Introduction

RheumAnalytics, LLC (the “Company” or “we”) respects your privacy and is committed to protecting it through our compliance with this Privacy Policy. This Privacy Policy describes the types of information we may collect from you or that you may provide when you use our application, the RhEumAtic Disease ActivitY (READY) application (the “App”), and our practices for collecting, using, maintaining, protecting, analyzing and disclosing that information. As you are aware, the App is intended for in-office use with the doctor(s)’ offices and individual doctor(s) responsible for your treatment, as well as such doctor(s)’ medical and administrative staff, with whom we do business (such offices, doctors and staff each referred to in this Privacy Policy as your “Doctor” and collectively referred to in this Privacy Policy as your “Doctors”). Additionally, the App may be integrated with your Doctor’s electronic health record or similar application or software (an “EHR Application”), if your Doctor chooses to integrate the two. Thus, this Privacy Policy also covers our treatment of any information about you that we collect from your Doctors or receive from any EHR Applications used by your Doctor or that we share with your Doctors and such EHR Applications.

This Privacy Policy applies to information we collect through the App from you, as well as information about you that we collect through the App from your Doctors or an EHR Application used by your Doctor. It does not apply to information collected by us outside of the App or through any other means, including on any website or through any other application operated or provided by the Company or any third party. It also does not apply to information collected by any third party, including information collected through any other application or content that may be accessible from or through the App (if any).

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. By accessing or using the App, you are accepting and agreeing to be legally bound by this Privacy Policy and thus are expressly consenting to our collection, use, maintenance, protection, analysis and disclosure of your information as described in this Privacy Policy. This Privacy Policy may change from time to time. Your continued use of the App after we make changes to this Privacy Policy is deemed to be an acceptance of those changes, so please check this Privacy Policy periodically for updates.

Collection of Your Information

We collect several types of information from and about users of the App, including the following:

- Information by which you may be personally identified, such as your name, address and any other information by which you may be contacted online or offline (collectively, “personal information”);
• Information that is about you but individually does not identify you, such as your date of birth, gender and medical record number, information related to your Doctors and your appointments with such Doctors (such as the name of a Doctor, the relevant National Provider Identifier for your health care provider and the date of an in-office visit to a Doctor), and medical record information related to your health and medical treatment (such as your height, weight, medical conditions and symptoms, progress as a result of treatment and prescriptions); and

• Information about the equipment you and/or your Doctors use to access the App (such as the operating system and version and device type), location data and usage details.

We collect this information (i) directly from you, when you provide it to us through the App, (ii) from your Doctors, when a Doctor provides it to us through the App, (iii) from any EHR Application used by your Doctor and integrated with the App (if any), and (iv) automatically as you and/or your Doctors navigate through and use the App.

**Information Provided by You, Your Doctors or an EHR Application**

The information we collect through the App from you, your Doctors or any EHR Application used by your Doctor and integrated with the App (if any) may include the following:

• Information that you or your Doctor provide by filling out forms within the App or otherwise directly inputting such information into the App. This includes information provided by your Doctor at the time such Doctor registers to use the App and health information submitted directly to the App by you or your Doctor during an in-office visit. We may also ask you or your Doctor for information when you or such Doctor report a problem with the App;

• Records and copies of your and your Doctors’ correspondence through the App, including any correspondence sent to us;

• Information that is downloaded into the App from any EHR Application used by your Doctor and integrated with the App, if your Doctor downloads such information from the EHR Application; and

• Transactional information based on your and your Doctors’ activities within the App, such as the date of your in-office visit.

**Information Collected Automatically**

As you and your Doctors navigate through and interact with the App, we may use automatic data collection technologies to collect certain information about the equipment used to access the App and in-App actions and patterns, including (i) details of your and your Doctors’ use of the App, including traffic and other usage data, location data and other communication data, as well as the resources that you access and use within the App, and (ii) information about the equipment used
to access the App, including the operating system and version, the device type and other sign-on data.

The information we collect automatically is statistical data and does not include personal information, but we may maintain it or associate it with personal information we collect in other ways. It helps us to improve the App and to deliver a better service, including by enabling us to estimate our audience size and usage patterns.

**Use of Your Information**

We use information that we collect about you or that you, your Doctors or any EHR Application provide to us, including any personal information, for the following:

- To provide, enhance, improve and develop the App and its services, including measuring and improving the App’s services, content and layout;
- To provide you and your Doctors with information or services that you or your Doctors request from us;
- To resolve disputes and troubleshoot problems, including fighting malware and identity theft;
- To prevent potentially unsafe, prohibited or illegal activities and enforce this Privacy Policy and any applicable licensing agreements between the Company and you and/or your Doctors and any terms and conditions associated therewith (collectively, our “License Agreements”);
- To carry out our obligations and enforce our rights arising from any contracts related to the App and entered into between the Company and you and/or your Doctors;
- To fulfill any other purpose for which you, your Doctors or any EHR Application provide such information, including providing assistance to your Doctors in analyzing patient data collected through or provided to the App;
- In any other way we may describe when you or your Doctors provide the information; and
- For any other purpose with your consent.

Additionally, we may use your information to respond to communications from you or your Doctors. We may also use your information to respond to your or your Doctors’ requests for information or updates related to the App and information provided through the App.

Further, the Company may use any information collected through or provided to the App, including, but not limited to, your personal information, for research and analysis purposes in the field of medical treatment and prevention, such as analyzing aggregated data collected through or provided to the App for purposes of researching the treatment of and issues related to rheumatoid
arthritis. By using the App, you agree that we may use your information, including, but not limited to, your personal information, for such research and analysis purposes.

**Disclosure of Your Information**

We may disclose information that we collect or that you, your Doctors or any EHR Application provide to us, including, but not limited to, personal information, as follows:

- To our affiliates;

- To third parties, such as contractors, service providers, consultants and other agents, that we use to support our business and provide the App, including disclosures to third-party educational institutions or software development entities for purposes of further enhancing, improving and developing the App and its services;

- To a buyer or other successor of the Company or any of our affiliates in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of the Company’s or any of our affiliates’ assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceedings, in which personal information held by the Company about the App’s users is among the assets transferred;

- To fulfill the purpose for which you, your Doctors or any EHR Application provide such information, including (i) disclosures to your Doctor in order to facilitate communications between you and such Doctor and to facilitate such Doctor’s provision of medical care and treatment to you and (ii) disclosures to any EHR Application used by your Doctor and integrated with the App (if any), whether such EHR Application is owned and controlled by your Doctor or a third party, in order to facilitate communications between you and such Doctor and to facilitate such Doctor’s provision of medical care and treatment to you;

- For any other purpose disclosed by us when you or your Doctors provide the information; and

- For any purpose with your consent. For example, we may share your information with third parties to whom you explicitly ask us to send your information if it is reasonable and not unduly burdensome.

Further, as described above, the Company may use any information collected through or provided to the App for research and analysis purposes in the field of medical treatment and prevention. Additionally, the Company may conduct such research by collaborating and working with third-party educational or research institutions, or the Company may assist such third parties by providing information for the institutions’ own research and analysis purposes in the medical field. In such cases, we may share any information that we collect through or that is provided to the App, including, but not limited to, personal information, with such third-party entities for research and analysis purposes. By using the App, you agree that we may disclose your
information, including, but not limited to, personal information, to third-party educational or research institutions for research in the field of medical treatment and prevention.

Notwithstanding any other provisions of this Privacy Policy, we also reserve the right to access, preserve and disclose any information, including, but not limited to, personal information, as we reasonably believe is necessary, in our sole and absolute discretion, (i) to respond to legal requirements, including complying with any court order, law or legal process and responding to any government or regulatory request (including responding to law enforcement or other government officials in response to a verified request relating to a criminal investigation or alleged illegal activity); (ii) to enforce or apply our policies and agreements, including our License Agreements and this Privacy Policy and including investigations of potential violations of such policies and agreements; (iii) to detect, prevent or otherwise address fraud, security, trust and safety or technical issues; (iv) to respond to user support requests; or (v) to protect the rights, property, health or safety of the Company, our users, any third parties or the public in general.

We may disclose non-private information, aggregated information about our users, and information that does not identify any particular user of the App with people and entities that we do business or collaborate with.

**Third Parties**

This Privacy Policy addresses only the collection, use, maintenance, protection, analysis and disclosure of information collected by the App or that you, your Doctors or an EHR Application used by your Doctor provide to us through the App. It does not apply to the practices of third parties that we do not own, control, employ or manage, including, but not limited to, any EHR Application or other third party applications, services or businesses. If you disclose your information to others, different rules may apply to their use or disclosure of the information you disclose to them. You acknowledge that if you provide information to third parties, that information will be subject to the privacy policies of those third parties, which may differ from this Privacy Policy. We are not responsible for the content or privacy policies of third parties, and we encourage you to ask questions before disclosing your information to others.

**Children**

The App is not intended for children under 13 years of age, and it is our policy that no individual under the age of 13 may submit any information through the App, including, for example, a name or address. Further, your information may be deleted, without warning, if we believe that you are under 13 years of age. If you believe we might have any information from or about a child under 13 years of age, please contact us at jcurtis@uab.edu.

**Security**

We have adopted various measures for the protection and security of your personal information. Unfortunately, however, third parties may unlawfully intercept or access transmissions or private communications. Therefore, although we work very hard to protect your privacy, we cannot guarantee the security of information or that your personal information or private communications will always remain private. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of user information at any time. Any
transmission of personal information is at your own risk, and we are not responsible for the circumvention of any security measures contained within the App.

**Changes to the Privacy Policy**

We may amend this Privacy Policy at any time by posting the amended Privacy Policy on this page. The date the Privacy Policy was last revised is identified at the top of this Privacy Policy. All amended terms automatically take effect after they are initially posted on this page, unless a change in any applicable law requires immediate amendment. Use of information we collect or that you, your Doctors or any EHR Application provide to us is subject to the Privacy Policy in effect at the time such information is collected or provided. You are responsible for periodically checking this Privacy Policy for any changes.

**Medical Disclaimer**

By using the App, you acknowledge and agree that the App and any clinical content furnished by the Company in connection with or within the App are information management, diagnostic and transmission tools only and that use of the App and such content contemplates and requires the involvement of trained individuals. You further acknowledge and agree that the Company has not represented the App or its services as having the ability to diagnose disease, prescribe treatment or perform any other tasks that constitute the practice of medicine. You agree that, as between the Company and you and/or your Doctors, you and/or your Doctors are responsible for the accuracy and quality of your data and information as input into the App. You acknowledge that the Company (i) has no control of or responsibility for your and/or your Doctors’ use of the App or clinical content and (ii) has no knowledge of the specific or unique circumstances under which the App and clinical content provided may be used by you and/or your Doctors. You agree that the Company does not provide medical services to patients (including, but not limited to, you) and is not engaged in the practice of medicine and that your and/or your Doctors’ use of the App does not absolve your Doctors of their respective obligations to exercise independent medical judgment in rendering medical services to patients (including, but not limited to, you). You acknowledge that the professional duty to you in providing medical services lies solely with the healthcare professional providing such services.

You further agree that the Company shall not be liable for any costs, expenses, attorneys’ fees, losses, damages, claims or liabilities which may result from injury, death or damage to persons or property as a result of your acts or omissions and/or the acts or omissions of your Doctors (including their respective directors, managers, officers, employees, agents or subcontractors) relating to the practice of medicine or provision of medical care.

**Questions & Concerns**

If you have any questions or concerns regarding this Privacy Policy, please contact us at: jcurtis@uab.edu.