# **Conciurgent Privacy Policy**

#### Last Updated: March 1, 2025

#### Introduction

Conciurgent Care (referred to as "Conciurgent," "Company," "we," or "us") owns and operates the website located at <u>conciurgentcare.com</u> (the "Website") and related applications and services (collectively, the "Platform"). Your access and use of the Platform, any part thereof, or anything associated therewith, including its content ("Content"), any products or services provided through the Platform or otherwise by Conciurgent or its independent contractors, and any affiliated website, software, or application owned or operated by Conciurgent (collectively, including the Platform and the Content, the "Service") are subject to this Privacy Policy unless specifically stated in writing otherwise.

We are committed to respecting the privacy of users of the Service. We created this Privacy Policy to tell you how Conciurgent collects, uses, and discloses information in order to provide you with the Service.

By creating, registering, or logging into an account through the Platform, or otherwise accessing or using the Service, you are automatically accepting, agreeing to, and acknowledging the most recent version of this Privacy Policy. If we make any changes to our Privacy Policy, we will post the revised Privacy Policy and update the "Last updated" date above. We encourage you to read the Privacy Policy in its entirety from time to time as we may update the Privacy Policy without direct notice to you. Your continued use of the Service means that you accept and agree to the revised Privacy Policy. If you do not accept this Privacy Policy (as amended from time to time), please exit the Website immediately.

#### **Protected Health Information:**

When you set up an account with Conciurgent, you are creating a customer relationship with Conciurgent that enables you to access and/or utilize the various functions of the Platform as a user. As part of that relationship, you provide information to Conciurgent, including, but not limited to, your name, email address, phone number and certain transactional information, which we do not consider to be "protected health information" or "medical information."

However, in using certain components of the Service, you may also provide certain health or medical information that may be protected under applicable laws. Conciurgent is not a "covered entity" under the Health Insurance Portability and Accountability Act of 1996, Public Law 104-191, and its related regulations and amendments from time to time (collectively, "HIPAA"). The Platform may be used to connect you with independent provider groups and individual practitioners who are not employed or controlled by Conciurgent (the "Providers"). The Providers may be a "covered entity" under HIPAA, and Conciurgent may in some cases be a "business associate" of a Provider. It is important to note that HIPAA does not necessarily apply to an entity or person simply because there is health information involved. To the extent Conciurgent is deemed a "business

associate," however, and solely in its role as a business associate, Conciurgent may be subject to certain provisions of HIPAA with respect to "protected health information," as defined under HIPAA and other governing law, that you provide to Conciurgent or the Providers ("PHI"). In addition, any medical or health information that you provide that is subject to specific protections under applicable state laws (collectively, with PHI, "Protected Information"), will be used and disclosed only in accordance with such applicable laws. However, any information that does not constitute Protected Information under applicable laws may be used or disclosed in any manner permitted under this Privacy Policy. Protected Information does not include information that has been de-identified in accordance with applicable laws.

By accessing or using any part of the Service, you agree that, even if HIPAA does apply to Conciurgent and/or the Providers, any information that you submit to Conciurgent that is not intended and used solely for the provision of diagnosis and treatment by the Providers is not considered Protected Information, and will only be subject to our Privacy Policy and any applicable state laws that govern the privacy and security of such information. For purposes of clarity, information you provide to Conciurgent in order to register and set up an account on the Platform, including name, username, email address, home address and phone number, is not considered Protected Information.

#### **Information That We Collect From You:**

(1) **Information that you give us.** This type of information includes your name, email address, phone number, physical address, payment information, billing information, and any other information you directly provide to us on our Platform. We use this information to create your account on the Platform and let you log on to your account and use the Platform, bill you for any fees or charges due for your use of the Service, as applicable, and communicate with you.

When you use this Platform, including communicating with Conciurgent personnel and Providers by phone, video, email, text message or other means of communication, we may collect personal information including, but not limited to, your name, email address, phone number and location. We use this information to match you with a Provider, to enable and facilitate delivery of the Service, as well as to supervise, administer, and monitor the delivery of the Service. We may also use the information to provide you with information, alerts and suggestions related to the Service, as well as to measure and improve the quality, effectiveness, and delivery of our Service.

(2) Information that we collect automatically. When you visit our Platform, we automatically log information about you and your computer and/or mobile device. For example, we log information about your computer such as your operating system type, browser type, browser language, and information about your use of and actions on our Platform to include access times and how much time you spent on a page. IP addresses may also be used to identify the location of users as this website is only intended for users based in the United States.

**Cookies**: We may log information using "cookies." Cookies are small data files stored on your hard drive by a website. We may use both session cookies (these expire once you close your web browser), and persistent cookies (these stay on your computer until you delete them or they expire). Cookies allow us to provide you with a more personal and interactive experience on our Platform. We use this information to make the Platform more useful to you, and to tailor your experience on our Platform to meet your needs and provide services to you. You may opt-out of allowing cookies

to be placed on your computer. Refusing cookies disables our ability to include information about your visit in our regular monitoring of Service traffic.

#### **Disclosure of Your Information:**

We may share your information with third-party service providers and medical providers to process information as part of a Service you request, for example, to process a credit-card payment or schedule an appointment. We may share your information to create your account on our Platform and enable you to log into your account, provide you with customer support, for billing-related purposes, to match you with a Provider, to enable and facilitate the Service as well as supervise and monitor the Service, to improve the Service, and to comply with applicable state and federal laws.

We require our third-party service providers to refrain from using or sharing your information to advertise or promote their products and services or those of other third parties.

We may share your information in response to a subpoena or similar investigative demand, a court order, or a request for cooperation from law enforcement or a government agency. We may also share your information to protect the rights and property of Conciurgent, to investigate, prevent, or take other action regarding illegal activity, suspected fraud, or other wrongdoing, and to enforce our Terms and Conditions or other agreements and policies. We may release information to government bodies and law enforcement under circumstances required by law or determined to be an emergency to protect the safety of an employee, customer, or agent of Conciurgent. This includes exchanging information with law enforcement in accordance with Providers' professional and legal responsibilities. To the fullest extent permitted by applicable law, and without notice to you, we have sole and complete discretion to elect whether or not to make such disclosures, and to contest or not contest requests for such disclosures.

In the course of using our Platform you may be directed to resources located on third-party websites. We are not responsible for the content or policies of third-party websites or organizations. You should read the privacy policies of any website you visit to determine what information is being collected about you. Third-party service providers may set and access their own tracking technologies on your device and they may otherwise collect or have access to information about you potentially including Protected Information.

#### Aggregate/Anonymized Data

This Privacy Policy does not apply to any data to the extent it is held, processed, disclosed, or published in a form which cannot be linked or attributed to a living individual (such as anonymized or aggregated data which cannot directly or indirectly be used to identify you or to obtain information about you) ("Aggregate/Anonymized Data"). We may generate, use, and share Aggregate/Anonymized Data for any purpose, in our sole discretion, subject to applicable law.

#### **Security of Protected Information**

We use commercially reasonable controls that are designed to reasonably safeguard Protected Information consistent with applicable and governing laws. We implement a variety of security measures when a user enters, submits, or accesses their information to maintain the safety of your Protected Information. However, please be aware that no method of electronic transmission or storage is completely secure, and we cannot guarantee the security of your Protected Information. Accordingly, we make no promise, representation, or warranty regarding the security of your Protected Information or any other information or date collected, stored, used, or transmitted in connection with the Website.

In the event that we become aware of unauthorized access to your Protected Information in a manner that exposes, or risks exposure of, your Protected Information in a manner that is inconsistent with this Privacy Policy, we will satisfy legal obligations to notify you and the other affected users, and display a notification on the Website, consistent and in accordance with our legal duties. We also reserve the right to cooperate with any individual who pursues legally enforceable rights against data collectors and processors who fail to adhere to the law.

## **Additional State-Law Privacy Protections**

# CALIFORNIA CONSUMER PROTECTION ACT (CCPA) AND CALIFORNIA PRIVACY RIGHTS ACT (CPRA)

This section applies to California Residents.

The Protected Information we collect might, depending on the situation, include identifiers, characteristics of protected classifications under California law, commercial information, internet or other network activity information, or inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, behavior, attitudes, intelligence, abilities and aptitudes. For detailed information on what we collect please review the "Information We Collect From You" section of this Privacy Policy.

As described in this Privacy Policy, Protected Information we collect from consumers might be shared for business or commercial purposes with third parties. You can find more details on this third-party sharing in the 'Disclosure Of Your Information' section.

We might have disclosed all of the categories of Protected Information, listed above, based on the use case, for a business purpose in the past 12 months.

The CCPA provides consumers (California residents) with specific rights regarding their Personal Data. This section describes your CCPA rights and explains how to exercise those rights. Those rights are:

- The right to know
- The right to delete
- The right to opt-out

In accordance with applicable law, we will not discriminate against you for exercising these rights. You can exercise your right, at any time by contacting us via email at <u>admin-ccare@conciurgentcare.com</u>, or via phone by calling (847) 483-3563.

You may only make a verifiable consumer request for access or data portability twice within a 12month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Protected Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your Protected Information. We cannot respond to your request or provide you with Protected Information if we cannot verify your identity, or authority to make the request, and confirm Protected Information relates to you. We will only use Protected Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We will respond to a Request to Opt-Out within 15 days. We will respond to Requests to Delete and Requests to Know within 45 days, unless we need more time, in which case, we will notify you and may take up to 90 days total to respond to your request.

California Do Not Track Disclosure: At this time, Conciurgent's Website does not respond to Do Not Track beacons sent by browser plugins as there is not yet a common agreement about how to interpret Do Not Track signals from browsers. However, you may delete or refuse cookies, though taking such action may limit your ability to use the Website fully.

# OTHER STATE CONSUMER PRIVACY LAWS

Other states also have enacted comprehensive consumer privacy laws that include additional provisions and protections that may apply if you reside in any of those states, including the following state laws:

The Colorado Privacy Act (CPA) (Colo. Rev. Stat. Ann. § 6-1-1308(1);

The Connecticut Act Concerning Personal Data Privacy and Online Monitoring (CTDPA) (Conn. Gen. Stat. Ann. § 42-520(c)-(e);

The Delaware Personal Data Privacy Act (DPDPA) (6 Del. C. § 12D-106(c)-(e) (effective January 1, 2025);

The Florida Digital Bill of Rights (FDBR) (§§ 501.711 and 501.715(2), Fla. Stat. (effective July 1, 2024);

The Indiana Consumer Data Protection Act (INCDPA) (Ind. Code §§ 24-15-4-3 to 24-15-4-5 (effective January 1, 2026);

The Iowa Consumer Data Protection Act (ICDPA) (Iowa Code Ann. § 715D.4(5)-(7) (effective January 1, 2025);

The Montana Consumer Data Privacy Act (MCDPA) (Mont. Code Ann. § 30-14-2812(5)-(6) (October 1, 2024);

Nevada Rev. Stat. 603A: Security and Privacy of Personal Information;

The Oregon Consumer Privacy Act (OCPA) (Section 5(4), 2023 Or. Laws Ch. 369 (SB 619) (effective July 1, 2024);

The Tennessee Information Protection Act (TIPA) (T.C.A. § 47-18-3305(c)-(e) (effective July 1, 2025);

The Texas Data Privacy and Security Act (TDPSA) (Tex. Bus. & Com. Code Ann. § 541.102 (effective July 1, 2024);

The Utah Consumer Privacy Act (UCPA) (Utah Code § 13-61-302(1) (effective December 31, 2023);

The Virginia Consumer Data Privacy Act (VCDPA) (Va. Code Ann. § 59.1-578(C)-(E);

These state laws may include additional provisions governing disclosure of your personal information, including provisions governing the following:

- Personal data categories collected or processed;
- Processing purposes;
- Personal data categories shared with third parties, if any;
- Categories of third parties with whom we share personal data, if any;
- The sale of personal data to third parties or processes personal data for targeted advertising and how you may exercise the right to opt out of this processing; and
- How you may exercise your consumer rights, including how to submit requests and, when available, appeal a controller's decision.

We will comply with legally required requests in accordance with any of these laws that govern your data. If you have any such requests, or questions about these issues, please contact us via email at admin-ccare@conciurgentcare.com or via phone by calling (847) 483-3563.

#### **Children Under the Age of 18**

The following applies to persons under 18 years of age (children) who have not secured parental authorization, consent, and monitoring to use our Platform as expressly agreed by parents and children in our Website terms and conditions. In the absence of such expressly agreed and accepted parental authorization, consent, and monitoring:

No one under age 18 may provide any Protected Information to or on the Platform. We do not knowingly collect Protected Information from children. If you are under 18, do not use or provide any information on the Platform, through any of its features, register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a person under 18 without verification of parental authorization, consent, and monitoring, we will delete that information. If you believe we might have any information from or about a person under 18, please contact us at admin-ccare@conciurgentcare.com.

## **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

# **Contact Information**

You may contact us at admin-ccare@conciurgentcare.com if you have questions or concerns about our Platform or this Privacy Policy.