with your consent;

We may request your consent to share personal information for special research projects and studies, co-registration with a non-profit, media interviews of a Site user, public registries, like the ALS Registry.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We may receive certain information during our account registration process which we consider a special category of personal information. This includes:

- Name;
- Email address;
- Password; and
- The content of private messages.

This special category of personal information is only shared with other users who may access and use our Site if such user register with our Site as a medical professional with a research account or an employee of ours. In such instance, only that users name and affiliation will be shared with other users who may access and use our Site. You should understand that anyone can register for an account on our Site and view the personal information you choose to share publically.

Except as described in this Privacy Policy, we will not share your personal information with any other third party without your consent.

9. How Long Your Personal Information Will Be Kept. We will keep your personal information while you have an account with us or while we are providing services to you. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;

- To show that we treated you fairly; or
- To keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this Privacy Policy. Different retention periods apply for different types of personal information.

When it is no longer necessary to retain your personal information, we will delete or anonymize it.

10. Children and our Site.

Our Site is not directed to children, and you may not use our Site if you are under the age of 18. If you are under 18, do not use our services, access the Site, or provide any information about yourself including, without limitation, your name, address, email address or any screen name or user name you may use. If we learn that we have collected or received personal information from a child under 13 without verification of parental consent, in compliance with the Children’s Online Privacy Protection Act, we will purge such information from our database and cancel the corresponding accounts. If you believe we may have any information from or about a child under 13, please see our “How to Contact Us” Section below. Please visit the FTC's website at www.ftc.gov for tips on protecting children's privacy online.

11. Keeping Your Personal Information Secure. We use reasonable and appropriate physical, technical, and administrative safeguards to protect your information from unauthorized use, access, loss, misuse, alteration, or destruction. We endeavor to protect the personal information we receive, gather and store, by such means as password protection, firewalls and other means. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We also require that third party service providers acting on our behalf or with whom we share your information also provide appropriate security measures in accordance with industry standards. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Transmissions over the internet are never entirely secure and we cannot guarantee the security of information you submit via our Site while it is in transit over the internet. Any such transmission of information by you over the internet is at your own risk.

12. Where Your Personal Information is Held. Information may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see above: “Who We Share Your Personal Information with”).

13. A Note to Users Outside of the United States. Company is headquartered in the United States and utilizes service providers in the United States. The Site is not intended for Site visitors outside the United States. If you are a non-U.S. user of the Site, by visiting the Site

and providing us with data, you acknowledge and agree that your personal information may be processed for the purposes identified in this Privacy Policy. If you choose to access our Site outside the United States, Company and our service providers may transfer your personal information to, or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. In particular, you are advised that the United States of America uses a sectoral model of privacy protection that relies on a mix of legislation, governmental regulation, and self-regulation. Where the laws of your country allow you to do so, by using the Site or the services or by providing your data, you consent and authorize Company to transfer, store, and use all such personal information in the United States of America (and any other country where we operate) which may not offer an equivalent level of protection to that required in the country where you reside and to the processing of that personal information by us on our servers located in the United States of America, as described in this Privacy Policy. If you do not want your personal information transferred to the United States of America and any other country where we operate, please do not submit any information to us or use our Site or the services.

14. Third Party Websites.

If, in your interactions with the Site, you are linked or directed to, or click on, a third party website, we cannot control what information you may provide to that party or on that website, and we are not responsible for how that party may use or disclose any information you may provide to them. This is not as an endorsement by us of any third party website, content that may be offered on such third party website, or of any products or services provided by such third party. We do not control, nor are we responsible for, such third party website, product or service offerings. As such, we urge that you exercise caution before providing them with your personal information and to review the third party's privacy policy for information on its data processing practice.

You should contact the site administrator for such third party website if you have any complaints, claims, concerns or questions regarding such third party website or its privacy practices.

15. Changes to This Privacy Notice. This Privacy Policy was published on the date "Last Updated" above.

We may change this Privacy Policy from time to time. Changes to this Privacy Policy will be made by updating this page. Please visit this Privacy Policy regularly to read the current version.

16. How to Contact Us. Please contact us by post or email if you have any questions about this Privacy Policy or the information we hold about you. Our contact details are shown below:

3273 Lakewood Drive,
Ann Arbor, Michigan 48103
info@thepaintools.com