

# ETHRA-BRANDED MOBILE APP PRIVACY POLICY

## **Privacy Statement**

ETHRA, through its relationship with third-parties, collects information about you when you use our mobile applications, websites and other online products and services (“Services”) and through other interactions and communications you have with us or our partners. ETHRA may also collect information about you from third party health insurance providers, managed health care organizations, and other agencies that contract with ETHRA to provide the Services. ETHRA encourages you to review the privacy statements associated with such third party service providers.

YOUR USE OF THE ETHRA-ECOLANE WEBSITE SIGNIFIES YOUR ASSENT TO THE TERMS OUTLINED BY OUR PRIVACY STATEMENT. IF YOU DO NOT AGREE TO OUR PRIVACY STATEMENT, PLEASE DO NOT USE THE SERVICES. YOUR USE OF THIS SITE IS ALSO SUBJECT TO THE TERMS OF USE AVAILABLE AT <https://www.ecolane.com/terms-of-use-mobile-app>.

Any references to “ETHRA” herein shall be construed to mean “ETHRA and/or its third-party providers.”

## **Use of your Personal Information**

ETHRA may collect and use your personal information to perform the Services. ETHRA may collect and store user activity on our server’s log files. We may log Internet Protocol addresses, your behavior profile or geographic location, browser type, operating system, pages visited, and other clickstream data. We may use “cookies” to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a Web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you

ETHRA may use the information we collect about you to provide, maintain and improve the Services, for example, to facilitate payments, send receipts, provide Services you request, develop new features, provide customer support, develop safety features, authenticate users, and send Service updates and administrative messages. ETHRA may also use the information we collect about you to perform internal operations, including but not limited to prevention of fraud and abuse, troubleshooting, data analysis, testing and research, and to monitor and analyze usage and activity trends. ETHRA may use the information we collect about you to send or facilitate communications between you and a Service provider, or to personalize and improve the Services.

ETHRA does not sell, rent or lease its customer lists to third parties. ETHRA may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your unique personally identifiable information (e-mail, name, address, telephone number) is not transferred to the third party. In addition, ETHRA may send you email or postal mail, provide customer support, or arrange for transportation. Without disclosing any personally identifiable information, ETHRA may share data with trusted partners to help us perform statistical analysis. If you give explicit consent, then ETHRA may provide personally identifiable information to trusted partners, but all such third parties are prohibited from using your personal information except to provide these services to ETHRA, and they are required to maintain the confidentiality of your information.

ETHRA websites will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to legal orders; (b) comply with legal process served on ETHRA or the website; (c) protect and defend the rights or property of ETHRA, or protect against misuse or unauthorized use of the Website; and, (d) act under exigent circumstances to protect the personal safety of users of ETHRA, or the public.

### **Special Note for Parents and Legal Guardians**

It is ETHRA's intention to adhere to the requirements of the Children's Online Privacy Protection Act of 1998 (COPPA) and the Children's Advertising Review Unit (CARU) guidelines on the Website.

ETHRA may collect and store personal information about children under 13 years of age ("children" or "child") only to the extent that this information is submitted by or with the permission of the parent or guardian in connection with registrations for any Services, including submission to a third party health insurance provider, managed health care organization, or other agency that contracts with ETHRA to provide the Services. By submitting such information, you represent that you are over the age of 13 or that you are submitting such information with the consent of your parent or guardian. When provided by or with the consent of the parent or guardian, ETHRA may collect and store personal information such as name, address, date of birth, gender, and other preferences; to the extent necessary to provide the Services. ETHRA will only collect this information if it believes that it is voluntarily submitted to us by the child's parent or guardian. For information on how ETHRA uses cookies and other information collection tools, please see our section above.

### **Changes to this Policy**

ETHRA will occasionally update this Policy to reflect company and customer feedback. When we make any material changes to this Policy, we will inform you by posting a notice on the home page of our website and by changing the date on this page noting when the Policy was last

updated. ETHRA encourages you to periodically review this Statement to be informed of how ETHRA is protecting your information.

### **Contact Information**

ETHRA welcomes your comments regarding this Privacy Policy. If you believe that ETHRA has not adhered to this Policy, please contact ETHRA at 9111 Cross Park Drive, Suite D-100, Knoxville, TN 37923. We will use commercially reasonable efforts to promptly address the problem.

### **Your California Privacy Rights**

California law permits residents of California to request certain details about how their information is shared with third parties for direct marketing purposes. ETHRA does not share your personally identifiable information with third parties for the third parties' direct marketing purposes unless you provide us with consent to do so.

*Last Updated: December 2023*