# A close-up of a logo Description automatically generated

# *Privacy Policy*

## **INTRODUCTION**

Valentine Integrative Health, LLC, on its own behalf and on behalf of its affiliates and/or wholly owned subsidiaries (collectively referred to as “Valentine Integrative Health”, “we”, “us”, or “our”), owns and operates the websites located at http://valentineintegrativehealth.com and various mobile applications (collectively, the “Site” or “Sites”). Through these Sites we operate various online services that enable eligible individuals (“Clients”) to receive various types of healthcare information and telehealth services (“Services”). The Sites also have public portions that allow anyone to educate themselves on the Services available from Valentine Integrative Health. Valentine Integrative Health understands that privacy of information is of great importance to our Clients and the people that visit our public sites (“Visitors”).

## **APPLICABILITY OF THIS PRIVACY POLICY**

This Web and Mobile Privacy Policy (“Privacy Policy”) describes what information Valentine Integrative Health collects about Member’s and Visitors on its Sites and how that information is used.

## **AGREEMENT TO THIS PRIVACY POLICY**

Your access and use of the Site is subject to your agreement with this Privacy Policy and the Web and Mobile Terms and Conditions. By using the site, you expressly agree to the terms of this Privacy Policy and consent to the collection and use of information as discussed in this Privacy Policy. If you do not agree with this Privacy Policy, please do not use or access the Sites for any purpose. Please print a copy of this Privacy Policy for your records.

## **MODIFICATIONS TO THIS PRIVACY POLICY**

Valentine Integrative Health may revise this Privacy Policy regarding the collection of information at any time. Should this Privacy Policy changed materially, Valentine Integrative Health will give notice to you by posting a notice regarding the new policy on the Site. New Privacy Policies will be effective as of their posting unless otherwise stated. By accessing or using the Site after such changes are posted you agree to all such changes.

## **COLLECTION USE AND DISCLOSURE OF NON-IDENTIFIABLE INFORMATION**

Either Valentine Integrative Health or a third-party vendor on behalf of Valentine Integrative Health may collect non-identifiable information, which is automatically collected as you browse or otherwise access the Sites. We may collect such information by tracking, or asking a third-party vendor to track, your click-stream activity when such information is not tied to a user ID through the use of “cookie” technology or by tracking internet protocol (IP) addresses, as explained below. Because we want our Sites to better serve Visitors’ needs, we collect some basic information about Visitors’ computers, including, but not limited to:

* IP address (the computer’s address on the internet)
* Operating system (e.g. Windows Vista)
* Browser software (e.g. Microsoft Internet Explorer, Firefox)
* Internet Service Provider (e.g. AOL)
* Geographic location (e.g. Miami, Fl.)

We use this information to continuously enhance our Sites and to better serve our Visitors’ needs. For example, we use this information to know what browsers people most commonly use, what pages are most often visited, and what functionality is most used. All the information Valentine Integrative Health collects from Visitors’ computers is de-identified and is not personal information. The non-identifiable information we collect may be shared with our suppliers and vendors and used in the aggregate to create summary statistics that help us analyze Site usage trends, assess what information is of most and least importance, determine technical design specifications, arrange the Sites in the most user-friendly way, and identify system performance or problem areas. We may also use your geographic location to provide you with specific content and direct you to your closest service providers to the extent permitted by applicable law.

## **COOKIES**

Like many companies, we use “cookies” to help you better navigate the Sites. A “cookie” is a small piece of information sent by Valentine Integrative Health’s web-based applications that are stored by your Web browser on your computer’s hard drive. Cookies enhance your online experience by saving your preferences while you are visiting a particular website. The cookies do not contain any identifiable information and cannot profile your system or collect information from your hard drive. Most Internet browsers automatically accept cookies, but you can set your browser to refuse them or to alert you when they are being sent.

## **PRIVACY AND SECURITY OF THE SECURE PORTAL**

Some of Valentine Integrative Health's Sites can be used only by Valentine Integrative Health Clients, require Clients to register and log-in, and are password protected (“Registered Users”). The password protected portions of the Sites are referred to as the Secure Portals. The Secure Portals contain protected health information (PHI) or personal information about Clients. Because of this, on the Secure Portals, Valentine Integrative Health must be able to link a Member’s activity back to their identity, for example to verify identity in our systems and eligibility for Services. Therefore, in the Secure Portals, Valentine Integrative Health does collect identifiable information about Clients. This includes pages visited and services initiated. While no web site can guarantee security, we maintain physical, administrative, and technical safeguards to help protect your PHI collected via the Secure Portals as required by applicable law. While we cannot guarantee that loss, misuse or alteration to data will not occur, we use industry standards, such as Secure Socket Layers (“SSL”) technology, to help safeguard against such occurrences. On the Secure Portals, the information passed between your browser and our system is encrypted with SSL technology to create a protected connection between you and our website to ensure confidentiality. Our data center is both physically and electronically secured. Our servers are protected behind the Internet by using firewall and encryption technology. All data is stored and transferred in encrypted formats that either meet or exceed standards defined by state and federal laws. No data is transferred to users that do not have rights to access such information.

## **MOBILE APPLICATIONS**

We allow Clients to access the Services through a software application on a mobile device (an “Application”). If you choose to an Application, Valentine Integrative Health will collect additional information about you including (1) location data, (2) device IDs and (3) other information regarding your use of the Application. Valentine Integrative Health uses the information collected to analyze and improve the Member’s experience using the Application and otherwise communicate with the Member about the Services. Additionally, we track your location and send push notifications from time to time in order to update you about the Services and what is available to you as a Member. If you no longer wish to receive such communications, you may turn them off at the device level.

A complete description of the purposes for which Valentine Integrative Health uses and discloses any PHI collected from our Clients (including PHI collected on the Secure Portal) is described fully in its Notice of Privacy Practices or any other applicable notices provided to Clients.

## **HOW TO CONTACT US**

Questions or comments regarding this Policy should be submitted to the Valentine Integrative Health Privacy Officer by electronic means as follows: info@valentineintegrativehealth.com