

# Privacy Policy

This Privacy Policy applies to this website ("the Site"), which is owned and operated by Knight Health Holdings, LLC, and/or its affiliates and related companies ("ScionHealth", "us" or "we"), and forms part of the [Terms and Conditions of Use](#) that govern your use of the Site.

## **PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING THE SITE.**

By using our Site, you acknowledge that you have read this Privacy Policy, and agree to be bound by it. If you do not agree to any of the terms contained in this Privacy Policy, your remedy is not to use the Site.

### **Our Privacy Policy is based on the principles of:**

- notice/awareness
- choice/consent
- access/participation
- integrity/security

**Privacy Policy last updated:** December 23, 2021

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### **1. Information We Collect and How We Collect It**

We may collect different kinds of information from you in different ways. This Privacy Policy tells you about our information gathering, use, and disclosure practices and applies to information gathered through your use of this Site and your electronic communications through this Site. We collect information on the Site in the following ways:

- Voluntarily Provided.*** In the course of visiting and using the Site, you may provide personal information. In the course of doing so, you may be asked for information about yourself, including your name, email address, mailing address, date of birth, or other personally identifiable information ("Personal Information"). You may also provide voluntary information when submitting an inquiry, asking us to provide information to you, or applying for a job. You may choose whether to disclose Personal Information, but you may not be able to use the Site without disclosing it. We may collect information you send us, use pseudonymous identifiers, aggregate it, and/or de-personalize it.
- Technologically Gathered.*** We may collect some information automatically as you navigate the Site. We may combine information about your use with information about others' use to generate aggregated information about visitors as a group. In particular, we employ Google Analytics and Facebook Pixels to collect user demographics, which helps inform us about our users' ages, genders, and preferences. We may also collect and store your IP address, your operating system version, your browser version, the pages you visit within the Site, the length of time you spend on pages within the Site, the site from which you linked to ours, search terms you used in search engines which resulted in you linking to the Site, etc. We may review this information and use it to view and create reports to assist us with analyzing our users' preferences and patterns.

We, as well as third parties such as Facebook, may use cookies, web beacons, and other storage technologies to recognize you or to collect or receive information from your use of the Site and elsewhere on the internet. We or third parties such as Facebook may aggregate the information collected through storage technologies with your information, and the information collected may be used to speed your use of the Site, to provide measurement services, or to provide targeted advertisements on the basis of legitimate interests.

1. "COOKIES" are small pieces of information that are stored by a user's internet browser on a user's computer's hard drive. Most internet browsers are initially set to accept cookies. You can set your browser to refuse cookies, but then you may not be able to access or use portions of this Site.
2. "WEB BEACONS" are small bits of code embedded in web pages or emails that assist in delivering cookies. Web beacons help us determine whether a page on this Site has been viewed and, if so, how many times. Although you cannot decline to receive web beacons when visiting a web page, you can choose not to receive web beacons by email if you disable HTML images or refuse HTML email messages, but you may not be able to experience all portions of the Site or service.
3. "LOG FILES": The Site server automatically recognizes the Internet URL from which you access this Site. We may also log your Internet protocol ("IP") address for system administration and troubleshooting purposes. (An IP address indicates the location of your computer on the Internet.)
4. FACEBOOK PIXELS AND GOOGLE ANALYTICS. We employ Google Analytics and Facebook Pixels to collect user demographics and online behaviors, which helps inform us about our users and their preferences. Our use of

Google Analytics is discussed below. We also share information about your use of the Site with our social media, advertising, and analytics partners.

## 2. **How We Use the Information**

Generally, we use information collected through the Site to enhance and personalize the Site, to communicate with you via email, to improve, administer, customize, and/or maintain the Site, to understand our users' preferences and patterns, and to carry out our obligations and enforce our rights. The disclosure of such information is on the basis of legitimate interests. We may use your depersonalized information to conduct market research and analysis for ourselves and for others or disclose information about demographics or use of our Site in a way that does not personally identify you. We may also use your Personal Information to contact you with service messages about our services or those of our affiliates. We will only email or text you with marketing information where you have consented to receive it. We do not use Personal Information to make automated decisions.

## 3. **Disclosure to Third Parties**

There are limited times when we may disclose your Personal Information, primarily to enforce legal rights or when authorized by you.

- a. **General Disclosures.** We may disclose your Personal Information in response to a subpoena or other court order, if otherwise required by law, or in an effort to cooperate with law enforcement. We may disclose your Personal information when we believe that doing so is necessary or desirable (a) to enforce our rights or defend against legal claims, (b) to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving personal threats to physical safety, allegations of intellectual property infringement or violations of privacy rights and/or (c) as otherwise required by law. We may disclose your Personal Information in the event of a sale of substantially all of the assets, the merger, dissolution, or reorganization, or in connection with the transfer of a discrete portfolio of assets or information of ScionHealth. If that happens, the new company's privacy policy may govern the further protection, use, and disclosure of your Personal Information.
- b. **Sharing Information.** Except as otherwise stated in this Privacy Policy, we do not currently share, sell, or rent your Personal Information with non-affiliated third parties so that they may offer, market, and advertise products and services directly to you. If you would like more information regarding your online choices, you can visit [www.aboutads.info/choices](http://www.aboutads.info/choices) or [www.youronlinechoices.eu](http://www.youronlinechoices.eu).
- c. **Opt-out / California Residents.** California Civil Code Section 1798.83 permits users of the Site who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. ScionHealth does not share personal information with third parties for direct marketing purposes unless specifically permitted herein. To opt out of having your personal information shared for direct marketing purposes, please send an email to [compliance@kindred.com](mailto:compliance@kindred.com), or write us at:  
  
ScionHealth  
Attn: Legal, California Privacy Request  
680 S. 4th Street  
Louisville, KY 40202-2412
- d. **Outside the EEA.** ScionHealth is based in the United States. By sharing your Personal Information with ScionHealth, you are transmitting your Personal Information outside the European Economic Area and to the United States. If ScionHealth shares your information with other persons or entities as described above, such recipients are also located outside the European Economic Area and in the United States.

## 4. **Basis for Processing Information**

We process data with your consent or when we have a legitimate basis for doing so.

## 5. **Managing Your Information**

***Your Rights, Generally.*** You have certain rights with respect to your Personal Information. We strive to provide you with access to your Personal Information that we hold so long as the burden or expense of doing so is not disproportionate to the risks to your privacy and where the rights of others would not be violated. Specifically, you have the right to access a copy of the Personal Information we collect from you and to verify, update, or correct it (including to have obsolete information removed); rectify, modify, erase, and/or export your Personal Information; object to the processing of your Personal Information; request data portability; and the right to lodge a complaint with the supervisory authority. To the extent we process your Personal Information based upon your consent, you have the right to withdraw your consent at any time by contacting us. You may also request information about how we have processed your Personal Information that we have retained, how we have used it, and to whom we have disclosed it by contacting us. The mechanisms below provide you with certain options about how to exercise control over your Personal Information:

- a. **Accessing, Modifying, or Deleting Your Personal Information.** You may request a copy of your Personal Information in electronic format and free of charge by sending us a written request. Upon your request, we will remove your Personal Information from our records related to this Site. If you wish to update/correct Personal Information or remove your Personal Information from our records, please send your request to us via email at [compliance@kindred.com](mailto:compliance@kindred.com) or via postal mail at:

ScionHealth  
Attn: Compliance, Online Records Update  
680 S. 4th Street  
Louisville, KY 40202-2412

- b. Opting Out. If you are in the European Economic Area, we will only send you marketing emails if you have given us your explicit consent. You may choose to opt out of receiving marketing emails from us at any time by sending your request to us via email at [compliance@kindred.com](mailto:compliance@kindred.com) or via postal mail at the address listed above, or by using the means (such as clicking "unsubscribe") provided in our emails.
- c. Do Not Track. Some browsers have a "do not track" feature that, when enabled, signals websites and online services that you do not wish to be tracked. We take no action in response to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking because there is still no acceptance standard for how to respond to them.

## 6. **Data Protection**

We take the protection of your Personal Information seriously. While we endeavor to safeguard your Personal Information, we cannot guarantee absolute security. You acknowledge and agree that we shall not be liable for any security breach that results from causes or events that are beyond our control, such as acts of God, hacking, terrorism, power outages, defects in third party security products and services, your own acts or omissions, and other similar events. Please be aware that no security measures are perfect or impenetrable, so security is not guaranteed.

## 7. **Cookies**

To make the visit to our website attractive and enable the use of certain functions to display suitable products or for market research, we use cookies on various pages. This serves to safeguard our legitimate interests in optimizing the representation of our offer that is predominant in the context of weighing our interests. Cookies are small text files that are automatically stored on your device. Some of the cookies we use are deleted after the end of the browser session, i.e., after closing your browser (session cookies). Other cookies remain on your device and allow us to recognize your browser on your next visit (persistent cookies). The duration of the storage can be found in the overview in the cookie settings of your web browser. You can set your browser so that you are informed about the setting of cookies and individually decide on their acceptance or exclude the acceptance of cookies for specific cases or in general. Each browser differs in the way he manages the cookie settings. This is described in the Help menu of each browser, which explains how to change your cookie settings. These can be found for the respective browser under the following links:

Internet Explorer: <https://support.microsoft.com/en-us/windows/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d>

Safari: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

Chrome: <https://support.google.com/chrome/answer/95647>

## 8. **Web Analytics**

For website analysis, this website uses Google Analytics, a web analytics service provided by Google LLC ([www.google.com](http://www.google.com)). This serves to safeguard our legitimate interests in optimizing the representation of our offer that are predominant in the context of weighing our interests. Google Analytics uses methods that allow you to analyze the use of the website, such as cookies. The automatically collected information about your use of this website is usually transmitted to and stored on a Google server in the United States. By activating IP anonymization on this website, the IP address will be shortened prior to transmission within the member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be sent to a Google server in the United States and shortened there. The anonymized IP address provided by Google Analytics within the framework of Google Analytics will generally not be merged with other data provided by Google.

Google LLC is headquartered in the US and is certified under the EU-US Privacy Shield. A current certificate can be viewed here. Under the agreement between the United States and the European Commission, the latter has established an appropriate level of data protection for companies certified under the Privacy Shield.

You can prevent the collection of the data (including your IP address) generated by the cookie and related to your use of the website from Google as well as the processing of this data by Google by downloading and installing the browser plug-in available under the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>. As an alternative to the browser plug-in, you can click on this link to prevent the collection by Google Analytics on this website in the future. An opt-out cookie is stored on your device. If you delete your cookies, you must click the link again.

## 9. **Data Retention**

We may keep your Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained.

## 10. **Children**

This Site is not intended for use by children under the age of 18 and we do not knowingly collect information from children under the age of 18 on this Site. If we discover that any information is collected from a child under the age of 18, such

information will be immediately removed from our Website. If you are concerned about your child's use of the Site, you may use web-filtering technology to supervise or limit access to the Site.

#### 11. **European Union**

For purposes of the General Data Protection Regulation, with respect to information collected through this Site, we are generally the data controller and you may contact us at the contact information set forth below. We use, process, or share your Personal Information upon the lawful basis of contract, consent, legal obligation, and/or our legitimate interests. We may use the services of third party data processors to process personal data in accordance with the purposes identified. We are based in the United States. Therefore, when we collect your Personal Information, it may be transferred to the United States and we process it in the United States.

#### 12. **Modifications to Privacy Policy**

We may modify this Privacy Policy from time to time in our sole discretion. If we make a material change to this Privacy Policy, we will post such changes on our Site. We may also notify you of the changes via email. By continuing to use our Site after such notice, you are bound by this Privacy Policy as modified.

#### 13. **Contact Information**

If you have questions about this Privacy Policy, you may contact us at: [compliance@kindred.com](mailto:compliance@kindred.com), via postal mail at ScionHealth at 680 S. 4th St., Louisville, KY 40202-2412, or toll-free at (800) 545-0749. We will use reasonable efforts to respond promptly to reasonable requests or questions you may have regarding our use of your Personal Information.