

Sempre Health Privacy Policy

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Sempre Health works with health plans and pharmaceutical manufacturers to change medication affordability and access across the United States.

Because we care about privacy, we are 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**”), our prescription benefits program (the “**Program**”), and our related online and offline offerings (collectively, the “**Services**”). Please note that 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 as required by law, and we’ll update the “Last Updated Date” above to indicate when those changes will become effective. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use the Services after the new Privacy Policy takes effect.

Collection of Information

Information Collected from You or Received from Your Insurer

The categories of personal information we collect depend on your relationship with us.

Program Participation. 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, date of birth, insurance policy number and/or health insurance information, and postal address (“**PII**”). We may also 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 (“**Health Information**” and, together with PII, “**Personal Information**”) from you or your Insurer in order to administer your use of the Program.

Demographic Information. We may also collect or receive certain data elements such as your gender and other information that is not considered Personal Information because, by itself, this information cannot be used to identify you.

Your Communications with Us. We may collect Personal Information, such as your name and email address, from you if you request information about our Services, elect to sign up for a mailing list on our Website, request customer or technical support, or otherwise communicate with us. For more information regarding our use of Personal Information submitted through the Website, please see the “Communications” section below.

Customer Service and Support. If you call or otherwise interact with Sempre Health’s customer service and support, we may collect the information you provide to our representatives. In addition, we may record telephone calls between you and our representatives for training and quality assurance purposes.

Interactive Features. Sempre Health may offer interactive features such as forums, chat and messaging services, and social media pages. Sempre Health and other individuals who use our Services may collect the information you submit or make available through these interactive features. Any information shared on the public sections of these channels will be considered “public” and may not be subject to the privacy protections referenced herein.

Conferences, Trade Shows, and other Events. We may attend conferences, trade shows, and other events where we collect Personal Information from individuals who interact with or express an interest in Sempre Health and/or the Services. If you provide us with any information at one of these events, we will use it for the purposes for which it was collected.

Surveys. We may contact you to participate in surveys. If you decide to participate, you may be asked to provide certain information which may include Personal Information.

Job Applications. We may post job openings and opportunities on the Services. If you reply to one of these postings by submitting your application, CV and/or cover letter to us, we will collect and process the information contained therein to assess your suitability, aptitude, skills, and qualifications for employment with Sempre Health.

Information Related to Use of the Services. We may collect certain information automatically when you use the Services. This information may include your Internet protocol (IP) address, user settings, IMEI, MAC address, Technologies including cookie identifiers, mobile advertising and other unique identifiers, mobile carrier, details about your browser, operating system or device, location information (including inferred location based off your IP address), Internet service provider, pages that you visit before, during and after using the Services, information about the links you click, and other information about how you use the Services. Information we collect may be associated with the devices you use.

Cookies, Web Beacons, and Personalized Advertising. We, as well as third parties that provide content, advertising, or other functionality on the Services, may use cookies, pixel tags, local storage, and other technologies (“**Technologies**”) to automatically collect information through the Services. Technologies are essentially small data files placed on your device that allow us and our partners to record certain pieces of information whenever you visit or interact with the Services.

- Cookies. Cookies are small text files placed in visitors’ device browsers to store their preferences. Most browsers allow you to block and delete cookies. However, if you do that, the Services may not work properly.
- Pixel Tags/Web Beacons. A pixel tag (also known as a web beacon) is a piece of code embedded on the Services that collects information about users’ engagement. The use of a pixel allows us to record, for example, that a user has visited a particular web page

or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Analytics. We may also use Google Analytics and other service providers to collect information regarding visitor behavior and visitor demographics on our 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 visiting <http://tools.google.com/dlpage/gaoptout>.

Use of Personal Information

We use Personal Information for a variety of business purposes, including:

To fulfill our contracts and provide you with the Services.

- Manage your information and participation in the Program;
- Respond to questions, comments, and other requests;
- Provide access to certain areas, functionalities, and features of our Services; and
- Answer requests for customer or technical support.

Administrative Purposes.

- Pursue legitimate business interests, such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
- Measure interest and engagement in the Services;
- Develop of new products and services;
- Improve our products and Services;
- Ensure internal quality control and safety;
- Verify individual identity;
- Carry out audits;
- Communicate with you about your activities in the context of the Program and/or our Services and changes to our agreements;
- Prevent and prosecute potentially prohibited or illegal activities;
- Enforce our agreements and policies; and
- Comply with our legal obligations.

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**").

Use De-Identified and Aggregated Information. We may use Personal Information and other data about you to create de-identified and aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access our Services, or other analyses we create. 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.

Marketing Our Products and Services. We may use Personal Information to tailor and provide you with content and advertisements. We may provide you with these materials as permitted by applicable law.

Some of the ways we market to you include email campaigns and “interest-based” or “personalized advertising.”

If you have any questions about our marketing practices or if you would like to opt out of the use of your Personal Information for marketing purposes, you may contact us at any time as set forth below.

Consent. Sempre Health may use Personal Information for other purposes that are clearly disclosed to you at the time you provide Personal Information or with your consent.

Information that We Share with Third Parties

We may share any Personal Information that we have collected from or regarding you as described below:

Information Shared with Insurer. Any Personal 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 and that we are not responsible for your Insurer’s privacy or security practices.

Information Shared with Our Services Providers. We may engage third-party services providers to work with us to administer and provide the Services. The types of service providers to whom we entrust Personal Information include service providers for: (i) the provision of the Services; (ii) the provision of information, products, and other services you have requested; (iii) marketing and advertising; (iv) payment processing; (v) customer service activities; and (vi) the provision IT and related services.

Information Shared with Our Business Partners. We may provide Personal Information to business partners to provide you with a product or service you have requested. We may also provide Personal Information to business partners with whom we jointly offer products or services.

Information Shared with Our Affiliates. We may share Personal Information with our affiliated companies.

Information Shared with Our Advertising Partners. Through our Services, we may allow third party advertising partners to set Technologies and other tracking tools to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited,

location, time of day). These advertising partners may use this information (and similar information collected from other websites) for purposes of delivering targeted advertisements to you when you visit third party websites within their networks. This practice is commonly referred to as “interest-based advertising” or “personalized advertising.” If you prefer not to share your Personal Information with third party advertising partners, you may follow the instructions below.

Information Shared with Third Parties. We may share de-identified 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 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 of a financing due diligence, reorganization, we go out of business or enter bankruptcy, some or all of our assets, including your Personal Information, may be disclosed or transferred 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, collect amounts owed to us, and enforce our policies and contracts; and (iii) to stop any activity that we consider illegal, unethical or legally actionable activity.

Communications

You may have certain choices about how your Personal Information is used.

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 phone number (to your health plan or Sempre Health) and agree to receive communications from Sempre Health, you specifically authorize Sempre Health to text message or call the number you have provided (including via an automatic telephone dialing system). Consent to receive text messages or calls is not a condition for purchase. 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.

“Do Not Track.” Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

Technologies and Personalized Advertising. If you would like to opt-out of the Technologies we employ on the Services, you may do so by blocking, disabling, or deleting them as your browser or device permits. Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of personalized advertisements on some mobile applications by following the instructions for [Android](#) and [iOS](#).

The online advertising industry also provides websites from which you may opt-out of receiving targeted ads from advertisers that participate in self-regulatory programs. You can access these, and also learn more about targeted advertising and consumer choice and privacy, at www.networkadvertising.org/managing/opt_out.asp, <http://www.youronlinechoices.eu/> and www.aboutads.info/choices/.

Please note you must separately opt out in each browser and on each device.

Your Choices

For purposes of the California Consumer Privacy Act, Sempre Health does not “sell” your Personal Information.

In accordance with applicable law, you may have the right to: (i) request confirmation of whether we are processing your Personal Information; (ii) obtain access to or a copy of your Personal Information; (iii) receive an electronic copy of Personal Information that you have provided to us, or ask us to send that information to another company (the “right of data portability”); and (iv) request erasure of Personal Information held about you by Sempre Health, subject to certain exceptions prescribed by law.

If you would like to exercise any of these rights, please contact us as set forth below. We will process such requests in accordance with applicable laws. To protect your privacy, we will take steps to verify your identity before fulfilling your request.

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 Third Party Services

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 Personal Information from children under 13. If we learn that we have collected Personal Information of a child under 13 we will take steps to delete such information from our files as soon as possible.

Contact Us

If you have any questions about our privacy practices or this Privacy Policy, please contact us at:

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