



Privacy Policy

PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING OR SUBMITTING PERSONAL INFORMATION TO THE SITE.

Please reference and review the Policy on a regular basis as it constitutes a legally binding agreement between you and Insignia Health, LLC and has important consequences on your legal rights and obligations. This Privacy Policy was last updated on July 6, 2018 ("**Revision Date**").

Insignia Health ("**Insignia Health**," "**we**," "**us**," or "**our**") and its affiliates, licensors, suppliers, officers, directors, employees, agents, or other related parties (collectively, the "**Affiliates**") are dedicated to safeguarding and respecting your privacy. This Policy informs you of our privacy practices, how we collect and use your information, when it might be disclosed, and how you can manage your personal information when using any and all Insignia Health websites and web-based applications, including but not limited to the PAM[®] survey and Flourish[™] (the "**Site**"). The Policy is incorporated into and is subject to Insignia Health's Terms and Conditions of Use ("**Terms**"). Your use of this website and any personal information you provide when using the Site ("**Personal Information**") is subject to this Policy and the Terms.

By using or accessing the Site, you agree to the terms and conditions of the Policy. It is your responsibility to read and understand them. If you do not agree to them, do not use the Site or submit any Personal Information to the Site.

Covered by this Policy

This Policy applies to all Insignia Health websites and web-based applications, including but not limited to the Patient Activation Measure[®] (PAM[®]) survey and Flourish[®] health education program.

Within its own Site, Insignia Health may provide links to third-party websites ("**Third Parties**"). If you access such third party links, you will leave the Site. Insignia Health does not control or endorse such Third Party sites, and this Policy and the Terms do not govern or apply to such sites. Please carefully review the terms and conditions applicable to such Third Party sites before using or submitting personal information to any such site.

Collection of Personal Information

Insignia Health collects and uses your Personal Information to better understand your needs and interests, and to help us deliver a consistent and personalized experience when you use our Site. For example, during the registration process, we will ask you to provide Personal Information to complete your registration. The types of Personal Information that you provide may include contact information such as your name, address, telephone number, and email address, and/or other unique information such as your username and password.

In addition to the information you provide, Insignia Health may also collect information during your visit to the Site through automated data collection methods (the "**Methods**"), which include Web beacons, cookies, embedded web links, and other commonly used information-gathering tools. These Methods collect certain standard information that your browser sends to the Site, such as your browser type and language, access times, and the address of the website from which you arrived at the Site. The Methods may also collect information about your Internet Protocol (IP) address and/or clickstream behavior (i.e., the pages you view, the links you click, and other actions you take in connection with the Site). The Methods also may be



used to collect information about your use of emails received from Insignia Health, such as when you open the email or click on a link contained in the email.

Use of Your Information

As noted above, Insignia Health will use your Personal Information to better serve your needs and interests as you use our Site. For example, Insignia Health may use or share your Personal Information to:

1. Verify that you are the source of feedback you wish published;
2. Assist you in completing a transaction;
3. Communicate with you about products and services;
4. Provide service and support;
5. Update you on new services and benefits;
6. Select content to be communicated to you;
7. Personalize Insignia Health features on the Site;
8. Allow you to participate in surveys; or
9. Contact you for research regarding your experiences with Insignia Health.

During the registration process we will give you the opportunity to choose your privacy preferences; you can update your preferences at any time.

When we collect and use your Personal Information, we do so in accordance with all applicable laws. Insignia Health may disclose certain Personal Information (i) to comply with a legal requirement, such as a law, regulation, court order, subpoena, or search warrant, (ii) in the course of a legal proceeding, (iii) in response to a law enforcement agency request, or (iv) to the organization providing you access to this Site and any of their affiliates or vendors. In addition, circumstances may arise where, whether for strategic or other business reasons, Insignia Health sells its businesses, purchases or merges with another business, or otherwise reorganizes its business. Such a transaction may involve the disclosure of Personal Information to prospective or actual purchasers, or the receipt of it from sellers. Insignia Health will seek appropriate protection for your Personal Information in these types of transactions.

Children's Privacy

We are committed to protecting the privacy of children. Insignia Health has neither designed nor intended its Site to attract children under the age of sixteen. Insignia Health does not collect information from children we actually know are under the age of sixteen. Anyone under the age of eighteen is prohibited from using or accessing the Site unless supervised by a parent or guardian. The parent or guardian is solely responsible for supervising a minor child's use of the Site, and assumes full responsibility for the interpretation and use of any information obtained from the Site for the minor.

Your Choices and Privacy Preferences

Insignia Health gives you the choice of receiving a variety of information that complements our products and services. You can subscribe to receive certain product- and service-specific information and also choose to receive Insignia Health general communications. You can make or change your choices about receiving either subscription or general communications by accessing your "Edit Account Info" page. The communication preferences in your Account Profile do not apply to



communications primarily for the purpose of support, product safety warnings, or other administrative and transactional notices, as the primary purpose of these communications is not promotional in nature.

The email communications that you receive from Insignia Health will be provided in accordance with this Policy and the communication preferences you select in your Account Profile.

Keeping Your Personal Information Secure

To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of your Personal Information, Insignia Health utilizes appropriate physical, technical, and administrative procedures to safeguard the information we collect. Nevertheless, you understand and agree that no security measures are absolute and that we cannot guarantee absolute protection of your Personal Information.

Privacy Shield Compliance

Insignia Health complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union (EU) and Switzerland to the United States. Insignia Health has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/list>.

If you are in the EU or Switzerland, you have the right to access the personal information we possess and direct us to correct, amend, or delete that information where it is inaccurate or has been processed in violation of the Privacy Shield Principles, as appropriate, in accordance with the Access Principle.

Insignia Health is responsible for the processing of personal data it receives under the Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. Insignia Health complies with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions.

The Federal Trade Commission has jurisdiction over Insignia Health's compliance with the EU-U.S. and Swiss-U.S. Privacy Shield. There is a possibility, under limited conditions, for individuals to invoke binding arbitration before a Privacy Shield Panel to be created by the U.S. Department of Commerce and the European Commission. For additional information about the Privacy Shield arbitration process, please visit the Privacy Shield website.

In compliance with Privacy Shield principles, Insignia Health commits to resolve complaints about our collection or use of your personal information. EU and Swiss residents with inquiries or complaints regarding our Privacy Shield policy should first contact Insignia Health at: info@insigniahealth.com or write to us at the following address:

Privacy Officer
Insignia Health, LLC
One SW Columbia Street, Suite 700
Portland, OR 97258



General Data Protection Legislation – Applicable to users in the European Union (EU) and Switzerland

Insignia Health is committed to cooperating with the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) and comply with the advice given by such authorities with regard to non-human resources data transferred from the EU and Switzerland. If you are a resident of the EU or Switzerland, the following information applies.

Right to lodge a complaint: Users who reside in the EU or Switzerland have the right to lodge a complaint about our data collection and processing actions with the appropriate supervisory authority. Contact details for data protection authorities are available [here](#).

Transfers: Personal information we collect may be transferred to, and stored and processed in, the United States or any other country in which we maintain facilities. In compliance with the General Data Protection Regulation (GDPR), we will ensure that transfers of personal information to a third country or an international organization are subject to appropriate safeguards as described in Article 46 of the GDPR.

Individual Rights: If you are a resident of the EU or Switzerland, you are entitled to the following rights under the GDPR.

Please note: In order to verify your identity, we may require you to provide us with personal information prior to accessing any records containing information about you.

- The right to request data erasure. You have the right to have your data erased from our Services if the data is no longer necessary for the purpose for which it was collected, you withdraw consent and no other legal basis for processing exists, or you believe your fundamental rights to data privacy and protection outweigh our legitimate interest in continuing the processing.
- The right to restrict or object to our processing. You have the right to restrict or object to our processing if we are processing your data based on legitimate interests or the performance of a task in the public interest as an exercise of official authority (including profiling); using your data for direct marketing (including profiling); or processing your data for purposes of scientific or historical research and statistics.
- It is possible, under certain circumstances, that you may invoke binding arbitration of claims.

Please note that Insignia Health is required to disclose personal information about you in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Changes to the Policy

Insignia Health may, without notice, revise and update the Policy at any time. Such updated Policy will apply to your use of the Site effective as of the Revision Date. Such revisions and updates will be signified by a change in the Revision Date listed above. Your continued use of the Site means that you accept the terms of the updated Policy.

Questions

We value your thoughts and concerns. To access your information, ask questions about our privacy practices, or to make a complaint, please contact Insignia Health at info@insigniahealth.com or write to us at the following address:

Privacy Officer
Insignia Health, LLC
One SW Columbia Street, Suite 700
Portland, OR 97258