

# WeCare Health System LLC.

## Website and Mobile Application Privacy Policy

**EFFECTIVE DATE: November 30, 2018**

WeCare Health System. (“WeCare”, “we”, “us”, or “our”) values your privacy. In this Privacy Policy (“Policy”), we describe how we collect, use, and disclose information that we obtain about visitors to our websites, [www.wecareportal.com](http://www.wecareportal.com) and the landing pages used to access the myCareportal platform (the “Sites”), our mobile application (the “App”), and the services available through our Sites and App (collectively, the “Services”). This Policy does not, however, apply to information collected and managed through the use of the myCareportal platform, which our customers, including our home care agency customers, and their employees, including caregivers, use to manage information collected in administering the relationships with their clients.

By visiting our Sites or using any of our Services, you agree that your information will be handled as described in this Policy. Your use of our Sites or Services, and any dispute over privacy, is subject to this Policy and our [Terms of Use](#), including its applicable limitations on damages and the resolution of disputes. Our [Terms of Use](#) are incorporated by reference into this Policy.

### INFORMATION WE COLLECT

We collect information about you directly from you; automatically through your use of our Sites, App, or Services; and from third parties. We may combine information automatically collected with other information that we have collected about you.

- **Information We Collect Directly from You.** Any Site visitor may browse our Sites without directly providing information to us. However, certain Services may require visitors to our Sites or App users to provide information, such as registering for an account. The information that we collect from you varies based on your particular interaction with our Services. For example, when you sign up for an account on one of our Sites or our App, we will collect your contact information, including your name, email address, and address; password; Company name, size, and website; phone number; and profession. If you make a payment through our Services, we will collect your name, email address, billing address, phone number and other payment information; however, please note that we use third parties to process your credit and debit card information. If you are applying to be a caregiver, you may additionally be asked to provide information, such as your education and employment history, professional skills and qualifications, relevant certifications and availability and job preferences.

- If you use our App, we will collect the information that you provide, including on behalf of our customers, which may include biometrics, information about your contacts, information included in files stored on your mobile device, such as calendar entries, photos, text, or video, and email content and history. In addition, our App will collect any health, medical or therapy information (including health claims and other information used to measure health or wellness) that users choose to provide.
- **Information We Automatically Collect About You.** When you use our Services, we automatically collect information such as the following through cookies and other technologies: domain name; browser type; operating system type, model, and version; device ID and configuration; pages, screens, or actions you view or take; links you click; Internet Protocol (IP) address; when and the length of time you visit or use our Services; and the referring uniform resource locator (URL), or the webpage that led you to our Sites. When you use our App, we may also collect your geolocation information. You can change your location tracking settings on iOS devices by going to your privacy settings and on Android devices by going to your app settings. If you choose not to share your location information with us you may lose some functionality. Please see the section “Cookies and Other Tracking Mechanisms” below for more information.
- **Customer Information.** Home care agencies and agents may submit, store, review and manage patient information, records, billing information and other protected health information using our platform. Their treatment of your information is subject to the terms of your agreement with them, not this privacy policy. If you would like more information about how your home care providers will use and disclose your health information, you should ask for a copy of their Notice of Privacy Practices.

## USING YOUR INFORMATION

We use the information that we gather about you, including personal information, for the following purposes:

- **Providing Our Services.** To provide our Services to you, to communicate with you about your use of our Services, to respond to your inquiries, to fulfill your orders, and for other customer service purposes.
- **Employment and Referrals.** With respect to the information submitted, collected and disclosed relating to the Sites, in order to facilitate job applications, postings, hiring and placement of qualified candidates for open home care positions and other positions posted by agencies and customers with whom we work.
- **Communicating with You.** To communicate with you about your use of our Services; to respond to your inquiries; to provide you with news and newsletters, special offers, and promotions; to contact you about products or information we think may interest you; and for other marketing, advertising, and promotional purposes, to the extent permitted by law. We also use the information that we learn about you to assist us in advertising our Services on third-party websites and to assist us in evaluating the success of our advertising campaigns in various platforms. We may communicate with you via email or push notification.

To opt out of push notifications, you can manage your preferences either through your App setting or device settings, depending on your device type. We do not use protected health information collected and managed by our customers using the myCarePortal App for marketing purposes described in this paragraph; as noted above, this information is subject to the privacy policy and Notice of Privacy Practices of each respective customer.

- **Tailoring Content.** To tailor the content and information that we may send or display to you; to offer personalized help and instructions; and to otherwise personalize your experiences while using our Sites or Services.
- **Analyzing Use of Our Services.** To better understand how users access and use our Sites and Services, both on an aggregated and individualized basis; to respond to user desires and preferences; to monitor the success of marketing and advertising campaigns; and for other testing, research, and analytical purposes.
- **Complying with the Law.** To comply with applicable legal obligations.

## SHARING YOUR INFORMATION

We may disclose the information that we collect about you, including personal information, with the following entities:

- **Affiliates.** We may disclose your information to our affiliates or subsidiaries for research, marketing, and other purposes consistent with this Policy.
- **Agencies and Employers.** If you apply to be a candidate, we may share your information with customers and other third parties, so that they may review and consider your information and qualifications for caregiver and home health care positions.
- **Other Users.** Your name and any information that you submit for use in our blogs or forums, including, without limitation, reviews, comments, and text will be available to, and searchable by, all users of the Sites and Services. Please see “User-Generated Content” below for more information.
- **Other Apps and Social Networks.** If you use our App, we may disclose information collected by the App to other apps and social networks. We do not share protected health information with these third parties for advertising purposes and we do not use protected health information to target advertising online.

We may also disclose the information that we collect about you, including personal information, in the following ways:

- **Business Transfers.** We may transfer your information to another entity if we are acquired by or merged with another company, if substantially all of our assets are transferred to another company, or as part of a bankruptcy proceeding.
- **In Response to Legal Process.** We may disclose your information in order to comply with the law, a judicial proceeding, subpoena, court order, or other legal process.
- **To Protect Us and Others.** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding illegal activities,

suspected fraud, situations involving potential threats to the safety of any person, violations of our [Terms of Use](#) or this Policy, or as evidence in litigation in which we are involved.

- **Aggregate and De-Identified Information.** We may also share aggregate or de-identified information about users with third parties for marketing, advertising, research, or other purposes.

## COOKIES AND OTHER TRACKING MECHANISMS

We and our service providers use cookies and other tracking mechanisms to track information about your use of our Sites, App, or Services. We or our service providers may combine this information with other personal information we collect from you.

- **Cookies.** Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Sites and Services, while others are used to enable a faster log-in process or to allow us to track your activities at our Sites, App and Services. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Visitors to our Sites who disable cookies will be able to browse certain areas of the Sites, but some features may not function.
- **Clear GIFs, pixel tags and other technologies.** Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your computer's hard drive, clear GIFs are embedded invisibly on web pages. We may use clear GIFs (a.k.a. web beacons, web bugs or pixel tags), in connection with our Sites to, among other things, track the activities of Site visitors, help us manage content, and compile statistics about Site usage. We and our third-party service providers also use clear GIFs in HTML e-mails to our customers, to help us track e-mail response rates, identify when our e-mails are viewed, and track whether our e-mails are forwarded.
- **Third-Party Analytics.** We use automated devices and applications, such as Google Analytics, to evaluate usage of our Sites, and, to the extent permitted, our Services. We also may use other analytic means to evaluate our Sites and Services. We use these tools to help us improve our Sites' and Services' performance and user experiences. These entities may use cookies and other tracking technologies, such as web beacons or local storage objects (LSOs), to perform their services in accordance with their own privacy policies. To learn more about Google's privacy practices, please review the Google Privacy Policy at <https://www.google.com/policies/privacy>. You can also download the Google Analytics Opt-out Browser Add-on to prevent your data from being used by Google Analytics at <https://tools.google.com/dlpage/gaoptout>.
- **Cross Device and Browser Use.** We and our third-party service providers may use the information that we collect about you (whether directly from you from our website, through your device(s), or from a third party) to help us and our third-

party service providers identify other devices that you use (e.g., a mobile phone, tablet, other computer). We, and our third-party service providers, also may use the cross-device and browser tracking and other information we learn about you to serve targeted advertising on your devices and to send you emails. To opt-out of cross-device and browser advertising, you may follow the instructions set forth in the Third-Party Ad Networks section below. Please note: if you opt out of these targeted advertising cookies, your opt-out will be specific to the web browser or mobile device from which you accessed the opt-out. If you use multiple devices or browsers, you will need to opt out of each browser or device that you use.

## DO-NOT-TRACK

Currently, our systems do not recognize browser “do-not-track” requests. You may, however, disable certain tracking as discussed above (e.g., by disabling cookies); you also may opt-out of targeted advertising by following the instructions in the Third-Party Ad Networks section below.

## THIRD-PARTY AD NETWORKS

In order to display more relevant advertising, to manage our advertising on third-party sites, mobile apps and online services and to measure and improve our ads and marketing efforts, we may work with third-party ad companies, including ad exchanges, channel partners, measurement services and ad networks, such as:

- **Google/DoubleClick** (more information: [privacy policy](#); [choices](#): [ads help page](#));
- **Google Analytics Advertising**, including its Remarketing, Demographics and Interests Reporting, Campaign Manager Integration, and Display & Video 360 Integration features (more information: [see “Third-Party Analytics” above](#));
- **AdRoll** (more information: [privacy policy](#)); and
- **Facebook Ads and Boosted Posts** (more information: [About Boosting Posts](#)).

Third-party ad companies may use cookies, web beacons or other tracking technologies to collect information about your use of the Services and your activities across other websites and online services, which they may associate with cookies and persistent identifiers. This information may be used to provide you with more relevant advertising, and to measure the performance of such advertising. In addition, we may share information, such as your email address, with third-party ad companies, so they may assist us in targeting our advertisements, but we do not allow them to use that information for their own marketing purposes. We do not share protected health information with these third parties for advertising purposes and we do not use protected health information to target advertising online. These third parties’ activities and your choices regarding their use of your information to personalize ads to you are subject to and set out in their own policies.

You can learn more about online advertising at [www.aboutads.info/consumers](http://www.aboutads.info/consumers) and opt out of interest-based advertising from many participating ad companies at the ad industry websites below:

- Canada: [www.youradchoices.ca](http://www.youradchoices.ca)

- U.S.: [www.aboutads.info](http://www.aboutads.info)

Please note that opting-out of advertising network services does not mean that you will not receive advertising while using our Services or other services, nor will it prevent the receipt of interest-based advertising from third parties that do not participate in these programs.

## **USER-GENERATED CONTENT**

If you submit a blog post, we will review and decide whether to make your post public. If we publish your blog post, the contents of your post and your name or user name will be available to all visitors to our Sites or users of our App, unless you request that we publish your blog post anonymously. Once published, we cannot prevent such information from being used in a manner that may violate this Policy, the law, or your personal privacy.

## **THIRD-PARTY LINKS**

Our Sites and Services may contain links to third-party websites. Any access to and use of such linked websites is not governed by this Policy, but instead is governed by the privacy policies of those third-party websites. We are not responsible for the information practices of such third-party websites.

## **THIRD-PARTY PLUG-INS AND WIDGETS**

We may also use certain third-party applications and widgets to operate features of our Sites. Widgets are displayed on our Sites, but are hosted by the third party identified in the widget.

## **SECURITY OF MY PERSONAL INFORMATION**

We have implemented safeguards to protect the information we collect, including when applicable safeguards to comply with HIPAA. Please be aware that despite these measures, no data security measures can guarantee 100% security. You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity.

## **YOUR CHOICES**

Users of our Sites may access, update, or delete the information you have provided to us by logging into your account and modifying your information or by contacting us at [info@wecareportal.com](mailto:info@wecareportal.com) and detailing which information you would like to access,



update, or delete and how you would like to modify it. Please note that copies of information that you have updated, modified or deleted may remain viewable in cached and archived pages of the Sites for a period of time. If you use our App, your ability to access, update, or delete the information you have provided is governed by the terms of your agreement with our home care agency customer.

We may send periodic promotional or informational emails to you. You may opt out of such communications by following the opt-out instructions contained in the email. Please note that it may take up to ten (10) business days for us to process opt-out requests. If you opt out of receiving emails about recommendations or other information we think may interest you, we may still send you emails about your account or any Services you have requested or received from us.

## **DATA RETENTION**

We retain the information that we collect through our App on behalf of our customers in accordance with our agreements with our customers. We will retain your personal information that we collect through the Sites and Services other than the App for the period necessary to fulfil the different purposes for which the data was collected, and to fulfil other commercial requirements as long as permitted by applicable law, which may include compliance with our records retention policy.

## **SPECIAL INFORMATION FOR CALIFORNIA CONSUMERS**

California residents may request a list of certain third parties to which we have disclosed personally identifiable information about you for their own direct marketing purposes. You may make one request per calendar year. In your request, please attest to the fact that you are a California resident and provide a current California address for your response. You may request this information in writing by contacting us at [info@wecareportal.com](mailto:info@wecareportal.com). Please allow up to thirty (30) days for a response.

### **CHILDREN UNDER 13**

Our Services are not designed for children under thirteen (13) years of age. If we discover that a child under thirteen (13) has provided us with personal information, we will delete such information from our systems.

### **CONTACT US**

If you have questions about the privacy aspects of our Services or would like to make a complaint, please contact us at [info@wecareportal.com](mailto:info@wecareportal.com).

### **CHANGES TO THIS POLICY**

This Policy is current as of the Effective Date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any changes to this Policy on our Sites. If we make any changes to this Policy that

materially affect our practices with regard to the personal information we have previously collected from you, we will endeavor to provide you with notice in advance of such change by highlighting the change on our Sites.