



General Information

Purpose: To outline the policies and procedures regarding privacy and use of personal information for those who visit the WelbeHealth website.

Policy

Policy:

- I. WelbeHealth is committed to protecting your privacy. We have developed this Privacy Policy to help you understand the kind of information about you that we collect, why we collect it, and what we do with it.
 - II. Throughout this Privacy Policy, the words “we,” “us,” and “our” refer to WelbeHealth and its directors, staff, and affiliates.
 - III. This Privacy Policy applies when you access our websites (including www.welbehealth.com) and other sites, mobile applications or other online content, functionality or services operated by us or on our behalf that link to this Privacy Policy (collectively, “Sites”).
 - IV. If one (1) of our Sites has different privacy practices and a different privacy policy, that policy will govern if there is a conflict with this Privacy Policy. Similarly, if one (1) of our Sites contains statements about how information is processed, those statements will govern if there is a conflict with this Privacy Policy.
 - V. By accessing or using our Sites on any computer, mobile phone, tablet, console, or other device, you agree that you have read, understand, and will be bound by this Privacy Policy.
 - VI. We may modify this Privacy Policy at any time. Your continued use of our Sites constitutes your acceptance of this Privacy Policy and any updates.
 - VII. If you do not agree to this Privacy Policy, please do not use our Sites.
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Procedures

I. Protected Health Information

- a. For information about how WelbeHealth may use and disclose health information about you, how you can get access to this information, and other rights under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), please review our HIPAA Notice of Privacy Practices.

II. Links to Third Party Websites

- a. This Privacy Policy applies exclusively to our Sites and not to any third-party websites which may be linked to from our Sites.
- b. The materials and websites referenced and/or linked to from our Sites are provided for information purposes only.
- c. The linked sites are not under our control, and we do not assume any responsibility or liability for any communication or materials available at such linked sites.
- d. You should review the privacy policies and terms of use associated with those linked sites if you decide to access them.
- e. Any reference to a commercial or noncommercial product, process, service, or company is not an endorsement or recommendation by WelbeHealth, nor a guarantee of the reliability of the information or product.

III. Collection of Your Personal Information

- a. Personal Information You Provide
 - i. When you use our Sites, WelbeHealth collects information about you. This includes information that identifies you or can be used to identify you (“Personal Information”).
 - ii. You may voluntarily provide certain Personal Information to us in order to use certain features available on the Sites.
 - iii. In connection with your use of our Sites, we may ask you to provide Personal Information, such as personal contact information and preferences.
- b. Information We Collect Automatically
 - i. We also automatically collect certain information, including Personal Information, about you when you interact with our Sites. For example, we may use website analytics tools on our Sites to retrieve information from your browser, including the website you came from, the search engine and the keywords you used to find our Sites, the pages you view within our Sites, your browser add-ons, and your browser’s width and height.
 - ii. We may also use technologies, such as cookies, to collect information about the pages you view, the links you click and other actions you take on our Sites.
 - iii. Additionally, we collect certain standard information that your browser sends to every website you visit, such as your IP address, browser type and language, access times and referring website addresses.

IV. Use of Your Personal Information

- a. WelbeHealth collects and uses your Personal Information to operate and improve its Sites, its products, and services.
- b. These uses may include:
 - i. Providing you with more effective services.
 - ii. Making the sites or services easier to use.
 - iii. Performing research and analysis aimed at improving our products, services, communications, and technologies; and
 - iv. Displaying content that is customized to your interests and preferences.

- c. We also use your Personal Information to communicate with you. We may send certain service communications such as information on technical service issues, information about our investigational products, programs, and business and security announcements.
- d. WelbeHealth may also use your Personal Information to inform you of other activities of WelbeHealth and its affiliates and partners, process employment applications, respond to your inquiries and requests including investment and strategic collaboration inquiries, investigate and respond to misuse of our Site, and comply with applicable regulatory and legal requirements, judicial process and WelbeHealth policies.
- e. We may combine Personal Information you give us with other information from our sources, transactions, and communications.
 - i. This may include, but is not limited to, information from direct mail, events, products and applications, or other interactions you have with WelbeHealth (for example, by telephone or in person).
 - ii. We may also combine that information with data that is publicly available and data from third parties. In addition, we may aggregate and/or de-identify the Personal Information we collect to create information that does not identify any individual and use that information for the above-listed purposes and any other lawful purpose.

V. Sharing Your Personal Information

- a. WelbeHealth does not rent, lease, sell or exchange Personal Information with other organizations.
- b. WelbeHealth may, however, share Personal Information with service providers to help perform statistical analysis, send you email or postal mail, host our Sites, respond to communications you send to us, or provide customer support.
 - i. We may also share Personal Information with other business partners with whom we collaborate regarding our investigational products and programs such as scientific advisors, joint venture partners, and strategic collaboration partners.
 - ii. All such third parties are prohibited from using your Personal Information except to provide these services to WelbeHealth, and they are required to maintain the confidentiality of your Personal Information.
- c. WelbeHealth may disclose your Personal Information, without notice, if required to do so by law or in the good faith that such action is necessary to:
 - i. Conform to the edicts of the law or comply with legal process served on WelbeHealth.
 - ii. Protect and defend the rights or property of WelbeHealth or a third party.
 - iii. Act under exigent circumstances to protect the personal safety of users of the Sites, or the public; and/or
 - iv. Assist in fraud protection or investigation.
- d. We may also share Personal Information we collect or create in connection with a purchase, transfer, or sale of WelbeHealth or its assets, such as in a merger or corporate reorganization. If this occurs, the Personal Information will be subject to the policies of the receiving organization.

- e. We may also disclose to third parties aggregate or de-identified data that is not personally identifiable for any legally permissible purposes.
- f. No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

VI. Security of Your Personal Information

- a. WelbeHealth uses a variety of security technologies and procedures to help protect your Personal Information from unauthorized access, use, or disclosure. However, like other companies, WelbeHealth cannot guarantee the security or confidentiality of the Personal Information you provide to us.
- b. As a result, while we strive to protect your Personal Information, you acknowledge that:
 - i. There are security and privacy limitations inherent on the Internet which are beyond our control; and
 - ii. Security, integrity, and privacy of any and all information and data exchanged between you and us through our Sites cannot be guaranteed.

VII. How Long We Keep Your Personal Information

- a. We retain your Personal Information in accordance with our business needs and for legal, regulatory, audit and tax requirements for as long as required by United States law. After this period, the Personal Information relating to your use of our Sites will be deleted; however, any Personal Information which you have provided to us for receiving information, newsletters and event invitations will be kept until you notify us that you no longer wish to receive this information.

VIII. Use of Cookies

- a. Cookies are small amounts of data which your web browser stores on your device at the request of certain websites. Cookies are then sent back to the originating web domain on your subsequent visits to that domain. Most pages contain elements from multiple web domains so when you visit the website, your browser may receive cookies from several sources.
- b. By using the Sites, you consent to the use of cookies. Web browsers may offer users of the Sites the ability to disable receiving certain types of cookies; however, if cookies are disabled, some features or functionality of the Sites may not work correctly.
- c. Cookies are useful because they allow a website to recognize a user's device. Cookies allow you to navigate between pages efficiently, remember preferences and generally improve the user experience.
- d. They can also be used to tailor advertising to your interests through tracking your browsing across websites.
- e. There are two (2) primary types of cookies that are used: session cookies and persistent cookies.
 - i. Session cookies are deleted automatically when you close your browser.

- ii. Persistent cookies remain on your device after the browser is closed (for example to remember your user preferences when you return to the site).
- iii. Each cookie typically falls into one (1) of several categories:
 - 1. Strictly Necessary Cookies – We make use of certain essential cookies in order to enable you to move around the Sites and use their features. Without these cookies, services you have asked for (such as navigating between pages) cannot be provided.
 - 2. Performance Cookies – We make use of analytics cookies to analyze how our visitors use the Sites to monitor the Sites' performance. This allows us to provide a high-quality experience by customizing our offering and quickly identifying and fixing any issues that arise. For example, we might use performance cookies to keep track of which pages are most popular and which method of linking between pages is most effective, and to determine why some pages are receiving error messages. We might also use these cookies to highlight articles or site services that we think will be of interest to you based on your usage of the website.
 - 3. Website Functionality Cookies – We make use of cookies to provide you with certain functionality. For example, to remember choices you make (such as your language or the region you are in), or to recognize the platform from which you access the Sites, and to provide enhanced and more personal features. These cookies are not used to track your browsing on other sites.
- iv. If you do not agree to the use of cookies that are not strictly necessary, you may disable them by following the instructions for your browser. Please note that some of our services may not function properly if cookies are disabled. You may also opt out of third-party cookies where available by using the links provided in this Privacy Policy.
- v. Furthermore, some of our service providers that set cookies via our Sites on our behalf may offer the ability to opt-out of cookies via the Network Advertising Initiative's consumer opt-out tool or the Digital Advertising Alliance's consumer choice page.
- vi. Please note that WelbeHealth is not responsible for the cookie practices of third-party websites which may be linked to on our Sites.

IX. Children Under 13

- a. Our Sites are not directed to children under the age of 13. WelbeHealth does not knowingly collect Personal Information from children under the age of 13 through our Sites. If we learn that we have collected Personal Information directly from a child under the age of 13 through the Sites, we will delete that information.

X. Email Communications

- a. From time to time, WelbeHealth may contact you via email for the purposes of responding to your communications to us and/or providing announcements, updates, alerts, confirmations, surveys, and/or general communication, if you have given us your email address.

- b. If you would like to stop receiving email from WelbeHealth, you may opt out of such communications by clicking “Unsubscribe from this list” at the bottom of the email.
- c. You may update the Personal Information you provide to us through the Sites, and your associated communications preferences, at any time by following the instructions on the relevant page of the Sites or by contacting us at personalinfo@welbehealth.com. If you have provided Personal Information to us through a third-party employment website, you should contact that website to update that Personal Information, or your communication preferences related to that website.

XI. California Residents’ Privacy Choices and Rights with Respect to Personal Information

- a. For information about the choices and rights you have with respect to cookies, please see the section of this Privacy Policy called “Cookie Policy” above.
- b. Users in California have additional choices and rights regarding WelbeHealth’s processing of their Personal Information.

XII. Your Privacy Rights Regarding Direct Marketing

- a. California Civil Code Section 1798.83 permits individual California residents to request certain information regarding WelbeHealth’s disclosure of Personal Information to third parties for the third parties’ direct marketing purposes.

XIII. California Consumer Privacy Act – Notice for California Residents

- a. If you are a California resident, this section supplements the information above regarding the collection, use, and disclosure of your Personal Information.
- b. The California Consumer Privacy Act of 2018 (CCPA) gives California consumers the right to know what Personal Information is collected about them, how it will be used and to whom it is disclosed. The CCPA gives California consumers the right to request access to and deletion of their Personal Information, and the right to request that their Personal Information not be sold to the extent applicable under the CCPA.
- c. The purpose of this notice is to describe our practices regarding the collection, use, disclosure, and sale of Personal Information and instructions for submitting CCPA data privacy requests.
 - i. Some of the Personal Information that we collect, use, and disclose may be exempt from the CCPA because it is regulated by other federal and state laws that apply to us. For example, “protected health information” is governed by Health Insurance Portability and Accountability Act of 1996 (HIPAA) and “medical information” is governed by the California Confidentiality of Medical Information Act.
 - ii. Accordingly, our HIPAA Notice of Privacy Practices generally will govern HIPAA protected health information.
- d. We collect Personal Information from you when you interact with us online through our Sites or offline (such as through your health care providers, if you are a patient, with your authorization as applicable).

- i. The Personal Information we may collect from you will depend on the nature of our interaction with you.
- ii. In the last 12 months, we have collected the following categories (as described in the CCPA) of Personal Information:

Category	Examples
Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.
Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.

- e. For further details, see the “Collection of Your Personal Information” section above. We collect this information for the purposes described in the “Use of Your Personal Information,” “Sharing Your Personal Information,” and “Use of Cookies” sections above.

XIV. Your Rights

- a. The CCPA provides you (as a California resident) with specific rights, subject to certain exceptions.
- b. Right to Know.
 - i. You have the right under the CCPA to request that we disclose what Personal Information we collect, use, disclose, and sell.
 - ii. The process for exercising this right is described below in the “How to Submit a Data Privacy Request” section. Please note that we may not be required to provide you with access to the specific pieces of information we have collected about you or delete information if we are unable to verify your identity.
- c. Right to Deletion.
 - i. You have the right under the CCPA to request deletion of any Personal Information about you that we have collected from you.
 - ii. The process for exercising this right is described below under the “How to Submit a Data Privacy Request” section.
 - iii. We may not be required to delete Personal Information under certain circumstances. Specifically, the CCPA includes exemptions that provide that we do not have to delete information that, for example, is necessary to comply with legal obligations including those pertaining to the quality, safety or effectiveness of a product or activity regulated by the Food and Drug Administration (FDA), complete a transaction, detect security incidents, or for certain other internal purposes.
- d. Right to Opt-Out.
 - i. You have the right under the CCPA to opt out of the sale of your Personal Information.

- ii. The CCPA definition of “sale” is broad. WelbeHealth does not sell personal information for financial gain; however, by using third-party services, some information sharing may be considered a “sale,” under the CCPA.
- iii. The definition of “sale” under CCPA includes “selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to another business or third party for monetary or other valuable consideration.”
- e. Right to Non-Discrimination.
 - i. You have the right under the CCPA not to be discriminated against for exercising your rights.
- f. Right to Correct-Amendment to CCPA
 - i. You may ask WelbeHealth to correct inaccurate information that they have about you. WelbeHealth may ask you for additional information for verification purposes. If WelbeHealth asks for personal information to verify your identity, we will only use that information for this verification purpose.
- g. Right to Limit Use
 - i. You can direct WelbeHealth to only use your sensitive personal information (for example, your social security number, financial account information, your precise geolocation data, or your genetic data) for limited purposes, such as providing you with the services you requested.

XV. How to Submit a Data Privacy Request

- a. You may exercise your Right to Know and Right to Deletion by emailing us at personalinfo@welbehealth.com or by calling us toll-free at, (888) 530-4415 [TTY: (711)].
 - i. To process your request to exercise your Right to Know and Right to Deletion, we must be able to verify your identity to a reasonable degree of certainty.
 - ii. To verify your identity, we will ask you to provide your contact information and additional identifiers based on your relationship with us.
 - iii. Before we process your request, we will match these data points with data points we currently maintain to verify your identity and your relationship with us.
- b. You may designate an authorized agent to make a request to exercise your Right to Know or Right to Deletion on your behalf.
 - i. When you use an authorized agent to submit such a request, you must provide the authorized agent with written permission to do so, and, in certain circumstances, we may ask you to verify your own identity directly with us.
 - ii. We may deny a request from an authorized agent that does not submit proof that they have been authorized by you to act on your behalf.

XVI. Changes to This Statement

- a. WelbeHealth reserves the right to change this Privacy Policy from time to time with changes effective as of the date indicated on the updated policy. Your continued use of our Sites after we have made such modifications will constitute your: (a) acknowledgment of the modified Privacy Policy; and (b) agreement to abide and be bound by our modified Privacy Policy.

XVII. Workforce Training

- a. Training shall be provided on an annual basis to WelbeHealth staff, including contracted staff, responsible for handling consumer inquiries regarding WelbeHealth's privacy practices and CCPA regulations. Staff shall be informed of all CCPA requirements, as outlined in the regulations, and how to direct consumers to exercise their rights.

XVIII. Contact Information

- a. WelbeHealth welcomes your questions or comments regarding this Privacy Policy. Please contact WelbeHealth at:
WelbeHealth, LLC.
440 N. Barranca Avenue #4051
Covina, CA 91723
Email Address: personalinfo@welbehealth.com

XIX. Accessibility Policy

- a. WelbeHealth is committed to making this Privacy Policy accessible to all people. If you encounter any difficulty accessing the information in this Privacy Policy or require access to it in an alternative format, please send us an e-mail or write us at our contact information set forth above in the "Contact Information" section of this Privacy Policy.

XX. Use of information on website

- a. This Site does not provide medical advice. Some information on the site is written by health care providers affiliated with WelbeHealth and its affiliates, and some content is provided by outside sources. The content of the Site, such as graphics, images, text, and all other materials, is provided for reference and educational purposes only. The content is not meant to be complete or exhaustive or to be applicable to any specific individual's medical condition.
- b. This Site is not an attempt to practice medicine or provide specific medical advice, and it should not be used to make a diagnosis or to replace or overrule a qualified health care provider's judgment. Users should not rely upon the Site for emergency medical treatment. The content on the Site is not intended to be a substitute for professional medical advice, diagnosis, or treatment. Always consult with a qualified and licensed physician or other medical care provider and follow their advice without delay regardless of anything read on this Site.
- c. Use of programs on the Site does not establish a doctor-patient or counselor-patient relationship. Should you electronically request an appointment through the Site, WelbeHealth will use the information you submit to arrange for care where and when appropriate.

References

Attachments

Attachment #
QIC-HA-02-A02-CA: Notice of Privacy Practices

Regulation/Reference/Statute

References
11 CCR ADC §7000: California Consumer Privacy Act of 2018
11 CCR Title 11, Chapter 20, §§999.300 – 999.337: California Consumer Privacy Act Regulations: General Provisions
Cal. Civ. Code §1798.83: Customer Records

Glossary

Term	Definition
California Consumer Privacy Act of 2018 (CCPA)	The CCPA regulations provide guidance to businesses on how to inform consumers of their rights under the CCPA, how to handle consumer requests, how to verify the identity of consumers making requests, and how to apply the law as it relates to minors. In doing so, the regulations make it easier for consumers to exercise their CCPA rights.
Cookies	Small amounts of data which your web browser stores on your device at the request of certain websites.
Health Insurance Portability and Accountability Act of 1996 (HIPAA)	A federal requiring the creation of national standards to protect sensitive patient health information from being disclosed without the patient's consent or knowledge.
Personal Information	Information that can be used to identify, locate, or contact an individual, alone or when combined with other personal or identifying information