

PRIVACY POLICY

Last Modified: May 18, 2021

Welcome to the web site(s) (the “Site” or “Sites”) or mobile apps (the “Apps”) of Prediction Health Inc., doing business as PredictionHealth (“PredictionHealth”, “we”, “us” and/or “our”). This Site is operated by PredictionHealth and has been created to provide information about our company and our physician support services, mobile applications and related products and services (together with the Sites and/or the Apps, the “Services”) to our Service visitors and users (“you”, “your”).

This Privacy Policy hereby incorporates by this reference our Terms of Use and any additional updates, revisions, supplements, modifications and additional rules, polices, terms and conditions (collectively referred to in this Agreement as “Additional Terms”). Except as otherwise indicated, any reference herein to the “Privacy Policy” shall include the Terms of Use and Additional Terms.

Please read this Privacy Policy carefully. By creating an account, providing information to us (by any means, whether in correspondence, via our Site, Apps, or otherwise), signing this Privacy Policy, or continuing to use the Site and Services, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy. You “sign” and accepts this Privacy Policy by clicking “I agree” on the account creation screen or signing an applicable order form, proposal, statement of work, or other separate legal agreement that specifically references this Privacy Policy.

If you do not agree with this Privacy Policy or our practices, you may not use our Services. This Privacy Policy may change from time to time and your continued use of our Services constitutes your acceptance of those changes. We encourage you to review this Privacy Policy periodically.

1. What this Policy Covers.

This Privacy Policy covers important information on who we are, how and why we collect, store, use, and share information relating to an identified or identifiable individual or their household (“Personal Information”) and other information that is collected from users of the Services. It also explains your rights in relation to your Personal Information and how to contact us in the event you have a complaint.

Personal Information does not include information (including Personal Information) you provide to us that we have aggregated. Personal Information may be collected about our customers, prospective customers, visitors to the Site, and end users of the Services. You can choose not to provide us with certain information, but by doing so, you may not be able to take advantage of many of the features and functionality of our Services.

The Services are intended for use by physicians and other health care providers only (“Customers”). If you are accessing or using the site on behalf of a company or other legal entity, you represent and warrant that you have the authority to bind such entity to this agreement, in which case references to “You” or “Your” in this Privacy Policy will refer to both the individual and any such Customer or legal entity using the Sites or any of the Services. Our Customers are responsible for maintaining their own privacy policies governing the collection, use and disclosure

of Personal Information and for obtaining the necessary authorizations and consents before any Personal Information is made available to us for use in accordance with this Privacy Policy.

You understand and agree that PredictionHealth and its authorized business partners, affiliates, subsidiaries or agents may collect, maintain, and process information provided by you, on and through the Services. You represent and warrant that you have permission to share any information you elect to provide to PredictionHealth, you consent to such information being shared with third parties as described in this Privacy Policy, and that such information is accurate, current, non-misleading, and consistent and relevant for the purpose for which you are providing information.

2. Personal Information We Collect About You.

We may collect and use the following Personal Information that identifies, relates to, describes, is reasonable capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

- contact and registration information from Customer employee signing up on behalf of the Customer.
- names, email addresses and other business contact information about individuals who we consider to be prospective Customers and business partners (“Prospects”). PredictionHealth uses third-party service providers in order to collect, store and process Personal Information about Prospects.
- protected health information about our Customer’s patients (e.g. diagnoses, physician name, address, email, and phone number, physician notes)
- information regarding your preferences related to us or our Site
- information regarding how you became aware of our Services
- information about the device and browser you use, your network connection, your IP address, and information about the cookies installed on your device.

This Personal Information is required to provide Services to you. If you do not provide Personal Information we ask for, it may delay or prevent us from providing Services to you.

By voluntarily providing us with Personal Information, you are consenting to our use of it in accordance with this Privacy Policy. If you provide Personal Information to the Services, you acknowledge and agree that such Personal Information may be transferred from your current location to the offices and servers of PredictionHealth and the authorized third parties referred to herein located in the United States.

3. Other Information

- Non-Identifiable Data: When you interact with PredictionHealth through the Services, we receive and store certain personally non-identifiable information. Such information, which is collected passively using various technologies, cannot presently be used to

specifically identify you. PredictionHealth may store such information itself or such information may be included in databases owned and maintained by PredictionHealth affiliates, agents or service providers. The Services may use such information and pool it with other information to track, for example, the total number of visitors to our Site or App downloads, the number of visitors to each page of our Site, and the domain names of our visitors' Internet service providers. It is important to note that no Personal Information is available or used in this process.

- Cookies: In operating the Services, we may use a technology called "cookies." A cookie is a piece of information that the computer that hosts our Services gives to your browser when you access the Services. Our cookies help provide additional functionality to the Services and help us analyze Services usage more accurately. For instance, our Site may set a cookie on your browser that allows you to access the Services without needing to remember and then enter a password more than once during a visit to the Site. In all cases in which we use cookies, we will not collect Personal Information except with your permission. On most web browsers, you will find a "help" section on the toolbar. Please refer to this section for information on how to receive notification when you are receiving a new cookie and how to turn cookies off. We recommend that you leave cookies turned on because they allow you to take advantage of some of the Service features.
- Log Files: Like many internet and mobile services, we may automatically gather certain information about our Services traffic and store it in log files. This information includes mobile device identifiers, browser type, IP address, mobile or internet service provider, referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information, which does not identify individual users, to analyze trends, to administer the Services, to track users' movements around the Services, and to gather demographic information about our user base.

We also store in our log files information identifying users who have accessed data that we process and store about patients, and any changes they make to such data. We use this information to comply with legal obligations relating to such data and to keep a record of such changes. We may also use it to improve our Services. We may link this automatically collected data to Personal Information. Device identifiers may be tied to Personal Information to troubleshoot access issues.

We may use third-party tracking services that use log files, cookies, and possibly other techniques to track non-Personal Information about visitors to the Services in the aggregate. These services capture usage and volume statistics as well as geographical location data to compile usage reports and maps for optimization and troubleshooting purposes.

- Aggregated Personal Information: In an ongoing effort to better understand and serve the users of the Services, PredictionHealth may conduct research on its customer demographics, interests and behavior based on the Personal Information and other information provided to us. This research may be compiled and analyzed on an aggregate basis, and PredictionHealth may share this aggregate data with its affiliates,

agents and business partners. This aggregate information does not identify you personally. PredictionHealth may also disclose aggregated user statistics in order to describe our Services to current and prospective business partners, and to other third parties for other lawful purposes.

4. How Your Personal Information is Collected.

We collect most of this Personal Information directly from you—in person, by telephone, text or email and/or via our Site and Apps. However, we may also collect information:

- From publicly accessible sources (e.g., property records);
- Directly from a third party (e.g., sanctions screening providers, credit reporting agencies, or customer due diligence providers);
- From a third party with your consent; and
- From cookies on our Site.

5. How and Why We Use Your Personal Information.

Under data protection law, we can only use your Personal Information if we have a proper reason for doing so, e.g.:

- To comply with our legal and regulatory obligations;
- For the performance of our contract with you or to take steps at your request before entering into a contract;
- To identify Prospects and locate contact information to contact Prospects about our Services;
- To help diagnose technical problems for analytics and for quality control purposes
- For our legitimate interests or those of a third party; or
- Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your Personal Information for and our reasons for doing so:

What we use your Personal Information for	Our reasons
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To provide Site and/or Services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or PredictionHealth	For our legitimate interests or those of a third party, i.e. to minimize fraud that could be damaging for us and for you
<p>Conducting checks to identify our Customers and verify their identity</p> <p>Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation or rules issued by our professional regulator</p>	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	<p>For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information</p> <p>To comply with our legal and regulatory obligations</p>
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, product range or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price

<p>Preventing unauthorized access and modifications to systems</p>	<p>For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you</p> <p>To comply with our legal and regulatory obligations</p>
<p>Updating and enhancing Customer records</p>	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products</p>
<p>Statutory returns</p>	<p>To comply with our legal and regulatory obligations</p>
<p>Ensuring safe working practices, staff administration and assessments</p>	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</p>
<p>Marketing our services to:</p> <ul style="list-style-type: none"> — existing and former Customers; — third parties who have previously expressed an interest in our services; — third parties with whom we have had no previous dealings. 	<p>For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers</p>

External audits and quality checks	<p>For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards</p> <p>To comply with our legal and regulatory obligations</p>
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6. Promotional Communications.

We may use your Personal Information, to the extent it does not contain Protected Health Information (defined below) to send you updates (by email, text message, telephone or post) about our Services, including exclusive offers, promotions or new Services.

We have a legitimate interest in processing your Personal Information for promotional purposes (see above “How and why we use your Personal Information”). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your Personal Information with the utmost respect and never sell OR share it with other organizations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- Contacting us; or
- Using the “unsubscribe” link in emails or “STOP” number in texts.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further Services in the future, or if there are changes in the law, regulation, or the structure of our business.

7. Information Processed by our Customers.

Our Customers may provide us with Personal Information belonging to their patients or other third parties in connection with their use of our Services. PredictionHealth does not control the content or nature of the information processed by our Customers in connection with their use of our Services. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate Personal Information processed by one of our Customers should direct his/her request to the Customer directly.

8. Processing of Medical Practice Data.

Some of the Personal Information received by PredictionHealth, in connection with the Services, may be provided by Customers that are subject to laws and regulations, such as rules issued under the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and Health Information

Technology for Economic and Clinical Health Act of 2009 (HITECH), that govern a health care providers' use and disclosure of certain individually identifiable health-related Personal Information ("Protected Health Information").

As a service provider to our Customers we collect and analyze data related to our Customers patient's on their behalf. When we receive Protected Health Information, we may do so as a "Business Associate" of our Customers under an agreement that, among other things, prohibits us from using or disclosing the Protected Health Information in ways that are not permissible by the Customer itself, and requires us to implement certain measures to safeguard the confidentiality, integrity, and availability of the Protected Health Information. When we act as a Business Associate, we may be subject to certain laws and regulations, including certain HIPAA rules that govern our use and disclosure of Protected Health Information and that may be more restrictive than otherwise provided in this Privacy Policy.

To the extent that any of the information we collect in connection with the Services constitutes Protected Health Information under HIPAA, we will comply with the requirements of HIPAA and its implementing regulations. Additionally, PredictionHealth will only process such Protected Health Information upon instruction from such Customer, consistent with our Terms of Use and a Business Associate Agreement with such Customer.

9. Who We Share Your Personal Information With.

We may share Personal Information with:

- Our affiliates;
- Service providers we use to help deliver our Site and/or Services to you;
- Other third parties we use to help us run our business, such as website hosts, maintenance services, database management, web analytics, and marketing agencies, to the extent the Personal Information does not contain Protected Health Information;
- Third parties approved by you, including social media sites you choose to link your account to or third-party payment providers, to the extent the Personal Information does not contain Protected Health Information;

We only allow our service providers to handle your Personal Information if we are satisfied they take appropriate measures to protect your Personal Information, including compliance with HIPAA if your Personal Information contains Protected Health Information. We also impose contractual obligations on service providers to ensure they can only use your Personal Information to provide the requested Services to us and to you. We may also share Personal Information with external auditors, e.g. in relation to accreditation and the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to (i) comply with our legal and regulatory obligations, (ii) protect and defend the rights or property of PredictionHealth, (iii) act in urgent circumstances to protect the personal safety of users of the Services or the public, or (iv) protect against legal liability.

We may also need to share some Personal Information with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

Other than as described in this Privacy Policy, we will not share your Personal Information with any other third party unless we have your express consent.

10. How Long Your Personal Information Will Be Kept.

We will keep your Personal Information while you have an account with us or while we are providing Services to you. Thereafter, we will keep your Personal Information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly; or
- To keep records required by law.

We will not retain your Personal Information for longer than necessary for the purposes set out in this Privacy Policy. Different retention periods apply for different types of Personal Information. When it is no longer necessary to retain your Personal Information, we will delete or anonymize it.

11. Keeping Your Personal Information Secure.

We have appropriate security measures in place to prevent Personal Information from being accidentally lost or used or accessed in an unauthorized way. We limit access to your Personal Information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

However, you recognize that data transmitted online or stored in a facility where online access is provided cannot be made to be 100% secure. In particular, email sent to or from the Sites may not be secure.

12. Our Services are not intended for use by children under the age of 18.

We do not knowingly collect personal information from children under the age of 18. If you are under 18 do not use our Services or provide any information about yourself including, without limitation, your name, address, email address or any screen name or user name you may use. If we learn that we have collected or received personal information from a child under 13 without verification of parental consent, in compliance with the Children's Online Privacy Protection Act, we will purge such information from our database and cancel the corresponding accounts. If you believe that we may have any information from or about a child under 13, please contact us at the

address below. Please visit the FTC's website at www.ftc.gov for tips on protecting children's privacy online.

13. Your Rights Under the CCPA.

If you are a California resident, you may have certain rights related to the Personal Information we have collected from you, which may or may not be granted based on the circumstances, but only in compliance with applicable law. These rights may include the following under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable:

<p>Disclosure of Personal Information We Collect About You</p>	<p>You have the right to know:</p> <ul style="list-style-type: none"> • The categories of Personal Information we have collected about you; • The categories of sources from which the Personal Information is collected; • Our business or commercial purpose for collecting or selling Personal Information; • The categories of third parties with whom we share Personal Information, if any; and • The specific pieces of Personal Information we have collected about you.
<p>Personal Information Sold or Used for a Business Purpose</p>	<p>In connection with any Personal Information we may sell or disclose to a third party for a business purpose, you have the right to know:</p> <ul style="list-style-type: none"> • The categories of Personal Information about you that we sold and the categories of third parties to whom the Personal Information was sold; and • The categories of Personal Information that we disclosed about you for a business purpose. <p>You have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to opt-out of the sale or disclosure of your Personal Information. If you exercise your right to opt-out of the sale or disclosure of your Personal Information, we will refrain from selling your Personal Information, unless you subsequently provide express authorization for the sale of your Personal Information.</p>
<p>Right to Deletion</p>	<p>Subject to certain exceptions, on receipt of a verifiable request from you, we will:</p> <ul style="list-style-type: none"> • Delete your Personal Information from our records; and

	<ul style="list-style-type: none"> • Direct any service providers to delete your Personal Information from their records.
Protection Against Discrimination	<p>You have the right to not be discriminated against by us because you exercised any of your rights under the CCPA. This means we cannot, among other things:</p> <ul style="list-style-type: none"> • Deny goods or services to you; • Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; • Provide a different level or quality of goods or services to you; or • Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services. <p>Please note that we may charge a different price or rate or provide a different level or quality of Services to you, if that difference is reasonably related to the value provided to our business by your Personal Information.</p>

14. **How to Exercise Your Rights.**

If you would like to exercise any of your rights as described in this Privacy Policy, please:

- Call us, at (615) 270-5813; or
- Email us at info@predictionhealth.com.

Please note that you may only make a CCPA-related data access or data portability disclosure request twice within a 12-month period.

If you choose to contact us by email or phone, you will need to provide us with:

- Enough information to identify you (e.g., your full name, address and customer or matter reference number, as applicable);
- Proof of your identity and address (e.g., a copy of your driving license or passport); and
- A description of what right you want to exercise and the information to which your request relates.

We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information, or is someone authorized to act on such person's behalf.

Any Personal Information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

15. Changes to This Privacy Policy.

This Privacy Policy was published on the date "Last Modified" above.

We may change this Privacy Policy from time to time—when we do, we will inform you by posting any changes to this Privacy Policy on this page and, if the changes are significant, we will provide a more prominent notice which may include sending notice to you by email or posting notice of such changes on our home page (<https://www.predictionhealth.com/>).

16. How to Contact Us.

Please contact us by post or email if you have any questions about this Privacy Policy or the information we hold about you.

Our contact details are shown below:

PredictionHealth, Inc. PO Box 158778 Nashville, TN 37215
info@predictionhealth.com