

 <b>aspenRxHealth</b>	<b>Policy &amp; Procedure</b>
Original issue date: 7/2/2019	Aspen P&P Number: PP – IS - 305
Subject: <b>Privacy Policy</b>	Current Effective Date: 8/2/2024
Department/Business Area: Information Security	Last Review Date: 8/1/2024
Approved By: Siviah Few	Original Effective Date: 7/2/2019
Policy Review Committee Approval Date: 8/1/2024	Next Review Date: 8/1/2025

**POLICY**            The purpose of this document is to detail Aspen RxHealth’s Privacy Policy as stated on the Aspen RxHealth’s website, <https://community.aspenrxhealth.com/privacy>, or the Alliance by Aspen RxHealth website.

**SCOPE**            All services and systems

**DEFINITIONS**    None

**OUR POLICY**        Welcome to the website of Aspen Health, Inc. ("Aspen RxHealth", "we", "us" and/or "our"). This Site is operated by Aspen RxHealth and has been created to provide information about our company and the services we offer to our Site visitors and users ("you", "your"), including licensed pharmacists who access our portal at community.aspenrxhealth.com, or alliance.aspenrxhealth.com (the "Pharmacist Portal", "Alliance by Aspen RxHealth", and collectively with our websites, the "Site"). This Privacy Policy sets forth our policy with respect to information including personally identifiable data ("Personal Data") and other information that is collected from visitors to the Site. This Privacy Policy describes how we collect, receive, use, store, share, transfer, and process your personal data. This Privacy Policy also describes your choices and rights with respect to your Personal Data, including your rights of access and correction of your Personal Data.

**INFORMATION WE COLLECT**    When you interact with us through the Site, we may collect Personal Data and other information from you, as further described below:

**Personal Data That You Provide Through the Site:** We collect Personal Data from you when you voluntarily provide such information, such as when you contact us with inquiries, respond to one of our prompts, or use certain Site functionality.

If you register with our Pharmacist Portal, we will collect Personal Data to create your profile and for related purposes, including, to verify your state license and to match you with patients. Such information includes demographic information such as your name, age, gender, and address, as well as applicable specialties and language skills. We may also require you to submit an audio recording of your voice.

By voluntarily providing us with Personal Data, you are consenting to our use of it in accordance with this Privacy Policy. If you provide Personal Data to the Site, you acknowledge and agree that such Personal Data may be transferred from your current location to the offices and servers of Aspen RxHealth and the authorized third parties referred to herein. Aspen RxHealth's authorized third parties, affiliates and agents' locations are varied but may be located in the United States, US Territories, and internationally.

#### **Other Information:**

Non-Identifiable Data: When you interact with us through the Site, we receive and store certain personally non-identifiable information. We may store such information itself or such information may be included in databases owned and maintained by our affiliates, agents, or service providers. The Site may use such information and pool it with other information to track, for example, the total number of visitors to our Site, the number of visitors to each page of our Site, and the domain names of our visitors' Internet service providers.

In operating the Site, we may use a technology called "cookies." A cookie is a piece of information that the computer that hosts our Site gives to your browser when you access the Site. Our cookies help provide additional functionality to the Site and help us analyze Site usage more accurately. On most web browsers, you will find a "help" section on the toolbar. Please refer to this section for information on how to receive notification when you are receiving a new cookie and how to turn cookies off. We recommend that you leave cookies turned on because they allow you to take advantage of some of the Site features.

Aggregated or De-Identified Personal Data: In an ongoing effort to better understand and serve the users of the Site, we often conduct research on its customer demographics, interests and behavior based on the Personal Data and other information provided to us. This research may be compiled and analyzed on an aggregated and/or de-identified basis, and we may share this aggregated and/or de-identified data with its affiliates, agents, and business partners. This aggregated and/or de-identified information does not identify you personally. We may also disclose aggregated and/or de-identified user statistics and other metrics related to our Site in order to describe our products and services to current and prospective business partners, and to other third parties and for other lawful purposes.

Analytics and Tracking Technologies: We may allow third party service providers to use cookies (as noted above) or other tracking technologies to collect information about your browsing activities over time and across different websites following your use of the Site. For example, we may use Google Analytics, a web analytics

service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help us analyze how users use the Site and enhance your experience when you use the Site, as well as provides us with certain information about your location. For more information on how Google uses this data, go to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). We may also track your geological location. Our Site currently does not respond to "Do Not Track" (DNT) signals and operates as described in this Privacy Policy whether a DNT signal is received. If we do so in the future, we will describe how we do so in this Privacy Policy.

OUR USE OF  
YOUR  
PERSONAL  
DATA AND  
OTHER  
INFORMATION

We use the Personal Data you provide in a manner that is consistent with this Privacy Policy. If you provide Personal Data for a certain reason, we may use the Personal Data in connection with the reason for which it was provided. For instance, if you contact us by email, we will use the Personal Data you provide to answer your question or resolve your problem. Aspen RxHealth and its subsidiaries and affiliates (the "Related Companies") may also use your Personal Data and other personally non-identifiable information collected through the Site to help us improve the content and functionality of the Site, to better understand our users and customers and to improve our products and services. Aspen RxHealth and its affiliates may use this information to contact you in the future to tell you about product or services we believe will be of interest to you. If we do so, each marketing communication we send you will contain instructions permitting you to "opt-out" of receiving future marketing communications. In addition, if at any time you wish not to receive any future marketing communications or you wish to have your name deleted from our mailing lists, please contact us as indicated below.

Certain other ways we may use your Personal Data are as follows:

- To present the Site and its contents to you.
- To troubleshoot problems with the Site, or any services.
- To enforce the [Site Terms of Use](#), [Pharmacist Portal Terms and Conditions](#), and to detect and protect against error, fraud and other unauthorized or illegal activities.
- To attempt to contact you regarding safety issues.
- To provide any legitimate business service or product.

OUR  
DISCLOSURE OF  
YOUR  
PERSONAL  
DATA AND  
OTHER  
INFORMATION

There are certain circumstances in which we may share your Personal Data with certain third parties without further notice to you, as set forth below:

Business Transfers: As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data may be part of the transferred assets.

Related Companies: We may also share your Personal Data with our Related Companies for purposes consistent with this Privacy Policy.

Agents, Consultants and Related Third Parties: Aspen RxHealth, like many businesses, sometimes hires other companies to perform certain business-related functions. Examples of such functions include mailing information, maintaining

databases and processing payments. If you apply to use the Pharmacist Portal, we may share your information with third parties who perform functions related to the Portal. For example, we may provide your Personal Data to Checkr or another service provider for the purpose of conducting background checks, as well as with our service providers who verify your credentials and provide continuing education courses and materials. When we employ another entity to perform a function of this nature, we only provide them with the information that they need to perform their specific function.

Legal Requirements: We may disclose your Personal Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of Aspen RxHealth, (iii) act in urgent circumstances to protect the personal safety of users of the Site or the public, or (iv) protect against legal liability.

#### YOUR PRIVACY RIGHTS & CHOICES

You can visit the Site without providing any Personal Data. If you choose not to provide any Personal Data, you may not be able to use certain functionality on the Site. You have the right to:

- Request access, correction updates, or deletions of your Personal Data.
- Withdraw consent.
- Data portability.
- Non-discrimination.
- Not have sensitive personal information processed.

To exercise these rights, contact [compliance@aspenrxhealth.com](mailto:compliance@aspenrxhealth.com).

To protect your personal information, we may verify your identity using a method appropriate to the type of request you make. Depending on where you reside, you may be entitled to empower an authorized agent to submit requests on your behalf. We will require authorized agents to confirm their identity and authority in accordance with applicable laws. You are entitled to exercise the rights described free from discrimination.

We will respond to your request to change, correct, or delete your data within a reasonable timeframe and notify you of the action we have taken. In some instances, your rights may be limited, such as where fulfilling your request would impair the rights of others, our ability to provide a service you have requested, or our ability to comply with our legal obligations and enforce our legal rights.

#### CALIFORNIA PRIVACY RIGHTS

This section is applicable to California consumers and describes your rights and how we collect, use, and share California Consumers' Personal Information. For the purposes of this section, "Personal Information" and "Sensitive Personal Information" is defined in accordance with the California Consumer Privacy Act (CCPA) Civil Code Section 1798.140, as amended by the California Privacy Rights Act (CPRA) of 2020.

You have the right to know, delete, opt-out of sale or sharing, correct and limit use and disclosure of your sensitive personal information. This includes the following:

- Ask us to disclose what personal information we have about you and what we do with that information.
- Ask us to delete your personal information.
- Direct us not to sell or share your personal information.
- Ask us to correct inaccurate information that we may have about you.
- Limit our use and disclosure of your sensitive personal information.

You also have the right to be notified, before or at the point where we collect your personal information. We will not discriminate against you for exercising your rights under the CCPA, nor will we make you waive these rights.

- We will not sell or share California Personal Information. We may share California Personal Information as required by law.
- We will not combine the California Personal Information included in Customer Data with personal information that we collect or receive from another source.
- We will comply with obligations applicable to us under the CCPA and provide California Personal Information with the same level of privacy protection as is required by the CCPA.
- You will have the right to take reasonable and appropriate steps to help ensure that we use California Personal Information in a manner consistent with our obligations under the CCPA.
- Upon notice, you will have the right to take reasonable and appropriate steps in accordance with the Agreement to stop and remediate unauthorized use of California Personal Information.

**EXCLUSIONS** This Privacy Policy shall not apply to any unsolicited information you provide to us through the Site or through any other means. This includes, but is not limited to, information posted to any public areas of the Site, any ideas for new products or modifications to existing products, and other unsolicited submissions (collectively, "Unsolicited Information"). All Unsolicited Information shall be deemed to be non-confidential, and we shall be free to reproduce, use, disclose, and distribute such Unsolicited Information to others without limitation or attribution.

**CHILDREN** We do not knowingly collect Personal Data from children under the age of 13. If you are under the age of 13, please do not submit any Personal Data through the Site. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children never to provide Personal Data on the Site without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Data to us through the Site, please contact us, and we will endeavor to delete that information from our databases.

**LINKS TO OTHER WEB SITES** This Privacy Policy applies only to the Site. The Site may contain links to other web sites not operated or controlled by Aspen RxHealth (the "Third Party Sites"). The policies and procedures we described here do not apply to the Third-Party Sites. The links from the Site do not imply that Aspen RxHealth endorses or has reviewed the Third-Party Sites. We suggest contacting those sites directly for information on their privacy policies.

SECURITY	<p>We take commercially reasonable steps to protect the Personal Data provided via the Site from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or email transmission is ever fully secure or error free. In particular, email sent to or from the Site may not be secure. Therefore, you should take special care in deciding what information you send to us via email. Please keep this in mind when disclosing any Personal Data to us via the Internet</p>
OTHER TERMS AND CONDITIONS	<p>Your access to and use of the Site is subject to the Terms of Use at <a href="https://community.aspenrxhealth.com/termsfuse">https://community.aspenrxhealth.com/termsfuse</a> by accessing the Terms and Conditions or the Platform Terms of Use located on the Alliance login page located on <a href="https://alliance.aspenrxhealth.com">https://alliance.aspenrxhealth.com</a>.</p>
CHANGES TO OUR PRIVACY POLICY	<p>The Site and our business may change from time to time. As a result, at times it may be necessary for us to make changes to this Privacy Policy. We reserve the right to update or modify this Privacy Policy at any time and from time to time without prior notice. Please review this policy periodically, and especially before you provide any Personal Data. This Privacy Policy was last updated on the date indicated above. Your continued use of the Site after any changes or revisions to this Privacy Policy shall indicate your agreement with the terms of such revised Privacy Policy.</p>
ACCESS TO INFORMATION: CONTACTING US	<p>To keep your Personal Data accurate, current, and complete, please contact us as specified below. We will take reasonable steps to update or correct Personal Data in our possession that you have previously submitted via the Site. Please also feel free to contact us if you have any questions about our Privacy Policy, the information practices of the Site, or to opt-out.</p> <p>You may contact us as follows: <a href="mailto:compliance@aspenrxhealth.com">compliance@aspenrxhealth.com</a>.</p>
RELATED POLICIES AND PROCEDURES	<p>None</p>
REFERENCES	<p> <a href="https://community.aspenrxhealth.com/privacy">https://community.aspenrxhealth.com/privacy</a>  <a href="https://community.aspenrxhealth.com/terms">https://community.aspenrxhealth.com/terms</a>  <a href="https://community.aspenrxhealth.com/termsfuse">https://community.aspenrxhealth.com/termsfuse</a>  <a href="https://alliance.aspenrxhealth.com/termsfuse">https://alliance.aspenrxhealth.com/termsfuse</a>  <a href="https://alliance.aspenrxhealth.com/privacy">https://alliance.aspenrxhealth.com/privacy</a>            California Consumer Privacy Act (CCPA) of 2018            California Privacy Rights Act (CPRA) of 2020         </p>
ATTACHMENTS	<p>Revision History Template</p>

**ATTACHMENT A**Revision History Table

<b>Date</b>	<b>Status</b>	<b>Revision Description</b>	<b>Author(s) of Revision</b>
7/2/2019	Policy development	Initial policy	Legal/Counsel
1/3/2022	Review	Annual review. No changes.	Compliance Committee
6/8/2022	Revision	Created standalone privacy policy in approved Aspen RxHealth P&P template.	S. Few
1/5/2023	PRC Review	N/A	PRC approval
5/12/2023	Revision	Added language regarding third-party associates. Added language regarding California Consumer Protection Act (CCPA) and California Privacy Rights Act (CPRA).	S. Few
5/24/2023	PRC Review	N/A	PRC approval
7/17/2024	Annual Review	Update to CCPA Privacy Section.	S. Few
8/1/2024	PRC	Committee approval with additional changes to be added after web application launch.	PRC approved