

# ONLINE PRIVACY POLICY

Populytics, Inc. is committed to maintaining the highest standards of information privacy and security. Any personal information collected in forms on our website or that is available through the use of our portals is kept private and confidential.

The methods we employ to collect, store and share personal information through our portals and websites are described herein. In addition, the Terms and Conditions of Use for Populytics' websites, applications or services can be found at the following link: [Terms and Conditions of Use](#)

Your access and/or use of any Populytics' websites, applications or services constitutes your acceptance of the associated confidentiality, privacy and security practices as well as any other terms and conditions referenced therein.

## **Types and Uses of Information Collected**

When you request information from Populytics through an online request form, you may be asked to provide personal information including your first name, last name and your email address. A request for information may include but not be limited to filling out a form on [www.Populytics.com](http://www.Populytics.com) to request information about one of our services, registering to attend an event or class held by Populytics, submitting a question, registering for an account and/or updating or creating a profile on [www.Populytics.com](http://www.Populytics.com) or [www.MyPopulytics.com](http://www.MyPopulytics.com). The information that you provide will be used to follow-up with you on your request. In order to respond appropriately, more information may be requested including but not limited to your postal address, telephone number and contact preferences.

When you submit information digitally to Populytics, such as through online forms on [www.Populytics.com](http://www.Populytics.com), technical information like your browser type or IP address may be collected to ensure technical functionality or to address any inappropriate use of our website. We use this information in aggregate form to understand how our websites, online advertisements and other digital content are being used and how to better adjust them to serve visitors to our sites.

## **Storage and Access of Information Collected**

Populytics may access collected customer information for the purposes of providing requested and related services, preventing or addressing service or technical problems, preventing or addressing customer support matters, or as may be required by law. The personal information provided is securely stored and is only accessible by staff members with a business need to access and use that information. Your information will be retained for as long as your account is active or as needed to provide you

services, comply with our legal obligations, resolve disputes, and enforce our agreements.

### **Use of Information Collected by 3<sup>rd</sup> Parties**

Populytics may share minimum necessary information collected with other companies that work on Populytics' behalf in order to further the purpose for which you provide the information, such as fulfilling information requests, forwarding complaints, or if release is required by law or is pertinent to judicial or governmental investigations or proceedings. For the exception of required by law requests, Populytics has policies in place to ensure that the appropriate agreements have been executed with a third party prior to disclosing data. Populytics does not share, sell, rent, or trade personally identifiable information with third parties for their promotional purposes.

Information collected may be matched or merged with general market data, such as that licensed for business use by Experian, Inc. or collected through claims, in order to build segmented profiles of customers for marketing and market research purposes. These segments do not identify personally identify customers.

### **Links to Third Party Sites**

We may provide links to third party sites on this website that we have an affiliation or partnership with and/or that we feel may be beneficial for your health and wellness needs. When you access the third party sites, you are responsible for reviewing each site's associated privacy or security policies as well as the associated terms for use. As such, your continued use of third party sites linked on this site constitutes your approval of said privacy and security policies/practices.

### **Cookies, Online Advertising and Other Tracking Technology**

Populytics uses common Internet technologies, such as cookies, website statistics tracking through Google Analytics, display and pay-per-click advertising (including remarketing) through Google AdWords and customer relationship management (CRM) marketing tools to keep track of interactions with our network. These technologies may be in place and active on Populytics' websites, applications or services.

Cookies, web beacons/pixel tags, log files and other technologies may be used to collect information about visitors to our website, use of our online services, and interactions with our emails, advertisements and other marketing content. Collected information may include, but not be limited to, browser type, operating system and IP address. This data may be merged with your behavior and interaction data, such as what pages you viewed or links you clicked. Collecting this information, and at times linking it with personally identifiable information that you have provided to us, helps customize our websites, applications and services to suit your needs.

Statistics that show the daily number of visitors to our sites, the daily requests we receive for particular files on our websites, and what territories or regions those

requests come from are compiled on a frequent basis for the purposes of improving our websites, applications and services. These aggregated statistics are used internally and may also be provided to others, including Populytics contracted vendors or those involved with managing this site, your Internet service provider, the registered owner of the computer device that you are using to access this site, advertising networks, the host of any web browsers (e.g., Internet Explorer and Chrome) used to access this site and any of the aforementioned third parties contractually or legally authorized to receive the information. These statistics do not contain personally identifiable information and cannot be used to gather such information.

Third party advertising networks may be used in our marketing activities. These advertisers and ad networks may use technology, such as cookies and web beacons/pixel tags, in order to track the effectiveness of our advertisements. These technologies will also send these advertisers and ad networks information including your IP address, ISP, browser type, and whether you have Flash installed. These advertisers and ad networks also may use anonymous demographic and preference data received from third parties to assist in the delivery of advertisements to you. Relevant advertisements may be shown to you by these providers based on your online behavior, search activities and demographic information.

## **Your Communication and Tracking Preferences**

### **Changing or updating your personal information**

You may change or update your personal information and/or health-related personal information at any time using the following options:

- Accessing your personal profile and changing it on [www.MyPopulytics.com](http://www.MyPopulytics.com).
- Contacting us using the methods outlined on [www.Populytics.com](http://www.Populytics.com), [www.MyPopulytics.com](http://www.MyPopulytics.com) or the back of your ID card.

### **Removing or deleting your personal information**

You may remove previously provided personal and/or health-related personal information at any time using the following option:

- Contacting us using the methods outlined on [www.Populytics.com](http://www.Populytics.com), [www.MyPopulytics.com](http://www.MyPopulytics.com) or the back of your ID card. If you contact us via email at [info@populytics.com](mailto:info@populytics.com), please refrain from providing health related information unless you have taken precautions to encrypt the communication. All electronic communications containing health related information or inquiries should be submitted through the secure messaging features available in [www.MyPopulytics.com](http://www.MyPopulytics.com) as outlined in the "Contact Us" link.

Please be aware that it may not be technically possible to remove or delete all of the information that you have provided to us. We take frequent back-ups of our systems to protect information from inadvertent loss. This means a copy of your personal information may exist in a non-erasable form that may be difficult or impossible to locate. Upon receiving your request, we will try to remove or delete all personal

information and/or health-related personal information stored in the databases that we use for research and daily business activities. We will not disclose any personal information stored in a non-erasable format after receiving your request for removal, except as required by law.

Additionally, there may be restrictions on your ability to correct, update or remove the information that you have entered into your personal and/or health-related personal record. If your doctor or another health care professional has access to add information to your record, your personal record could be considered an official medical record for legal purposes. In this case, information cannot be deleted or removed, only updated or annotated.

### **Opting out from Promotional Communications**

When you contact us or register with our site, you may opt to receive e-mails, text messages (SMS), phone calls and/or other mailings, including but not limited to announcements of new services or events, and products and newsletters on relevant health and wellness topics.

If you opt-in to receive promotional communications, you can choose to opt-out at any time by sending us an inquiry through one of the methods mentioned on this site. Your request to unsubscribe or stop receiving promotional communications will only be limited to this site. If you wish to opt-out of any other services or programs that are offered by Populytics or you need assistance with managing your preferences, please contact us via one of the methods identified in the "Contact Us" section of this policy.

Please note that by disabling or opting-out from the use of these communications or technologies, you may not be able to take full advantage of the features and information from websites, applications or services provided by Populytics.

### **Opting out from Tracking Technologies**

You can set your Internet browser settings to block cookies, to receive notice when you receive a new cookie, to delete existing cookies, and to omit images (which will disable pixel and other invisible tracking tags that may be in use) and/or to send a "Do Not Track" request with your browsing traffic. These settings will vary depending on your browser. Note that the opt-out will apply only to the browser and the device that you are using when you adjust your tracking settings or cookie preferences. If you switch from Internet Explorer to Google Chrome browser, for example, the tracking may be put back in place. Additionally, our system may not respond to Do Not Track requests or headers from some or all browsers.

Please note that by disabling or opting-out from the use of these communications or technologies, you may not be able to take full advantage of the features and information provided on Populytics' websites, applications or services.

## **Information Privacy and Security Program/PHI**

Populytics has implemented a comprehensive information privacy and security program to ensure the availability, privacy, security and integrity of its data, as required by federal privacy and security regulations.

PHI is stored and made electronically available based on the terms of the license agreement and/or terms and conditions required for registration prior to the creation or use of any accounts.

Prior to utilizing this website and/or any other Populytics' applications, we recommend that keep your computer or mobile device up to date with the latest security updates, including but not limited to anti-virus software, as well as any other software that may be used to protect unauthorized access to your data. Certain applications or tools provided by Populytics provide the ability to access, print or download health information that is confidential or sensitive in nature. As a result, we recommend that you refrain from connecting to or printing to a public or unsecured network that may become vulnerable for re-disclosure.

## **Children's Online Privacy Protection Act (COPPA)**

Children under the age of 13 are not allowed or encouraged to register on Populytics' websites, applications or services. As such, we do not actively market our websites, applications or services directly to children.

## **Governing Law**

Governing law regarding access and the collection and/or protection of your information on this site is administered in accordance with the Commonwealth of Pennsylvania as well as federal privacy and security laws that govern the types of data. All disputes related to the use of this site shall be subject to the jurisdiction of state and federal courts located in the Commonwealth of Pennsylvania.

Data maintained or collected on this site and any third party sites linked to this site is only stored in the United States. As such, this site is only intended for use/access within the United States. If you reside outside of the United States and either use this site and/or provide us with your personal information, you consent to the transfer of personal information outside of your country of residence to the United States.

## **Updates to Our Privacy Policy.**

This policy was last updated in August 2021.

Populytics reserves the right to modify our policy at any time by making updates to this page. Any modifications made to this page and the policy outlined shall be effective immediately upon being posted. It is your responsibility to review this Online Privacy Policy and/or any linked sites that you access upon entry. Your continued use of any

Populytics' websites, applications or services following the posting of the updated policy will mean that you agree to the modified policy for the use of these resources.

### **Contact Us**

US Mail: 707 Hamilton Street, Sixth Floor, Allentown, PA 18101

Phone: 866-733-6158

Email: [info@populytics.com](mailto:info@populytics.com)