



# Website Privacy Policy

This Website Privacy Policy ("Policy") describes how Honest Medical Group, dba Honest Health ("Honest Health", "we," "us," or "our"), collects, uses, and discloses information when you visit HonestHealth.com and other Honest Health websites, web pages, online forms, careers pages, and online features that link to this Policy, collectively our "Websites."

This Policy applies to information collected online through the Websites, unless we expressly state otherwise. It does not apply to protected health information ("PHI") governed by the Health Insurance Portability and Accountability Act of 1996 and its implementing regulations ("HIPAA"), or to information we collect or receive from health care providers, health systems, payers, or other partners in connection with our services, programs, or contractual relationships.

This Policy does not apply to any third-party operated websites, applications, platforms, or services even if they link to, are linked from or integrate with Honest Health Websites. Refer to the privacy policies and/or statements of those third parties for more information about their privacy practices.

## Who We Are and How We Work With Partners

Honest Health works with health systems, physicians, advanced practice providers, care teams, payers, and community partners to support value-based care, clinical programs, care coordination, operational support, and improved access to care.

We may support our partners by:

- helping health systems and care teams navigate value-based and risk-based arrangements;
- supporting physicians, advanced practice providers, and care teams across care settings;
- helping payers align with provider networks and improve clinical and financial outcomes; and
- supporting programs intended to improve equitable access to care and community health resources.

Patients of our partners may interact with our landing pages or submit information through public website forms. Depending on the context, information processed in connection with care delivery, care coordination, treatment, payment, health care operations, or services performed for a covered entity may be PHI and governed by HIPAA rather than this Policy.

## Information You Actively Submit

In this Policy, “personal information” means information that identifies, relates to, describes, or could reasonably be linked to you, such as your name, email address, phone number, mailing address, employment application information, communications with us, and, where you choose to provide it through a patient-facing form, health-related or care-management information.

For many Website features, you can browse without actively submitting information that directly identifies you.

Personal information may be required or collected when you choose to (i) submit a job application or information through our careers pages; (ii) sign up for a class or event conducted at one of our medical centers; (iii) use a patient-facing landing page or contact form to ask that Honest Health’s Care Management team contact you or someone you are authorized to assist; (iv) send an e-mail message to us or otherwise provide online comments, criticisms, suggestions, or feedback; (v) participate in a chat session; or (vi) use any other functionality of the Websites that asks you to provide information. The contact form may collect identifiers and contact information, such as full name, email address, and phone number, and any information you choose to include in the free-text message box.

If you use a patient-facing landing page or contact form, please provide only the information reasonably needed for us to respond. The contact form is not for medical emergencies, urgent clinical issues, or communications requiring an immediate response. Depending on the context and content of your submission, information submitted through patient-facing pages may include health-related information or PHI and may be handled under Honest Health’s Notice of Privacy Practices and applicable healthcare privacy laws, as well as this Policy.

Honest Health may also receive information about patients from providers, health systems, payers, and other partners in connection with care management, clinical programs, value-based care arrangements, or related healthcare operations. This Policy addresses information collected through the Websites; information received from or shared with those partners outside the Websites may be governed by Honest Health’s Notice of Privacy Practices, agreements with those organizations, and applicable healthcare privacy laws.

## Automatically Collected Information

When you use the Websites, we may automatically collect or receive certain information from you. This information may include some or all of the following items: the name of the domain and host from which you access the Internet, including the Internet protocol (IP) address of the computer you are using and the IP address of your Internet Service Provider; the type and version of Internet browser software you use and your operating system; the type and version of your media player(s); the date and time you access our Websites, the length of time you spend on the Websites and the specific pages, images, video or forms that you access while using the

Websites; the Internet address of the website from which you linked directly to our Websites and, if applicable, the search engine that referred you and any search strings or phrases that you entered into the search engine to find the Websites; and demographic information concerning the country of origin of your computer and the language(s) used by it. We use this information to monitor the usage of our Websites, assess performance, ensure technological compatibility with your computer, and understand the relative importance of the information provided on our Websites. We may also use this data to conduct statistical analyses on visitors' usage patterns and other aggregated data.

### **Information Collected via Cookies**

"Cookies" are small files or records that we place on your computer's hard drive to distinguish you from other visitors using the Websites.

You can choose to have your browser warn you every time a cookie is being sent to you or you can turn off cookie placements. If you refuse cookies, you can still use our Websites, but your overall experience may be affected, and some functionality may be reduced or unavailable.

### **Information Collected Using Pixel Tags or Clear GIFs**

Pixel Tags or Clear GIFs, also known as Web Beacons or Web Bugs, are transparent graphical images placed on a website. We may use these technologies to understand how the Websites are used, measure performance, maintain security, and improve the Websites. We do not use Pixel Tags, cookies, or similar technologies to collect the contents of patient-facing contact forms for targeted advertising, and patient-facing pages are configured so that form entries and other health-related contact-form information are not disclosed to advertising or analytics vendors for their independent use.

### **Personal Information about Children**

Our Websites are targeted primarily for use by adults, including patients, parents, guardians, authorized representatives, job applicants, and other individuals who interact with Honest Health online. We do not knowingly collect personal information directly from children under the age of 13 through the Websites, except where a parent, guardian, or other authorized representative provides information on behalf of a patient or as otherwise permitted by law. If we discover that a child under the age of 13 has provided personal information directly to us without appropriate authorization, in accordance with the Children's Online Privacy Protection Act (see the [Federal Trade Commission's web site](#) for more information about this Act), we will delete the child's personal information from our files to the extent technologically possible.

### **How We Use the Information Gathered on Our Websites**

When you actively submit information through our Websites, we may use that information in one or more of the following ways:

- To process, complete or otherwise act upon or respond to your request or reason for submitting that information;
- To register and/or verify you in connection with a service or feature that you are attempting to access or obtain;
- To communicate with you about your request or reason for submitting that information;
- To respond to patient-facing requests, contact you about Honest Health programs and services, and support care management, care coordination, patient engagement, or related healthcare operations in connection with our provider, health system, payer, or other partners;
- To provide additional information to you about Honest Health and our Websites that we believe may interest you;
- To evaluate and manage job applications, recruiting, assessment, background screening, employment eligibility, onboarding, and related employment or legal compliance activities;
- To study and analyze the use of the information and features available on our Websites; and
- To assist, when necessary, in protecting our rights or property, enforcing the provisions of our Privacy Policy and Terms of Use, and/or preventing harm to you or others.

*We do not sell personal information to third parties, and we do not share patient-facing contact-form information for targeted advertising or cross-context behavioral advertising.* Except where we obtain your permission or as otherwise permitted or required by law, we may disclose your information with third parties under the following circumstances:

- Personal information disclosed to third parties necessary to process a particular request you have made, to complete a request, or any other process required to respond to the information you provide.
- Personal Information submitted through patient-facing landing pages or contact forms may be disclosed to Honest Health personnel, care management staff, provider partners, health systems, physician groups, care teams, payers, or other organizations involved in responding to your request, supporting adoption of Honest Health clinical programs, coordinating care, or carrying out related healthcare operations.
- Personal Information may be disclosed to service providers, contractors, vendors, and other operational partners that support the Websites, contact forms, communications, scheduling, care-management workflows, recruiting, analytics, security, hosting, customer relationship management, or similar operations, subject to applicable legal and contractual restrictions.

- Personal information submitted through a job application or careers page may be disclosed to recruiting platforms, background-check providers, references, prior employers, professional advisers, and other service providers or authorities where reasonably necessary for recruiting, employment eligibility, background screening, assessment, onboarding, legal compliance, or related employment purposes, subject to applicable law.
- Personal information is subject to disclosure in response to judicial or other governmental subpoenas, warrants and court orders served on Honest Health in accordance with their terms, or as otherwise required by applicable law.
- Personal information is subject to disclosure to protect our rights or property, to enforce the provisions of our Privacy Policy and Terms of Use, and/or to prevent harm to you or others.
- Personal information may be disclosed and transferred if Honest Health or its business is sold or offered for sale to another company or person(s), if a petition for relief under the United States Bankruptcy Laws is filed by or against Honest Health, or if Honest Health becomes subject to an order of appointment of a trustee or receiver.
- If you communicate with us via e-mail, we will share your correspondence, including any user information provided in the e-mail, with employees, volunteers, representatives, or agents most capable of addressing your correspondence. We will retain your communication in accordance with Honest Health's internal standards or legal requirements for retention.

Where required by law, you may have choices regarding our use or disclosure of your personal information, including the ability to opt out of certain uses or request that we limit, correct, delete, or provide access to information we maintain about you. Some choices may affect our ability to provide the Websites, respond to your request, process an application, or support requested services. Privacy rights related to PHI are described in Honest Health's Notice of Privacy Practices.

If you submit comments, feedback, suggestions, ideas, or other non-clinical submissions about the Websites or Honest Health's services ("Comments"), we may use them to improve our Websites, services, and operations, subject to applicable law. Patient-facing contact-form submissions, health-related communications, job applications, and other personal information are not treated as unrestricted Comments and will be handled as described in this Policy, the Notice of Privacy Practices where applicable, and applicable law.

## Retention

We retain personal information for as long as reasonably necessary to fulfill the purposes described in this Policy, including responding to requests, supporting care management or related healthcare operations, maintaining business and legal records, administering the

Websites, processing job applications, protecting security, resolving disputes, and complying with legal, regulatory, contractual, healthcare, employment, and recordkeeping obligations.

Retention periods vary based on the type of information, the context in which it was collected, our relationship with you or the relevant partner organization, applicable legal requirements, and whether the information is subject to Honest Health's Notice of Privacy Practices or other healthcare recordkeeping obligations.

When you click on links in our Websites that take you to third-party websites, you will be subject to the third parties' privacy policies. While we support the protection of privacy on the Internet, *Honest Health cannot be responsible for the actions of any third-party websites*. We encourage you to read the posted privacy statement(s) of any and every site you visit, whether you are linking from our Websites or browsing on your own.

### Your Privacy Choices and Rights

Depending on where you live and the context in which we collected your information, you may have the right to request access to, correction of, deletion of, or a portable copy of personal information that we maintain about you, subject to applicable exceptions. You may also have the right not to receive discriminatory treatment for exercising applicable privacy rights. To submit a request about Website information, contact us using the information below. For requests involving PHI, please refer to Honest Health's Notice of Privacy Practices.

You have several options when deciding how you can best protect your user information. One option is simply not to volunteer it. As stated above, this approach would allow you to still use our Websites – although it may prevent you from taking advantage of some of our Websites' features. The Federal Trade Commission's website, [www.ftc.gov](http://www.ftc.gov), also offers useful information about how to protect User Information provided to a website.

If at any time you believe Honest Health has not adhered to the policies and principles set forth in this Policy, please notify us using the contact information provided below. We will make all commercially reasonable efforts to promptly address your concerns.

This Policy was last modified on the date noted above. If we change our Policy, we will post those changes on our website. If we make material changes to how we collect, use, or disclose information through patient-facing pages, contact forms, job application features, or other Website functionality, we will provide additional notice or obtain consent where required by law. Unless we clearly express otherwise, we will use information in accordance with the Policy in effect when the information was collected or as otherwise permitted by law.

If you have any questions or comments concerning our Privacy Policy, please contact us at:

Mail: Honest Medical Group, dba Honest Health

ATTN: Privacy Officer

210 Athens Way, Suite 100

Nashville, TN 37228

Email: [PrivacyOfficer@honesthealth.com](mailto:PrivacyOfficer@honesthealth.com)

Website: <https://honesthealth.com>