

Sempre Health Privacy Policy

Last Updated: May 24, 2017

Protecting your privacy is really important to us. With this in mind, we're providing this Privacy Policy to explain our practices regarding the collection, use and disclosure of information that we receive through our website located at <https://semprehealth.com> (the "**Website**") and our prescription benefits program (the "**Program**"). To make this Privacy Policy easier to read, the Website and our Program are collectively called the "**Services**." This Privacy Policy does not apply to any third-party websites, services or applications, even if they are accessible through our Services.

Revisions to this Privacy Policy

Any information that is collected via our Services is covered by the Privacy Policy in effect at the time such information is collected. We may revise this Privacy Policy from time to time. If we make any material changes to this Privacy Policy, we'll notify you of those changes by posting them on the Services or by sending you an email or other notification, and we'll update the "Last Updated Date" above to indicate when those changes will become effective.

Collection and Use of Information

Information Collected or Received from You or Your Insurer

Our primary goals in collecting information are to provide and improve our Services, to administer your use of the Program, and to enable you to enjoy and easily navigate our Services.

Personally Identifiable Information. In connection with the Program, we may collect certain information from you or your health insurance provider ("**Insurer**") that can be used to identify you, such as your name, phone number, email address and postal address ("**PII**"). We may also collect PII, such as your name and email address, from you if you elect to sign up for a mailing list on our Website. For more information regarding our use of PII submitted through the Website, please see the "Communications" section below.

Health Information. We may collect or receive certain health information regarding you, including, without limitation, claims data, information regarding the medications you take or other similar personal health information (collectively, "**Health Information**") from you or your Insurer in order to administer your use of the Program.

Your PII and Health information are collectively referred to as "**Personal Information**" throughout this Privacy Policy.

Demographic Information. We may also collect or receive your gender, date of birth and other information that is not considered PII or Health Information because it cannot be used by itself to identify you.

Usage Information. By enrolling in the Program, you hereby grant Sempre Health permission to collect and store information regarding your usage of the Program, including, without limitation, when you pick up prescriptions, the amounts you pay for a prescription, your responses to messages sent in connection with the Program, your responses to surveys and any other usage information (collectively, "**Usage Information**").

De-Identified Information. You acknowledge that Sempre Health may use your Health Information and Usage Data to create de-identified or aggregated data that does not identify you ("**De-Identified Data**"), in a manner that complies with the Health Insurance Portability and Accountability Act of 1996 ("**HIPAA**").

Sempre Health may retain, use and disclose De-Identified Data for research and analysis purposes, to improve the Services or to promote the Services.

Information Collected Using Cookies and other Web Technologies. Like many website owners and operators, we use automated data collection tools such as Cookies and Web Beacons to collect certain information from our Website.

- **“Cookies”** are small text files that are placed on your device by a web server when you access our Services. We may use both session Cookies and persistent Cookies to identify that you’ve logged in to the Services and to tell us how and when you interact with our Services. We may also use Cookies to monitor aggregate usage and web traffic routing on our Services and to customize and improve our Services. Unlike persistent Cookies, session Cookies are deleted when you log off from the Services and close your browser. Although most browsers automatically accept Cookies, you can change your browser options to stop automatically accepting Cookies or to prompt you before accepting Cookies. Please note, however, that if you don’t accept Cookies, you may not be able to access all portions or features of the Services. Some third-party services providers that we engage (including third-party advertisers) may also place their own Cookies on your hard drive. Note that this Privacy Policy covers only our use of Cookies and does not include use of Cookies by such third parties.
- **“Web Beacons”** (also known as web bugs, pixel tags or clear GIFs) are tiny graphics with a unique identifier that may be included on our Services for several purposes, including to deliver or communicate with Cookies, to track and measure the performance of our Services, to monitor how many visitors view our Services, and to monitor the effectiveness of our advertising. Unlike Cookies, which are stored on the user’s hard drive, Web Beacons are typically embedded invisibly on web pages (or in an e-mail).

Information Related to Use of the Services. Our servers automatically record certain information about how a person uses our Website (we refer to this information as **“Log Data”**). Log Data may include information such as a user’s Internet Protocol (IP) address, browser type, operating system, the web page that a user was visiting before accessing our Website, the pages or features of our Services to which a user browsed and the time spent on those pages or features, search terms, the links on our Services that a user clicked on and other statistics. We use Log Data to administer the Services and we analyze (and may engage third parties to analyze) Log Data to improve, customize and enhance our Services by expanding their features and functionality and tailoring them to our Users’ needs and preferences. We may use a person’s IP address to generate aggregate, non-identifying information about how our Services are used.

Information Sent by Your Mobile Device. We collect certain information that your mobile device sends when you use our Website, like a device identifier, user settings and the operating system of your device, as well as information about your use of our Website.

Information that We Share with Third Parties

We will not share any Personal Information that we have collected from or regarding you except as described below:

Information Shared with Insurer. Any Health Information sent to the Services by an Insurer will be accessible by that Insurer independent of the Services. You acknowledge that our Terms of Service and this Privacy Policy do not apply to your Insurer.

Information Shared with Our Services Providers. We may engage third-party services providers to work with us to administer and provide the Services. These third-party services providers have access to your Personal Information only for the purpose of performing services on our behalf and are expressly obligated not to disclose or use your Personal Information for any other purpose.

Information Shared with Third Parties. We may share anonymized or aggregated information, including, without limitation, De-Identified Data, demographic information, information about the computer or device from which you access the Services and other analysis that we create based on information we receive from you and other users, with third parties for research and analysis, promoting the services, demographic profiling and other similar purposes.

Information Shared with Web Analytics Services Providers. We use Google Analytics, a service provided by Google, Inc. (“Google”), to gather information about how users engage with our Site and Services. For more information about Google Analytics, please visit www.google.com/policies/privacy/partners/. You can opt out of Google’s collection and processing of data generated by your use of the Services by going to <http://tools.google.com/dlpage/gaoptout>.

Information Disclosed in Connection with Business Transactions. Information that we collect from our users, including Personal Information, is considered to be a business asset. Thus, if we are acquired by a third party as a result of a transaction such as a merger, acquisition or asset sale or if our assets are acquired by a third party in the event we go out of business or enter bankruptcy, some or all of our assets, including your Personal Information, may be disclosed or transferred to a third party acquirer in connection with the transaction.

Information Disclosed for Our Protection and the Protection of Others. We cooperate with government and law enforcement officials or private parties to enforce and comply with the law. We may disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate: (i) to respond to claims, legal process (including subpoenas); (ii) to protect our property, rights and safety and the property, rights and safety of a third party or the public in general; and (iii) to stop any activity that we consider illegal, unethical or legally actionable activity.

Communications

Program Messages. As part of the Program, you may (if enabled) receive notifications, alerts or other types of messages via text message or email (“Messages”). You have control over the Messages settings, and can opt out of these Messages (with the exception of infrequent, important service announcements and administrative messages) by replying “STOP” to a text message or following the unsubscribe instructions provided in the e-mail you receive, as applicable. Please be aware that third party messaging fees may occur for some of the Messages depending on the message plan you have with your wireless carrier.

If you provide your cellular phone number and agree to receive communications from Sempre Health, you specifically authorize Sempre Health to send text messages or calls to your phone. You are not required to consent to receive text messages or calls as a condition of using the Services and may opt out of such messages. You can opt out of receiving text messages by responding “STOP” to any text message you receive from Sempre Health.

Mailing Lists. You may sign up for our mailing lists via the Website. If you do, we may periodically send you e-mails that directly promote our Services (or the services of our third-party partners) or that relate to your use of the Services. When you receive promotional communications from us, you will have the opportunity to opt-out by following the unsubscribe instructions provided in the e-mail you receive.

Your Choices

You can always opt out of receiving communications from Sempre Health by following the instructions above. If you want Sempre Health to delete your Personal Information, please contact us at support@semprehealth.com, (415) 792-1070, or 333 Bryant Street Suite 210 San Francisco, CA 94107. We'll take steps to delete your Personal Information as soon as we can, but some information may remain in archived/backup copies or as required by any state or federal law. Sempre Health may also retain any De-Identified Information as described above.

Responding to Do Not Track Signals

Our Website has the capability to respond to "Do Not Track" signals received from various web browsers.

The Security of Your Information

We take reasonable administrative, physical and electronic measures designed to protect the information that we collect from or about you (including your Personal Information) from unauthorized access, use or disclosure and to comply with all applicable laws. Please be aware, however, that no method of transmitting information over the Internet or storing information is completely secure. Accordingly, we cannot guarantee the absolute security of any information.

Please note that your Personal Information may be transferred to, and maintained on, computers located outside of your state or other governmental jurisdictions where the privacy laws may not be as protective as those in your jurisdiction.

Links to Other Sites

Our Services may contain links to websites and services that are owned or operated by third parties (each, a "**Third-party Service**"). Any information that you provide on or to a Third-party Service or that is collected by a Third-party Service is provided directly to the owner or operator of the Third-party Service and is subject to the owner's or operator's privacy policy. We're not responsible for the content, privacy or security practices and policies of any Third-party Service. To protect your information we recommend that you carefully review the privacy policies of all Third-party Services that you access.

Our Policy Toward Children

Our Services are not directed to children under 13 and we do not knowingly collect PII from children under 13. If we learn that we have collected PII of a child under 13 we will take steps to delete such information from our files as soon as possible.

Questions?

Please contact us at support@semprehealth.com if you have any questions about our Privacy Policy.