

Privacy Policy

Connexion Health and its affiliates (collectively, "Company"), recognizes the importance of protecting your personal and financial information when you visit our website located at connexion.health ("Website") and interact with the offerings on the Website (the "Services"). The following information is designed to help you understand the information collection practices at this Website.

By visiting this Website, you are accepting the practices described in this Privacy Policy. If you do not agree to this policy, please do not use this Website. Please review the Terms and Conditions to learn of other terms and conditions applicable to your use of this Website.

Changes to this Privacy Policy

Company reserves the right to change, modify, add, or remove portions of this Privacy Policy at any time for any reason. Such changes shall be effective immediately upon posting. We suggest that you review this policy periodically for changes. The current version of this Privacy Policy can be accessed from the link on our homepage, or at the bottom of our other Website pages. You acknowledge that by accessing our Website after we have posted changes to this Privacy Policy, you are agreeing to the terms of the Privacy Policy as modified.

Information Collection and Use

Personally Identifiable Information:

The personally identifiable information you submit to our Website is used only to service your account and/or to provide you with information on Company products and services. The types of personal information that may be collected at our Website include: name, address, e-mail address and telephone number. We will not sell, share or rent your personally identifiable information to others in contravention of this Privacy Policy. Please contact us by email or telephone as specified below to update your account information whenever such information ceases to be complete or accurate.

Additionally, if you are accessing parts of this Website that are password protected, then (a) once you submit your password and enter, this Website will recognize who you are and collect all information that you submit, including all electronic information (including all transaction information), and (b) any information collected about you from this Website may be associated with other identifying information that we have about you.

Aggregate Information:

We generally record certain usage information, such as the number and frequency of visitors to our Website. This information may include the websites that you access immediately before and after your visit to our Website, the Internet browser you are using and your Internet Protocol (IP) address. If we use such data at all it will be on an aggregate basis, and we will not disclose to third parties any information that could be used to identify you personally.

INFORMATION WE COLLECT FROM YOU

In the course of your use of the Website, we obtain the following information about you as described below. We collect this data for the purposes described under “How We Use Your Information”.

SIGNING UP FOR SERVICES; USER INFORMATION

- Information you provide prior to any registration process, such as your email when you provide it to us;
- Information that you provide during any registration process, including in connection with a co-branded offer (such as your name, company name, email address, phone number, billing address or credit card information, geographic location and industry), when you call or email us (for support or otherwise) or when you use our products or services; and
- Payment information that you provide to us (by way of our Services or otherwise) when you purchase some of our products and services, including credit card data.

USE OF SERVICES, WEBSITE VISITS AND SUPPORT

Data relating to your online activity on our websites with respect to our Services, including the following:

- IP address
- browser type and version
- geographic location
- pages you view
- how you got to our Website and any links you click on to leave our Website
- when you update your information, communicate with us, or order new Services
- metadata about your use and your contacts’ use of our Website and your emails you send (including clicks and opens)
- your interactions with any videos we offer
- issues you encounter requiring our support or assistance
- any device or other method of communication you use to interact with the Website

We store this data we collect in a variety of places within our infrastructure, including system log files, back end databases and analytics systems.

- Your telephone conversations with us (which we may monitor or record).

SOCIAL MEDIA

- Information from third party social networking sites, including information that social networking sites provide to us if you use your credentials at such social networking sites to log into some of our Services (such as your name and email address to pre-populate our sign-up form).
- The information you allow us to access varies by social networking site, and depends on the level of privacy settings you have in place at the social

networking site. You can control and find out more about these privacy settings at the applicable social networking site.

OTHER SOURCES

- Information you provide to us at seminars or to our partners;
- Information you provide to us in surveys;
- Information that is publicly available; and
- Information you consent to us receiving from third parties.

HOW WE USE YOUR INFORMATION

We have a legitimate interest in running a successful and efficient business and in providing you with Website and useful content, and we use the information we collect, both on its own and combined with any other information we collect about you, for the following purposes:

- To provide requested Services to you;
- To provide you with useful content;
- To ensure the proper functioning of our Website
- To offer and improve our Website;
- To provide you with requested information or technical support
- To facilitate your movement through our websites or your use of our Website;
- To do a better job of advertising and marketing our Website (our use of your information to do this is performed with your consent where required by applicable law);
- To advertise and market third party products and services (such advertisement is only performed with your permission where your consent is required by applicable law)
- To diagnose problems with our servers or our Website;
- In connection with our security and compliance programs;
- To administer our websites;
- To communicate with you;
- To target prospective customers with our products or services (such targeting is only performed with your permission where your consent is required by applicable law);
- To assist us in offering you a personalized experience or otherwise tailor our Website to you; and
- As otherwise described in this privacy policy.

Cookies:

Cookies are small text files that are stored in your computer's memory and hard drive when you visit certain web pages. They are used to enable websites to function or to provide information to the owners of a website.

Cookies help us to provide customized services and information. We use cookies on this Website for the following purposes:

Analytical purposes:

Analytical cookies allow us to recognize, measure and track visitors to the Website. This helps us to improve and develop the way the Website works, for example, by determining whether site visitors can find information easily, or by identifying the aspects of the site that are of the most interest to them.

Usage preferences:

Some of the cookies on the Website are activated when visitors to our sites make a choice about their usage of the site. Our Website then 'remembers' the settings preferences of the user concerned. This allows us to tailor aspects of the site to the individual user.

Terms and conditions:

We use cookies on the Website to record when a site visitor has seen a policy, such as this one, or provided consent, such as consent to the terms and conditions on our Website. This helps to improve the user's experience of the site – for example, it avoids a user from repeatedly being asked to consent to the same terms.

Session management:

The software that runs the Website uses cookies for technical purposes needed by the internal workings of our servers. For instance, we use cookies to distribute requests among multiple servers, authenticate users and determine what features of the site they can access, verify the origin of requests, keep track of information about a user's session and determine which options or pages to display in order for the site to function.

Functional purposes:

Functional purpose cookies store information that is needed by our applications to process and operate. For example, where transactions or requests within an application involve multiple workflow stages, cookies are used to store the information from each stage temporarily, in order to facilitate completion of the overall transaction or request.

To make full use of the Website, your computer or mobile device will need to accept cookies, as the site will not function properly without them. In addition, cookies are required in order to provide you with personalized features on the Website.

Local Flash Storage:

We may include content on the Website designed for display using Adobe Flash Player, such as animations, videos and tools. Local flash storage (often referred to as "Flash cookies") can be used to help improve your experience as a user. Flash storage is retained on your device in much the same way as standard cookies, but is managed directly by your Flash software.

If you wish to disable or delete information stored locally in Flash, please see the documentation for your Flash software, located at www.adobe.com. Please note that, if you disable Flash cookies, some site functionality may not work.

Third party cookies:

When you visit the Website, you may receive cookies that are set by third parties. These may include cookies set by Google, Unica, Forsee, Wall Street on Demand, Morningstar, Media Mind

and/or Flurry. These cookies are used for the purposes described in the bullet points above. We do not control the setting of these third party cookies, so we suggest you might wish to check the third party websites for more information about their use of cookies and how to manage them.

Amending cookie preferences:

You can configure your browser to accept all cookies, reject all cookies, notify you when a cookie is set, or delete cookies that have already been set. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences. You are always free to decline our cookies if your browser permits, although in that case you may not be able to use certain features on our Website. In addition, a number of companies offer utilities designed to help you visit websites anonymously.

The site www.allaboutcookies.org includes instructions for managing cookies on many commonly used browsers, or you may consult the vendor documentation for your specific software.

Privacy Preferences:

This Website may contain information, including P3P privacy policies ("Privacy Preference Information"), intended to work with your selected privacy preferences. While we have tried to make such Privacy Preference Information included within this Website conform to this full-text of this Privacy Policy, this Privacy Policy is the definitive statement of the privacy policies and practices for this Website.

Service Providers:

We may use internal or external service providers to operate our Website and employ other persons to perform work on our behalf, such as sending postal mail and e-mail. These persons may have access to the personally identifiable information you submit through the Website, but only for the purpose of performing their duties. These personnel are not permitted to use your personally identifiable information for any other purpose.

Compliance with Laws:

Company does not automatically collect personally identifiable information from visitors to our Website, except to the extent we are required to do so pursuant to the USA PATRIOT Act or some other statute or regulation applicable to us. We will not provide any personally identifiable information to any other persons, except (a) if we are required to make disclosures to the government or private parties in connection with a lawsuit, subpoena, investigation, similar proceedings or regulatory examination, (b) to comply with applicable laws or regulations, (c) to enforce these Terms, or (d) to share information with our affiliates or service providers in connection with providing services to you. We can (and you authorize us to) disclose any such information in those circumstances.

E-mail and Marketing:

Company does not sell its customers' e-mail addresses, nor will we provide your personal information to third parties for their marketing purposes. Company will not send you e-mail messages without first receiving your permission, unless it relates to servicing your account or unless you have consented to receiving electronic delivery of fund documents as part of our E-Delivery service. It is our policy to include instructions for unsubscribing from these permission-based programs. We recommend that you do not send us any individual personal information via nonsecure methods of correspondence, including via public electronic communication channels, such as Internet e-mail, which are generally not secure.

Business Transfers:

If all or some of the business, stock or assets of Company are acquired or merged with another business entity, we will share all or some of your information with this entity to continue to provide service to you. You will receive notice of such an event and the new entity will inform you of any changes to the practices in this Privacy Policy. If the new entity wishes to make additional use of your information, you may decline such use at such time.

Children's Privacy

Although this Website is not targeted toward children, we are concerned about the safety and privacy of children who use the Internet. Consistent with the Children's Online Privacy Protection Act of 1998, we will never knowingly request personally identifiable information from anyone under the age of 13 without prior verifiable parental consent. If we become aware that a child under 13 has provided us with personally identifiable information without verifiable parental consent, we will use our best efforts to remove such information from our files. If a parent or guardian becomes aware that his or her child has provided us with personally identifiable information without verifiable parental consent, he or she should contact us.

Third Party Websites

Company may establish links between this Website and one or more websites operated by third parties. Company has no control over any such other websites, the contents therein or the products/services offered. Your access to and use of such linked websites is governed by the terms of use and privacy policies of those sites, and shall be at your own risk. Company disclaims responsibility for the privacy policies and customer information practices of third-party internet websites hyperlinked from our Website.

Security

No data transmission over the internet can be 100% secure, so Company cannot ensure or warrant the security of any information you submit to us on this Website. However, Company seeks to protect your personal information when you transact business on our Website by requiring the use of a browser software program that supports industry standard SSL encryption with 128-bit key lengths. The "128-bit" designation refers to the length of the key used to encrypt the data being transmitted, with a longer key representing a higher level of security.

Marketing Specific Privacy Practices

Company, Inc. respects your privacy and the need to protect the information you provide. Company strives to conform to the Council of American Survey Research Organizations (CASRO)'s Code of Standards and Ethics for Survey Research and the Direct Marketing Association (DMA)'s and the Federal Trade Commission (FTC)'s Fair Information Practice Principles, and complies with applicable privacy laws in the United States and other countries. We may conduct employee and customer research. Protecting survey respondents' privacy is of utmost importance to us. We inform respondents as to the nature of the study and how the data will be used; we discuss length of the interview and assure confidentiality. Company conducts customer research on behalf of our clients and may provide full disclosure of the study sponsor if necessary.

For surveys, Company takes every measure to ensure that no personally identifiable information is collected about survey respondents unless it is voluntarily provided by the respondent through either email, a request for information, or conference registration. Except as permitted in CASRO's Code of Standards and Ethics for Survey Research or as required by law, if you are asked personally identifiable information during the survey, the personally identifiable information will not be shared with any other party, unless you consent. We may use information about you to conduct future surveys or studies, but your participation is always voluntary.

All personally identifiable information obtained by Company is stored on equipment located in the United States, except as required by EU Privacy regulations (below).

We do not rent or sell any information to third parties other than the client for whom the survey was conducted.

As a client, you can be assured your customer information is kept strictly confidential. We also guarantee a secure environment for client surveys and data. All information is stored in a protected location.

Company routinely reviews its security and privacy practices, and improves on them to better protect your privacy. If we decide to change our privacy policy, we will post notification of those changes to this privacy policy on the homepage so users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We will use information in accordance with the privacy policy under which the information was collected. If, however, we are going to use a respondent's personally identifiable information in a manner materially different from that stated at the time of collection, we will notify users. Users will have a choice as to whether or not we use their information in this different manner. However, if we do not have current contact information for a respondent, then they will not be contacted, nor will their personal information be used in this new manner.

Personally Identifiable Information:

The personally identifiable information you submit to our Website is used only to service your account and/or to provide you with information on Company products and services. The types

of personal information that may be collected at our Website include: name, address, e-mail address and telephone number. We will not sell, share or rent your personally identifiable information to others in contravention of this Privacy Policy. Please contact us by email or telephone as specified below to update your account information whenever such information ceases to be complete or accurate.

Additionally, if you are accessing parts of this Website that are password protected, then (a) once you submit your password and enter, this Website will recognize who you are and collect all information that you submit, including all electronic information (including all transaction information), and (b) any information collected about you from this Website may be associated with other identifying information that we have about you.

If you have any questions about our privacy policy, please contact us at privacy@connexion.health

Users from the European Union or Switzerland

This section of the Privacy Policy applies only if you use our Website or services covered by this Privacy Policy from a country that is a Member State of the European Union or Switzerland, and supplements the information in this Privacy Policy.

CONTROLLER OF PERSONAL INFORMATION

To the extent that Company is subject to the laws of the European Union and Switzerland when processing personal data (“Personal Data”), it shall be the “data controller” under such laws.

LEGAL BASIS FOR DATA PROCESSING

We process Personal Data for the purposes set out in this Privacy Policy, as described above. Our legal basis to process Personal Data includes processing that is: necessary for the performance of the Services; necessary to comply with legal requirements (for example, to comply with applicable accounting rules or to make mandatory disclosures to law enforcement); necessary for our legitimate interests (for example, to manage our relationship with you and to improve the website and our Services); and, where legally required and we have no other valid legal basis to process Personal Data, we will use consent by our customers (for example, to provide you with marketing information or share information with third parties), which may subsequently be withdrawn at any time (by emailing privacy@connexion.health) without affecting the lawfulness of processing based on consent before its withdrawal.

In some instances, you may be required to provide us with Personal Data for processing as described above, in order for us to be able to provide you all of our Services, and for you to use all the features of our website.

INTERNATIONAL TRANSFERS OF PERSONAL DATA

The nature of Company's business means that the Personal Data collected through our Website and Services will be transferred to the United States. Also, Company personnel and some of the third-parties to whom we disclose Personal Data (as set out above) may be located in the United States and other countries outside of the European Union or Switzerland, including in countries to which you fly and that may not provide the same level of data protection as your home country. We take appropriate steps to ensure that recipients of your Personal Data are bound to duties of confidentiality and we implement measures such as standard data protection contractual clauses to ensure that any transferred Personal Data, remains protected and secure. A copy of these clauses can be requested by emailing privacy@connexion.health.

YOUR RIGHTS

Where the European Union's General Data Protection Regulation 2016/679, or GDPR, applies, in certain circumstances and subject to data processing agreements, you have rights in relation to the personal information we hold about you. We set out below an outline of those rights and how to exercise those rights. Please note that we will require you to verify your identity before responding to any requests to exercise your rights by providing details only known to the account holder. To exercise any of your rights, please email privacy@connexion.health. Please note that for each of the rights below we may have valid legal reasons to refuse your request, in such instances we will let you know if that is the case.

ACCESS

You have the right to know whether we process personal information about you, and if we do, to access data we hold about you and certain information about how we use it and who we share it with.

PORTABILITY

You have the right to receive a subset of the personal information you provide us if we process it on the legal bases of our contract with you or with your consent in a structured, commonly used and machine-readable format and a right to request that we transfer such personal information to another party. If you wish for us to transfer the personal information to another party, please ensure you detail that party and note that we can only do so where it is technically feasible. We are not responsible for the security of the personal information or its processing once received by the third party.

CORRECTION

You have the right to require us to correct any personal information held about you that is inaccurate and have incomplete data completed. Where you request correction, please explain in detail why you believe the personal information we hold about you to be inaccurate or incomplete so that we can assess whether a correction is required. Please note that while we assess whether the personal information we hold about you is inaccurate or incomplete, you may exercise your right to restrict our processing of the applicable data as described below.

ERASURE

You may request that we erase the personal information we hold about you in the following circumstances:

- where you believe it is no longer necessary for us to hold the personal information;
- we are processing it on the basis of your consent and you wish to withdraw your consent;
- we are processing your data on the basis of our legitimate interest and you object to such processing;
- you no longer wish us to use your data to send you marketing; or
- you believe we are unlawfully processing your data.

Please provide as much detail as possible on your reasons for the request to assist us in determining whether you have a valid basis for erasure.

RESTRICTION OF PROCESSING TO STORAGE ONLY

You have a right to require us to stop processing the personal information we hold about you other than for storage purposes in the following circumstances:

- You believe the personal information is not accurate for the period it takes for us to verify whether the data is accurate;
- We wish to erase the personal information as the processing we are doing is unlawful but you want us to simply restrict the use of that data;
- We no longer need the personal information for the purposes of the processing but you require us to retain the data for the establishment, exercise or defense of legal claims; or
- You have objected to us processing personal information we hold about you on the basis of our legitimate interest and you wish us to stop processing the personal information while we determine whether there is an overriding interest in us retaining such personal information.

OBJECTION

You have the right to object to our processing of data about you and we will consider your request. Please provide us with detail as to your reasoning so that we can assess whether there is a compelling overriding interest in us continuing to process such data or we need to process it in relation to legal claims.

You also have the right, at any time, to object to our processing of data about you in order to send you marketing, including where we build profiles for such purposes and we will stop processing the data for that purpose.

WITHDRAWAL OF CONSENT

Where you have provided your consent to us processing your personal data, you can withdraw your consent at any time by emailing privacy@connexion.health.

Effective May 25, 2018