



U.S. PRIVACY POLICY

Last Updated: October 1, 2024

This privacy policy (“Privacy Policy”) describes how Perfect Health, Inc. dba ConcertoCare (“ConcertoCare,” “we,” “us,” “our”) and all of our affiliated practices, collect, process, and retain your Personal Information when you use the website www.concertocare.com (collectively, the “Site(s)/Services”), however accessed and/or used, whether via personal computer, mobile devices, tablets or other means, and offline.

Additionally, please note that **Section 1** of this Notice, which describes our collection and use of information through our Site, also serves as our **Notice at Collection for California residents** for purposes of the California Consumer Privacy Act (CCPA). By using the Site(s)/Services, you agree to this Privacy Policy. Any changes to this Privacy Policy will become effective upon posting of the revised Privacy Policy on the Internet, accessible through the Site.

This Privacy Policy has been designed to be reasonably accessible to people with disabilities. If you experience any difficulties accessing the information in the Privacy Policy, please contact us at privacy@conceretocare.com.

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1. NOTICE AT COLLECTION; COLLECTION AND USE OF PERSONAL INFORMATION

We collect two types of information: Personal Information and Other Information.

Personal Information is any information:

- that identifies or can be used to identify you;
- that relates to, describes, is capable of being associated with, or could reasonably be linked (directly or indirectly) with you;
- that can be used to authenticate you or provide access to an account through this Site;
- that relates to you and that might be sensitive.

Personal Information includes Protected Health Information (as that is defined by the U.S. Health Insurance Portability and Accountability Act) and Sensitive Personal Information (as that is defined by applicable state laws).

The table below and additional paragraphs immediately following the table are a summary of the categories of Personal Information we have collected over at least the last twelve (12) months, the purposes for collection and use of that Personal Information, and how long we keep each category of Personal information. If you would like to opt-out of the sale or sharing of any of the information as described below, please email us at privacy@concertocare.com.

Categories of Personal Information We Collect	Our Business or Commercial Purposes for Collection and Use of Your Personal Information
Personal Identifiers , such as your name, addresses, telephone number, e-mail, including driver's license number, date of birth and social security number which are considered Sensitive Personal Information .	We do not sell or share your Personal Identifiers. We use this information to: <ul style="list-style-type: none">• Schedule appointments;• Help verify your identity;• Personalize your experience with us; and• Provide customer service, including to respond to your inquiries and fulfill and verify requests made pursuant to this Privacy Policy.
Demographic Information , including gender and age.	We do not sell or share your Demographic Information. We use this information to: <ul style="list-style-type: none">• Facilitate your participation in promotions on or through the Site; and• Provide you with direct email and U.S. mail promotions.
Financial Information , including income, payment card number, bank account number and account details, income and other financial information.	We do not sell or share your Financial Information. We use it only to complete your payment or credit for services.

<p>Device, Internet and Network Activity Information, and Online Identifiers (IP Address, cookie IDs, and Device ID). This includes usage data of the Site(s) (e.g., the date and time the app on your device accesses our servers and what information and files have been downloaded to or presented through the app), information collected through cookies, web beacons and other technologies, and aggregated information about your visits to, or use of, our Sites/Services, as well as across other sites, and various attributes associated with your device (e.g., IP address, installed fonts, language and browser settings, and time zone in order to create a device fingerprint or identifier so that we can recognize your device). While that information alone may not reveal your specific individual identity, we may associate this usage and Other Information we collect with Personal Information about you.</p>	<p>We sell or share your Device, Internet and Network Activity Information, and Online Identifiers with third parties for targeted advertising on and off the Site. We also use this information to:</p> <ul style="list-style-type: none"> • Help us personalize your experience with us; • Determine the general geographic region from which you are accessing the services, using your IP address, which allows us to present appropriate content and inform you of special rules or rights that may apply to people in your jurisdiction; • Review statistical information about the use of the systems, Site and services in order to improve their design and functionality, to understand how they are used, and to assist us with resolving questions; and • Track responses to our e-mails and advertisements.
<p>General Location Information, including zip code.</p>	<p>We sell or share your location information with third parties for targeted advertisements on and off the Site. We use the information to:</p> <ul style="list-style-type: none"> • Assist you in your search for nearby services and practices; and • Help us personalize your experience with us.
<p>Inferences drawn from Personal Identifiers, Demographic Information, Medical and Health Information to create a profile about a consumer reflecting the consumer’s preferences, characteristics, predispositions, and behavior.</p>	<p>We do not sell or share the inferences drawn or profiles we create about our consumers. We use this information to:</p> <ul style="list-style-type: none"> • Help us personalize your experience with us by sending you direct e-mail and U.S. marketing communications.
<p>Medical and Health Information, including insurance provider, your current and past health history, such as symptoms and reason for a visit, physician visit history, allergies, medications, and specific medical diagnoses as HIV/AIDS status and pregnancy status all of which are Sensitive Personal Information. We collect health insurance information.</p>	<p>We do not sell or share your Medical or Health Information. We use it to:</p> <ul style="list-style-type: none"> • Ensure patient safety; • Provide healthcare services; • Process insurance claims; • Communicate with you and provide customer service; and • Detect and investigate insurance fraud or other illegal activity.



Additional Uses. We may also use **all** the Personal Information listed in the table above as we believe necessary:

- (1) if we determine a policy violation has occurred, to enforce our rights, or to enforce agreements;
- (2) if we believe such processing is necessary to identify, contact, or bring legal action regarding the rights and property of ConcertoCare or our affiliates;
- (3) to enforce our rights or protect against unauthorized access to our systems or other inappropriate use of our services, products, or other services;
- (4) to comply with laws, regulations, court orders and subpoenas or similar requests for information by authorities;
- (5) to protect your safety and the safety of others;
- (6) to perform audits;
- (7) to contact you about our Site or policy updates;
- (8) for research and analytics, including to identify usage trends, and to improve and update our products and services; and
- (9) to assist us in fraud prevention or investigation, all based on its legitimate interest in the continuation of our commercial activities and the protection of our rights.

Aggregate or De-identified Information. We may collect, use and share information that does not identify you (including information that has been aggregated or de-identified) except as prohibited by applicable law. We will maintain and use de-identified information in de-identified form and will not attempt to re-identify the information, except to make sure the information is truly de-identified.

Retention. We will retain your Personal Information for as long as is needed to carry out the purposes we've described, or as otherwise required by law. The criteria used to determine the applicable retention period for your Personal Information includes the length of time we have an ongoing relationship with you and whether there is a legal obligation to which we are subject that requires us to retain your Personal Information.

Where we have no continuing purpose to process your Personal Information, we will either delete or anonymize it or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further processing until deletion is possible.

2. SOURCES OF YOUR PERSONAL INFORMATION

We collect and obtain information from:

You. We collect information when you provide it to us directly, offline or online, through a web form or direct communication with us by e-mail or other message system.

Service Providers and Contractors. We work with service providers and contractors who collect information on our behalf to provide services to us, such as advertising agencies, ad networks, website developers, and other vendors and suppliers that provide us with



technology, services, and/or content related to our operations. We only allow our service providers and contractors to collect and use your Personal Information in connection with the services they provide us and as otherwise permitted by law.

Affiliate Providers. Affiliate Providers are affiliated practices. We may collect information about you from our affiliated practices to provide you with healthcare services.

Other Entities. We may also collect information from government sources to help us with engaging in fraud monitoring and prevention, compliance with applicable laws and regulations.

Cookies and Similar Technologies. We may use online tracking technologies, such as cookies, web beacons and/or embedded scripts, to help us remember devices associated with users of the Site, analyze the parts of our Sites that users visit, the length of time spent at any area, the general geographic location of the IP address and the specific functionalities that users choose to use. Essentially, cookies are a user's identification card for our servers. Web beacons are small graphic files linked to our servers that allow us to track your use of our Site. An embedded script is programming code that is designed to collect information about your interactions with us. All these help us remember and respond to what you do on our Site.

3. DISCLOSURES OF PERSONAL INFORMATION TO OTHER ENTITIES

During at least the past twelve (12) months, we have disclosed your Personal Information outlined in the table above to the following categories of entities for business purposes:

Affiliate Providers. Affiliate Providers are affiliated practices. We may disclose all categories of Personal Information listed in the Notice at Collection of this Privacy Notice for potential business purposes.

Service Providers and Contractors. We disclose all categories of Personal Information listed above with our service providers and contractors. Our service providers and contractors may have access to your Personal Information while providing products or services to us. These service providers and contractors may include agencies, ad networks, website developers, and other vendors and suppliers that provide us with technology, services, and/or content related to our operations, payment processing, data analytics, marketing and advertising, website hosting, advertisement auditing, security and integrity of the Site, the quality and safety of the Site, debugging to identify and repair errors that impair existing intended functionality of the Site, internal research, and technical and customer support. These service providers and contractors are only using your Personal Information at our direction and on our behalf.

Third Parties. We may disclose **General Location Information, and Device, Internet and Network Activity Information, and Online Identifiers** with third parties, such as our advertising and marketing partners. We may work with advertising partners to serve you third-party advertisements, including interest-based advertisements, on the Site and on other services. You may be presented with an opportunity to receive information and/or marketing offers directly from third parties. If you do agree (or do not decline where permitted by law) to have your Personal Information shared, your Personal Information will be disclosed to such third parties and all information you disclose will be subject to the privacy policy and practices



of such third parties. We are not responsible for the privacy policies and practices of such third parties and, therefore, you should review the privacy policies and practices of such third parties prior to agreeing to receive such information from third parties. If you later decide that you no longer want to receive communication from a third party, and unless stated otherwise in this Privacy Policy, you will need to contact that third party directly.

Government Authorities, Legal Rights and Actions. We disclose all categories of Personal Information listed above with various government authorities in response to subpoenas, court orders, or other legal process; to establish or exercise our legal rights or to protect our property; to defend against legal claims; or as otherwise required by law. In such cases we reserve the right to raise or waive any legal objection or right available to us. We also may share your Personal Information when we believe it is appropriate to investigate, prevent, or act regarding illegal or suspected illegal activities; to protect and defend the rights, property, or safety of ConcertoCare, the Site, our users, customers, or others; and in connection with our Terms of Use and other agreements. We may also use IP addresses or other Device Identifiers to identify users, and may do so in cooperation with copyright owners, Internet Service Providers, wireless service providers or law enforcement agencies in our discretion. Such disclosures may be carried out without notice to you.

Acquirers. We may disclose and/or transfer all categories of Personal Information listed above to an acquirer, assignee or other successor entity in connection with a sale, merger, or reorganization of all or substantially all the equity, business or assets of ConcertoCare to which your Personal Information relates.

Corporate Family. We disclose all categories of Personal Information listed above with our subsidiaries and affiliates, including where they act as our service providers or for their own direct marketing purposes.

Facilitating Requests. We disclose all the categories of Personal Information listed above at your request or direction.

Consent. We disclose all the categories of Personal Information listed above if we have let you know what information will be shared, with whom, and obtained your consent.

4. YOUR CHOICES REGARDING YOUR PERSONAL INFORMATION

A. Your U.S. State Privacy Rights

You may have certain rights with respect to Personal Information under U.S. State Privacy Laws. Under the California Consumer Privacy Act (CCPA), these rights have been extended to Personal Information collected, used, and shared between businesses (B2B); however, these rights have not been extended in any other state. As a result, these rights are limited to consumers, not applicable to individuals in their capacity as employees of businesses that are exchanging personal information between one another. For purposes of this subsection, the terms “consumer”, “categories of personal information”, “business purpose”, “third party”, “sell”, and “share” have the meanings ascribed to them respectively in the applicable state law. To the extent provided for under the applicable laws, you may have the right to:

- **Access and Disclosure.** You can request, up to two times every twelve (12) months, that we disclose to you the categories of Personal Information we collected about you,

the categories of sources from which we collected the Personal Information, the categories of Personal Information we sold or disclosed, our business or commercial purpose for collecting, selling, or sharing the Personal Information, the categories of third parties with whom we shared the Personal Information, and the specific pieces of Personal Information we collected about you. You also have the right to request a portable copy of your Personal Information.

- **Correction and Deletion.** You can request that ConcertoCare correct or delete Personal Information that we have about you, subject to certain exceptions allowed under applicable law.
- **Do Not Sell or Share My Personal Information (Opt-out of Targeted Advertising).** Under certain U.S. State Privacy Laws, you may be able to request that we not sell, or share for targeted behavioral advertising, your Personal Information. We may sell, share, and use for targeted advertising the following categories of Personal Information to companies that provide marketing and advertising services to us, as well as advertisers that place advertisements on the Site: **Internet Network, Activity, Device Information, Online Identifiers, and General Location Information.** This information is shared to help us understand who our users are, so that we can sell ads on the Site and advertise and market the Site to new users. You can request that we not sell or share your Personal Information by sending an e-mail to privacy@concertocare.com with your request.
- **Opt-out Preference Signals: Global Privacy Control.** You have the right to submit a request to opt-out of the selling and sharing of Personal Information through an opt-out preference signal. If you use an opt-out preference signal, we will apply the opt-out to the device or browser which sends the opt-out preference signal and to any consumer profile associated with that browser or device, including pseudonymous profiles. You can use an opt-out preference signal by downloading a supported browser or extension. If known, we will also treat the opt-out preference signal as a valid request to opt-out of sale/sharing for the user. Some browsers allow you to send a Do Not Track signal, an older request to block tracking of users by third parties. We may not honor these older signals.
- **Sensitive Personal Information.** You also have the right to limit the use of your Sensitive Personal Information to those uses that are necessary to perform the services reasonably expected by an average person and to certain other permitted business purposes. These business purposes include helping to perform services reasonably expected by users of this Site who have requested such services, ensuring security and integrity (to the extent the use of the information is reasonably necessary and proportionate for these purposes), ensuring physical safety of natural persons (to the extent the use of the information is reasonably necessary and proportionate for these purposes), short-term, transient use (subject to certain conditions), performing certain services, and engaging in certain activities related to quality or safety of our services or products. **We collect and process your Sensitive Personal Information for the purpose of inferring characteristics about you.** You may limit our use of your Sensitive Personal Information to that which is necessary to perform the services by sending an e-mail to privacy@concertocare.com with your request.

- *No Financial Incentive.* We do not offer any programs that would be considered a “financial incentive” for sharing your Personal Information under U.S. state privacy laws.
- *No Discrimination.* ConcertoCare will not discriminate against you because you made any of these requests. We may deny certain requests, or fulfill a request only in part, based on our legal rights and obligations. For example, we may retain Personal Information as permitted by law, such as for tax or other record keeping purposes, to maintain an active account, and to process transactions and facilitate customer requests.
- *How to Submit a Request.* You may exercise the above rights by calling our toll-free number: 877-597-1440 or by submitting the request online [here](#). Note that we may deny certain requests, or fulfill a request only in part, based on our legal rights and obligations. For example, we may retain Personal Information as permitted by law, such as for tax or other record keeping purposes, to maintain an active account, and to process transactions and facilitate customer requests.
- *How We Verify Your Identity.* Whether you submit a request directly on your own behalf, or through an authorized agent, we will take reasonable steps to verify your identity prior to responding to your requests under applicable law.

In response to verified requests for **access and disclosure** or a portable copy of your Personal Information, we will confirm receipt of the request within ten (10) business days of receipt of the request and disclose and deliver the required information to you free of charge within forty-five (45) days of receiving a verifiable consumer request. We may extend this period to deliver information once by an additional forty-five (45) days when reasonably necessary. We will provide notice of the extension within the first forty-five (45) day period

In response to verified requests to **correct or delete**, we will confirm receipt of the request within ten (10) business days of receipt of the request.

Following verification of your request to **delete**, we may require you to separately confirm that you want your Personal Information to be deleted. We will delete the information within forty-five (45) days of receiving a verifiable consumer request (subject to certain exceptions). We may extend this period once by an additional forty-five (45) days when reasonably necessary. We will provide notice of the extension within the first forty-five (45) day period.

Following verification of your request to **correct**, we may require you to provide documentation, if necessary, to rebut our own documentation that the Personal Information is accurate. If we determine, based on the totality of the circumstances, that the information is not accurate, we will respond to the request by correcting the information, deleting the information (if deletion of the information does not negatively impact you), or providing you with the name of the source from which we have received the alleged inaccurate information (if we are not the source). We will correct the information within forty-five (45) days of receiving a verifiable consumer request. We may extend this period once by an additional forty-five (45) days when reasonably necessary. We will provide notice of the extension within the first forty-five (45) day period. You have



the option to submit a 250-word written statement per alleged inaccurate piece of Personal Information if it is considered health information or is concerning your health, and if you request, this statement will be made a part of your consumer record with us.

- **Authorized Agent.** Applicable law may permit consumers to designate authorized agents to submit requests on their behalf. Under certain applicable laws, an authorized agent is a natural person or a business entity in the applicable state that a person has authorized to act on their behalf subject to the requirements. If you would like to designate an authorized agent to submit a request to know, a request to delete, or a request to correct Personal Information on your behalf, please call our toll-free number at 877-597-1440. When submitting the request, please ensure the authorized agent identifies himself/herself/themselves as an authorized agent.

You or your authorized agent may provide us with a written power of attorney, executed by you, confirming the authority of the authorized agent with respect to your Consumer request(s).

If we have not received a power of attorney, we may require your authorized agent to provide proof that you gave the agent signed permission to submit your Consumer request(s).

In addition, we may also require you to do the following directly with us:

- Verify your own identity with us;
- Confirm you have provided the authorized agent permission to submit the Consumer request(s).
- Once verified, your authorized agent may act on your behalf.
- ***Appeals.*** You may have a right to appeal decisions concerning your ability to exercise your Consumer rights. Please contact us at privacy@concertocare.com to request an appeal concerning decisions on your Consumer request.

B. Managing Your Email and SMS Communications

It is our intention to only send email and SMS text communications that are useful to you and that you want to receive. When you provide us with your email address as part of the registration or appointment setting process, we will place you on a list of patients to receive informational and promotional emails. ConcertoCare may use a third-party vendor to help us manage some of our email and voice/text messaging communications with you. While we do supply these vendors with email addresses or mobile telephone numbers of those we wish for them to contact, your email address or mobile telephone number is never used for any purpose other than to communicate with you on our behalf. When you click on a link in an email, you may temporarily be redirected through one of the vendor's servers (although this process will be invisible to you) which will register that you've clicked on that link and have visited our Site.

We directly market to you through e-mail and SMS text messaging with your consent. You can opt out of receiving e-mails at any time by clicking the "unsubscribe" link in the email footer. Please note that your opt-out is limited to the email address used to opt-out. You



can opt out of receiving SMS text messaging at any time by texting back with the keyword "STOP".

Email and SMS text messages are not secure communications. By providing your email address and/or mobile number you consent to receiving communications that may contain Protected Health Information (PHI) in those communications. We never share any information, other than your e-mail address or telephone number, with our third-party e-mail and voice/text messaging vendors, which may only share this information with its authorized subcontractors. We also never sell your email or mobile information, or any text messaging originator opt-in data or consent to third parties. Please note that we may continue to contact you to the extent necessary for the purposes of any products or services you have requested and our ongoing business relations.

C. Tracking Technologies

Google provides tools to allow you to opt out of the use of certain information collected by Google Analytics at <https://tools.google.com/dlpage/gaoptout>, by Google Analytics for Display Advertising or the Google Display Network at <https://www.google.com/settings/ads/onweb/>, or downloading the Google Analytics Opt-out Browser Add-on.

To learn more about targeted ads and how to opt out of receiving certain targeted ads from third parties, please visit: (i) for website targeted ads from DAA participants, <https://www.aboutads.info/choices>; (ii) for app targeted ads from DAA participants, <https://www.aboutads.info/appchoices>; and (iii) for targeted ads from NAI participants, <https://www.networkadvertising.org/choices/>. Opting out only means that the selected participants should no longer deliver certain targeted ads to you, but does not mean you will no longer receive any targeted content and/or ads (e.g., in connection with the participants' other customers or from other technology services).

You may also limit our use of information collected from or about your mobile device for purposes of serving targeted ads to you by going to your device settings and turning off tracking for advertising purposes.

Most browsers allow you to control certain tracking tools on your web browser. You do not have to accept cookies to use our Website; however, if you disable cookies, certain functionality on our Website may be lost. Most browsers allow you to delete cookies or decline to accept cookies by going to the preferences, tools or options menus of your browser. Selections you make are device-specific and browser-specific, meaning that you should update your preferences on each device you use and within each browser.

Please note that if you opt out using any of these methods, the opt out will only apply to the specific browser or device from which you opt out. We are not responsible for the effectiveness of, or compliance with, any opt-out options or programs, or the accuracy of any other entities' statements regarding their opt-out options or programs.

5. OTHER CONSUMER RIGHTS IN CALIFORNIA

Shine the Light. If you are a California resident, you have the right to ask us one time each year if we have shared Personal Information with third parties for their direct marketing purposes. To make a request, please send us an e-mail, or write to us at the address listed



in the [Contact Us](#) section. Indicate in your letter that you are a California resident making a “**Shine the Light**” inquiry.

Right to Erasure. If you are a California resident under 18 years old and you are registered with the Site, you can ask us to remove content or information you have posted to the Site. E-mail us at the address listed in the [Contact Us](#) section with “**California Under 18 Content Removal Request**” in the subject line and tell us what you want removed. We may require additional information from you to allow us to verify your identity as well as details about where the content is posted. We will make reasonable efforts to remove the post from prospective public view, although we cannot ensure the complete or comprehensive removal of the content and may retain the content as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

6. SECURITY OF PERSONAL INFORMATION

We incorporate commercially reasonable safeguards to help protect and secure your Personal Information. However, no data transmission over the Internet, wireless transmission or electronic storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure or warrant the security of any information you transmit to us, and you use our Site and provide us with your information at your own risk. We keep Personal Information as long as it is necessary or relevant for the practices described in this Privacy Policy, including, for example, for legal compliance, dispute resolution, contract enforcement, backup, archival, and other internal operations purposes. This includes data you or others provide to us and data generated from your use of our Site. We also keep information as otherwise required by law.

7. OTHER IMPORTANT INFORMATION

A. Notice of Changes to Our Privacy Policy

This Privacy Policy reflects our current practices and is subject to change and update from time to time. When we post changes to this Privacy Policy, we will modify the “Effective Date” at the top of this Privacy Policy to indicate when such changes have come into effect. If we change this Privacy Policy in a material way, we will inform you through a notice advising of such change at the beginning of this Privacy Policy and on our Site.

B. Links to Other Sites

This Notice does not address, and we are not responsible for, the privacy, security, or other practices of any third parties, including any third party operating any site or service to which the Site links. The inclusion of a link on the Site does not imply endorsement of the linked site or service by us or by our affiliates.

In addition, we are not responsible for the information collection, usage, disclosure, or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, or any other third-party app provider, social media platform provider, operating system provider, device manufacturer, or wireless service provider, including with respect to any Personal Information you disclose to other organizations through or in connection with the Site.



C. Jurisdiction – United States Only

The Site is controlled and operated by ConcertoCare from the United States and is not intended to subject us to the laws or jurisdiction of any state, country, or territory other than those of the United States.

8. MINOR CHILDREN

Our websites are not directed to children under the age of 18. We do not seek to, nor do we knowingly collect, information from children under the age of 18, and we request that such individuals do not provide Personal Information through our websites. While we do not sell any Personal Information, we would not knowingly sell the Personal Information of children under the age of 18 without affirmative authorization. Parents and legal guardians are welcome to provide information on behalf of their minor children under 18.

9. CONTACT US

If you would like any more information about us or our Privacy Policy, please e-mail us at privacy@concertocare.com, or call us at 877-597-1440.

We do not discriminate based on race, color, national origin, ancestry, religion, sex, marital status, gender, gender identity, sexual orientation, age or disability.