

## **MOMS Privacy Policy**

### **I. Introduction**

As a health technology company focused on connecting patients with timely and easy access to scheduling to obtain specimen collection for clinical laboratory testing services, and the coordination of such services between clinical laboratories and medical access points that participate in our network, your privacy is important to My One Medical Source, LLC (“MOMS,” “we,” “our,” or “us”). We are committed to respecting your privacy and maintaining the confidentiality of our users’ and visitors’ personal information (“user,” “visitor,” “you,” or “your”). This Privacy Policy outlines our personal information practices and procedures and the options you have for the way your personal information is collected, used, stored, and disclosed. This policy applies to information and data received and processed by MOMS through its website to provide MOMS products, services, and related support, as well as information collected for marketing purposes. All terms used in in this Privacy Policy shall have the same meaning as defined in the MOMS Terms of Service.

### **II. Scope of the Privacy Policy**

As described in this Policy, we may use and disclose your information to provide you with MOMS products and services and to provide support to and improve our products and services (the “Services”). In some instances, our use and disclosure of your personally identifiable information may include protected health information (“PHI”) as defined in the Health Portability and Accountability Act of 1996 (“HIPAA”), as amended. By using our Services, including any website, online service, or mobile application where this Policy is posted, you agree to the terms and conditions of this Policy and acknowledge that your information will be collected, used, stored, and disclosed in accordance with this Policy.

### **III. Information We Collect**

When you visit, use, download, register with, or log into our Services, we collect certain personally identifiable and nonpublic information regarding your use of and interaction with our Services. This may be information that you provide directly to us, information that we automatically collect, and information we receive from third parties. The types of information we collect and in what manner is described below.

#### *Information You Provide Directly to MOMS*

When you log into or register a user account with our Services, contact us regarding our Services, or submit comments or questions to MOMS you may provide us with personal contact information such as your name, mailing or billing address, ZIP code, health insurance information, payment related information, telephone number, email address, date of birth, and usernames and passwords.

You may also provide us with information related to the specimen collection and laboratory testing services you will receive from clinical laboratories and MAPS that participate in the MOMS Network. This information may relate to or identify your current health status or condition and inform us about your past or present medical conditions.

If you choose to not provide your personal contact and health information when requested by our website, MOMS will not be able to provide you our Services, with the information you requested, or respond to your comments or questions.

#### *Information We Collect Automatically*

We and our third-party partners (see below for more information) may use automated means to collect information about you, the device you use to access the Services, and your use of the Services. These automated data collection technologies include cookies, web log files, analytics tools, QR codes, and other

similar technologies. These technologies allow us to track and analyze user trends and interaction with the Services, administer and improve the Services, gather demographic information on our user base, and provide you with relevant and personalized information. This information may include:

- Location of your device/computer
- IP address
- ZIP code and location information of user through location tagged QR codes when scanned by user
- Information associated with your ISP and your accounts associated with your service providers
- The content you view or download, features you use, and date and time of your visits or logins

### Cookies and Analytics

MOMS may use cookies and other website analytics tools, such as Google Analytics, data collection, and third-party privacy tool technologies on the MOMS site and application. Some cookies may be set by third party service providers that MOMS uses to assist with providing website analytics and similar services. MOMS may use these technologies to: personalize and provide a more convenient browsing experience to you, including assisting in your navigation of the MOMS website and technical solutions; measure advertising and promotional effectiveness; analyze which pages on the MOMS website you visit, provide certain features on the MOMS website, and provide content from MOMS's third party content providers.

MOMS uses a privacy tool to monitor opt-out choices for users which are following an opt-out protocol. In that case, the opt-out tool signals to other companies not to use your browsing behavior when providing interest-based advertising, by setting their opt-out cookie in your browser. It's important to know that if you decide to clear your browser's cookies, this will remove the opt-out cookies set by these companies. You may need to re-access the opt-out tool to reset your preferences.

With your express consent, MOMS works with service providers which may track your activities on the MOMS website to improve MOMS's marketing efforts and provide you with third-party advertising based on your usage and demographic information. MOMS may not always perform such third-party advertising and such advertising may not be implemented or activated across all MOMS websites at all times. Before MOMS implements such third-party advertising that utilizes your personal information, in an application or on its site, or makes changes to such advertising, it will obtain your express consent to use your information for such advertising purposes. If you do not want to have your information collected and used for remarketing purposes, you can either choose to not provide consent to such uses or opt-out after having previously provided such consent.

Our Services use cookies to enhance your experience while using our site. A cookie is a file containing an identifier, a string of numbers and letters, that is sent by a web server to a web browser and is stored by the web browser. The identifier is then sent back to the server each time the browser requests a page from the server. Cookies may be either "persistent" cookies or "session" cookies. A persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date. A session cookie will expire at the end of the user session, when the web browser is closed. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

We also use cookies to track whether users have previously reviewed and accepted our Privacy Policy. This cookie allows us to determine whether to present the Privacy Policy for consent each time a user visits our website.

If you so choose you may refuse to accept cookies on your browser. Blocking all cookies may have a negative impact upon the usability of many websites. You may also delete cookies already stored on your browser. Deleting cookies may also have a negative impact on the usability of this Site and many other websites. If you block cookies, you will not be able to use all the features on our website.

### Social Media

Similarly, our website may include social media widgets to make it easy for users to interact with us on social media or like and share certain content. These features may include interactive mini-programs that run on our website, which may also collect your IP address, which page you are visiting on our website and other information about your use of website and applications and widgets, which are either hosted by a third party or directly on our website and link our website with social media accounts. Your interactions with these widgets and social media programs are governed by the privacy statement of the third-party company providing the widget or program.

### *Information we Receive from Third-Parties*

MOMS enters into business relationships with other entities to make our Services available to you. These include clinical laboratories, medical access points (MAPS) and other service providers and entities that contract with MOMS. These third-parties may have information about you that they are permitted to share with us when you use our Services. This may include your identity, other demographic information, your health status and condition, or other personal information. By receiving such information for our third-party partners when permitted it assists us in learning more about you and your preferences, so we can better direct and tailor our Services to you.

### *Protected Health Information*

MOMS is not a covered entity as that term is defined in HIPAA. However, some of our third-party partners are covered entities who maintain PHI about you. Some of the information that they share with us may constitute PHI. When they are permitted by HIPAA and their own privacy practices to share your PHI with MOMS, we have HIPAA business associate agreements in place to ensure that your PHI is maintained, used, and disclosed in a HIPAA-compliant manner. Further information about how your PHI is disclosed to MOMS, and used, disclosed, and maintained by MOMS, is below. To understand how and in what circumstances our third-party partners may share PHI with us, please refer to the Notice of Privacy Practices of the clinical laboratories and MAPS from which you obtain services.

## **IV. How We Use Your Information**

MOMS, and our third-party vendors acting on our behalf, may use the information we collect about you to provide our Services to you. This includes, but is not limited to, for the following purposes:

- Registering you to use our Services through a user specific account and allowing you to log into our Services, including the authentication of your identity and enable your access to the Services
- Responding to and fulfilling your requests and communications
- Sending authentication codes or contact you for multi-factor authentication
- Providing the Services to you, including administering, operating, and improving the Services
- Providing clinical laboratory and medical access point location information, directions, and appointment notifications based on your location
- Tracking user demographics, interests, and use of the Services
- Providing you with content and generating recommendations for your use of the Services,

- Customizing and personalizing the Services through the creation of tailored and personalized content
- Troubleshooting and resolving issues with your account or the Services
- Enabling us and our third-party vendors to display advertisements to you based through our website on your preferences, usage of website, clinical laboratories and medical access points used and selected, user profile, and demographic information with your consent
- To create de-identified and aggregated data about our users and customers for purposes of sharing such de-identified and aggregated data with third-parties
- Other commercial reasonable purposes related to the operation and performance of the Services

### *Marketing*

If you so choose and provide us with express opt-in consent, we may send you information about other third-parties' products and services. We may also send marketing emails to persons who have expressed an interest in using the MOMS Services or other third-party products or services, or whom we believe to otherwise be interested in such products or services. Typically, such consent to marketing is collected when you register as a user for our Services or otherwise provide us your information and consent through our website.

### **V. How We Share Your Information**

We may share and disclose your information in the following circumstances:

#### *Disclosures to our Third-Party Vendors*

MOMS may engage third-party vendors to provide services in connection with our Services on our behalf. When we do use third party vendors, we disclose only the personal information that is necessary to deliver the service, and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes. MOMS requires these service providers to have strong access controls, encryption key management, and other safeguards so that third parties only have appropriate access to achieve the intended business function.

#### *Disclosures to our Clinical Laboratory and MAP Partners*

MOMS will also share information with our third-party partners that provide personal information, including PHI, to us. These partners are clinical laboratories and MAPS that MOMS has contracts with to provide our Services in connection with specimen collection and clinical laboratory testing services We share information collected through our Services about your health status and condition assists our third-party partners in providing care, benefits and health services to you. When we share PHI back to our partners we do so in accordance with the requirements of HIPAA, including under the terms of HIPAA-complaint business associate agreements we have with our partners.

#### *Safety, Security and Compliance with Law*

We may share your information to the extent that it is required or permitted by law to do so. This may include complying with subpoenas and other legal processes, when necessary to enforce and protect our rights, including enforcing the terms of this Policy, responding to government requests or investigations, reporting unlawful activity, preventing and investigate fraud, and when necessary to protect the safety and security of our users.

### *Subsidiaries and Affiliates*

We may share your information with parent, affiliate, and subsidiary entities of MOMS unless otherwise prohibited by law or contract from doing so.

### *Corporate Transactions*

In the event MOMS is engaged in a sale, merger, dissolution, or other corporate transaction or restructuring, we may share your information to third parties in connection that transaction.

### *De-Identified and Aggregate Information*

We may create and share data about our Services and users that is de-identified and aggregated, including information on user demographics or usage. This de-identified data may be shared with third-parties.

### *HIPAA*

To the extent that we maintain PHI because of our agreements with our third-party clinical laboratory and MAP partners, we will only share PHI in accordance and compliance with HIPAA. We have entered into business associate agreements with all our third-party covered entity partners that limit our use and disclosure of your PHI to the minimum necessary to provide the Services to you. We have also agreed to be bound by the notice of privacy practices of each of our third-party health plan and provider partners. Please consult the notice of privacy practices for your selected clinical laboratories and MAPS to determine the scope and extent to which your PHI may be used and disclosed under their particular privacy practices.

### *Marketing*

With your consent, which you must expressly provide and opt into, we may share your information with third parties for marketing purposes for both our services and services of other third parties, except when otherwise permitted to market the services of our clinical laboratory and MAP partners in accordance with HIPAA or for advertising and marketing purposes that do not use your information.

## **VI. How We Store and Secure Your Information**

### *Security*

MOMS is committed to the security of its systems and privacy of its customers' data. MOMS is vigilant in protection of the information you provide from its loss, misuse, and unauthorized access or disclosure. MOMS utilizes servers operated and hosted on Amazon Web Services ("AWS"), which allows MOMS to access and utilize the security infrastructure and protections offered through AWS. **However**, no method of transmission over the Internet, wireless communication, or other method of electronic storage is 100% secure. Therefore, we cannot guarantee its security.

### *Data Retention and Portability*

MOMS will retain the personal information collected from you only as long as we need it to fulfill the purposes for which we have initially collected it, unless otherwise required by law. PHI will be maintained in accordance the requirements of HIPAA, our business associate agreements, and applicable law. MOMS may transmit such PHI back to our covered entity partners to meet such retention requirements when our use of the data is no longer necessary for our purposes. Information that is processed by MOMS users is stored for the minimum time necessary to process the information. This may include storage and retention of data for an unlimited duration of time so long as it is still being used in connection for the purposes for which it was collected. Information collected is used for marketing purposes until a customer

or prospect opts-out. In the event a user deactivates his/her account with the MOMS platform, all data the platform has collected will be automatically removed unless it otherwise needs to be retained as required by law or our contractual obligations.

Users who wish to export their personal data stored on the MOMS platform may submit a request via email to MOMS at [support@myonemedicalsource.com](mailto:support@myonemedicalsource.com) and receive any archived personal data regarding the user.

#### *Cloud and local storage of data*

Information that is acquired from third-parties, our website, or that is uploaded to the MOMS Platform is stored on servers operated which are hosted on AWS. These servers are located in the United States. Information stored with the MOMS Platform is subject to the terms, conditions, and security policies and procedures of AWS in addition to the terms and conditions in this Policy. You may review the AWS privacy policies here for more information. <https://aws.amazon.com/privacy/>

#### *HIPAA compliance*

PHI that MOMS receives, creates, maintains, uses and discloses is stored and maintained in a HIPAA compliant manner in accordance with the requirements of our business associate agreements with our covered entity partners. To the extent you are a self-directed user of MOMS who has not already been referred to a clinical laboratory or MAP by another covered entity, the health-related information you provide to MOMS will become subject to HIPAA upon your entering into a service relationship with one of the covered entity clinical laboratories or MAPS that participate in the MOMS Platform.

### **VII. Your Choices and Preferences**

#### *Accessing, changing, requesting your data*

You may indicate your desire to change your privacy preferences at any time. This includes the ability to request access to, correct, or delete any information that the MOMS has about you. Further, you may change your permissions for how we use your information and for what purposes. Depending on your request and the type of information involved, this section explains the various ways you may contact regarding your information privacy preferences and choices.

MOMS permits users to access and request their personal data submitted through our website. You may edit your personal information or change your privacy settings at any time either through the user preference settings in our web portals or by emailing a request to the MOMS at [legal@myonemedicalsource.com](mailto:legal@myonemedicalsource.com).

If you feel that personal information we have about you is incorrect or incomplete, you have the right to amend (through the privacy preference and user information settings in our application) or to ask us to amend your personal information. Your request for an amendment must be in writing, signed, and dated. It must specify the records you wish to amend, identify the global region, software, or tool that maintains those records, and give the reason for your request. You must address your request to the MOMS Privacy Officer at [legal@myonemedicalsource.com](mailto:legal@myonemedicalsource.com). We will respond to you within 30 days. We may deny your request; if we do, we will tell you why and explain your options.

To delete information that MOMS maintains about you in accordance with this policy, please email the MOMS Privacy Officer at [legal@myonemedicalsource.com](mailto:legal@myonemedicalsource.com). Such requests will be reviewed on a case-by-case basis and responded to within 30 days. MOMS will work with you to delete your information when possible without disrupting the provision of Services.

### *Account Preferences and Right to Request Restrictions*

Account preferences and settings may be made through our website through the privacy preference settings and menu options. However, changes to user login and email are not permitted through our self-service portals. Changes to your user login and email information can be made by contacting MOMS support at [support@myonemedicalsource.com](mailto:support@myonemedicalsource.com) with the change requested.

To the extent MOMS maintains PHI about you, you may request restrictions on how we use and disclose that PHI. Unless, the restriction relates to certain disclosures to health insurance companies and other payors for health care services that you have paid for completely out of pocket, we are not required to agree to your requested restrictions. To make such a request, please contact the Privacy Officer at [legal@myonemedicalsource.com](mailto:legal@myonemedicalsource.com).

### *Marketing*

Changes to your mailing list choices and changes to your contact information can be made via the MOMS Subscription Center. For more advanced modifications or if you cannot access the MOMS Subscription Center, you will need to request restrictions to processing of your information for marketing purposes by contacting the MOMS Privacy Officer at [legal@myonemedicalsource.com](mailto:legal@myonemedicalsource.com) with any change requests.

You may opt out of marketing communications by editing your preferences in the MOMS Subscription Center or by contacting the MOMS Privacy Officer at [legal@myonemedicalsource.com](mailto:legal@myonemedicalsource.com).

### *Complaints*

File a complaint with MOMS: If you believe your privacy rights have been violated by MOMS, you may file a complaint with the MOMS Privacy Officer. To file a complaint with MOMS, you must submit your complaint in writing. You'll find the contact details of our Privacy Officers below. You will not be penalized or have your use or access of the Services limited for filing a complaint.

## **VIII. Miscellaneous**

### *Third party websites, links, and services*

MOMS is not responsible for the Privacy Policy of other websites or applications to which we may link and makes no representations whatsoever about other websites or applications other than those included in the Services, including websites or applications that may contain a link to, or information about MOMS.

### *California Disclosures*

California law permits customers of MOMS who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such requests, please contact the Privacy Officer at [legal@myonemedicalsource.com](mailto:legal@myonemedicalsource.com).

We will provide a list of the categories of personal information, if any, disclosed to third parties during the immediately preceding calendar year for third-party direct marketing purposes, including the names and addresses of such third parties. This request may be made no more than once per year. We reserve the right to not respond to requests submitted to other than the email or mailing address above. Please address all such requests as "California Privacy Rights Request," and you must provide sufficient information about yourself to enable us to identify you and accurately respond to your request.

MOMS is committed to protecting your privacy and respecting your choices with respect to your information, however, we do not recognize or respond to browser-initiated "Do Not Track" signals as such standards are not currently implemented on an industry wide or consistent basis.

### *Age Requirements*

MOMS's Services are not directed to children under the age of 18, and children under the age of 18 are not eligible to use our Services. Protecting the privacy of children is important to us and we do not collect information from persons we actually know to be under 18 years of age. No part of our services is designed to be used by or to attract persons under 18 years of age. If we later learn that a child under the age of 18 has provided with their information through the Services, we will take steps to remove his or her information from our systems and servers and prevent the person from using the Services going forward.

### *International*

Only legal U.S. residents currently residing in the United States are permitted to use the Services. Importantly, the Services are not available to any persons currently residing in the European Union or other persons subject to the EU's General Data Privacy Regulation ("GDPR"). If you are using our Services from outside the United States, please be aware that you are sending information to the United States where our servers are located and that by using our Website and providing us with your data you are consenting to such a transfer. Information provided may then be transferred within the United States or back out of the United States to other countries outside of your country of residence, depending on the type of information. These countries (including the United States) may not necessarily have data protection laws as comprehensive or protective as those in your country of residence; however, our collection, storage, and use of your information will at all times continue to be governed by this Privacy Policy.

### *Changes to Privacy Policy*

MOMS may revise this Privacy Policy from time to time to reflect regulatory changes and changes to our business. Changes will be posted here with email notification to our users. If you disagree with our changes, you'll retain the right to opt-out or request deactivation of your account by sending an email to the MOMS Privacy Officer at [legal@myonemedicalsource.com](mailto:legal@myonemedicalsource.com).

### *Contact Information*

If you have any questions about this Policy or privacy-related questions that are not addressed in the MOMS Privacy Policy, please contact MOMS:

U.S. Contact Information:

My One Medical Source, LLC  
24700 Center Ridge Road  
Suite G50,  
Westlake, Ohio 44145  
Attn: Privacy Officer  
[legal@myonemedicalsource.com](mailto:legal@myonemedicalsource.com)