

WELLNESS CORPORATE SOLUTIONS WELLCONNECTPLUS PRIVACY POLICY

Last Updated: March 12, 2018

SCOPE

This Privacy Policy describes how Wellness Corporate Solutions, LLC treats personal information collected on the websites and mobile sites (collectively, our "Platform") where it is located. This Policy does not apply to information we collect in other ways, such as information we collect offline. By using our Platform, you agree to the terms of this Policy.

In certain circumstances, our treatment of the personal information we collect may be restricted by HIPAA or other laws.

TYPES OF INFORMATION WE COLLECT

We collect information from you and about you. Here are some examples of the information we may collect:

Contact information. For example, we may collect your name, mailing address, telephone or mobile phone number and email address.

Account information. For example, if you create an account, we will collect your username and password.

Information you post or submit. For example, we will collect information about the appointments you schedule through our Platform. We will also collect information you include in the messages you send to your health coach. We also collect information when submit a question through the "Contact Us" feature on our site or when you submit survey or promotional responses.

Demographic information. For example, we may collect your gender or date of birth.

Device information. We may collect the type and make of device you use to access our Platform. This may include your device identification number, IP address or mobile operating system. If you use our website, we may collect information about the browser you are using. We might look at what site you came from, or what site you visit when you leave us.

Location Information. For example, we may collect precise location information from your device. We may use GPS to collect this information. This may include information about your exact location when you use our Platform. For more information about your options related to the collection of your location information, see the Choices section below.

HOW WE COLLECT YOUR INFORMATION

We collect your information in different ways. Below are some examples of how we may collect your information.

Directly from you. For example, we collect information when you create an account or participate in a promotion or survey. We may also collect information when you schedule appointments or submit information to your health coach.

Passively. We use common tracking technologies to collect information passively. We collect information about users over time when you use this Platform.

From third parties. We may receive information about you from other sources. This might include the employer that sponsors your benefits plan or other health and wellness companies involved in delivery of your benefits.

By combining information. We may combine information that we collect offline with information we collect online. We may also combine information we collect from you with information we get about you from others.

HOW WE USE YOUR INFORMATION

Examples of how we may use your information include:

To communicate with you. For example, this includes responding to your questions or inquiries. We will also use your information to send you messages about our relationship.

To provide you with our services. This includes fulfilling your requests for our services. This may also include determining your eligibility for our services and coordination of service delivery with other companies involved in delivery of your health and wellness benefits.

To improve our services. We may use your information to make our Platform and services better. This may include improving user experience. We may also use your information to determine your interest in our services.

For promotional purposes. We may provide you with information about current or new services that are available to you through your employer-sponsored health plan or wellness program.

For security purposes. This could include protecting our family of companies and our customers. It may also include protecting our Platform.

As otherwise permitted or required by law or as we may notify you. This includes using your information for our legitimate business needs.

HOW WE SHARE YOUR INFORMATION

We may share your information in the following ways:

Internally. For example, we will share your information with our health coaches and others within our organization for the purposes of providing our services.

With the employer that sponsors your wellness plan or your health plan. For example, we may share whether you signed up for an account, booked an appointment for service, downloaded a voucher or accessed a third party service with the employer that sponsors your wellness plan or with your health plan.

With third parties involved in delivery of your health and wellness benefits. For example, if you book an appointment for services through our Platform, we will share your information with the company providing the services.

With third parties who perform services on our behalf. For example, this may include companies that send emails for us. It may also include companies that run our Platform or manage our client contact information.

With any successor to all or part of our business. For example, if all or part of our business is sold, we may share your personal information with the new owner. This may include as part of an asset sale, corporate reorganization or other change of control.

To comply with the law or to protect ourselves. This includes responding to a court order or subpoena. It could also include sharing information if a government agency or investigatory body requests. We might share information when we are investigating a potential fraud.

For other reasons we may describe to you.

CHOICES ABOUT YOUR INFORMATION

You have certain choices about how we use your information:

You can opt out of receiving our promotional messages. To stop receiving our promotional messages, you can follow the instructions in any email you receive from us. Note that even if you opt out of our promotional messages, you will still receive transactional email messages from us. These include appointment confirmation and reminder messages, secure message notifications or responses to your inquiries.

You can control tools on your mobile devices. For example, you can turn off the GPS locator on your smartphone.

You can control cookies and certain tracking tools. Your browser may give you the ability to control cookies or other tracking tools. How you do so depends on the type of tool. Certain browsers can be set to reject browser cookies. To control flash cookies, which we may use on certain websites from time to time, you can go [here](#). Why? Because flash cookies cannot be controlled through your browser settings.

Our Do Not Track Policy: Some browsers have “do not track” features that allow you to tell a website not to track you. These features are not all uniform. We do not currently respond to those signals. If you block cookies, certain features on our sites may not work. If you block or reject cookies, not all of the tracking described here will stop.

Options you select are browser and device specific.

OUR PLATFORM AND CHILDREN

Our platform is meant for adults. We do not knowingly collect personally identifiable information from children under 13. If you are a parent or legal guardian and think your child under 13 has provided us with information, please contact us at support@wellnesscorporatesolutions.com. You can also write to us at the address listed at the end of this Policy. Please mark your inquiries “COPPA Information Request.” Parents, you can learn more about how to protect children's privacy on-line [here](#).

SECURITY MEASURES

The Internet is not 100% secure. We cannot promise that your use of our Platform will be completely safe. We encourage you to use caution when using the Internet. We use reasonable means to safeguard personal information under our control.

STORAGE OF INFORMATION

Information we maintain may be stored in the United States. If you live outside of the United States, you understand and agree that we may transfer your personal information to the United States. This site is subject to U.S. laws, which may not provide the same level of protections as those in your own country.

THIRD PARTY SITES

Our Platform may contain links to other third party sites that are not governed by this Policy. If you click on a link to a third party site, you will be taken to a site we do not control. We are not responsible for the privacy practices used by third party sites. We suggest that you read the privacy policies of those sites carefully. We are not responsible for these third party sites.

HOW TO CONTACT US

If you have any questions, comments or concerns with respect to our privacy practices or this Policy, please feel free to contact us at support@wellnesscorporatesolutions.com or by telephone at 1-877-469-5411. You may also write to us at the following address:

Wellness Corporate Solution
Attn: Jared Rice, Chief Privacy and Security Officer
7617 Arlington Road
Bethesda, MD 20814

CHANGES TO THIS PRIVACY POLICY

From time to time, we may change our Policy. We will notify you of any material changes to our Policy as required by law. We will also post an updated copy on our Platform. Please check our Platform periodically for updates.

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