

**Keet Inc.**  
**PRIVACY POLICY**

**(REVISED FEBRUARY 2015)**

Keet Inc., a Delaware corporation (“**Keet**,” “**our**,” “**us**,” or “**we**”) offers a physical therapy care platform-as-a-service (the “**Service**”) that is designed to allow physical therapists to efficiently manage the patient care process and to allow patient end users (“**Patients**”) to effectively complete their home treatments outside of the physical therapy office and meaningfully interact with physical therapist users (“**Therapists**”). The Beta Service includes a responsively designed web application (the “**App**”).

Keet respects your privacy. In that regard, we have created this Privacy Policy to let you know the information we collect, how we use that information and any potential disclosures of such information.

This Privacy Policy applies to:

- The Service;
- The website [www.getkeet.com](http://www.getkeet.com) (the “**Website**”);
- The App; and
- Any email, text and other electronic communications you send to Keet through the Website or the Service.

This Privacy Policy does not apply to:

- Information we collect offline or by any other means (such as through other websites, products or services we may offer); and
- Information collected by third parties, which may have their own privacy policies.

The term “**you**,” as used in this Privacy Policy, refers to a Patient or Caregiver end user of the Service. Please read this Privacy Policy carefully and save it. If you do not agree with it, you should not access the Website or use the Service. By using the Service or the Website or by submitting electronic communications to us, you consent to the practices prescribed in this Privacy Policy.

**What information does Keet collect?**

- **Personal Information.** When we refer to “**Personal Information**” in this Privacy Policy, we mean any information by which you may be personally identified or contacted, whether online or offline. When you use the Service, whether as a Patient or a Caregiver, fill out any forms located on the Website, or use the App, you acknowledge that we may collect certain Personal Information from you, such as your first and last name, home or other physical address, email address, phone number or other contact information, whether at work or at home, schedule information and credit card or other payment information.
- **Health Information.** You also acknowledge and agree that, if you are a Patient, we may collect your Health Information. “**Health Information**” means any information related to your physical or mental health, including your medical history, physical therapy goals, health background and current health status information, age information and information related to the diagnosis and treatment of health conditions, insurance information, information regarding your physicians and other healthcare providers and information regarding over-the-counter and prescription medications.
- **Technical Information.** We may also collect and use technical data and related information, such as information about your device, system and application software, peripherals and other data related to your interactions with the Service (“**Technical Information**”). We may automatically collect Technical Information through [cookies and

log files. The information we collect from these technologies may include your IP address, device ID, browser information and the page you request. Keet does not consider this information to be Personal Information.

### **Information Collected from Caregivers**

If you are a Patient, you acknowledge that we may collect your Personal Information or Health Information from you directly or through your Caregivers. It is your choice whether or not to provide that Personal Information or Health Information through the Service; provided that if, as a Patient, you designate a Caregiver, the Caregiver may elect to provide your Personal Information or Health Information on your behalf. In such case, the Caregiver is solely responsible for obtaining your consent to provide the Personal Information or Health Information. If you choose not to provide requested Personal Information or Health Information, you may not be able to use certain features of the Service.

### **Information You Voluntarily Disclose**

Please keep in mind that whenever you voluntarily disclose Information through any messaging or news feed features or otherwise voluntarily utilize features of the Service that inherently share Information such as features that allow a Patient to share Information with a Caregiver or that allow a Patient or Caregiver to share a Patient's Information with a Therapist, that Information can be collected and used by others. You submit this Information at your own risk. We are not responsible for the security or privacy of any Information you choose to submit in connection with these public features.

### **How does Keet use Information?**

Except as described in this Privacy Policy or in our Terms of Service, Personal Information, Health Information and Technical Information (collectively, "**Information**") that Patients or Caregivers provide or that we collect from Patients or Caregivers, will be kept confidential.

We may use your Information, including your Personal Information and Health Information, as follows:

- To provide software updates, product support, product enhancements and other services to you related to the Service, the App and the Website.
- To improve, market or promote Keet's products and services.
- To enable you to participate in features of the Service, the App or the Website.
- To communicate with you, including about the Service, the App or the Website.
- To respond to comments, questions or requests for customer service.
- For any other purpose we may describe when you provide the Information.

The Service exists in order to allow Patients and Therapists to communicate with one another regarding the Patient's physical therapy program. In order to provide for this type of exchange, we need to ensure that each user that contributes Information expressly permits the uses that we envision. For this reason, we need a license from you to use your Information, whether collected directly from you or, if applicable, your Caregiver. You hereby grant to Keet a non-exclusive, transferable, sublicensable, royalty free license to use your Information in order to provide the Service to the Patient, and the Patient's Caregivers and Therapists and as necessary to monitor and improve the Service. The license is non-exclusive (meaning you are free to license the Information to anyone else in addition to us), fully-paid and royalty-free (meaning that we are not required to pay you for our use of the Information), sublicensable (so that we are able to use affiliates and subcontractors to provide the Service), transferable (meaning that we may transfer it to a third party should we restructure our business), irrevocable (meaning that you may not revoke or rescind such license for any reason once the Information is uploaded) and worldwide (because the Internet is and the Service may be global in reach).

We may also use your Information for any other purpose with your consent.

### **Data and Blind Data**

You also grant Keet a perpetual, non-exclusive, transferable, sublicensable, royalty free license to use such Information other than Personal Information and Health Information and other data we collect from you via Patient's or Caregiver's use of and interaction with the Service in order to collect, develop, create, extract or otherwise generate statistics and other information and to otherwise compile, synthesize and analyze such Information and data ("**Blind Data**"), such as to generate anonymous usage statistics. If we generate Blind Data, it will be owned by us and we may use it for any lawful business purpose. Any Blind Data will not personally identify you or the source of the Data.

### **Information We Share**

Except as described in this Privacy Policy, Keet does not share, rent or sell the Personal Information we collect with third parties.

Keet or its agents, vendors or contractors may disclose Information, including your Personal Information, to third parties in the following circumstances:

- To our agents, vendors or contractors that we use to support the internal operations of our business who are required to keep the Information confidential and use it only for the purposes for which we disclose it to them.
- If required to do so by law, comply with legal process or to comply with a governmental or regulatory request;
- To protect and defend the rights or property of Keet or its agents or contractors;
- To enforce our Terms of Service or other Keet agreements;
- To act in urgent circumstances to protect the personal safety of users of the Service or the Website or the public; and
- As part of a transaction or potential transaction where Keet merges with another organization, files for bankruptcy, or sells its assets or capital stock.

If, as a Patient, you validate another end user as your designated Caregiver, we may share certain Information with that Caregiver.

Additionally, Keet may Share your Information with Therapists with whom you have a relationship for the provision of physical therapy services. We share this Information (including certain Personal Information and Health Information) with Therapists in order to provide elements of the Service and to allow communication between the Therapists and you.

### **Security of Your Information**

We maintain physical, electronic, and procedural safeguards designed to protect the Information. These safeguards include storing your Information on secure servers using encryption technology. All Personal Health Information (PHI) records are encrypted with 256-bit AES encryption keys as soon as they enter the infrastructure. Every record is encrypted with a unique initialization vector by a unique encryption key to achieve semantic security. The system verifies each record's integrity on a regular basis and on each record request using a hash-based authentication code (HMAC) calculated using its own unique 256-bit HMAC key. Encryption keys, initialization vectors and HMAC keys are re-keyed and each record re-encrypted on a regular basis. Despite the actions and precautions we take, no data transmissions over the Internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of the Information and you acknowledge and agree that you transmit it to us at your own risk.

### **Third-Party Websites, Services and Technologies**

We may provide links to third-party websites on the Website or in other communications to you. These links may appear as a specific domain name or URL or may be activated by clicking on an advertisement or other icon or graphic. Please be aware that other websites and services, including the websites of third parties that you connect with through the Service, may collect personally identifiable information about you. We cannot control and are not responsible for the information collection practices of any third-party websites, services or applications. We encourage you to carefully review their terms of use, privacy policies, and any other legal notifications before using or providing information through such websites, services or applications.

Further, the Service may employ third party technologies that require you to accept such third party's terms. This Privacy Policy does not cover the information practices of those third-party technologies.

### **International Transfers**

Information collected from you may be stored and processed in the United States or any other country in which Keet or its affiliates, subsidiaries, agents or contractors maintain facilities. If you are accessing the Service, Website or the App from the European Union or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your data to the United States and processing globally. By providing your Information, you consent to any transfer and processing in accordance with this Privacy Policy.

### **HIPAA**

This Privacy Policy and the privacy and security practices described in this Privacy Policy are designed to comply with the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Therapists and their employers, to the extent they are "Covered Entities" under HIPAA (as such term is defined in HIPAA) have their own privacy and security obligations with respect to your Personal Information and Health Information. Additionally, we have agreements in place with Therapists or their organizations, which define certain of our security and privacy obligations. We encourage you to contact each Therapist with whom you interact through the Service and the App regarding their privacy and security practices. For more information regarding your rights under HIPAA, see <http://www.hhs.gov/ocr/privacy/>.

### **Children's Privacy**

The Service, Website and the App are not intended for children under the age of 13. We do not knowingly collect Information from children under 13. If you believe that we may have collected Information from a child under the age of 13, please contact us at [info@getkeet.com](mailto:info@getkeet.com).

### **Information Choices and Changes**

We may need to communicate with you about the Service, Website or the App, and we would like to make certain commercial offers available to you from time to time. As such, by signing up for our newsletter or by creating an account on the Website, you consent to receive commercial messages (whether by phone, email, text or push notifications) from us or our third party partners, and acknowledge and agree that your email addresses and other information may be used for the purpose of initiating commercial messages. We will allow you to opt-out of receiving commercial messages, but in order to stop receiving any messages from us whatsoever (including administrative messages regarding the Service), you will need to terminate your account.

Depending on your browser, you may be able to remove and reject cookies from our Website by changing your browser settings. The default setting of many browsers is set to accept cookies until you change your settings. Please note that if you disable or refuse cookies, certain features of the Website may become inaccessible or may not function properly.

### **Changes to this Privacy Policy**

This is our entire Privacy Policy and it replaces any earlier version. We may change this Privacy Policy by posting a new version on the Website or through the Service or the Website, and it is your responsibility to review this Privacy Policy periodically. If we make material changes to our practices regarding the collection, use and sharing of your Personal Information, we will notify you via e-mail to the email address you provide to us and/or through a notice on the Website home page or via the Service or the Website.

When we do change the Privacy Policy, we will also revise the “revised” date. Your continued use of the Service, Website or the App after such date constitutes your agreement to this Privacy Policy and any updates.

### **Contacting Keet**

For questions or comments regarding this Privacy Policy, please contact us at 98 San Jacinto, Austin Tx 78701, 413.230.0085 and [info@getkeet.com](mailto:info@getkeet.com).