



I N T E G R A T E H E A L T H

Effective Date: December 10, 2019

I N T E G R A T E H E A L T H P R I V A C Y P O L I C Y

Integrate Health (“IH”) is committed to protecting the privacy of users of the website located at www.integratehealth.org or any website owned, operated, licensed or controlled by us (the “Website”). This Privacy Policy describes how we gather and use information about visitors to our Website (“Visitors”). This Privacy Policy applies solely to the information that we collect through the Website. This Privacy Policy does not address personal information that you provide to us in other contexts (e.g., through a business relationship not handled through the Website).

Acceptance of Privacy Policy

By using the Website, you signify your acceptance of this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use the Website. Your continued use of the Website following the posting of changes to these terms will mean that you accept those changes.

How Do We Collect Your Personal Information?

You may visit our Website without telling us anything about yourself. If you contact us or donate and choose to provide personally identifiable information, such as your name, address, telephone number or e-mail address (“Personal Information”), we will use that information and may share it with other companies and/or individuals (e.g., our partners, consultants, and service providers) for the purpose for which you submitted it to us, such as to respond to your inquiry or to provide you with information that you requested.

From time to time, our Website may be configured to collect domain, usage, and Google Analytics information. This data enables us to become more familiar with which users visit our site, how often they visit and what parts of the site they visit most often. IH uses this information to improve our Website. No personally identifiable information is gathered in this process. This information is collected automatically and requires no action on your part.

How Do We Use Your Personal Information?

If you choose to provide us with Personal Information by completing a form on the Website or emailing us, we will use that Personal Information to (i) respond to your question or request, (ii) communicate with you about our organization via email, (iii) send information to you, and (iv) notify you of changes to this Privacy Policy. If you do not wish to receive unsolicited emails or other communications from us, you may contact us at info@integratehealth.org and request that your Personal Information be removed from our list.

We will only use your Personal Information when the law allows us to. Most commonly, we will use your Personal Information in the following circumstances:

- Where you have requested information from IH about its services.
- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Note that we may process your Personal Information for more than one lawful ground depending on the specific purpose for which we are using your data.

If you are based outside the United States, please note that the Personal Information that you provide through the Website is transferred to the United States (where privacy laws may not be as adequate as in your jurisdiction) to IH and third parties engaged by IH to assist in operation of the Website or provide a service to you. We will take appropriate steps to ensure that recipients of such Personal Information act in accordance with European data privacy laws as applicable. By using the Website, you expressly agree to the transfer of the Personal Information to the United States.

Do We Disclose Any Personal Information to Outside Parties?

Unless you expressly give us permission in writing to do so, IH will not sell, rent, license, or trade your Personal Information other than as specified in this Privacy Policy.

Disclosures to Third Parties Assisting In Our Operations. IH may share your Personal Information under confidentiality agreements with other companies that work with, or on behalf of, IH to provide services. These companies may use your Personal

Information to assist IH in its operations and impact. However, these companies do not have any independent right to share this information.

Disclosures Under Special Circumstances. We may provide information about you to respond to subpoenas, court orders, legal process or governmental regulations, or to establish or exercise our legal rights or defend against legal claims. We believe it is necessary to share information in order to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or as otherwise required by law. In such circumstances, we will take appropriate measures to ensure that the requester understands the sensitive nature of the Personal Information that they may receive.

Business Transfers. We may share your Personal Information with other business entities in connection with the sale, assignment, merger or other transfer of all or a portion of IH's business to such business entity. We will require any such successor business entity to honor the terms of this Privacy Policy.

Automatically Collected Information and Anonymous Information

Each time a Visitor comes to the Website, IH collects some information to improve the overall quality of the Visitor's online experience.

Aggregated Data. IH collects aggregate queries for internal reporting and also counts, tracks, and aggregates the Visitor's activity into IH's analysis of general traffic-flow at the Website. To these ends, IH may merge information about you into aggregated group data. In some cases, IH may remove personal identifiers from Personal Information and maintain it in aggregate form that may later be combined with other information to generate anonymous, aggregated statistical information. Such anonymous, group data may be shared on an aggregated basis with IH's affiliates, business partners, service providers and/or vendors; if it does so, IH will not disclose your individual identity.

Web Server Logs and IP Addresses. An Internet Protocol ("IP") address is a number that automatically identifies the computer or device you have used to access the Internet. The IP address enables our server to send you the web pages that you want to visit, and it may disclose the server owned by your Internet Service Provider. IH may use IP addresses to conduct Website analyses and performance reviews and to administer the Website.

Cookies and Web Beacons. Periodically, some pages on this Website may use “cookies,” which are small files that the site places on your hard drive for identification purposes. These files are used for site registration and customization the next time you visit us. You should note that cookies cannot read data off of your hard drive. Your web browser may allow you to be notified when you are receiving a cookie, giving you the choice to accept it or not. You can also refuse all cookies by turning them off in your browser. By not accepting cookies, some pages may not fully function and you may not be able to access certain information on this Website. Information that we collect through cookies includes (i) the name and version of the operating system on the Visitor’s computer, (ii) the name and version of the Visitor’s browser, (iii) which page on the Site the Visitor is currently reading, as well as clicks and time spent on a particular page, (iv) if the Visitor was sent to the current page by some other page on the web, the universal resource locator (“URL”) of the referring web page, and (v) geolocation of the Visitor’s computer or device. Some of the Site’s web pages may use web beacons in conjunction with cookies to compile aggregate statistics about Site usage. A web beacon is an electronic image (also referred to as an “action tag,” “single-pixel,” or “clear GIF”) that is commonly used to track the traffic patterns of users from one web page to another in order to maximize web traffic flow and to otherwise analyze the effectiveness of the Website. Some web beacons may be unusable if you elect to reject their associated cookies.

By accessing and using the Website, you expressly consent to the storage of cookies, other local storage technologies, beacons or other information on your computer or devices. You also consent to the access of such cookies, local storage technologies, beacons and information by us.

Security

The security of your data is very important to IH. We have implemented appropriate security measures preventing your Personal Information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. However, you should know that no web site operator, including IH, can fully eliminate security risks associated with Personal Information. While IH has endeavored to create a secure and reliable website for users, the confidentiality of any communication or material transmitted to/from the Website or via e-mail cannot be guaranteed.

We have put in place procedures to deal with any suspected Personal Information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Children's Privacy Protection

Under Age 13

IH understands the importance of protecting children's privacy in the interactive online world. The Website is not designed for, or intentionally targeted at, children under 13 years of age. It is not our policy to intentionally collect or maintain information about anyone under the age of 13. No one under the age of 13 should submit any Personal Information to IH or the Website.

Under Age 18

Minors under 18 years of age may have the Personal Information that they have provided to IH through the Website deleted by sending an email to info@integratehealth.org requesting deletion. Please note that, while we make reasonable efforts to comply with such requests, deletion of your personal information does not ensure complete and comprehensive removal of that data from all systems.

Response to "Do Not Track" Signals

Some Internet browsers include the ability to transmit "Do Not Track" signals. Since uniform standards for "Do Not Track" signals have not yet been adopted, IH does not process or respond to "Do Not Track" signals.

Updating Your Information

If you wish to stop receiving e-mails or other communications from us, or if you have submitted Personal Information through our Website and would like that information deleted from our records, please notify us at info@integratehealth.org. Please note that we reserve the right not to remove or amend information provided to us regarding an adverse drug event or any information that we are otherwise required to retain by law or regulation.

Links to Third Party Websites

As a convenience to our Visitors, this Website may contain links to other sites. The terms of usage and other conditions of use posted on those sites, and not the policies and procedures we described here, apply to those sites. Your linking to any other websites is at your own risk, and you are responsible for learning about and complying with the terms of usage and other conditions posted on those websites.

European Data Privacy Laws

If you reside or are located in the European Economic Area, you have certain rights in relation to your Personal Information under the applicable European data privacy laws under the General Data Protection Regulation and any other applicable data protection laws which may be amended from time to time (“European Data Privacy Laws”). This section only applies to such users. Under applicable European Data Privacy Laws, IH is the data controller.

Under the applicable European Data Privacy Laws, you have the right to ensure your Personal Information is accurate. You have the right to request that we correct any inaccurate Personal Information. You also have the right to request that we delete or restrict the processing of your Personal Information, although we are permitted to retain it where we still have an ongoing purpose to retain it or as otherwise permitted under the European Data Privacy Laws. This may compromise our ability to provide you with our services. You also have the right to transfer your personal information to another service provider subject to the European Data Privacy Laws. We will, following your written request to us, provide you with your relevant Personal Information in a machine-readable format to transfer to another service provider. We will aim to respond to your request within one calendar month of receipt of the request. Where we are unable to do so within the calendar month, we will notify you of our need to extend this timeline. There are certain exemptions and restrictions applicable to the exercise of these rights under the European Data Privacy Laws that enable personal information to be retained, processed or withheld from access and we will inform you of these, if applicable. To make any of these requests or to opt out of receiving marketing communications, please contact us at info@integratehealth.org

You have the right to raise a complaint with a supervisory authority in your country of residence if applicable under European Data Privacy Laws.

Changes to this Privacy Policy

This Privacy Policy may be revised from time to time as we add new features and services, as laws change, and as industry privacy and security best practices evolve. We display an effective date on the policy in the upper right corner of this Privacy Policy so that it will be easier for you to know when there has been a change. If we make any change to this Privacy Policy regarding use or disclosure of Personal Information, we will provide advance notice on the Website. Small changes or changes

that do not significantly affect individual privacy interests may be made at any time and without prior notice.

For Additional Information

If you have any questions about this Privacy Policy, the practices of this Website, or your dealings with this Website, please contact info@integratehealth.org.