

Privacy Policy

Effective as of May, 1 2021.

Please click [here](#) to view the previous version of our Privacy Policy.

This Privacy Policy describes the privacy practices of Welkin Health, Inc. ("**Welkin**," "**we**", "**us**" or "**our**") and how we handle personal information that we collect through our digital properties that link to this Privacy Policy, including our website (collectively, the "**Service**"), as well as through social media, our marketing activities, our live events and other activities described in this Privacy Policy.

Welkin provides a patient management platform for healthcare organizations. This Privacy Policy does not apply to information that we process on behalf of our healthcare organization customers while providing the Welkin platform to them. Welkin is a service provider or processor for these organizations. When you use the Welkin platform as a user or when the organizations use the platform to process information about you, the processing of your personal data is determined and administered by the business under its privacy policies and is governed by our agreements with the business customer. Our use of this information is restricted by our agreements with those business customers. If you have concerns regarding personal information that we process on behalf of a business, please direct your concerns to that business.

Welkin may provide additional or supplemental privacy policies to individuals for specific products or services that we offer at the time we collect personal information.

You can download a printable copy of this Privacy Policy [here](#).

Index

Personal information we collect

How we use your personal information

How we share your personal information

Your choices

Other sites and services

Security

International data transfer

Children

Changes to this Privacy Policy

How to contact us

Information for California residents / Your California privacy rights

Notice to European users

Personal information we collect

Information you provide to us. Personal information you may provide to us through the Service or otherwise includes:

- **Contact data**, such as your first and last name, salutation, email address, billing and mailing addresses, professional title and company name, and phone number.
- **Demographic information**, such as your city, state, country of residence, postal code, and age.
- **Profile data**, such as the username and password that you may set to establish an online account with us, date of birth, redemption code, biographical details, photograph, links to your profiles on social networks, interests, preferences, information about your participation in our contests, promotions, or surveys, and any other information that you add to your account profile.
- **Communications** that we exchange with you, including when you contact us with questions or feedback, through social media or otherwise.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Third-party sources. We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Public sources**, such as government agencies, public records, social media platforms, and other publicly available sources.
- **Data providers**, such as information services and data licensors that provide demographic and other information.
- **Our affiliate partners**, such as our affiliate network provider and publishers, influencers, and promoters who participate in our paid affiliate programs.
- **Marketing partners**, such as joint marketing partners and event co-sponsors.

Automatic data collection. We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Device data**, such as your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our marketing emails or clicked links within them.

(Precise geolocation/Location) data when you authorize

Cookies. Some of our automatic data collection is facilitated by cookies and similar technologies. For more information, see our Cookie Notice.

Data about others. Users of the Service may have the opportunity to refer friends or other contacts to us and share their contact information with us. Please do not refer someone to us or share their contact information with us unless you have their permission to do so.

How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

Service delivery. We may use your personal information to:

- provide, operate and improve the Service and our business;
- establish and maintain your user profile on the Service;
- facilitate your invitations to friends who you want to invite to join the Service;
- enable security features of the Service, such as by sending you security codes via email or SMS, and remembering devices from which you have previously logged in;
- communicate with you about the Service, including by sending announcements, updates, security alerts, and support and administrative messages;
- understand your needs and interests, and personalize your experience with the Service and our communications; and
- provide support for the Service, and respond to your requests, questions and feedback.

Research and development. We may use your personal information for research and development purposes, including to analyze and improve the Service and our business.

Marketing and advertising. We, our service providers and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes:

- **Direct marketing.** We may send you Welkin-related or other direct marketing communications as permitted by law. You may opt-out of our marketing communications as described in the [Opt-out of marketing](#) section below.
- **Interest-based advertising.** We may engage third-party advertising companies and social media companies to display ads on our Service and other online services. These companies may use cookies and similar technologies to collect information about your interaction (including the data described in the automatic data collection section above) over time across the Service, our communications and other online services, and use that information to serve online ads that they think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms. You can learn more about your choices for limiting interest-based advertising in the [Your choices](#) section of our Cookie Notice.

Compliance and protection. We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

With your consent. In some cases, we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

To create anonymous, aggregated or de-identified data. We may create anonymous, aggregated or de-identified data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous, aggregated or de-identified data by removing information that makes the data identifiable to you. We may use this anonymous, aggregated or

de-identified data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

How we share your personal information

We may share your personal information with the following parties and as otherwise described in this Privacy Policy or at the time of collection.

Service providers. Third parties that provide services on our behalf or help us operate the Service or our business (such as hosting, information technology, customer support, email delivery, marketing, and website analytics).

Advertising partners. Third-party advertising companies for the [interest-based advertising purposes](#) described above.

Third parties designated by you. We may share your personal data with third parties where you have instructed us or provided your consent to do so. For example, we may share your personal information with third-party advertisers with whom we are collaborating to offer you additional services. We will share personal information that is needed for these other companies to provide the services that you have requested.

Business and marketing partners. Third parties with whom we collaborate on joint activities, with whom we have entered into joint marketing relationships or other joint ventures, or who we think may offer you products or services that you may enjoy.

Professional advisors. Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

Authorities and others. Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the [compliance and protection purposes](#) described above.

Business transferees. Acquirers and other relevant participants in business transactions (or negotiations and diligence for such transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, or equity interests in, Welkin or our affiliates (including, in connection with a bankruptcy or similar proceedings).

Your choices

You have the following choices with respect to your personal information.

Opt-out of marketing communications. You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by [contacting us](#). Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.

Cookies. For information about cookies employed by the Service and how to control them, see our Cookie Notice.

Advertising choices. You can limit use of your information for interest-based advertising by:

- **Browser settings.** Blocking third-party cookies in your browser settings.
- **Privacy browsers/plug-ins.** By using privacy browsers or ad-blocking browser plug-ins that let you block tracking technologies.

- **Platform settings.** Google and Facebook offer opt-out features that let you opt-out of use of your information for interest-based advertising:
 - Google: <https://adssettings.google.com/>
 - Facebook: <https://www.facebook.com/about/ads>
- **Ad industry tools.** Opting out of interest-based ads from companies participating in the following industry opt-out programs:
 - Network Advertising Initiative: http://www.networkadvertising.org/managing/opt_out.asp
 - Digital Advertising Alliance: optout.aboutads.info.
 - AppChoices mobile app, available at <https://www.youradchoices.com/appchoices>, which will allow you to opt-out of interest-based ads in mobile apps served by participating members of the Digital Advertising Alliance.
- **Mobile settings.** Using your mobile device settings to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

You will need to apply these opt-out settings on each device from which you wish to opt-out.

Please note that we also may work with companies that offer their own opt-out mechanisms and may not participate in the opt-out mechanisms that we linked to above.

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites and mobile applications and online services you use.

Security

We employ a number of technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

Children

The Service is not intended for use by children under 16 years of age. If we learn that we have collected personal information through the Service from a child under 16 without the consent of the child's parent or guardian as required by law, we will delete it. We encourage parents or guardians with concerns to contact us.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service. If required by law we will also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via email or another manner through the Service. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acceptance of the modified Privacy Policy.

How to contact us

- **Email:** privacy@welkinhealth.com
- **Mail:** Welkin Health Inc., 548 Market St, PMB 75357, San Francisco, CA 94104-5401
- **Phone:** +1 (415) 689-772

Information for California residents / Your California privacy rights

Scope. This section applies only to California residents. It describes how we collect, use, and share Personal Information of California residents in our capacity as a “business” under the California Consumer Privacy Act (“**CCPA**”) and their rights with respect to that Personal Information. This Section, like the rest of this Privacy Policy, does not apply to information we collect as a service provider on behalf of our business customers. For purposes of this section, the term “**Personal Information**” has the meaning given in the CCPA but does not include information exempted from the scope of the CCPA. In some cases, we may provide a different privacy notice to certain categories of California residents, such as job applicants, in which case that notice will apply instead of this section.

Your California privacy rights. As a California resident, you have the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

- **Information.** You can request the following information about how we have collected and used your Personal Information during the past 12 months:
 - The categories of Personal Information that we have collected.
 - The categories of sources from which we collected Personal Information.
 - The business or commercial purpose for collecting and/or selling Personal Information.
 - The categories of third parties with whom we share Personal Information.
 - The categories of Personal Information that we sold or disclosed for a business purpose.
 - The categories of third parties to whom the Personal Information was sold or disclosed for a business purpose.
- **Access.** You can request a copy of the Personal Information that we have collected about you during the past 12 months.
- **Deletion.** You can ask us to delete the Personal Information that we have collected from you.
- **Opt-out of sales.** You can opt-out any sale of your Personal Information.
- **Opt-in.** If we know that you are 13-15 years of age, we will ask for your affirmative authorization to sell your Personal Information before we do so.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by the CCPA.

Right to information, access and deletion. You may submit requests to exercise your right to information, access or deletion at [link to webform] or via email to [email for data requests].

Notice of right to opt-out of the “sale” of your Personal Information. Like many companies, we use services that help deliver interest-based ads to you. Our use of some of these services may be classified under California law as a “sale” of your Personal Information to the advertising partners that provide the services because they collect information from our users (e.g., device data and online activity data) to help them serve ads more likely to interest you. You can request to opt-out out of this “sale” of your personal information here: [Do Not Sell My Personal Information](#), where you will find instructions on opting-out of the use of your information for interest-based advertising.

We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

We will need to verify your identity to process your information, access and deletion requests and reserve the right to confirm your California residency. To verify your identity, we may require

government identification, a declaration under penalty of perjury or other information. Your authorized agent may make a request on your behalf upon our verification of the agent’s identity and our receipt of a copy of a valid power of attorney given to your authorized agent pursuant to California Probate Code Sections 4000-4465. If you have not provided your agent with such a power of attorney, you must provide your agent with written and signed permission to exercise your CCPA rights on your behalf, provide the information we request to verify your identity, and provide us with confirmation that you have given the authorized agent permission to submit the request.

Personal information that we collect, use and disclose. The chart below summarizes the Personal Information we collect by reference to the categories of Personal Information specified in the CCPA and describes our practices currently and during the 12 months preceding the effective date of this Privacy Policy. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below.

Statutory category of personal information (PI) (Cal. Civ. Code § 1798.140)	PI we collect in this category (See Personal information we collect above for description)	Source of PI	Business/commercial purpose for collection	Categories of third parties to whom we “disclose” PI for a business purpose	Categories of third parties to whom we “sell” PI
<u>Identifiers</u>	<ul style="list-style-type: none"> ● Contact data ● Profile data ● Data about others 	<ul style="list-style-type: none"> ● You ● Third-party sources 	<ul style="list-style-type: none"> ● Service delivery ● Research & development ● Marketing & advertising ● Compliance & protection 	<ul style="list-style-type: none"> ● Affiliates ● Service providers ● Payment processors ● Advertising partners ● Third parties designated by you ● Professional advisors ● Authorities and others ● Business transferees ● Business and marketing partners ● Other users and the public 	<ul style="list-style-type: none"> ● Advertising partners (to facilitate online advertising) ● Business and marketing partners
<u>California Customer Records</u> (as defined in California Civil Code section 1798.80)	<ul style="list-style-type: none"> ● Contact data ● Transactional data ● Financial data ● User-generated content ● Data about others 	<ul style="list-style-type: none"> ● You ● Third-party sources 	<ul style="list-style-type: none"> ● Service delivery ● Research & development ● Marketing & advertising ● Compliance & protection 	<ul style="list-style-type: none"> ● Affiliates ● Service providers ● Payment processors ● Advertising partners 	<ul style="list-style-type: none"> ● Advertising partners (to facilitate online advertising)

				<ul style="list-style-type: none"> • <i>Third parties designated by you</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> • <i>Business and marketing partners</i> • <i>Other users and the public</i> 	<ul style="list-style-type: none"> • <i>Business and marketing partners</i>
<p><u>Commercial Information</u></p>	<ul style="list-style-type: none"> • <i>Transactional data</i> • <i>Financial information</i> • <i>Marketing data</i> • <i>Online activity data</i> 	<ul style="list-style-type: none"> • <i>You</i> • <i>Third-party sources</i> • <i>Automatic collection</i> 	<ul style="list-style-type: none"> • <i>Service delivery</i> • <i>Research & development</i> • <i>Marketing & advertising</i> • <i>Compliance & protection</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Payment processors</i> • <i>Advertising partners</i> • <i>Third parties designated by you</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> • <i>Business and marketing partners</i> 	<ul style="list-style-type: none"> • <i>Advertising partners (to facilitate online advertising)</i> • <i>Business and marketing partners</i>
<p><u>Financial Information</u></p>	<ul style="list-style-type: none"> • <i>Transactional data</i> • <i>Financial information</i> 	<ul style="list-style-type: none"> • <i>You</i> • <i>Third-party sources</i> 	<ul style="list-style-type: none"> • <i>Service delivery</i> • <i>Research & development</i> • <i>Marketing & advertising</i> • <i>Compliance & protection</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Payment processors</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> 	<p>None</p>
<p><u>Online Identifiers</u></p>	<ul style="list-style-type: none"> • <i>Profile data</i> • <i>Device data</i> 	<ul style="list-style-type: none"> • <i>You</i> • <i>Third-party sources</i> • <i>Automatic collection</i> 	<ul style="list-style-type: none"> • <i>Service delivery</i> • <i>Research & development</i> • <i>Marketing & advertising</i> • <i>Compliance & protection</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Payment processors</i> • <i>Advertising partners</i> • <i>Third parties designated by you</i> 	<ul style="list-style-type: none"> • <i>Advertising partners (to facilitate online advertising)</i> • <i>Business and marketing partners</i>

				<ul style="list-style-type: none"> • Professional advisors • Authorities and others • Business transferees • Business and marketing partners • Other users and the public 	
<p><u>Internet or Network Information</u></p>	<ul style="list-style-type: none"> • Marketing data • Device data • Online activity data 	<ul style="list-style-type: none"> • Automatic collection 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing & advertising • Compliance & protection 	<ul style="list-style-type: none"> • Affiliates • Service providers • Payment processors • Advertising partners • Third parties designated by you • Professional advisors • Authorities and others • Business transferees • Business and marketing partners • Other users and the public 	<ul style="list-style-type: none"> • Advertising partners (to facilitate online advertising) • Business and marketing partners
<p><u>Geolocation Data</u></p>	<ul style="list-style-type: none"> • Device data • Precise geolocation/Location data 	<ul style="list-style-type: none"> • Automatic collection 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing & advertising • Compliance & protection 	<ul style="list-style-type: none"> • Affiliates • Service providers • Advertising partners • Third parties designated by you • Professional advisors • Authorities and others • Business transferees • Business and marketing partners • Other users and the public 	<ul style="list-style-type: none"> • Advertising partners (to facilitate online advertising) • Business and marketing partners

<p><u>Inferences</u></p>	<p><i>May be derived from your:</i></p> <ul style="list-style-type: none"> ● <i>Contact data</i> ● <i>Profile data</i> ● <i>Transactional data</i> ● <i>Financial information</i> ● <i>Marketing data</i> ● <i>User-generated content</i> ● <i>Device data</i> ● <i>Online activity data</i> 	<p>N/A</p>	<ul style="list-style-type: none"> ● <i>Service delivery</i> ● <i>Research & development</i> ● <i>Marketing & advertising</i> ● <i>Compliance & protection</i> 	<ul style="list-style-type: none"> ● <i>Affiliates</i> ● <i>Service providers</i> ● <i>Advertising partners</i> ● <i>Authorities and others</i> ● <i>Business transferees</i> ● <i>Business and marketing partners</i> 	<ul style="list-style-type: none"> ● <i>Advertising partners (to facilitate online advertising)</i> ● <i>Business and marketing partners</i>
<p><u>Protected Classification Characteristics</u></p>	<p><i>We do not intentionally collect this information, but it may be revealed in identity data or other information we collect</i></p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>No</p>
<p><u>Sensory Information</u></p>	<ul style="list-style-type: none"> ● <i>User-generated content (images, video or audio)</i> 	<ul style="list-style-type: none"> ● <i>You</i> 	<ul style="list-style-type: none"> ● <i>Service delivery</i> ● <i>Research & development</i> ● <i>Marketing & advertising</i> ● <i>Compliance & protection</i> 	<ul style="list-style-type: none"> ● <i>Affiliates</i> ● <i>Service providers</i> ● <i>Advertising partners</i> ● <i>Third parties designated by you</i> ● <i>Authorities and others</i> ● <i>Business transferees</i> ● <i>Business and marketing partners</i> ● <i>Other users and the public</i> 	<p>No</p>

Your California privacy rights. Under California’s Shine the Light law (California Civil Code Section 1798.83), California residents may ask companies with whom they have formed a business relationship primarily for personal, family or household purposes to provide the names of third parties to which they have disclosed certain personal information (as defined under the Shine the Light law) during the preceding calendar year for their own direct marketing purposes and the categories of personal information disclosed. You may send us requests for this information to privacy@welkinhealth.com. In your request, you must include the statement “Shine the Light Request,” and provide your first and last

name and mailing address and certify that you are a California resident. We reserve the right to require additional information to confirm your identity and California residency. Please note that we will not accept requests via telephone, mail, or facsimile, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.

Notice to European users

The information provided in this “Notice to European users” section applies only to individuals in the United Kingdom, Switzerland, and the European Economic Area (hereafter collectively referred to as “Europe”).

Personal information. References to “personal information” in this Privacy Policy are equivalent to “personal data” governed by European data protection legislation.

Controller. Welkin is the controller of your personal information covered by this Privacy Policy for purposes of European data protection legislation. As outlined above, this Privacy Policy does not apply to information we process on behalf of businesses while providing the service to them. If you have questions or want to exercise your data subject rights with respect to information we process as part of providing our services to a business, please direct your questions or requests to that business.

Legal bases for processing. We use your personal information only as permitted by law. Our legal bases for processing the personal information described in this Privacy Policy are described in the table below.

Processing purpose <i>Details regarding each processing purpose listed below are provided in the section above titled “How we use your personal information”.</i>	Legal basis
For Service delivery	Processing is necessary to perform the contract governing our provision of our services or to take steps that you request prior to signing up for the services. If we have not entered into a contract with you, we process your personal information based on our legitimate interest in providing the services you access and request.
<ul style="list-style-type: none"> ● Research and development ● Marketing and advertising purposes ● Compliance and protection purposes ● Sharing your personal information as described in this Privacy Policy 	These activities may constitute our legitimate interests, may be necessary to perform the contract governing our provision of our services or to take steps that you request prior to signing up for the services, or may be based on your consent. To the extent that these activities constitute our legitimate interests, we do not use your personal information for these activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

To comply with applicable law	Processing is necessary to comply with our legal obligations.
With your consent	Processing is based on your consent. Where we rely on your consent you have the right to withdraw it any time in the manner indicated when you consent or in the services.

Use for new purposes. We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

Retention. We retain personal information for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for Compliance and protection purposes.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information we have collected about you, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. If we anonymize your personal information (so that it can no longer be associated with you), we may use this information indefinitely without further notice to you.

Sensitive personal information. We ask that you not provide us with any sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the services, or otherwise to us.

If you provide us with any sensitive personal information to us when you use the services, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our services.

Your rights. European data protection laws give you certain rights regarding your personal information. If you are located in Europe, you may ask us to take the following actions in relation to your personal information that we have collected as a controller:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information.
- **Transfer.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal information.

- **Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

You may submit these requests by email to privacy@welkinhealth.com or our postal address provided above. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or our response to your requests regarding your personal information, you may contact us or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator [here](#).

Cross-border data transfer. If we transfer your personal information from Europe to another country such that we are required to apply appropriate safeguards to your personal information under European data protection laws, we will do so. Please contact us for further information about any such transfers or the specific safeguards applied.

Cookie Notice

This Cookie Notice explains how Welkin (“**Welkin**”, “**we**”, “**us**” or “**our**”) uses cookies and similar technologies in connection with the www.welkinhealth.com website and any other website that we own or control and which posts or links to this Cookie Notice (collectively, the “**Sites**”).

What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies serve different purposes, like helping us understand how a site is being used, letting you navigate between pages efficiently, remembering your preferences, and generally improving your browsing experience.

Our Sites may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them).

We use two broad categories of cookies: (1) first party cookies, served directly by us to your computer or mobile device, which we use to recognize your computer or mobile device when it revisits our Sites; and (2) third-party cookies, which are served by service providers or business partners on our Sites, and can be used by these parties to recognize your computer or mobile device when it visits other websites. Third-party cookies can be used for a variety of purposes, including site analytics, advertising, and social media features.

What types of cookies and similar tracking technologies does Welkin use on the Sites?

On the Sites, we use cookies and other tracking technologies in the following categories described in the table below.

Type	Description	Who serves the cookies (link to privacy policy/site)	How to control them
<i>Advertising</i>	These cookies are used by advertising companies to collect information about how you use our Sites and other websites over time. These companies use this information to show you ads they believe will be relevant to you within our services and elsewhere, and to measure how the ads perform.	Google Doubleclick Facebook	You can opt-out of Google Doubleclick cookies here . You can opt-out of Facebook cookies here . See ‘your choices’ below.
<i>Analytics</i>	These cookies help us understand how our services is performing and being used. These	Google Analytics	You can find out more information about Google Analytics cookies here and about how Google protects your data here . You can

	cookies may work with web beacons included in emails we send to track which emails are opened and which links are clicked by recipients.		prevent the use of Google Analytics relating to your use of our Sites by downloading and installing a browser plugin available here . See 'your choices' below.
<i>Essential</i>	These cookies are necessary to allow the technical operation of our services (e.g., they enable you to move around on a website and to use its features).	Google Tag Manager	See 'your choices' below.
<i>Functionality / performance</i>	Enhance the performance and functionality of our services (e.g., accounts-related cookies to authenticate users, prevent fraudulent use of user accounts, and to remember information that changes the way the Sites behave or looks).		See 'your choices' below.
<i>Social</i>	These cookies may allow you to log into the Sites or App through your social media account or share content in our sites that you find interesting through third-party social media providers. These cookies may also be used for advertising purposes.	Facebook Connect	See 'your choices' below.

Other technologies

In addition to cookies, our Sites may use other technologies, such as Flash technology to pixel tags to collect information automatically.

Browser Web Storage

We may use browser web storage (including via HTML5), also known as locally stored objects (“LSOs”), for similar purposes as cookies. Browser web storage enables the storage of a larger amount of data than cookies. Your web browser may provide functionality to clear your browser web storage.

Flash Technology

We may use Flash cookies (which are also known as Flash Local Shared Object (“Flash LSOs”)) on our Sites to collect and store information about your use of our Sites. Unlike other cookies, Flash cookies cannot be removed or rejected via your browser settings. If you do not want Flash LSOs stored on your computer or mobile device, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the Website Storage Settings Panel. You can also control Flash LSOs by going to the Global Storage Settings Panel and following the instructions. Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications, including, potentially, Flash applications used in connection with our Sites.

Web Beacons

We may also use web beacons (which are also known as pixel tags and clear GIFs) on our Sites and in our HTML formatted emails to track the actions of users on our Sites and interactions with our emails. Unlike cookies, which are stored on the hard drive of your computer or mobile device by a website, pixel tags are embedded invisibly on webpages or within HTML formatted emails. Pixel tags are used to demonstrate that a webpage was accessed or that certain content was viewed, typically to measure the success of our marketing campaigns or engagement with our emails and to compile statistics about usage of the Sites, so that we can manage our content more effectively.

Session Replay Technologies

We may use third-party services provided by Hotjar that employ software code to record users’ interactions with the Services in a manner that allows us to watch DVR-like replays of those user sessions. The replays include users’ clicks, mobile app touches, mouse movements, scrolls and keystrokes/key touches during those sessions. These replays help us diagnose usability problems and identify areas for improvement. You can learn more about Hotjar at <https://www.hotjar.com/legal/policies/privacy/>.

Your choices

Your options for controlling what information cookies and similar technologies collect about you include:

- **Blocking cookies in your browser.** Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Sites may not work properly. For more information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit www.allaboutcookies.org. If you do not accept our cookies, you may experience some

inconvenience in your use of our Sites. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Sites.

- **Third-party opt-out option.** You can opt-out of interest-based advertising through some of the third parties listed in the chart above by using the corresponding third-party opt-out tool provided in the chart.
- **Industry association opt-outs.** You may opt out of receiving interest-based advertising on websites through members of the Network Advertising Initiative by clicking [here](#) or the Digital Advertising Alliance by clicking [here](#). You may opt out of receiving targeted advertising in mobile apps through participating members of the Digital Advertising Alliance by installing the AppChoices mobile app, available [here](#), and selecting the user's choices. Please note that we also may work with companies that offer their own opt-out mechanisms and may not participate in the opt-out mechanisms linked above.
- **Blocking advertising ID use in your mobile settings.** Your mobile device settings may provide functionality to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

For more information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit www.allaboutcookies.org. If you do not accept our cookies, you may experience some inconvenience in your use of our Sites. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Sites.

If you choose to opt-out of targeted advertisements, you will still see advertisements online, but they may not be relevant to you. Even if you do choose to opt out, not all companies that serve online behavioral advertising are included in this list, and so you may still receive some cookies and tailored advertisements from companies that are not listed.

For more information about how we collect, use and share your information, see our Privacy Policy.

Changes

Information about the cookies we use may be updated from time to time, so please check back on a regular basis for any changes.

Questions

If you have any questions about this Cookie Notice, please contact us by email at privacy@welkinhealth.com.

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