

# Privacy - Our Commitment

## ***First, a note about Olaris's commitment to your privacy:***

*Olaris deeply values its role as a trusted care provider. Central to that promise is safeguarding the privacy of your personal information, including personal information that is protected by the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and personal information that may not be considered protected health information ("PHI").*

*Our [Notice of Privacy Practices](#) ("NPP") and this Privacy Policy describe Olaris's privacy practices in user-friendly terms, including what information we collect in order to deliver you high-quality care, what we use your information for, how we may share your information when needed, and the rights and preferences you may have with respect to your personal information.*

*Here are a few things we want you to know:*

- 1. We only collect the personal information we need in order to provide you with Olaris's services and products.*** *We do not collect more information than we need. The personal information that we ask you to provide us, or give you the option to provide us, is intended to help us deliver the health care services, health-related services and products you have come to Olaris for, and to do so consistent with our standards of high-quality care; intuitive technology products; and exceptional service.*
- 2. We do not use your personal information for purposes unrelated to the reasons for which it was collected or your reasonable expectations.*** *We know it is important to you that you be aware of all the reasons that your information is handled by Olaris and its partners. Our stewardship of the information you entrust to us is of the utmost importance. We hold your personal information to the same standard we would expect for ourselves and our families.*
- 3. We do not retain personal information for longer than is necessary.*** *We understand the importance of minimizing the personal and sensitive data that we may maintain. We will only retain your data for the period of time required by law and if there is no requirement, then only so long as we need to continue to store it.*
- 4. We do not sell your personal information.*** *We will not sell your identifiable personal information to third parties.*

***We offer you ways to control your personal information and express your preferences.*** *We provide you with a variety of ways to exercise control over your personal information, including making the provision of certain data optional. (As a health care provider, we are required to retain some of your data under law.)*

# Olaris Privacy Policy

Effective date: September 5, 2024

Last updated: September 5, 2024

Olaris, Inc. (“Olaris”, “us”, “we”, or “our”) is committed to respecting your privacy and protecting your personal information. This Privacy Policy explains the types of personal information we may collect from visitors to our websites, including [www.myolaris.com](http://www.myolaris.com) and all related websites and web-based services (collectively, our “Sites”). This Privacy Policy also describes how we use personal information, the purpose for sharing and recipients of personal information, and your available rights and choices associated with that information.

We may collect or receive certain personal information and other data about you that is governed by federal law, such as the Health Insurance Portability and Accountability Act (“HIPAA”). Please review our [Notice of Privacy Practices](#), which governs our use, disclosure and access to information protected by HIPAA. This Privacy Policy does not intend to include information about how we handle HIPAA-regulated protected health information (“PHI”).

This Privacy Policy does not apply to third-party websites, products, or services, even if they may link to our Sites or our Sites may link to them. We recommend you review the privacy practices of those third parties before connecting accessing third-party websites and sharing any personal information.

We also encourage you to review our [Terms of Use](#) to understand how we treat your personal information as you make full use of our Sites. Unless otherwise defined in this Privacy Policy, capitalized terms used in this Privacy Policy have the same meanings as in our Terms of Use.

This Privacy Policy is provided in a layered format. You can jump to a specific section by clicking on the section below:

- 1. [Collection of personal information](#) *We may collect your personal information when you interact with us through our Sites, or by other means. We may also automatically collect information regarding your use of our Sites as you use them.*
  
- 2. [Use of personal information](#) *We may use your personal information for various purposes connected with your interest in our Sites and services, and to allow us to maintain and improve them.*
  
- 3. [Sharing of personal information](#) *We may share your personal information with certain third parties, such as with our service providers, as directed by you.*
  
- 4. [Your rights and choices](#) *You may have certain rights and choices regarding our collection, use, and disclosure of your personal information.*

5. [Data security](#) *The security of your personal information is of the utmost importance to us and we maintain appropriate safeguards to protect it.*
6. [International data transfers](#) *Our Sites are operated exclusively in the United States.*
7. [Cookie policy](#) *When you visit our Sites, we may collect certain information from you automatically through cookies and other tracking technologies.*
8. [Children’s privacy](#) *You must be at least 13 years old or older to use our sites.*
9. [Links to other websites](#) *Our Sites may contain links to other websites that are not operated by us and that are subject to third party privacy policies and other terms.*
10. [Changes to this Privacy Policy](#) *We may change this Privacy Policy from time to time to reflect new services or changes in our data practices or relevant laws.*
11. [Contact us](#) *You may contact us for comments or questions in various ways.*

## 1. Collection of Personal Information

For purposes of this Privacy Policy, “**personal information**” means any information that relates to an identified or identifiable individual, and does not include PHI. The personal information we collect through our Sites will be apparent by the context of the page, and may include the following types of information.

For information on Olaris’s privacy practices specific to PHI, please see our **Notice of Privacy Practices**.

### a. Personal information you provide to us

We may collect the following personal information about you that you choose to provide us when you use our Sites:

- **Registration and account information.** If you request information on purchasing a product or sign up for our blog/news letter on our Sites or through other means, you may be asked to provide certain personal information including your legal first and last name, preferred name, date, address, and email address.
- **Profile and demographic information.** Through your use of our Sites, we may ask you to provide additional information about yourself, such as your phone number, or date of birth.

- **Communications information.** When you communicate with us through our Sites, we may collect your first and last name, phone number, email address, and any personal information that you choose to provide in the content of your message.
- **Payment information.** If you purchase a product from us, you may be required to provide your payment card or bank account information.

#### **b. Information that we automatically collect**

Our Sites may use cookies and other tracking technologies such as web beacons, embedded scripts, and tags (“**Cookies**”), which collect information from you automatically as you use our Sites, including:

- **Browser and device data**, such as IP address, device identifier, device type, operating system and Internet browser type, screen resolution, operating system name and version, device manufacturer and model, language, plug-ins, add-ons, and the language version of the Sites you are visiting; and
- **Usage data**, such as browsing history, time spent on the Sites, pages visited, links clicked, language preferences, patterns of use, and the pages that led or referred you to our Site.

We may also collect information about your online activities on websites and connected devices over time and across third-party websites, devices, apps, and other online features and services.

Please review our [Cookie Policy](#) below for more information about our use of these technologies.

#### **c. Aggregated, anonymized, and deidentified information**

We may create aggregated, anonymous or de-identified data from personal information by removing data components that make the data personally identifiable to you or through obfuscation or other means. Our use of aggregated, anonymized and de-identified data is not subject to this Privacy Policy and may be further controlled by federal health privacy law as outlined in our [Notice of Privacy Practices](#).

## **2. Use of Personal Information**

We use the personal information we collect to provide, maintain, and improve our Sites and the services that Olaris offers through them (our “**Services**”). These uses may include, now or in the future:

- Providing you with requested Services.
- Providing you with customer service and support, and to facilitate other communications that you request or that are required to render Services to you.
- Performing analytics for new and existing Sites and Services.
- Maintaining and improving the quality of our Sites and Services.

- Growing our business, including performing research and development, and understanding our user trends.
- Protecting ourselves, you, and others; preventing fraud; and creating and maintaining a trusted, secure, and reliable online environment.
- Evaluating or conducting a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about the users of our Sites or Services is among the assets transferred.
- Complying with our legal obligations; responding to subpoenas, court orders, or legal process; or to establish or exercise our legal rights or defense against legal claims.

### 3. Sharing of Personal Information

We may share your personal information with the following categories of third parties:

- Our affiliates.** We may share personal information with our affiliates, in which case, we will require such affiliates to comply with the terms of this Privacy Policy.
- Service providers.** We may share personal information with our service providers to provide services on our behalf, such as payment processing, analytics, advertising, hosting, customer and technical support, and other services.
- Third-party providers, plans, and institutional partners.** We may share personal information with third-party partners in connection with our Site and Services, including your care providers.
- Third-party platform advertising.** We may share your information with third-party platform providers who assist us, now or in the future, in serving advertising regarding the Sites and Services to others who may be interested.
- Affiliate and business transfer.** If Olaris is involved in a merger, acquisition or asset sale, your personal information may be shared or transferred in connection therewith.
- Compliance and harm prevention.** We may share personal information as we believe necessary (i) to comply with applicable law, rules and regulations; (ii) to enforce our contractual rights; (iii) to investigate possible wrongdoing in connection with the Site and Services; (iv) to protect and defend the rights, privacy, safety and property of Olaris, you or others; and (v) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities.

### 4. Your Rights and Choices

You may have rights and choices regarding our use and disclosure of your personal information. Unless instructed otherwise, you can exercise these rights and choices using the information in the [Contact Us](#)

section at the end of this Privacy Policy. Please note that you may have further rights and choices as may be described in our [Notice of Privacy Practices](#).

- a) **Your California privacy rights.** California residents have certain rights with respect to our sharing of their personal information with third parties for their own direct marketing purposes. We do not disclose personal information to third parties for their own direct marketing purposes. However, because California residents have the right to request information regarding such practices under California’s “Shine the Light” Law, please contact us using the information in the **Contact Us** section. You must include your full name, email address and postal address in your email or mail request so that we can verify your California residence and respond. “Personal information” under this California law means any information that identified, described, or was able to be associated with an individual at the time of disclosure.
  
- b) **Your Nevada privacy rights.** Nevada residents have the right to request to opt out of any “sale” of their personal information under Nevada SB 220. We do not currently sell personal information under Nevada law; however, you may still request to opt out of the future sale of your personal information. If you are a Nevada resident and would like to make such a request, please contact us using the information in the **Contact Us** section at the end of this Privacy Policy, and provide “Nevada Privacy Rights” in the subject line. You must include your full name, email address and postal address in your request so that we can verify your Nevada residence and respond. In the event we sell your personal information after the receipt of your request, we will make reasonable efforts to comply with such request.

## 5. Data Security

The security of your personal information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. We maintain appropriate technical, administrative, and physical safeguards to help protect the security of your personal information against unauthorized access, destruction, loss, alteration, disclosure or misuse. We encourage you to secure your account with a strong password and to keep your password private.

## 6. International Data Transfers

Our Sites are operated exclusively in the United States and intended for users who use our Sites and are located in the United States or are only temporarily residing outside of the United States. We may transfer, store, and use information we collect and maintain about you, including personal information outside of your state, province, country, or other governmental jurisdiction. The data protection laws in the jurisdiction in which we process personal information may differ from those of your jurisdiction, and in certain circumstances, your personal information may be subject to access requests from governments, courts, law enforcement agencies or regulatory agencies in those other jurisdictions. By

using the Sites or providing us with any information, you consent to the transfer and processing of your information, including personal information, in the United States as set forth in this Privacy Policy.

## 7. Cookie Policy

When you visit our Sites, we may collect information from you automatically through **Cookies**. We may also rely on partners to provide many features of our Sites using data about your use of the Sites. We may use Cookies for the following purposes:

- **Necessity.** To enable features that are necessary for providing you the services on our Sites, such as improving security, and preventing and detecting fraud.
- **Preference.** To allow us to remember your preferences and identify you when you return to our Sites.
- **Analytics.** To allow us to understand how our Sites are being used, track site performance and content views, and make improvements to the content, products, or services.
- **Advertising.** To deliver targeted advertising based on your preferences, location, and/or interests across different services and devices and measuring effectiveness of ads.
- **Social Media.** To enable the sharing of content from our Sites through social networking and other sites.

In the event that we employ Cookies, you can modify your browser settings to decline or accept them. However, in a few cases, some of our Sites' features may not function as designed.

If you wish to opt out of our sharing of the data that is gathered when you visit our Site for purposes of targeted digital advertising, we encourage you to visit the [Network Advertising Initiative](#) or the [Digital Advertising Alliance's Self-Regulatory Program for Online Behavioral Advertising](#) for more information about opting out of seeing targeted digital advertisements. You may also visit these websites for more information on how you can opt back in to the sharing of data. Please note that Olaris does not maintain this web tracking data in an identifiable manner.

Opting out of advertising networks does not necessarily mean that you will not receive advertisements while using our Sites or on other websites.

## 8. Children's Privacy

You must be at least 13 years old or older to use our Sites, including our account features. The Sites are intended for a general audience and we do not knowingly collect personal information from children under age 13 through the Sites. If we become aware that we have collected personal information from children under age 13 without verification of parental consent, we will take steps to remove that information from our servers.

If you are a parent or guardian and you are aware that a child under age 13 has provided us with personal information without parental consent, please contact us using the information in the [Contact Us](#) section.

## **9. Links to Other Websites**

Our Sites may contain links to other websites that are not operated by Olaris. We are not responsible for the content or privacy policy policies of websites we do not own or control, and our privacy policy does not apply to third-party websites. We strongly suggest you review the privacy policies for third-party websites to understand how your personal information is used and stored by those websites.

## **10. Changes to This Privacy Policy**

We may change this Privacy Policy from time to time to reflect new services or changes in our data practices or relevant laws. The “effective date” legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes are effective when we post the revised Privacy Policy on the Sites. If we make any material changes to this Privacy Policy, we will take reasonable measures to notify you via email and/or a prominent notice on our Site prior to the change becoming effective, and will update the effective date at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes.

## **11. Contact Us**

If you have any questions about this Privacy Policy or wish to exercise one of your privacy rights, please contact us by emailing [customer care@myolaris.com](mailto:customer care@myolaris.com).

**// END PRIVACY POLICY //**