

Together Senior Health, Inc. Privacy Policy

Together Senior Health Inc. ("Together Senior Health", "We" or "Our") is committed to protecting the privacy of users of its software applications and services. This Privacy Policy states the Together Senior Health practices applying to individual users of the Together Senior Health managed services (the "Services").

Together Senior Health owns, operates, and maintains the Services. Together Senior Health is a Delaware corporation with its principal office in San Francisco, California.

BY ACCESSING AND USING THE SERVICES, YOU AGREE TO THE INFORMATION USE AND COLLECTION TERMS OF THIS PRIVACY POLICY TOGETHER SENIOR HEALTH HAS THE RIGHT TO REVISE THIS POLICY AT ANY TIME. WE MAY NOT NOTIFY USERS INDIVIDUALLY IF WE CHANGE THIS PRIVACY POLICY. ANY CHANGES WILL BE EFFECTIVE WHEN POSTED. WE ENCOURAGE YOU TO CHECK THIS PRIVACY POLICY FREQUENTLY FOR CHANGES.

Information We Collect

Together Senior Health requires users of the Services to have a user account. Each registered user of the Services is provided a Together Senior Health user identity in the form of an email address. The users unique ID is linked to "Personal Information" that may include any information or data that is specific to an individual person and may be used to directly or indirectly determine their identity, such as full names, addresses, phone numbers, and email addresses. Except as specifically stated below, we will not provide Personal Information you provide to us so that we may establish or maintain a user account to any third parties without your express consent.

The Services may collect and process information about the physical location of your mobile device using GPS or other location technologies offering various levels of specificity to precise latitude and longitude, that we derive from the device operating system ("Location Information").

Together Senior Health may also collect information regarding a user's use of the Services from a variety of sources including application log data, web cookies, network information including IP addresses, device state data, unique device identifiers, device hardware and OS information, and information relating to how the Services are functioning ("Usage Information").

Use and Disclosure of Information

We use your Personal Information to maintain your user account and operate the Services.

We may use Location Information to configure the Services for your use and provide you with access to information and functionality specific to your location. On your behalf, or on behalf of

the entity paying for the Service, we also may use Location Information to help determine the location of a lost or stolen mobile device.

We use the Usage Information to analyze and evaluate the features and functionality of the Services and to make improvements to the service. Together Senior Health may also use Usage Information to process data regarding service availability and performance including application crash data or other technical issues with the Services.

Where we have an agreement in place with an enterprise customer, such as your healthcare provider or insurance company to make the Service available to you, we may obtain and process your personal information from that enterprise customer. In that context, such enterprise customers are the data controllers and their privacy policies will apply to the processing of your Information. We encourage you to read their privacy policies.

Certain information will also be provided to certain third-party technology services providers as necessary to provide the Services functionality. Third party technology services providers include, providers of core technology used for certain functions of the service, and providers of analytics services. Together Senior Health is responsible for assuring that these third parties comply with the terms of this Privacy Policy.

Except for our third party technology services providers, we will not voluntarily share Personal Information or Location Information with a third party without your prior authorization, unless doing so is necessary (1) to enforce this Privacy Policy, to comply with law, regulation or other legal processes or to protect the rights, property or safety of us or others, (2) to comply with a valid order or process from a public authority, (3) in emergency situations, (4) to protect against misuse or unauthorized use of the Services, (5) to detect or prevent criminal activity or fraud.

Web Cookies

Together Senior Health uses web cookies, pixel tags, and other software tracking technologies (“Tracking Information”) to collect information regarding your use of the Services and to uniquely identify you and distinguish you from other users in order to aid your experience and measure and improve aspects of the Service.

Cookies are small files of letters and numbers that we store on your browser or on your device. They contain information that is transferred to your device.

We use Cookies to collect information about your browsing activities and to distinguish you from other users of our Services in order to aid your experience.

We use the following types of Cookies and similar technologies:

Strictly necessary Cookies: Some Cookies are strictly necessary to make our Services available to you; for example, to provide login functionality, user authentication and security. We cannot provide you with the Services without this type of Cookie.

Functional Cookies: These are used to recognize you when you return to our Website. This enables us to personalize our content for you and remember your preferences (for example, your choice of language).

Analytical, performance, or advertising Cookies: We also use Cookies and similar technologies for analytics purposes in order to operate, maintain, and improve our Services. We use third party analytics providers, including Amplitude, to help us understand how users engage with us.

You can block Cookies by setting your internet browser to block some or all of Cookies. However, if you use your browser settings to block all Cookies (including essential Cookies) you may not be able to use our Services.

Except for essential Cookies, all Cookies will expire after a maximum of two years.

Data Security

Data security is implemented through physical, administrative, and technical safeguards we put in place and operational procedures we follow to protect Personal Information. We protect your transactions involving Personal Information over the Internet using Secure Sockets Layer (SSL) technology. We restrict access to your Personal Information in our database to our authorized employees, our agents, and certain of our authorized partners.

Your Rights

In certain circumstances you have the following rights in relation to your Personal Information that we hold.

Access. You have the right to access the Personal Information we hold about you, and to receive an explanation of how we use it and who we share it with.

Correction. You have the right to correct any Personal Information we hold about you that is inaccurate or incomplete.

Erasure. You have the right to request for your Personal Information to be erased or deleted.

Object to processing. You have the right to object to our processing of your Personal Information where we are relying on a legitimate interest or if we are processing your Personal Information for direct marketing purposes.

Restrict processing. You have a right in certain circumstances to stop us from processing your Personal Information other than for storage purposes. Portability. You have the right to receive, in a structured, commonly used and machine-readable format, Personal Information that you have provided to us if we process it on the basis of our contract with you, or with your consent, or to request that we transfer such Personal Information to a third party.

Withdraw consent. You have the right to withdraw any consent you previously applied to us. We will apply your preferences going forward, and this will not affect the lawfulness of processing before your consent was given.

Please note that, prior to any response to the exercise of such rights, we will require you to verify your identity. In addition, we may require additional information (for example, why you believe the information we hold about you is inaccurate or incomplete) and may have valid legal reasons to refuse your request. We will inform you if that is the case. For more information on how to exercise your rights, or to exercise your rights, please email support@TogetherSeniorHealth.com.

If you are a California resident, California law affords you certain rights regarding our collection and use of your personal information. To learn more about your California privacy rights, please visit our Privacy Notice for California Residents.

Children's Privacy

Our Services are intended for use by older adults and are not intended for use by children under the age of 16. We will not knowingly collect any Personal Information from users under the age of 16 online through the Services. If you think that we have collected Personal Information from a visitor under the age of 16, please contact us using the information provided in the "Contact Us" section.

Contact Us

If you have any questions, comments or concerns about this Privacy Policy, or your privacy please contact us at privacy@TogetherSeniorHealth.com or via the contact information provided on the Together Senior Health website.

Changes to Our Privacy Policy

We may modify, alter or update our privacy policy at any time, so we encourage you to review our privacy policy frequently. We will not provide individual notice to you of changes to our privacy policy, but when we make updates to our privacy policy, we will update the date in this section.

California Privacy Policy Notice

This California Resident Privacy Notice supplements the information and disclosures contained in our Privacy Policy. It applies to individuals residing in California from whom we collect Personal Information as a business under California law.

1. Personal Information Collection, Disclosure, and Sale

For the purposes of this notice, Personal Information means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, or as otherwise defined by the California Consumer Privacy Act of 2018 (California Civil Code §§ 1798.100 to 1798.199) and its implementing regulations, as amended or superseded from time to time (“CCPA”).

Personal Information does not include information that is:

- Lawfully made available from government records.
- Deidentified or aggregated.
- Otherwise excluded from the scope of the CCPA.

The chart below provides the categories of Personal Information (as defined by the CCPA) we have collected, disclosed for a business purpose, sold, or used for business or commercial purposes in the preceding twelve months since this notice was last updated, as well as the categories of third parties with whom we shared Personal Information. The examples of Personal Information provided for each category reflect each category’s statutory definition and may not reflect all of the specific types of Personal Information associated with each category.

CATEGORY	WE COLLECT	WE DISCLOSE	WE SELL	CATEGORIES OF THIRD PARTIES WITH WHOM WE SHARE PERSONAL INFORMATION
Identifiers Phone Number, Internet protocol address, email address	Yes	Yes	No	We may share certain personal information with the healthcare provider or other service provider so that they may deliver services to you. We may share certain data with service providers that provide scheduling, notification, identity management or communications services.
B. Categories of Personal Information in Cal. Civ. Code Section 1798.80(e) Example: Name	Yes	No	No	We collect your name as part of the signup process we do not disclose to others that would not otherwise have access to it.

CATEGORY	WE COLLECT	WE DISCLOSE	WE SELL	CATEGORIES OF THIRD PARTIES WITH WHOM WE SHARE PERSONAL INFORMATION
C. Characteristics of Protected Classifications under California or Federal Law	No	N/A	N/A	N/A
D. Commercial Information	No	N/A	N/A	N/A
E. Biometric Information	No	N/A	N/A	N/A
F. Internet or Other Electronic Network Activity Information	Yes	Yes	No	We may share application usage and other data with providers of analytics services that act on it on our behalf.
G. Geolocation Data	Yes	No	No	N/A
H. Sensory Information Examples: Audio, electronic, visual, thermal, olfactory, or similar information.	Yes	Yes	No	We collect and may use or share sensory information data with research partners or providers of analytics services that act on it on our behalf.
I. Professional or employment-related information	No	N/A	N/A	N/A
J. Non-Public Education Information (as defined in 20 U.S.C. 1232g; 34 C.F.R. Part 99) Examples: Records that are directly related to a student maintained by an educational agency or institution or by a party acting for the agency or institution.	No	N/A	N/A	N/A
G. Geolocation Data Example: Precise physical location	No	N/A	N/A	N/A
I. Professional or employment-related	No	N/A	N/A	N/A

CATEGORY	WE COLLECT	WE DISCLOSE	WE SELL	CATEGORIES OF THIRD PARTIES WITH WHOM WE SHARE PERSONAL INFORMATION
information Job application or resume information, past and current job history, and job performance information.				
J. Non-Public Education Information (as defined in 20 U.S.C. 1232g; 34 C.F.R. Part 99) Examples: Records that are directly related to a student maintained by an educational agency or institution or by a party acting for the agency or institution.	No	N/A	N/A	N/A
K. Consumer profiles reflecting a consumer’s preferences, and characteristics	No	N/A	N/A	N/A

2. Use of Personal Information

- We collect, use, and disclose your Personal Information in accordance with the specific business and commercial purposes below:
- Providing Services: Providing our services.
- Communicating: Communicating with you, providing you with updates and other information relating to our services, providing information that you request, responding to comments and questions, and otherwise providing customer support.
- Social Network Support: sending messages on your behalf to your social networks and providing other features and services to you.
- Connecting Third Party Services: Facilitating the connection of third-party services or applications, such as video conferencing services, online storage, and social networks.
- Marketing: Marketing purposes, such as developing and providing promotional and advertising materials that may be useful, relevant, valuable or otherwise of interest to you.

- Personalization: Personalizing your experience on our services such as presenting tailored content.
- Sending Messages: Sending you push notifications or text messages
- Deidentification and Aggregation: De-identifying and aggregating information collected through our services and using it for any lawful purpose.
- Safety Issues: Responding to trust and safety issues that may arise.
- Compliance: For compliance purposes, including enforcing our Terms of Service or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency.
- Auditing Interactions: Auditing related to a current interaction with you and concurrent transactions.
- Fraud and Incident Prevention: Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Debugging: Debugging to identify and repair errors that impair existing intended functionality.
- Transient Use: Short-term, transient use.
- Contracting Vendors: Contracting with service providers to perform services on our behalf or on their behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.
- Research: Undertaking internal research for technological development and demonstration.
- Improving Our Services: Undertaking activities to verify or maintain the quality or safety of our services, and to improve, upgrade, or enhance our services.
- Enabling Transactions: Otherwise enabling or effecting, directly or indirectly, a commercial transaction.
- Notified Purpose: For other purposes for which we provide specific notice at the time the information is collected.

3. Collection and Disclosure of Personal Information

In the preceding twelve months since this notice was last updated, we have collected Personal Information from the following categories of sources:

A. You/Your Devices: You or your devices directly. B. Users: Other users of our services. C. Partners: Business partners. D. Public: Publicly accessible sources.

Pursuant to our Privacy Policy, we share your Personal Information with the following categories of third parties:

I. Analytics Providers. II. Vendors: Vendors and service providers. III. Integrated Third Parties: Third parties integrated into our services. IV. Third Parties as Legally Required: Third parties as required by law and similar disclosures. V. Third Parties in Merger/Acquisition: Third parties in connection with a merger, sale, or asset transfer. VI. Third Parties with Consent: Other third parties for whom we have obtained your permission to disclose your Personal Information.

4. Your California Privacy Rights

If you are a California resident, you may exercise the following rights.

Right to Know and Access. You may submit a verifiable request for information regarding the: (1) categories of Personal Information collected, sold, or disclosed by us; (2) purposes for which categories of Personal Information are collected or disclosed by us; (3) categories of sources from which we collect Personal Information; (4) categories of third parties with whom we disclosed Personal Information; and (5) specific pieces of Personal Information we have collected about you during the past twelve months.

Right to Delete. Subject to certain exceptions, you may submit a verifiable request that we delete Personal Information about you that we have collected from you.

Verification and Submit Requests. Requests for access to or deletion of Personal Information are subject to our ability to reasonably verify your identity in light of the information requested and pursuant to relevant CCPA requirements, limitations, and regulations. To verify your access or deletion request, please authenticate your account by logging into your account and submitting a support request from the application.

Shine the Light. We do not rent, sell, or share Personal Information with nonaffiliated companies for their direct marketing uses as contemplated by California's "Shine the Light" law (Civil Code § 1798.83), unless we have your permission.").

Authorizing an Agent. To authorize an agent to make a request to know or delete on your behalf, please send a written authorization signed by you and the authorized agent to us via the Contact Information section.

5. Do Not Track

There is no accepted standard on how to respond to Do Not Track signals, and we do not respond to such signals.

6. Contact Information

If you have any questions, comments, or concerns about our processing activities, or you would like to exercise your privacy rights please email us at privacy@TogetherSeniorHealth.com or write to us at:

Together Senior Health, Inc.
Attn: Privacy Officer
1121 Tennessee Street, Unit 1
San Francisco, CA 94107

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