

Privacy Policy

For Residents of California, see Privacy Notice for California Residents

Effective Date: May 15, 2020

1. Introduction

Kvell, Inc. ("Kvell", "we", "us", or "our") owns and operates the websites located at www.kvell.app, www.kvell.io, and www.kvell.us (collectively, the "Websites") and various web-based and mobile applications (collectively, the "Platforms"). Through the Websites and the Platforms, we offer various online services that enable visitors to the Websites ("you" or "Visitors") to receive access to various types of healthcare information and information about our services ("Services").

2. Applicability of this Privacy Policy

This Web and Mobile Privacy Policy ("Privacy Policy") describes what information Kvell collects about Visitors on the publicly available portions of the Websites and how that information is used.

This Privacy Policy does not apply to information collected from Visitors who register and log-in ("Members") to the password protected and secure portions of our websites and mobile applications ("Secure Platforms"). These Secure Platforms allow Members to perform certain transactions (e.g., fill out an initial information form) and use our Services. All information stored and collected by Kvell or added by our Members into such Secure Platforms is identifiable, protected health information (PHI) and therefore governed by the Health Insurance Portability and Accountability Act ("HIPAA"). How Kvell uses and discloses such PHI shall be in accordance with our Notice of Privacy Practices.

3. Agreement to this Privacy Policy

Your access and use of the Websites is subject to your agreement with this Privacy Policy and our Terms and Conditions. By using the Websites, you expressly agree to the terms of this Privacy Policy and consent to the collection and use of information as discussed in this Privacy Policy.

If you do not agree with this Privacy Policy, please do not use or access the Websites for any purpose. Please print a copy of this Privacy Policy for your records.

4. Modifications to this Privacy Policy

Kvell may revise this Privacy Policy regarding the collection of information at any time in our discretion. Should this Privacy Policy change materially, Kvell will give notice to you by

posting a notice regarding the new policy on the Websites. The revised Privacy Policy will be effective as of its posting unless otherwise stated.

By accessing or using the Websites after such changes are posted you agree to all such changes.

5. Collection, Use and Disclosure of Information

Either Kvell or a third-party vendor on behalf of Kvell may automatically collect information while Visitors browse the Websites. We may collect such information by tracking, or asking a third-party vendor to track, your click-stream activity when such information is not tied to a user ID through the use of "cookie" technology or by tracking internet protocol (IP) addresses, as explained below.

Because we want our Websites to better serve Visitors' needs, we collect some basic information about Visitors and their devices, including, but not limited to:

- IP address (the computer's address on the Internet)
- Operating system (e.g. Windows Vista)
- Browser software (e.g. Microsoft Internet Explorer, Firefox)
- Internet Service Provider (e.g. AOL)
- Geographic location (e.g. Boston, Mass.)
- Type of device (e.g. iPad, desktop)
- Mobile device crash information
- Locale and language of device and whether it has fingerprint/face sensors
- Dates and times that you accessed and used the Websites, features you used in the Websites, and how long you use the Websites overall
- Links you click and pages you view within the Websites
- Pages you view before and after you leave the Websites

We use this information to continuously enhance our Websites and to better serve our Visitors' needs. For example, we use this information to know what browsers people most commonly use, what pages are most often visited, and what functionality is most used. Some of the information we collect from Visitors, such as IP Address, may be considered identifiable personal information ("Personal Information"). Additionally, there are times on our Website that Visitors are able to voluntarily submit Personal Information, such as their name, phone number, and/or email address in order to obtain more information from us. We may remove personal identifiers from your Personal Information and maintain and use it in a de-identified form ("De-Identifiable Information"). De-Identifiable Information and Personal Information are collectively referred to throughout this Privacy Policy as "Information".

The Information collected from Visitors on our Websites may be shared with: (i) our subsidiaries and affiliates; (ii) our contractors, service providers and other third parties we use to support our business; or (iii) a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about Visitors is among the assets transferred. The information may also be used in the aggregate to create summary statistics that help us analyze the Websites' usage trends, assess what information is of most and least importance, determine technical design specifications, arrange the Websites in the most user-friendly way, and identify system performance or problem areas.

By continuing to use the Websites, you hereby consent to the use and disclosure of your Information as set forth above and as additionally stated below:

- with our financial, insurance, legal, accounting or other advisors that provide professional services to us;
- to respond to a subpoena, order, legal process, or government request;
- to protect, establish or exercise our legal rights or defend against legal claims;
- to investigate, detect, suppress, prevent or take action regarding illegal or prohibited activities, suspected fraud, situations involving potential threats to the reputation or physical safety of any person;
- as otherwise required by law.

6. Cookies

Like many companies, we use "cookies" to help you better navigate the Websites. A "cookie" is a small piece of information sent by Kvell's web-based applications that are stored by your web browser on your computer's hard drive. Each cookie is unique to your web browser. It will contain some anonymous information such as a unique identifier and the site name and some digits and numbers. Cookies enhance your online experience by allowing a website to remember things like, your preferences or keep your sessions open so you don't have to login again.

The cookies do not contain any identifiable information and cannot profile your system or collect information from your hard drive. Most Internet browsers automatically accept cookies, but you can set your browser to refuse them or to alert you when they are being sent. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our Websites. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit our Websites.

Kvell issues cookies as soon as you visit one of our Websites. Kvell uses performance and functionality cookies.

Performance cookies collect information about how you use our Websites, e.g., which pages you visit and if you experience any errors. These cookies do not collect any information that could identify you and are only used to help us improve how our Websites work, to understand what interests our users, and to measure how effective our content is.

We use performance cookies for web analytics, which provide us with anonymous statistics on how our Websites are used, and for error management, which helps us improve the Websites by measuring any errors that occur.

Some of our performance cookies are managed for us by third parties. However, we don't allow the third party to use the cookies for any purpose other than those listed above.

Functionality cookies remember choices you make to improve your experience. By using the Websites, you agree that we can place these types of cookies on your device. They allow the Websites to remember choices you make (such as your username, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize. The information these cookies collect may be anonymized and they cannot track your browsing activity on other websites.

If you continue to use our Websites and/ or use our Services and do not reject the cookies, we understand you consent to the use of the cookies outlined in this Privacy Policy and for the purposes stated herein.

7. Your Rights Regarding Your Personal Information

You have a right to request that Kvell amend or delete the Personal Information it collects from your use of the Websites if you believe it is incorrect or incomplete, and you may request an amendment or deletion for as long as the Personal Information is retained by Kvell. You must submit your request in writing to us and provide a reason to support the requested amendment. Kvell may, under certain circumstances, deny your request by sending you a written notice of denial.

Subject to applicable law, you may withdraw your consent to uses and disclosures of Personal Information as outlined in this Privacy Policy. You must submit your request in writing to Kvell. Withdrawing consent does not invalidate consent to any collection, use or disclosure of Personal Information to which you consented before consent was withdrawn. If you withdraw consent, or refuse further consent, our ability to offer services to you may be limited.

8. How to Contact Us

Questions or comments regarding this Privacy Policy should be submitted to the us by mail or electronic means as follows:

email: _____