



HEALTH WEALTH SAFE, INC.
MEDICAL RECORD BANK
2005 PRINCE AVENUE, ATHENS, GA 30606
Email: Privacy@healthwealthsafe.com Phone: (706)296-8632

PRIVACY POLICY

A letter to our members from our Chief Privacy Officer, Dawn Dobbs

My name is Dawn Dobbs, I am the Privacy Officer and Director for Health Information Privacy at Health Wealth Safe, INC. In my role, I am responsible for enforcing HIPAA and issuing guidance on how to comply with its rules.

I am working on behalf of patient rights regarding secure access to personal health data, privacy protection, putting patients in charge of their health records and providing easy access to all of your Protected Health Information (PHI) in one place. To further my mission, I am decreasing cost in the health care system by minimizing the need for duplicate testing by multiple Providers, creating easy access to all PHI giving the patient the ability to collect, store and share their PHI with multiple Providers from one user friendly, shareable platform. I'm here to make sure you know your rights regarding your health information and your information is protected.

It is a goal of mine to issue additional guidance to those entities required to comply with the law. HIPAA (or the [Health Insurance Portability and Accountability Act of 1996](#)) is the piece of U.S. legislation that provides data privacy and security provisions for safeguarding our medical information. It is important to me that hospitals, health professionals, and insurers better understand their obligation to patients under this act. I also wanted patients to be more aware of their rights under HIPAA so they can safely access, store and share their personal health information. We have developed a consumer friendly platform which includes a website, patient portal and application for your mobile device. Materials, including brochures and videos are also available to view online today. If you've requested a copy of your health record and found getting a copy to be difficult, I have some good news for you regarding your rights. You have plenty of them:

- You, as a patient, have the right to all the health information generated as part of a visit to the doctor or a stay in the hospital. You have the right to copies of your lab tests. You have the right to the results and underlying data from your genome sequence. You have a right to your x-rays, CT scans, and MRIs, too.
- Not only do you have the right to all your data, you have the right to it within 30 days of the request (in most circumstances), in the format you want it (so long as the entity can produce it). If you want that information digitally, you have the right to have it digitally.

You have the right to a copy of all your health information for no more than the reasonable cost of making that copy. You have the right to get that information in a secure way. Most importantly, you have the right to get all of it. Every bit of medical information that is generated about you is your right. All of these rights have been in existence since the early 2000s, so most of them are almost twenty years old at this point.

However, most people don't fully realize it. Many institutions and medical practices have not paid attention to the HIPAA right of access and therefore have not established practices allowing for people to easily exercise it.

That being said, I know what your rights are. I'm here on behalf of the users of Health Wealth Safe to make sure you have full access to your complete health information through a safe secure platform.



Christal Dawn Dobbs

Privacy Policy

Thank you for choosing to be part of our community at Health Wealth Safe, Inc., doing business as Health Wealth Safe ("Health Wealth Safe", "we", "us", or "our"). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at info@healthwealthsafe.com.

When you visit our website <http://www.healthwealthsafe.com>, mobile applications, patient portal and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy policy, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please contact us or discontinue use of our Sites or Apps and our services.

This privacy policy applies to all information collected through our websites such as <https://www.healthwealthsafe.com> , <https://www.healthwealthsafe.net> (Platform), <https://portal.healthwealthsafe.net> (patient portal), "Health Wealth Safe" mobile application ("Apps"), and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the "Services" or "Platform").

The Health Wealth Safe Platform contains features designed to inter-operate with third party services (including but not limited to CMS Blue Button 2.0) ("Third-Party Services"). To use such features, you may be required to obtain access to such Third-Party Services, through websites, User portals or Apps may be required to obtain access to such Third-Party Services on your behalf from the providers of such Third-Party Services. You are solely responsible for compliance with the terms and conditions applicable to any Third-Party Services accessed by you through the App and will indemnify Health Wealth Safe from any and all harm, damages, costs, and expenses incurred by Health Wealth Safe in connection with a breach of the foregoing. Health Wealth Safe shall not be responsible for any disclosure, modification, or deletion of data resulting from any such access to Third-Party Services and their providers. If the provider of any Third-Party Service ceases to make the application available for inter-operation with the corresponding feature of the App on reasonable terms, Health Wealth Safe may cease providing such features without entitling the User to any refund, credit, or other compensation. Any acquisition or use of Third-Party Services and any exchange of information between an end user and any third party is directly between the end users and the applicable third party. HEALTH WEALTH SAFE EXPRESSLY DISCLAIMS RESPONSIBILITY AND LIABILITY FOR ANY CLAIMS OR DAMAGES ARISING IN CONNECTION WITH OR RELATING TO ANY END USER INTERACTIONS WITH THE APP OR ANY THIRD-PARTY SERVICES.

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

TABLE OF CONTENTS

1. KEY DEFINITIONS
2. WHAT INFORMATION DO WE COLLECT?
 - ❑ INFORMATION YOU PROVIDE TO US
 - ❑ INFORMATION COLLECTED THROUGH TRACKING TECHNOLOGY AND COOKIES
 - ❑ OTHER TYPES OF INFORMATION
3. HEALTH RECORDS TO POPULATE YOUR HEALTH WEALTH SAFE ACCOUNT (“HEALTH WEALTH SAFE RECORD INFORMATION)
4. HOW DO WE COLLECT YOUR MEDICAL RECORDS?
5. HOW DO WE USE YOUR INFORMATION?
6. WHO WILL YOUR INFORMATION BE SHARED WITH?
7. HOW LONG DO WE KEEP YOUR INFORMATION?
8. HOW DO WE KEEP YOUR INFORMATION SAFE?
9. DO WE COLLECT INFORMATION FROM MINORS?
10. WHAT ARE YOUR PRIVACY RIGHTS?
11. DATA BREACH
12. CONTROLS FOR DO-NOT-TRACK FEATURES
13. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS? Nevada and Maine, also
14. DO NEVADA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?
15. DO WE MAKE UPDATES TO THIS POLICY?
16. HOW CAN YOU CONTACT US ABOUT THIS POLICY?
17. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

1. KEY DEFINITIONS

1. **Aggregate Information:** information that has been combined with that of other users and analyzed or evaluated as a whole, such that no specific individual may be reasonably identified.
2. **De-identified Information:** information that has been stripped of your Registration Information (e.g., your name and contact information) and other identifying data such that you cannot reasonably be identified as an individual, also known as pseudonymized information.
3. **Individual-level Information:** information about a single individual's genotypes, diseases or other traits/characteristics, but which is not necessarily tied to Registration Information.
4. **Identifiable Personal Information:** information that can be used to identify you, either alone or in combination with other information. Health Wealth Safe collects and stores the following types of Personal Information:

A.) **Registration Information:** information you provide about yourself when registering for and/or utilizing our Services (e.g. name, email, address, user ID and password, and payment information).

B.) **Self-Reported Information:** information you provide directly to us, either through the Services or through a third party, including your disease conditions, other health-related information, personal traits, ethnicity, family history, and other information that you enter into surveys, forms, or features while signed in to your Health Wealth Safe account.

C.) **Sensitive Information:** information about your health, Genetic Information, and certain Self-Reported Information such as racial and ethnic origin, sexual orientation, and political affiliation.

D.) **User Content:** information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials - other than Genetic Information and Self-Reported Information-generated by users of Health Wealth Safe Services and transmitted, whether publicly or privately, to or through Health Wealth Safe.

E.) **Inferences and Derived Data:** information, data, assumptions, or conclusions that are derived directly or indirectly from another source of Personal Information.

F.) **Web-Based/Internet Information:** information on how you use our Services collected through log files, cookies, web beacons, and similar technologies, (e.g., device information (device identifiers), IP address, browser type, domains, page views).

2. WHAT INFORMATION DO WE COLLECT?

2.1: We collect Information you provide directly to us or with your consent through Third-Party Services (including but not limited to CMS Blue Button 2.0) (“Third-Party Services”).

The personal information that we collect depends on the context of your interactions with us, the Services or Apps, the choices you make and the products and features you use. The personal information we collect can include but not limited to the following:

A.) **Personal information:** Personal information you disclose and provide to us. This is data that can be used to identify you or contact you. We collect personal information from you, which includes your name, date of birth, billing and shipping address, payment information (e.g., credit card), e-mail address, and telephone number, and may also include contact preferences, device identifiers and IP address.

B.) **Registration Information:** When you voluntarily register at Health Wealth Safe for Services or Apps, expressing an interest in obtaining information about us or our products and services, when participating in activities on the Services or Apps or by otherwise contacting us.

C.) **Self-Reported Information:** You have the ability to provide us with additional information about yourself through health surveys, forms, features and applications. For example, you may provide us with information about your personal traits (e.g., eye color, height), ethnicity, disease conditions (e.g., Type 2 Diabetes), other health-related information depending on questions assigned by your Provider related to your health conditions (e.g., blood pressure, pulse rate, cholesterol levels, visual acuity, pain level), and family history information (e.g., information similar to the foregoing about your family members). Before you disclose information about a family member, you should make sure you have permission from the family member to do so.

D.) **Personal Health Information Provided by You:** We collect data about health, DNA, medical records, FitBit, API devices, RPM issued monitoring devices, and similar apps; data held by a hospital or doctor; app usage; passwords; financial information (credit card number, purchase history, invoices); and other similar data.

E.) **User Content:** Some of our Services allow you to create and post or upload content, such as data, text, music, audio, photographs, graphics, video, messages, or other materials that you create or provide to us through either a public or private transmission ("**User Content**"). For example, User Content includes any discussions, posts, or messages you send on our Platforms.

F.) **Blogs and Forums:** Our website offers publicly accessible blogs and content. Additionally, Health Wealth Safe users may participate in our online Forums. You should be aware that any information you provide or post in these areas may be read, collected, and used by others who access them. To request that we remove or de-identify your Personal Information from our blog or Forums, contact us at Privacy@healthwealthsafe.com . Please note that whenever you post something publicly, it may sometimes be impossible to remove all instances of the posted information, for example, if someone has taken a screenshot of your posting. Please exercise caution before choosing to share Personal Information publicly on our blogs, Forums or in any other posting. You may be required to register with a third party application to post a comment. To learn how the third party application uses your information, please review the third party's terms of use and privacy statement.

G.) **Third-Party Services: (including but not limited to CMS Blue Button 2.0) ("Third-Party Services")**. If and when you use a Third-Party Site and/or Services, in connection with our Services (e.g., to make a medical records request or post referrals or to request that we communicate with another person), then in addition to that person's name and contact information, we may also collect other information (e.g., your profile picture, network, gender, username, user ID, age range, language, and location) depending on your privacy settings on the third party site. We do not control the third party site's information practices, so please review the third party's privacy statement and your settings on the third party's site carefully. If you provide authorization to Health Wealth Safe, we will collect and use the information you share with us via that third party service (such as your email address, name, and date of

birth as specified in your third party service account) in accordance with this Privacy Statement. You are responsible for managing your credentials for your third party service account, and for maintaining the security of your third party service account. Health Wealth Safe does not have access to the credentials for your third party service account. If you lose access to your credentials for your third party service account, it is your responsibility to obtain the lost credentials through that third party service.

H.) **Referral information and sharing:** When you choose to share your health information through Health Wealth Safe with another person, we will ask for that person's email address and/or cell phone number. We will use their email address and cell phone number solely, as applicable, to communicate your sharing request to them, and we will let your contact know that you requested the communication. By choosing to share information with another person, you confirm that the person has given you consent for Health Wealth Safe to communicate (e.g., via email, text message, SMS notification or voice communication) with him or her. The person you chose may contact us at Privacy@healthwealthsafe.com to request that we remove this information from our database.

I.) **Customer service:** When you contact Customer Care or correspond with us about our Service, we collect information to: track and respond to your inquiry; investigate any breach of our Terms of Service, Privacy Statement or applicable laws or regulations; and analyze and improve our Services.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

2.2: Web-Based/Internet Information collected through tracking technology (e.g. from cookies and similar technologies)

We and our third party service providers use cookies and similar technologies (such as web beacons, tags, scripts and device identifiers) to:

- ★ help us recognize you when you use our Services;
- ★ customize and improve your experience;
- ★ provide security;
- ★ analyze usage of our Services (such as to analyze your interactions with the results, reports, and other features of the Service);
- ★ gather demographic information about our user base;
- ★ offer our Services to you;
- ★ monitor the success of marketing programs; and
- ★ serve targeted advertising on our site and on other sites around the Internet.

A.) Information collected automatically:

Certain information is automatically collected when you visit, use or navigate the Health Wealth Safe website, Applications, Portal and/or Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs,

device name, country, location, information about how and when you use our Services or Apps and other technical information.

B.) Web-based Online Identifiers: We collect devices; applications; tools and protocols, such as IP (Internet Protocol) addresses; cookie identifiers, or others.

C.) Information collected through our Apps: We may collect information regarding your geo-location, mobile device, and push notifications, when you use our apps.

D.) Geo-Location Information. We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using our mobile application, to provide location-based services. If you wish to change our access or permissions, you may do so, at any time, in your device's settings.

E.) Mobile Device Data. We may automatically collect device information (such as your mobile device ID, model and manufacturer), operating system, version information and IP address.

F.) Push Notifications. We may request to send you push notifications regarding your account or the mobile application. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

G.) Mobile Device Access. We may request access or permission to certain features from your mobile device, including your mobile device's bluetooth, calendar, camera, microphone, sensors, sms messages, storage, contacts, reminders, and other features. If you wish to change our access or permissions, you may do so in your device's settings.

2.3) Information collected from other sources:

We may collect limited data about you from other sources, such as public databases, joint marketing partners, as well as from other third parties. Examples of the information we receive from other sources include: marketing leads and search results and links, including paid listings (such as sponsored links).

3. HEALTH RECORDS TO POPULATE YOUR HEALTH WEALTH SAFE ACCOUNT (“HEALTH WEALTH SAFE RECORD INFORMATION”)

Health Wealth Safe’s mission is to enable individuals to collect all of their health information in one place, organize it, use it and share it, as they please. The Service is a technology platform that:

(A) allows you to request access to your historical health information and records (“Health Records”) through the “right of access” granted under the Health Insurance Portability and Accountability Act (“HIPAA”), as well as through online portal accounts made available to you by some health care providers or health plans, as well as, but not limited to imported and downloaded data from CMS Blue button 2.0 API ;

(B) asks you to directly input information about your health, such as information about how you’re feeling or pain management (“Content”);

(C) transforms them into digital data and analyzes it to offer you opportunities to share it;

(D) allows you to decide if, when and how to use and share any such Health Records, Content, and Refined Health Information with third parties, including caregivers, medical professionals and researchers; and

(E) allows you to post content and interact with care coordinators and your Provider. This is only available through some “Services” that are provided by Health Wealth Safe, Inc.

4. HOW DO WE COLLECT YOUR MEDICAL RECORDS?

As part of the Service, Health Wealth Safe, with your consent, collects your Health Records on your behalf and populates them in your Health Wealth Safe account. We find your Health Records using one or more of the following processes:

(A) Ask you to identify the medical providers and institutions where you have received care;

(B) Ask you to identify the health plans that have provided you with health insurance;

(C) Have you connect Health Wealth Safe to the online portal hosted by your healthcare provider(s) or health plan(s) in order to obtain any medical or health plan records that can be accessed to populate your Health Wealth Safe account (you will need to enter your portal credentials (your portal username and password) such as, but not limited to using your portal credential to access, import and share your data from Medicare utilizing CMS Blue Button 2.0 API;

(D) Sending a request for your medical records to networks – commonly known as health information exchanges or HIEs;

(E) Sending a request for your records to another medical provider that is identified in your medical records (for example, sending a request for a copy of a lab test result from the laboratory identified in the doctor’s medical record); and

(F) You can also choose to obtain your own records and upload them into your Health Wealth Safe account.

5. HOW DO WE USE YOUR INFORMATION?

We process your information for purposes based on your (the users) express consent, legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, only as described in this privacy policy.

A.) To provide you with Services and to analyze and improve our Services We use the information you allowed us to collect or receive from those third parties to operate, provide, analyze and improve our Services. These activities may include, among other things, using your information in a manner consistent with this Privacy Statement to:

- 1)** facilitate account creation and logon process to open your account, enable purchases and process payments, communicate with you, and implement your requests (e.g., medical record request);

- 2) enable and enhance your use of our website and mobile application(s), including authenticating your visits, providing personalized content and information, and tracking your usage of our Services;
- 3) contact you with administrative information about your account, new products, services, new feature information and any relevant information about our Services (e.g. terms or policy changes, security updates or issues, etc.);
- 4) enforce our Terms of Service and other agreements for Business Purposes, Legal Reasons and Contractual. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.;
- 5) protect our services and you: monitor, detect, investigate and prevent prohibited or illegal behaviors on our Services, to combat spam and other security risks; and
- 6) perform research & development activities, which may include, for example, conducting data analysis in order to develop new or improve existing products and services, and performing quality control activities.

B) To Manage User Accounts

We may use your information for the purposes of managing your account and keeping it in working order and/or to provide you with the requested service.

C) To fulfill and manage your orders. We may use your information to fulfill and manage your orders, payments, returns, and exchanges made through the Services or Apps.

D) To allow you to share your Identifiable Personal Information with others Health Wealth Safe gives you the ability to share your information, including Personal Information, through our Services. You have the option to share directly with your providers or with individuals using sharing features and tools. Some sharing features may include receiving sharing invitations, such as opting in or opting out, to share Sensitive Information.

E) To provide customer support

When you contact Customer Care, we may use or request Personal Information, including Sensitive Information, as necessary to answer your questions, resolve disputes, and/or investigate and troubleshoot problems or complaints. We will not share your Personal Information with another customer without your express consent.

F) To monitor user responses/offer support to users. We will use your information to monitor the responses you entered into the Health Wealth Safe database pertaining to your health questions, inquiries and solve any potential issues you might have with the use of our Services.

G) To post testimonials and conduct surveys or polls

We post testimonials on our Services or Apps that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and testimonial. If you wish to update, or delete your testimonial, please contact us at info@healthwealthsafe.com and be sure to include your name, testimonial location, and contact information. We may send you surveys, polls, or requests for

testimonials to improve and optimize our Services. You are in control of the information you would like to share with us.

H) To provide you with marketing communications

To send you marketing and promotional communications. We and/or our third party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails at any time (see the "WHAT ARE YOUR PRIVACY RIGHTS" below).

I) Deliver targeted advertising to you

We may use your information to develop and display content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.

J) To recruit you for external research

Research is the key to advancing technology and medical treatments. We may inform you of third party research opportunities for which you may be eligible. We may send an email to Health Wealth Safe users who potentially fit the relevant eligibility criteria to make them aware of the research project and provide a link to participate with the research organization conducting the study. We want to ensure interested participants are aware of additional opportunities to contribute to interesting, novel scientific research conducted by academic institutions, healthcare organizations, pharmaceutical companies, and other groups. We will not share Individual-level Genetic Information or Self-Reported Information with any third party without your explicit consent. If you do not wish to receive these notifications, you can email us at Privacy@healthwealthsafe.com with your request to OPT-OUT of receiving these notifications.

K) For other Business Purposes

We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Services or Apps, products, marketing and your experience. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end users and does not include personal information. We will not use identifiable personal information without your express consent.

6. WHO WILL YOUR INFORMATION BE SHARED WITH?

We only share information with your express consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations. We share information with our third party service providers, as necessary for them to provide their services to us and help us perform our contract with you. Service providers are third parties (other companies or individuals) that help us to provide, analyze and improve our Services. While Health Wealth Safe directly conducts the majority of data processing activities required to provide our Services to you, we engage some third party service providers to assist in supporting our Services, including in the following areas:

A. General service providers:

1.) Vendors, Consultants and Other Third-Party Service Providers: We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Services

or Apps, which will enable them to collect data about how you interact with the Services or Apps over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organization apart from us. They will hold it securely and retain it for the period outlined in this privacy policy.

2.) Marketing and analytics: When you use our Services, including our website, portal or mobile app(s), our third party service providers may collect Web-Behavior Information about your visit, such as the links you clicked on, the duration of your visit, and the URLs you visited. This information can help us improve site navigability and assess our Marketing campaigns.

NOTE: Our service providers act on Health Wealth Safe's behalf. We implement procedures and maintain contractual terms with each service provider to protect the confidentiality and security of your information. However, we cannot guarantee the confidentiality and security of your information due to the inherent risks associated with storing and transmitting data electronically.

B. "Targeted advertising" service providers:

We permit third party advertising networks and providers to collect Web-Based Information regarding the use of our Services to help us to deliver targeted online advertisements ("ads") to you. They use cookies and similar technologies, to gather information about your browser's or device's visits and usage patterns on our Services and on other websites over time, which helps to better personalize ads to match your interests, and to measure the effectiveness of ad campaigns. We and our third party service providers will not use your Sensitive Information, such as Protected Health Information and Self-Reported Information, for targeted marketing without asking for and receiving your explicit consent.

C. Aggregate information:

We may share Aggregate Information, which is information that has been stripped of your name and contact information and combined with information of others so that you cannot reasonably be identified as an individual, with third parties. This Information is not Personal Information, it does not identify any particular individual or disclose any particular individual's data.

D. Information we share with commonly owned entities: Legitimate Interests: We may share some or all of your Personal Information with other companies under common ownership or control of Health Wealth Safe, which may include our subsidiaries, our corporate parent, or any other subsidiaries owned by our corporate parent in order to provide you better service and improve user experience. Sharing such information is necessary for us to perform on our contract with you. We may provide additional notice and ask for your prior consent if we wish to share your Personal Information with our commonly owned entities in a materially different way than discussed in this Privacy Statement.

E. As required by law: Legal Obligations:

Under certain circumstances your Personal Information may be subject to processing pursuant to laws, regulations, judicial or other government subpoenas, warrants, or orders. For example, we may be required to disclose Personal Information in coordination with regulatory authorities in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. Health Wealth Safe will preserve and disclose any and all information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or

disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that Health Wealth Safe may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the Health Wealth Safe Terms of Service and other policies; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of Health Wealth Safe, its employees, its users, its clients, and the public. View our Transparency Report for more information.

F. Business transactions:

We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. Health Wealth Safe will notify you of the business transfer via email, text message or SMS notification. The acquiring company will be required to notify you of any/all privacy policy updates, secondary to the business transfer, within 30 business days of the transfer. The acquiring company will be required to honor all pre-existing privacy policy terms.

G. Legal basis: We may process or share data based on the following legal basis:

- 1. Express Consent:** We may process your data if you have given us express consent to use your personal information for a specific purpose.
- 2. Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- 3. Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- 4. Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

7. HOW LONG DO WE KEEP YOUR INFORMATION?

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

8. SECURITY MEASURES: HOW WE KEEP YOUR INFORMATION SAFE?

Health Wealth Safe takes the trust you place in us seriously. Health Wealth Safe implements physical, technical, and administrative measures to prevent unauthorized access to or disclosure of your information, to maintain data accuracy, to ensure the appropriate use of information, and otherwise safeguard your Personal Information. Our team regularly reviews and improves the security of the Health Wealth Safe platform to help ensure the integrity of our systems and your information. These practices include, but are not limited to the following areas:

- ★ **Encryption.** Health Wealth Safe uses industry standard security measures to encrypt Sensitive Information both at rest and in transit.
- ★ **Limited access to essential personnel.** We limit access to Sensitive Information to authorized personnel, based on job function and role. Health Wealth Safe access controls include personal access credentials for each individual with strict adherence to HIPAA laws.

NOTE: Please remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Services or Apps is at your own risk. You should only access the services within a secure environment.

9. DO WE COLLECT INFORMATION FROM MINORS?

No, Health Wealth Safe does not knowingly solicit data from or market to children under 18 years of age. By using the Services or Apps, you acknowledge you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services or Apps. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at info@healthwealthsafe.com.

10. WHAT ARE YOUR PRIVACY RIGHTS?

You can exercise your privacy rights by following the instructions below or contacting us at Privacy@healthwealthsafe.com. We will handle your request under applicable law. When you make a request, we may verify your identity to protect your privacy and security. You may review, change, or terminate your account at any time.

If you have questions or comments about your privacy rights, you may email us at Privacy@healthwealthsafe.com. Your privacy rights include the following:

Account Information

If you would like to review or change the information in your account or terminate/deactivate your account, you can, at any time by contacting Health Wealth Safe by email at: Privacy@healthwealthsafe.com or by using the contact information provided.

Upon your request to terminate your account, we will deactivate your account immediately and remove your information from our active databases within 30 days. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services or Apps. To opt-out of interest-based advertising by advertisers on our Services or Apps visit <http://www.aboutads.info/choices/>.

Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or opt-out by contacting Health Wealth Safe using the contact

information provided in this policy. You will then be removed from the marketing email list – however, we will still need to send you service-related emails that are necessary for the administration and use of your account.

11. DATA BREACH

A privacy breach occurs when there is unauthorized access to or collection, use, disclosure or disposal of personal information. You will be notified about data breaches following the (United States Government Health and Human Services) Office of the National Coordinator for Health Information Technology's (ONC's) guidelines, when and if Health Wealth Safe, Inc. believes you are likely to be at risk or serious harm. For example, when a data breach might be likely to result in serious financial harm or cause harm to your mental or physical well-being. In the event that Health Wealth Safe, Inc. becomes aware of a security breach which has resulted or may result in unauthorized access, use or disclosure of personal information Health Wealth Safe, Inc. will promptly investigate the matter and notify the applicable Supervisory Authority no later than 72 hours after the breach was discovered, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of our users. To learn more about the National Coordinator for Health Information Technology (ONC) guidelines, visit the official website at <https://www.healthit.gov>.

12. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

Yes, Pursuant to California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Services or Apps, you have the right to request removal of unwanted data that you publicly post on the Services or Apps. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services or Apps, but please be aware that the data may not be completely or comprehensively removed from our systems.

13. DO NEVADA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

Yes, Pursuant to Nevada law, you may direct a business that operates an internet website not to sell certain Personal Information a business has collected or will collect about you. We do not sell your Personal Information pursuant to Nevada law. For more information about how we handle and share your Personal Information or your rights under Nevada law, contact us at Privacy@healthwealthsafe.com.

14. CONTROLS FOR DO-NOT-TRACK FEATURES

Some web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to indicate your privacy preference of not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. Due to the lack of industry standards, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform

you about that practice in a revised version of this privacy policy. To learn more about interest-based advertising or to opt-out of this type of advertising, visit the [Network Advertising Initiative website](#) and the [Digital Advertising Alliance website](#). Options you select are browser- and device-specific.

15. DO WE MAKE UPDATES TO THIS POLICY?

Yes, Health Wealth Safe will update this privacy policy from time to time, as necessary to stay compliant with relevant laws. The updated version will be indicated by a “Revised” or “Lasted Updated” date and the updated version will be effective as soon as it is accessible. If and when we make changes to this privacy policy, we will notify you by prominently posting a notification with the “Revised” or “Lasted Updated” date of this privacy policy along with a copy of the updated version of the privacy policy on the Health Wealth Safe website, portal and Apps and by directly sending you a notification to the email address associated with your account and/or by sending you a notification by text or SMS message to the phone number associated with your account. We encourage you to review this privacy policy frequently to stay informed of any changes in how we are protecting your information. By continuing to access or use the Services and/or Apps after changes to this Privacy Policy become effective, you agree to be bound by the “Revised” Privacy Policy. If any changes are unacceptable to you, you may stop using our Services and deactivate your account at any time.

16. HOW CAN YOU CONTACT HEALTH WEALTH SAFE ABOUT THIS POLICY?

If you have questions about this Privacy Policy, or wish to submit a request, inquiry or complaint, please email Health Wealth Safe at Privacy@healthwealthsafe.com, Attention: Privacy Administrator, or send a letter in writing to:

ATTN: Privacy Administrator
Health Wealth Safe, Inc.
2005 Prince Avenue
Athens, GA 30606
United States

17. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Submit an inquiry via email to Privacy@healthwealthsafe.com and a request in writing should be mailed to the contact address listed above in order for your request to be processed.

Based on the laws of each state, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please submit a request in writing. We will respond to your request within 30 days.