

## **Privacy Policy**

DoctorGlobe, Inc. (“us” or “we”) is committed to respecting the privacy of users of DoctorGlobe (the “Website”) and services provided by us through the services under the doctorglobe.com domain (collectively, the “Services”). We (or our subcontractors) host the Website to connect you to healthcare providers that have entered into an agreement with us (a “Provider”). Once you select one or more Providers through the Website to provide services to you, each of those Providers may be referred to as “your Provider.” We created this Privacy Policy (“Privacy Policy”) to tell you how we protect, collect, use, disclose and store the information collected through the Services.

BY DOWNLOADING, ACCESSING, OR USING THE WEBSITE OR SERVICES, AND/OR BY REGISTERING WITH US OR PROVIDING INFORMATION TO US IN CONNECTION WITH THE WEBSITE, YOU ACCEPT THE PRACTICES AND POLICIES OUTLINED IN THIS PRIVACY POLICY AND YOU HEREBY CONSENT THAT WE WILL COLLECT, USE, AND SHARE YOUR INFORMATION AS SET FORTH IN THIS PRIVACY POLICY. IF YOU ARE REGISTERING AN ACCOUNT OR USING THE SERVICES ON BEHALF OF AN INDIVIDUAL OR ENTITY OTHER THAN YOURSELF, YOU REPRESENT THAT YOU ARE AUTHORIZED BY SUCH INDIVIDUAL OR ENTITY TO ACCEPT THIS PRIVACY POLICY ON SUCH INDIVIDUAL'S OR ENTITY'S BEHALF.

Your use of the Website is also subject to our Terms and Conditions of Use.

We may change this Privacy Policy at any time and any changes to this Privacy Policy will become effective when we make the revised Privacy Policy available through the Website. We will update the “Last Revised” date at the bottom of this Privacy Policy if we make any such changes to this Privacy Policy. Your use of the Website or the submission of any information in connection with the Website following any change means that you accept the revised Privacy Policy.

### **JURISDICTIONAL ISSUES**

We intend to provide our Services in the United States. Accordingly, this Policy, and our collection, use, and disclosure of your Personal Information (as defined below) is governed by U.S. law. We do not represent or warrant that the Website, or any functionality or feature thereof, is appropriate or available for use in any particular jurisdiction. If you choose to access or use the Website from outside the United States, you do so on your own initiative and at your own risk, and are responsible for complying with all local laws, rules and regulations. By using the Website and submitting any Personal Information from outside the United States, you acknowledge that the Website is subject to U.S. law and consent to the transfer of your Personal Information to the United States, which may provide a different level of data security than in your country of residence.

## **PERSONAL INFORMATION**

### **Personal Information We May Collect**

In order for you to use the Services, we may require you to provide us with information that identifies you as an individual (“Personal Information”). We and our service providers may collect Personal Information from you that includes, but is not limited to: (1) your name and your contact data (such as your e-mail address, phone number, billing and physical addresses, and your Website login and password); (2) demographic data (such as your gender, your date of birth and your zip code); (3) insurance information (such as your insurance carrier and insurance plan); (4) medical and health information you choose to share with us, that you provide through the Website. If you communicate with us by, for example, e-mail or letter, any information provided in such communication may be collected as Personal Information.

In addition to the information that we collect directly from you, we may also collect certain Personal Information about you from or on behalf of your Providers. We use and disclose this information only in accordance with your express authorization, which we request from you through a separate document when you sign up to use the Website. Please be aware that if you do not provide your authorization, or if you subsequently withdraw your authorization, you may not be able to use the Services through the Website, but may continue to receive services from a Provider outside of the Website.

We may also collect precise information about the location of your device with your consent. Please see below under “How We Collect Non-Personal Information” for additional information about our collection of location information.

### **How We May Use Personal Information**

We and our third-party service providers may use Personal Information to:

- Respond to your inquiries and fulfill your requests, such as to arrange transportation for a house call or to establish a telephone conference;
- Send to you administrative information, including information regarding the Website, and changes to our terms, conditions and policies;
- Confirm that services you request were provided to you by your Providers;
- Send to you marketing communications that we believe may be of interest to you;

- Allow you to post messages on our network through the Website;
- Personalize your experience on the Website by presenting products and offers tailored to you;
- Further our business purposes, such as quality assessment, data analysis, audits, developing new products, enhancing the Website, improving our services, identifying usage trends, developing tools which help you assess the performance, competence and qualifications of healthcare professionals and conducting training programs for such professionals, and determining the effectiveness of our promotional campaigns; and
- Act as we believe to be necessary or appropriate: (a) under applicable law; (b) to comply with legal process; (c) to respond to requests from public or government authorities; (d) to enforce our Terms and Conditions of Use; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, or that of our affiliates, you or others; (g) at our discretion under emergency circumstances, to notify emergency services or your family members, personal representative or other individuals involved in your care of your location and condition; or (h) to allow us to pursue available remedies or limit the damages that we may sustain.

Our use of your Personal Information may also be subject to certain restrictions set forth in an agreement between us and your Provider.

### **How Personal Information May Be Disclosed**

Your Personal Information may be disclosed to:

- Our third-party service providers that provide services such as hosting of the Website, data analysis, IT services and infrastructure, customer service, e-mail delivery, auditing and other similar services;
- Providers, including your Providers, to schedule appointments and confirm those services were delivered to you;
- Our affiliates, for the purposes described for Personal Information in this Privacy Policy, including marketing purposes relating to their products and services;
- Third parties, to permit them to send marketing communications to you regarding our products or services or the services of your Providers;
- For other treatment, payment or health care purposes of your Provider;

- A third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, liquidation or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceeding); and
- A third party as we believe to be necessary or appropriate: (a) under applicable law; (b) to comply with legal process; (c) to respond to requests from public or government authorities; (d) to enforce the Terms of Use; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, or that of our affiliates, you or others; (g) at our discretion under emergency circumstances, to notify emergency services or (h) to allow us to pursue available remedies or limit the damages that we may sustain.

Our disclosure of your Personal Information may also be subject to certain restrictions set forth in an agreement between us and your Provider.

## **NON-PERSONAL INFORMATION**

### **Non-Personal Information We May Collect**

“Non-Personal Information” is any information that does not reveal your specific identity. The types of Non-Personal Information that we collect are described in more detail below under “How We Collect Non-Personal Information.”

#### How We Collect Non-Personal Information

We and our third-party service providers may collect Non-Personal Information in a variety of ways, including:

- **Through your device:** Certain information is collected automatically through your device, such as your operating system name and version, device manufacturer and model, device identifier, language, the name and version of the software Website you are using. We use this information to ensure that the Website functions properly and to understand usage of the Website.
- **Through server log files:** Your “IP Address” is a number that is automatically assigned to the device that you are using by your Internet Service Provider (ISP). An IP Address is identified and logged automatically in our server log files whenever a user uses the Website, along with the time of the use and the pages visited within the Website. We use IP Addresses for purposes such as helping to calculate Website usage levels, diagnose server problems and administer the Website.

- **Physical Location:** If you give us your consent, we may collect information about the physical location of your device. We may use such information to provide you with personalized location-based services and content (for example, information regarding local Providers). We may also share your device's physical location, combined with information about what advertisements you viewed and other information we collect, with our marketing partners to enable them to provide you with more personalized content and to study the effectiveness of advertising campaigns. You will be permitted to allow or deny such uses and/or sharing of your device's location, but if you choose to deny such uses and/or sharing, we and/or our marketing partners may not be able to provide you with the applicable personalized services and content.
- **From you:** We may collect Non-Personal Information such as your general geographic location, as well as other information, such as your preferred means of communication, when you voluntarily provide such information to us. Unless combined with Personal Information, this information does not personally identify you or any other user of the Website.
- **By de-identifying information:** Aggregated Personal Information is information that is derived from Personal Information that does not personally identify you or any other user of the Website. For example, we may aggregate Personal Information to calculate the percentage of our users who have a particular telephone area code or a particular medical condition.

### **How We Use and Disclose Non-Personal Information**

Because Non-Personal Information does not personally identify you, we may use and disclose Non-Personal Information for any purpose. In some instances, we may combine Non-Personal Information with Personal Information (such as combining your zip code with your name, or with your name together with a medical condition). If we combine any Non-Personal Information with Personal Information, the combined information will be treated by us as Personal Information as long as it is so combined.

### **THIRD PARTIES**

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including Providers, the manufacturer of your mobile device, and any other third party mobile Website or website to which the Website may contain a link. We encourage you to review the Notice of Privacy Practices of each Provider who provides you with services and the privacy policies of each website and Website you visit and use.

### **HIPAA**

Your Provider may be regulated as a “covered entity” under the Health Insurance Portability and Accountability Act (“HIPAA”). Please be aware that this Privacy Policy is distinct from your Provider’s HIPAA Notice of Privacy Practices, which describes in detail overall how your Provider uses and discloses your individually identifiable health information. If you would like to review a copy of your Provider’s HIPAA Notice of Privacy Practices, please request a copy directly from your Provider. Our use and disclosure of your Personal Information, which we receive pursuant to your express authorization, is not restricted under HIPAA. We will use and disclose your Personal Information consistent with the terms of your authorization and this Privacy Policy.

## SECURITY

We seek to use reasonable physical, technical and administrative measures to protect Personal Information under our control. Unfortunately, no data transmission over the Internet or data storage system is 100% secure, and therefore we cannot guarantee against all potential security breaches.

If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the "Contacting Us" section below.

## CHOICES AND ACCESS

Your choices regarding our use and disclosure of your Personal Information

We give you choices regarding our use and disclosure of your Personal Information for marketing purposes. Specifically, you may opt-out from:

- **Receiving marketing-related e-mails from us based upon your Personal Information:** If you no longer want to receive marketing-related e-mails from us on a going-forward basis, you may opt-out of receiving such marketing related e-mails by sending an email to [support@doctorglobe.com](mailto:support@doctorglobe.com).
- **.Our sharing of your Personal Information with affiliates for their marketing purposes:** If you would prefer that we do not share your Personal Information on a going-forward basis with our affiliates for their marketing purposes, you may opt-out of such sharing by sending an e-mail to [support@doctorglobe.com](mailto:support@doctorglobe.com).

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out as described above, we will not be able to remove your Personal Information from the databases of our affiliates with which we have already shared such information (i.e., to which

we have already provided such information as of the date that we implement your opt-out request). Please also note that if you do opt-out of receiving marketing-related messages from us, we may still send administrative messages to you; you cannot opt-out from receiving administrative messages.

### **How you can access or update your Personal Information**

If you would like to review or update your Personal Information that has been previously provided to us, you may do so by logging into your account within the Website. We will try to comply with your request to update your Personal Information as soon as reasonably practicable. We are not responsible for changing information from the databases of third parties with whom we have already shared your Personal Information. You may have additional rights to access, correct or modify the health information that is held by your Provider. Please consult your Provider's Notice of Privacy Practices for a description of those rights and how to exercise them.

### **USE OF WEBSITE BY MINORS**

Note that users of the Website may be children under the age of 13 years old. We are committed to complying fully with the Children's Online Privacy Protection Act ("COPPA") (*see* COPPA Privacy Policy). Our information collection policy is described below. Parents of children who are under the age of 13 should ensure that they understand our policies regarding personal information before entering any personally identifiable information on or through the Website.

### **YOUR CALIFORNIA PRIVACY RIGHTS**

California Civil Code Section 1798.83 permits users of the Website who are California residents to request certain information regarding our disclosure of personally identifiable information to third parties for their direct marketing purposes. To make such a request, please write to us at: [support@doctorglobe.com](mailto:support@doctorglobe.com).

We do not currently respond to web browser "do not track" signals or other mechanisms that provide a method to opt out of the collection of information across the networks of websites and online services in which we participate. If we do so in the future, we will describe how we do so in this Privacy Policy.

### **CONTROLLING YOUR PERSONAL INFORMATION**

As a registered user of the Services, you can modify some of the Personal Information you have included in your profile or change your username by logging in and accessing your account. Upon your request, we will use commercially reasonable efforts to delete your account and the

Personal Information in your profile; however, it may be impossible to remove your account without some residual information being retained by us, and we may be required by law or our agreement with your Provider to retain certain information. We have no obligation to delete any data or information you provide on a Medical History Form following termination of your account or the account of any Provider to whom your Medical History Form was submitted through the Services. Registered users who wish to close their account should email: [support@doctorglobe.com](mailto:support@doctorglobe.com).

## **CONTACTING US**

If you have any questions about this Privacy Policy, please contact us by e-mail at [support@doctorglobe.com](mailto:support@doctorglobe.com) or by regular mail at:

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2012 Stewart St.  
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USA

Please note that e-mail communications are not always secure; so please do not include health information, credit card information or other sensitive information in your e-mail messages to us.

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