



LAST MODIFIED: August 2nd, 2023

Medesto Privacy Policy

Perigon Health 360 (“Perigon Health 360,” or “We”, or “Us”) respects your privacy and is committed to safeguarding your personal information. This Privacy Policy explains what information we collect and how it is used and shared when you use the Medesto online web application (“The Site”), the Medesto mobile applications and all related services, features or tools (collectively, “Services”). This Privacy Policy also describes how we use and disclose such information and how you can control your information. By using these Services, you acknowledge that you agree to the terms of this privacy policy and the Terms of Use.

UPDATES TO THIS PRIVACY POLICY

We may periodically update this Privacy Policy. If we make any changes, any modified privacy policy will be posted on the Site and the “LAST MODIFIED” date will be revised. Your continued use of the Site after the effective date of any modification, means you accept and agree to be bound by the updated Privacy Policy. It is your responsibility to periodically check the Site to review the latest policy and understand how your personal information is being collected, used and shared.

THIRD PARTY WEBSITES

The Site may contain links to other websites that are owned or maintained by other companies or organizations (“Third Party Websites”). We are not responsible for the privacy practices or the content of any Third Party Websites. Please review the privacy policies for any Third Party Websites and avoid clicking external links if you are unfamiliar with the Third Party Website. The information practices of Third Party Websites are not covered by this Privacy Policy.

INFORMATION COLLECTED

The personal information that we collect about you is any information that specifically identifies you and your connection to our Services.



Personal Information that We Collect May Include:

- CONTACT INFORMATION - Including your name, username, email address, mailing address, phone number, DOB, and Medical Record Number (MRN)
- DEMOGRAPHIC AND OTHER INFORMATION - Including gender, race, ethnicity, and date of birth
- ORGANIZATION AND PROVIDER INFORMATION - Including National Provider Identifier (NPI), organization-provided employee identification numbers, and the name of the organization/provider
- MEDICAL INFORMATION - Including blood pressure readings, pulse oximeter readings, and medical records, and weight
- DOCUMENTS AND FILES - Including any documents or other files that you upload, or are uploaded on your behalf, to the Services

The non-personal information that we collect cannot be used to identify you specifically.

Non-Personal information that We Collect May Include:

- The Internet Protocol (IP) address(es) that you use to access our network
- The mobile device type and version you use to access our services
- Time zone
- Device Information
- Usage data about how you interacted with our Services including how long you spent on each screen and your access times

Personal Information that we collect may fall under Personal Health Information (PHI) which is regulated by HIPAA. We will take all reasonable and appropriate measures to safeguard any collected PHI and follow all HIPAA regulations pertaining to storing, processing or transmission of that PHI.



HOW WE COLLECT INFORMATION ABOUT YOU

Information that we collect may come from various sources including information that you may directly provide to us, that is collected from an entity on your behalf, or that is collected automatically by your use of our Services.

By using the Services and submitting Personal Information, you consent to the collection and use of your Personal Information by Perigon Health 360 as described in this Privacy Policy.

In addition, when you use the Services, our web servers may collect Non-Personal Information by using technology that can recognize, collect, log and transmit information that is associated with you, but that cannot identify you personally. This technology, referred to as “cookies”, specifically refers to a small data file that is stored by your browser on your device for record keeping purposes and to enhance the quality of service and the user experience that you receive. Cookies can be read by the Site when your browser connects to one of our web servers. Cookies contain numbers and letters that can uniquely identify your device along with other information. Cookies are used to customize websites based on the content you view and the preferences you have indicated.

HOW WE USE COOKIES

We may use cookies to perform the following actions:

- Track your interactions with the Services including the pages you visit, the links you click on and other similar usages
- Gather device information or other identifiers when you use the Services
- Allow you to sign-on to the Services
- For security purposes
- Analyze the performance of our Services
- Personalize information and features of our Services to different segments of our customer base
- Associate individuals with their profiles
- Track your status and preferences or other information provided that you provide



Please note that you can view, control, reject and delete your cookies at any time by going to your browser settings. If you choose to reject or delete cookies, this could affect the Services and you may be unable to access certain features or all of the Services.

HOW WE USE INFORMATION COLLECTED

We use information collected or obtained when you use the Services, including Personal Information for the purposes set out below:

- Monitoring patient medication adherence and device adherence
- Assisting patients with their medication adherence and device usage by monitoring schedules and sending reminders via app notifications, text messages, or emails
- Allowing Healthcare Providers with valid Business Associate Agreements to Monitor Patient Health Information including, but not limited to blood pressure readings and pulse oximeter readings
- Contacting you by telephone, including SMS text, and/or email to inform you of services or send you surveys and notifications
- Integrating patient data between the online web application and the mobile applications
- Generating statistical reports
- Monitoring medication adherence and patient device usages
- Providing you with relevant medical-related content, tools or communications
- Marketing research
- Responding to feedback, questions, and communications about our Services
- For other purposes when we have obtained your permission
- Maintaining and supporting new and existing functions and materials on the Services
- Providing and sending requested devices and medications to your physical address
- For billing purposes and account management
- To verify your identity using your email and/or phone number



DATA SECURITY

We will maintain appropriate administrative, physical, and technical safeguards for the protection of customer data

DISCLOSURE OF INFORMATION TO THIRD PARTIES

We may share your Personal Information to third parties under the following instances:

- If a third party healthcare provider has signed a business associate agreement, they will have access to personal information for any users that receive their services (examples include pharmacies or doctor's offices)
- We may share Personal Information with our service providers that support in the performance and communication of our Services including hosting and maintenance, data storage, customer management and disaster recovery
 - We limit any personal information that is shared with our service providers to what is reasonably necessary to perform their service
- If there is an account administrator with administrative rights over your account

We also reserve the right to make your Personal Information available in the following instances:

- To comply with any applicable law, regulation, a court or other legal process, an enforceable government request, or when we believe in good faith that the law requires us to do so
- When it is necessary or useful for us to conduct our business, as long as the use is permitted by law and does not violate HIPAA regulations
- To protect our property or the health, safety, security, interests, or rights or those of others
- To defend our interests, resolve problems or investigate and respond to inquiries

CALIFORNIA PRIVACY RIGHTS



If you are a resident of the State of California, and processing information about you falls under the California Consumer Privacy Act of 2018 (CCPA), you have the following rights with respect to your collected information:

- The Right to Know and Access - You have the right to request information about what Personal Information we collect about you and see how it is processed and shared, subject to certain restrictions.
- The Right to Opt-Out - You have the right to request information about what Personal Information we collect that we sell or disclose to third parties and request that we stop selling or sharing your personal information, subject to certain restrictions.
- The Right to Delete - You have the right to request that we delete your Personal Information if you no longer consent to your data being processed, subject to certain restrictions. You acknowledge that deleting Personal Information may affect your experience with the Services.
- The Right to Correct - You have the right to request updates or corrections to your Personal Information that you believe is inaccurate or incomplete
- The Right to Non-Discrimination - You have the right to be free from discrimination for exercising your rights under the CCPA.

We collect Personal Information from the following categories of sources:

- Information that you provide directly and indirectly based on the products and services that were provided to you
- Information that you provide directly and indirectly based on your activity and usage of our Services
- Information from third parties that interact with us, or provide information on your behalf in connection with the services we provide (including pharmacies and doctor's offices).

We may disclose your Personal Information related to any products or services that we provide you with to third parties or service providers to whom you, an authorized agent, or an entity acting on your behalf has authorized us to disclose your Personal Information. We require all third parties to adhere to all applicable laws regarding Personal Information and



respect the security of your Personal Information. The following is types of Personal Information that we may share with third parties:

- IDENTITY INFORMATION - Including your first name, last name, gender, race, ethnicity, Medical Record Number (MRN), and similar identifiers
- CONTACT INFORMATION - Including email addresses, physical addresses, and phone numbers
- DEMOGRAPHIC - Including gender, race, and ethnicity
- ORGANIZATION AND PROVIDER INFORMATION - Including National Provider Identifiers (NPIs), organization-provided employee identification numbers, certifications and licenses, the name of the organization/provider
- MEDICAL INFORMATION - Including blood pressure readings, pulse oximeter readings, and medical records, weight
- DOCUMENTS AND FILES - Including any documents or other files that you upload, or are uploaded on your behalf, to the Services
- TECHNICAL INFORMATION - Including login data (emails and passwords), access dates and times, browser activity, cookie data, Internet Protocol (IP) addresses, geolocation data, cookie data, browser activity, interactions with our Services
- PERSONAL RESPONSES - Including feedback, and survey responses.
- NON-COVERED MEDICAL INFORMATION - Medical Information not governed under the Health Information Portability and Accountability Act (HIPAA) or the Confidentiality of Medication Information Act Part 2.6.

To exercise your rights to privacy listed above, please contact us at:

support@perigonhealth.org

CHILDREN'S PRIVACY

The Services are not intended or targeted to children and we do not knowingly collect Personal Information on our Services about children under the age of 13. If we become aware that a child is using the Services or has disclosed Personal Information to us without proper parental consent, we will destroy all disclosed information.



QUESTIONS OR CONCERNS

Please direct any questions or concerns about our Privacy Policy to:
support@perigonhealth.org