

# phrHero Privacy & Security Policy

phrHero is committed to maintaining the confidentiality, integrity and security of any personal information about our users. This Privacy & Security Policy explains how we protect personal information provided through our website [phrHero.com](http://phrHero.com) (the “Site”) and how we use that information in connection with our service offered through the Site (the “Service”). “Personal information” for purposes of this Policy means information that identifies you, such as your name, address, phone number, fax number or email address.

phrHero stresses its privacy and security standards to guard against identity theft and provide security for your personal information. We regularly re-evaluate our privacy and security policies and adapt them as necessary to deal with new challenges.

## 1. Your Privacy is not for sale

Simply put, we do not and will not sell or rent your personal information to anyone, for any reason, at any time. phrHero uses and discloses your personal information only as follows:

- to provide the Service;
- to analyze site usage and improve the Service;
- for internal system administration;
- to deliver to you any administrative notices, health alerts and communications relevant to your use of the Service;
- to fulfill your requests for certain products and services;
- for market research, project planning, troubleshooting problems, detecting and protecting against error, fraud or other criminal activity;
- to third-party contractors that provide services to phrHero and are bound by these same privacy restrictions;
- to enforce phrHero’s Terms of Use; and
- as otherwise set forth in this Privacy and Security Policy.

## 2. We limit the collection and use of personal information

Certain areas and features of phrHero are available to you without registration or the need to provide to us any information. However, other features of the Site or the Service may require registration, which involves provision to phrHero of an email address, a password and a

username (collectively the “Registration Information”). In order to benefit from the full functionality of the Service, you also must provide your third-party health portal credentials (“Portal Credentials”) to allow phrHero to access your health data at those other healthcare providers institutions (“Portal Information”) for your use.

From time to time we may request other personal information to provide you with other benefits of the Service. In all such instances, you will be given the opportunity to provide or to decline to provide that information, and it will be used only for the stated purpose. phrHero may make anonymous or aggregate personal information and disclose such data only in a non-personally identifiable manner to:

- Organizations approved by phrHero that conduct research into health; and
- Users of the Service for purposes of comparison of their personal health situation relative to the broader community.

Such information does not identify you individually. Access to your Registration Information, Portal Credentials, Portal Information and any other personal information you provide is strictly restricted and used in accordance with specific internal procedures and safeguard governing access, in order to operate, develop or improve the Service. These individuals have been selected in accordance with our security policies and practices and are bound by confidentiality obligations. They may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

### 3. Changes to your Registration Information

If your Registration Information changes during your subscription to phrHero, you may update it any time via the Service.

### 4. Online session information and use is only used to improve your experience

When you visit phrHero.com, we may collect technical and navigational information, such as computer browser type, Internet protocol address, pages visited, and average time spent on our Site. This information may be used, for example, to alert you to software compatibility issues, or it may be analyzed to improve our Web design and functionality.

“Cookies” are alphanumeric identifiers in the form of text files that are inserted and stored by your Web browser on your computer’s hard drive. phrHero.com may set and access cookies

on your computer to track and store preferential information about you. phrHero.com may gather information about you through cookie technology. Please note that most Internet browsers will allow you to stop cookies from being stored on your computer and to delete cookies stored on your computer. If you choose to eliminate cookies, the full functionality of the Service may be impaired for you.

We encode our cookies so that only we can interpret the information stored in them.

Web beacons are images embedded in a Web page or email for the purpose of measuring and analyzing site usage and activity. phrHero.com, or third party service providers acting on our behalf, may use Web beacons to help us analyze Site usage and improve the Service.

We may use third party service providers to help us analyze certain online activities. For example, these service providers may help us measure the performance of our online campaigns or analyze visitor activity on phrHero.com. We may permit these service providers to use cookies and other technologies to perform these services for phrHero.com. We do not share any personal information about our customers with these third party service providers, and these service providers do not collect such information on our behalf. Our third party service providers are required to comply fully with this Privacy and Security Policy.

## 5. phrHero blog

If you comment on the blog on our Site, you should be aware that any information you submit there can be read, collected or used by other users and could be used to send you unsolicited messages. We are not responsible for the personal information you choose to submit in these forums.

## 6. You can transport or delete your data

Your data is yours. You can remove it anytime you want. When you request us to delete your account for the Service, your data will be permanently expunged from our primary production servers and further access to your account will not be possible. We will also promptly disconnect any connection we had established to your Portal Information and delete all portal credentials.

## 7. Email communications from us

From time to time we may provide our registered customers with email alerts or email newsletters. phrHero subscribers have the ability to opt-out of receiving our promotional

emails and to terminate their newsletter subscriptions by following the instructions in the emails. Opting out in this manner will not end transmission of service-related emails, such as email alerts.

## 8. Your data is secure

We use a combination of firewall barriers, encryption techniques and authentication procedures, among others, to maintain the security of your online session and to protect phrHero accounts and systems from unauthorized access.

When you register for the Service, phrHero.com requires a password from you for your privacy and security. phrHero transmits information such as your Registration Information for phrHero.com or Portal Credentials securely.

Our servers are in a secure facility.

Our databases are protected from general employee access both physically and logically. We encrypt your Service password so that your password cannot be recovered, even by us. All backup drives and tapes also are encrypted.

We enforce physical access controls to our buildings.

No employee may put any sensitive content on any insecure machine (i.e., nothing can be taken from the database and put on an insecure laptop).

## 9. Our service ensures secure communications with encryption

From the time you submit your Login ID and Password, these communications between your computer and phrHero.com are encrypted. This enables client and server applications to communicate in a way that is designed to prevent eavesdropping, tampering and message forgery.

## 10. We post updates on our website whenever there is a change to our Privacy and Security Policy

We update this Privacy & Security Policy periodically. The date last revised appears at the top of the Policy. Changes take effect immediately upon posting.

## 11. Contact us if you have any questions or concerns

If you have questions, comments, concerns or feedback regarding this Privacy and Security Policy or any other privacy or security concern, send an e-mail to [privacy@phrHero.com](mailto:privacy@phrHero.com)