

Overwatch Health Privacy Policy

Last Updated: October 7th, 2022

Your privacy is important to us at Overwatch Health (“**Overwatch**,” “**we**,” “**us**,” or “**our**”), and we are committed to safeguarding, preserving, and respecting your privacy rights. This online privacy statement (the “**Statement**” or “**Policy**”) describes how we collect, use, disclose, and the security of the personal information we gather about you through our Website, <https://overwatchhealth.co>, our platform, or when we otherwise interact with you (together, the “**Services**”).

For purposes of this Statement, personal information means data that classifies as personal information, personal data, personally identifiable information, personal health information, or similar terms under applicable data privacy and security laws and regulations. It does not include data excluded or exempted from those laws and regulations, such as deidentified, anonymized, or aggregated data. Nothing in this Statement will constitute an admission or evidence that any particular data privacy or information security law or regulation applies to Overwatch generally or in any specific context.

Our Services are used at times by third parties in connection with the services they provide. This Policy does not apply to how third parties may collect and process personal information, and you should consult their applicable privacy policies and terms.

You Consent to This Statement

You should read this Statement carefully. We recommend printing and retaining a copy for your future reference. By accessing, browsing, or otherwise using the Services, you confirm that you have read, understood, and agreed with this Statement. If you do not agree to this Statement, you may not use the Services.

This Statement applies regardless of how the Services are accessed and will cover any technologies or devices by which we make the Services available to you.

We may provide you with additional privacy notices and terms where we believe it is appropriate to do so. It is important that you read this Statement together with any other privacy notice or terms we may provide on specific occasions, so that you are fully aware of how and why we are using your data. This Statement supplements these other notices and is not intended to override them.

If you have any questions or concerns about our personal information policies or practices, you can contact us in the methods described in the “**Contact Us**” section below.

The Information We Collect

We collect the information you voluntarily provide directly to us, such as when you complete a form, submit information to us through our Services, or conduct an exercise session through our Platform. We also collect information when you interact with the Services, for example, through our use of cookies.

Information You Provide

- *Completing Forms on Our Website or through Our Services.* If you request to receive information or fill out any forms on our Website, we may ask you to provide information such as your name and email address.
- *Using Our Services.* If you use our Services, we will ask you to provide certain personal information. The specific information will depend on the Service requested and may include your name, email address, mailing address, phone number, date of birth, emergency contact information, driver's license or passport information as necessary to verify your identity, and information about any relevant legal representatives. We may also collect health related information relevant to your use of our Services, which may include medical records, medical history, treatment records, diagnostic testing, sexual orientation information, and related information relevant to your use of our services. We may also draw inferences from the information you provide in order to offer various educational resources. As noted in our Terms, we do not provide medical advice, and you should always consult with your health care providers on what treatments are best for you. Finally, we may collect audio files from appointments held using our Services.
- *Social Media.* If you interact with our Services through social media, we may collect information that you post. Please note that your comments and information will be visible to the public, so you should never share personal information that you would like to keep private.
- *When You Contact Us.* If you send us an email or otherwise contact us, we will collect your email address and any information that you provide in the email.
- *Job Applications and Employment.* If you apply for a job with or are employed or contracted by us, we will collect various pieces of information about you to administer the employment relationship, provide benefits, and ensure security. Such information will vary depending on your role, but it would likely include name, social security number, educational information, and financial account information.

Information That We Collect About You from Third Parties

We may collect information about you from third parties, such as your treating physician, when you authorize us to collect medical records. We may also collect information from your insurance company or employer solely as necessary to determine eligibility for our Services. Prior to collection of your information from these third parties, we will provide you with notice and obtain your consent, as required by law. If we receive information pursuant to a contract with a third party, our processing will be governed by that contract.

Information We Collect as You Navigate Our Site

We automatically collect certain information as you use the Services, such as the following:

- *Usage Information.* We may collect information automatically through your use of the Services, such as which of the pages on the Services you access, the frequency of access, and how long you use our Services.

- *Device Information.* We may collect information about the device you are using, such as hardware model, operating system, application version number, browser, and IP addresses.
- *Mobile Device Information.* When you access our Services via a browser on your mobile device, we may also collect mobile network information, including telephone number, the unique device identifier assigned to that device, mobile carrier, operating system, and other device attributes.
- *Location Information.* We may collect information about your actual location which may be determined from GPS and other sensors that may reveal information on or nearby devices, Wi-Fi access points, and cell towers.

How Do We Use “Cookies” and Other Tracking Technologies?

We may send one or more Cookies to your computer or other device. We may also use other similar technologies such as tracking pixels, tags, or similar tools when you visit our Services.

Cookies are small files created by websites, including our Services, that reside on your computer’s hard drive and that store information about your use of a particular website. When you access our Services, we use Cookies and other tracking technologies to:

- Provide you with access to and ensure the functionality of our Services;
- Estimate our audience size and usage patterns;
- Store information about your preferences, allowing us to customize our Services according to your individual needs;
- Contact you to provide you with information or services that you request from us;
- Advertise new content, events, and services that relate to your interests;
- Provide you with more personalized content that is most relevant to your interest areas; and
- Recognize when you return to our Services.

You can manage your Cookies preference as described in the “**Managing Your Cookies**” section below.

What Types of Cookies Do We Use and Why?

The following chart lists the different types of Cookies that we and our service providers use on the Services, examples of who serves those Cookies and links to the privacy notices and opt-out information of those Cookie servers. Please note that this list includes third party cookie providers.

Types of Cookies	Purpose	Who Serves (for example)
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Essential	These Cookies are required for the operation of the Services and enable you to move around the Services and use its features. Disabling these Cookies can negatively impact the performance of Services.	<ul style="list-style-type: none"> • Overwatch • Google
Functionality	These Cookies are used to recognize you when you return to the Site. This enables us to personalize content for you and remember your preferences. These Cookies also enable your interactions with the Services such as emailing us.	<ul style="list-style-type: none"> • Overwatch • Google
Analytics, Performance, and Research	These Cookies, beacons, and pixels allow us to analyze activities on the Services. They can be used to improve the functioning of the Services. For example, these Cookies recognize and count the number of visitors and see how they move around the Services. Analytics Cookies also help us measure the performance of our advertising campaigns to help us improve them and to optimize the content on the Services for those who engage with our advertising.	<ul style="list-style-type: none"> • Overwatch • Google
Social Networking	These Cookies are used to enable you to share pages and content that you find interesting on our Services through third-party social networking and other websites. These Cookies may also be used for advertising purposes.	<ul style="list-style-type: none"> • Google
Advertising	These Cookies and pixels are used to deliver relevant ads, track ad campaign performance, or track email marketing.	<ul style="list-style-type: none"> • Google

We do not use any cookies, pixels, or other tracking that discloses to any third party information that identifies a person as having viewed specific video materials.

How Long Do Cookies Stay on My Device?

Some Cookies operate from the time you visit the Services until the end of that particular browsing session. These Cookies, which are called “**Session Cookies**,” expire and are automatically deleted when you close your Internet browser.

Some Cookies will stay on your device between browsing sessions and will not expire or automatically delete when you close your Internet browser. These Cookies are called “Persistent Cookies” and the length of time they will remain on your device will vary from Cookie to Cookie. Persistent Cookies are used for a number of purposes, such as storing your preferences so that they are available for your next visit and to keep a more accurate account of how often you visit the Services, how your use of the Services may change over time, and the effectiveness of advertising efforts.

Managing Your Cookies

It may be possible to block Cookies by changing your Internet browser settings to refuse all or some Cookies. If you choose to block all Cookies (including Essential Cookies), you may not be able to access all or parts of the Services.

You can find out more about Cookies and how to manage them by visiting www.AboutCookies.org.

Does the Site Respond to “Do Not Track” Signals?

At this time, our Site does not respond differently based on a user’s Do Not Track signal.

How We Use the Personal Information

We use personal information we collect about you or that you provide to us in the following ways:

- To present our Services and its contents in a suitable and effective manner for you and your device;
- To provide you with products, information, or Services that you request from us;
- To develop new products;
- To conduct quality assessment and improvement;
- We may use de-identified, anonymized, or aggregated information as part of medical research or studies;
- To advertise opportunities, services, or special events that we think may be of interest to you;
- To provide customer support, troubleshoot issues, manage accounts, and respond to requests, questions, or comments;
- To carry out our obligations and enforce our rights arising from any contracts; and
- To notify you about any additions, upgrades, or changes in our Services.

How We Share Personal Information

With Your Consent:

The Services were created in order to give you control over your personal information. In the course of using our Services or Site, you may consent to the sharing of your personal information with various third parties, such as the provider of your health care services.

Access and use by third-party service providers:

From time to time, Overwatch enters into arrangements with companies whose expertise is essential for our own services to function properly. We disclose to these service providers only such personal information as is reasonably necessary to perform these functions, and any such

third parties will be under an obligation to us to maintain the confidentiality of your personal information.

As part of research or medical studies:

Overwatch may provide certain data to third parties in connection with research or medical studies. However, Overwatch will de-identify, anonymize, or aggregate such data before providing it for use in a research or medical study.

For legal purposes:

Overwatch reserves the right to cooperate with local, provincial, state, federal and international officials in any investigation requiring either personal information or reports about lawful or unlawful user activity on this site. We also reserve the right to share your personal information to establish, exercise, or defend our legal and property rights, including providing information to others for the purposes of fraud prevention. We may also share your personal information with any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

If Overwatch is ordered by a legal process or government to provide data about one or more individual users, we will notify those users of our compliance with that order, to the extent permitted by law.

Business transactions or mergers:

Overwatch reserves the right to share your personal information to third parties as part of any potential business or asset sale, merger, acquisition, investment, round of funding, or similar type of transaction.

Bankruptcy or insolvency:

In the event of bankruptcy, insolvency, or dissolution proceedings, we may share your personal information with third parties as part of the sale or reorganization process.

Advertising and Marketing Choice

We respect your rights in how your personal information is used and shared. If at any time you would like to unsubscribe from receiving future emails, you can email us at: kazuo@overwatchhealth.co as well as follow the instructions at the bottom of each email and we will promptly remove you from all correspondence. Please note, however, that we may still need to contact you regarding other matters.

How Long Is Your Personal Information Kept

We will retain your personal information until the personal information is no longer necessary to accomplish the purpose for which it was provided. We may retain your personal information for longer periods for specific purposes to the extent that we are obliged to do so in accordance with

applicable laws and regulations, to protect you, other people, and us from fraud, abuse, an unauthorized access, as necessary to protect our legal rights, or for certain business requirements.

We will delete your personal information when it is no longer necessary for the purpose for which it was collected, or upon your request, subject to exceptions as discussed in this Statement or under applicable law, contract, or regulation.

Our Commitment to Data Security

The security of your personal information is important to us. We take various reasonable organizational, administrative, and technical measures to protect your personal information from unauthorized access, disclosure, alteration, or destruction. If required by law to do so, we will notify you and/or the relevant supervisory authority in the event of a data breach.

However, we cannot and do not guarantee complete security, as it does not exist on the Internet.

Third Party Links

Overwatch's Services may contain links to third-party websites. When we provide links, we do so only as a convenience and do not endorse any products or services and are not responsible for any content of any third-party website or any links contained within. It is important to note that this Statement only applies to Overwatch's Services. We are not responsible and assume no responsibility for any personal information collected, stored, or used by any third party as a result of you visiting third-party websites. We also advise that you read the privacy notice of any third-party websites you choose to visit carefully.

Children's Privacy

Protecting the privacy of the very young is especially important. Our Services are not intended for children under 18 years of age, and we do not knowingly collect personal information from children under 18. In the event that we learn that we have collected personal information from a child under age 18 without verification or parental consent, we will immediately delete that information. If you believe that we might have any information from or about a child under 18, please contact us using the information provided in the "**Contact Us**" section below.

Policy Changes

This Statement may change from time to time. We will post any changes to this Statement on this page, and you should check these terms when you use the Services. Your continued use of the Site constitutes acceptance of the most current version of this Statement.

Contact Us

If you have any questions about this Privacy Policy, please contact us by email at: kazuo@overwatchhealth.co

Phone: (631) 372-8456

Mail:

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