



Privacy Policy

Privacy Policy

Last updated: June 26, 2023

BioConvergent Health, LLC (“**BioConvergent**,” the “**Company**,” “**we**,” “**us**,” or “**our**”) is committed to privacy and data protection. This Privacy Policy (“**Policy**”) describes the privacy practices that BioConvergent follows when collecting and using personal information collected from you, through our interactions with you, through the websites under the control of BioConvergent that link to this Policy, and our services (collectively the “**Services**”), as well as how we use and protect your personal information. You may download a copy of the Policy here.

This Policy explains who we are; what personal information we collect about you; how we use it (including who we share that personal information with), and your rights and choices regarding your personal information.

1. WHAT INFORMATION DOES BioConvergent COLLECT ABOUT ME AND WHY?

We collect information that identifies, describes, or is reasonably capable of being associated with you (“**personal information**”). We use different methods to collect data from and about you, including when you fill out a form or give us information via the phone, or by email, or otherwise. The following discusses the categories of personal information we may collect.

- **To provide you with the services that you have requested** – This includes administering our relationship with you and to carry out our obligations arising from the relationship between you and us.

To provide you with services that you have requested we may collect:

- *Identifiers*. Such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.

- **To administer and protect our business and this website** – This includes troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data. We may use any information we collect to protect and defend the rights and property of BioConvergent, our employees, and business partners.

To administer and protect our business and this website we may collect:

- *Identifiers*. Such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.
- *Internet or other similar network activity*. Such as browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement. If you use our Services, we automatically collect information about your browsing and search history, interaction with the features of our Services, and responses to advertisements.



- **To use data analytics to improve our website, services, marketing, customer relationships, and experiences** - For example, we may analyze your personal information including your location, /or services requested, age, time zone, IP address and URL visited, against our wider customer base for internal business purposes, such as generating statistics and developing marketing plans, to improve our services and the website. We may also aggregate and de-identify your information to create customer segments and share with our affiliates and partners.

To perform analytics we may collect and process:

- *Internet or other similar network activity.* Such as information on a consumer's interaction with a website, application, or advertisement. If you use our Services, we automatically collect information about your browsing, interaction with the features of our Services, and responses to advertisements.
 - *Geolocation data.* Such as physical location. We do not collect precise geolocation data from you or your device, but may collect and use information about your general location (such as any state or country of residence supplied by you when setting up your user profile) or infer your approximate location based on your IP address in order to track our general website usage or to tailor any pertinent aspects of your user or educational experience to your region.
- **Information that we collect automatically.** When you engage with BioConvergent we may use cookies and similar tracking technology to collect the following information about you automatically:
 - *Internet or other electronic network activity information.* Such as browsing history, information on a consumer's interaction with a website, application, or advertisement. If you use our Services, we automatically collect information about your browsing and search history, interaction with the features of our Services, and responses to advertisements.
 - For example, when you visit the website, engage with BioConvergent content or with us digitally, we may collect certain information from your computer, tablet or mobile phone ("**Device**") such as your IP address, Device type (i.e., make and model), unique device identification numbers, browser-type, and time zone settings.
 - We may also collect information about how your Device has interacted with us including: the pages accessed and links clicked; how you navigate to and from the website (such as how you scroll over the site, which parts you click and how long you spend on each page); your preferences, the /or services that you have viewed or searched for; and crashes, download errors, and response times.
 - *Geolocation Data.* Such as physical location. We do not collect precise geolocation data from you or your device, but may collect and use information about your general location (such as any state or country of residence supplied by you when setting up your user profile) or infer your approximate location based on your IP address in order to track our general website usage or to tailor any pertinent aspects of your user or educational experience to your region.
 - For example, when you visit the website, engage with BioConvergent content or with us digitally, we may collect your broad geographic location (e.g., country or city-level location) from your Device.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using the contact details provided in the section below marked "How do I contact BioConvergent?" for more information on the specific legal ground we are relying on to process your personal data.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the business purpose which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

2. DO WE SELL OR SHARE PERSONAL INFORMATION?



We retain personal information in identifiable form only for as long as necessary to fulfill the purposes for which the personal information was provided to us or, if longer, to comply with legal obligations, to satisfy accounting or reporting requirements, to resolve disputes, to enforce agreements, and similar essential purposes. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us using the contact details provided in the section below marked "How do I contact BioConvergent?"

4. FOR WHAT BUSINESS PURPOSE CAN BIOCONVERGENT USE MY PERSONAL INFORMATION?

We are required to satisfy one or more of the reasons set out by applicable data privacy law before we can collect and use your personal information.

Generally, our business purpose for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally rely on the following reasons to collect and use your personal information:

- **Performance of a contract**

Using your information may be necessary for us to perform our obligations under a contract with you or with a view to entering into such a contract. This may include, for example, (i) providing you with services requested by you or your insurer or your employer; (ii) setting up and maintaining your account with us; or (iii) managing our relationship with you.

- **Compliance with our legal obligations**

The collection and use of your personal information may be necessary to enable us to meet our legal obligations, for example, to verify your identity and undertake necessary due diligence checks.

- **Pursuing our legitimate interests**

Where such processing is not overridden by your interests or fundamental rights, we are permitted to use your personal information where it is necessary in order to pursue our legitimate interests. Other legitimate interests may include:

- To communicate with you;
- To administer and protect our business including troubleshooting, data analysis, security, testing, system maintenance, support, reporting, technical functionality, hosting of data, and in the context of a business reorganization or group restructuring exercise;
- To prevent and investigate fraud and other misuses;
- To deliver relevant website content to you and measure or understand the effectiveness of the advertising we serve to you;
- To use data analytics to improve our website, services, marketing, client relations and experiences;
- To perform statistical, demographic, and marketing analyses of users of the website; or
- To make suggestions and recommendations to you about services that may be of interest to you.

We may have other legitimate interests and if appropriate we will make this clear to you at the relevant time.

- **Consent**

In some limited circumstances, we may rely on your consent to collect and use your personal information. For example, we may rely on consent: (i) where you have approached us in relation to employment opportunities and have provided us with sensitive personal information, such as information in relation to your racial and ethnic origin, sexual orientation, religion, physical and mental health, disabilities or trade union membership; or (ii) in relation to the sending of e-marketing or communications.



In some instances, we may need to use your personal information to protect your vital interests or those of another person.

You may not always be required to provide the personal information that we have requested. However, if you choose not to provide certain information, you may not be able to take advantage of some of our Services. Any information that is so required is clearly marked as mandatory. If you would prefer that we not collect certain personal information from you, please do not provide us with any such information, or opt out of providing this information where applicable.

If you have any questions or need further information concerning the business purpose on which we collect and use your personal information, please contact us using the contact details provided in the section below marked "How do I contact BioConvergent?"

5. DOES BIOCONVERGENT SHARE MY PERSONAL INFORMATION WITH ANYONE?

We may have disclosed the categories of personal information listed in the section marked "What categories of personal information does BioConvergent collect about me?" to the following categories of recipients:

- **With our affiliates** – We may make your personal information available to BioConvergent affiliated companies to allow us to provide our services to you, for the purposes described in this Policy, or as notified to you when we collect your personal information.
- **With third parties for marketing purposes** – Certain promotions and events may offer you the opportunity to consent to receive marketing communications from our business. If you have given your **consent**, your personal information may be used by such third party for the purposes stated at the point you enter the event and/or sign-up to receive the promotional updates.
- **With our service providers and business partners** – We engage third-party service providers and business partners to perform functions on our behalf (for example, to support the delivery of our services, or the website). BioConvergent will ensure that any service provider with which we share personal information agrees to safeguard it in substantially the same manner as BioConvergent has described in this Policy and in accordance with all applicable laws. This includes but is not limited to sharing information with the following types of service providers or business partners:
 - *advertising providers* – including companies that provide: (i) advertising space for BioConvergent; (ii) the provision of advertising related services, including agencies instructed to make advertising purchases on our behalf, providers of ad-exchanges (a digital marketplace to buy and sell advertising space) and providers of a demand-side platform (software used to purchase advertising in an automated fashion);
 - *providers of marketing and customer relationship management databases and data management platforms* – that enable BioConvergent to manage your information in a safe and efficient manner;
 - *data analysis firms* – that provide insights and help us to analyze trends using the data that we and they hold;
 - *customer support specialists* – that provide customer support services on our behalf for BioConvergent services;
 - *application development and web-hosting companies* – to enable us to manage and improve the website;
 - *information technology and related infrastructure providers;*
 - *email delivery providers;* and
 - *audit and professional service providers.*
- **As part of a business transfer** – BioConvergent may disclose your personal information to an actual or potential buyer (and its agents and advisers) in relation to any actual or proposed divestiture, merger, acquisition, joint venture, bankruptcy, dissolution, reorganization, or any other similar transaction or proceeding.
- **To comply with laws** – BioConvergent may disclose your personal information to any competent law enforcement body, regulatory, government agency, court, or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person; and
- **As information you've shared with other users on our platform** – When you use the Services (in particular, our interactive features), you may share certain personal information with other users. Please be aware that BioConvergent has little or no control over how individuals may use the information you share.



WITHOUT INSTRUCTIONS.

6. WHAT IF I ACCESS A THIRD-PARTY SITE THROUGH THE WEBSITE?

The website may contain links to or from third-party sites. Please be aware that we are not responsible for the privacy practices of such third parties. This Policy applies only to the personal information we collect as described above. We encourage you to read the privacy policies of third-party sites you access from links on the website or otherwise visit.

7. HOW DO I STOP RECEIVING MARKETING COMMUNICATIONS?

We will only send you marketing communications if you have agreed to this, or if we are otherwise permitted by law. If at any time you decide that you no longer wish to receive marketing communications from us, you may opt out by clicking on the relevant 'unsubscribe' link in the emails you receive, by contacting us using the details found in the section "How do I contact BioConvergent?".

Please note, while we will honor your request to stop receiving marketing communications, we will continue to send you service-related communications such as emails confirming purchases through the website.

8. DOES BIOCONVERGENT TRANSFER MY PERSONAL INFORMATION TO OTHER COUNTRIES?

In order to provide our services, we may need to transfer and process your personal information internationally (including to destinations outside the country in which you are located).

As a result, your information may be transferred to and/or processed in countries which may not guarantee the same level of protection for personal information as the country in which you reside. However, we have taken appropriate safeguards to ensure that your personal information will remain protected in accordance with this Policy.

Further information can be provided on request: please contact us using the details found in the section "How do I contact BioConvergent?" We have also implemented similar appropriate safeguards with our third-party service providers and partners and further details can be provided upon request.

9. IS MY PERSONAL INFORMATION SECURE?

We understand that you care how your personal information is used and/or shared with others, and we value your trust and seek to safeguard your personal information.

We implement appropriate technical and organizational security measures, including physical, administrative, and technical safeguards to protect your personal information from unauthorized access, use, and disclosure. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

The measures we use to protect your personal information are designed to provide a level of security appropriate to the risk of processing your personal information. However, please be aware that no electronic transmission of information can be entirely secure. We cannot guarantee that the security measures that we have in place to safeguard personal information will never be defeated or fail, or that those measures will always be sufficient or effective.

10. HOW OLD DO I HAVE TO BE TO USE THE BIOCONVERGENT SITES OR OTHER DIGITAL OFFERINGS?

You must be aged 13 or over to use the BioConvergent sites and our other digital offerings.

BioConvergent encourages parents and guardians to monitor and participate in their children's online activities. Unless you are viewing a website directed specifically to children, no information should be submitted to this site by users under 13 years of age, and users under 13 years old are not allowed to register for newsletters, clubs, or activities. In addition, users under 18 years of age are not allowed to make purchases or participate in contests, except for those specifically directed to children. Where appropriate, BioConvergent may ask you to indicate your age to verify compliance with these policies.

We take your privacy very seriously and we understand the importance of taking extra precautions to protect the privacy and safety of children who use our services. We do not solicit or knowingly collect personal information from children aged 13 and under. If we are made aware that we have received such information, or any information in violation of our policy, we will use reasonable efforts to locate and remove that information from our records.



that: (1) federal or state law requires us or a third party to maintain; (2) was not posted by you; (3) is anonymized so that you cannot be identified; (4) you don't follow our instructions for removing or requesting removal; or (5) you received compensation or other consideration for providing the content or information. Removal of your personal information from the Services does not ensure complete or comprehensive removal of that content or information from our systems or the systems of our service providers. We are not required to delete the content or information posted by you; our obligations under California law are satisfied so long as we anonymize the content or information or render it invisible to other users and the public.

11. DOES THIS POLICY EVER CHANGE?

We may update or modify this Policy from time to time in response to changing legal, technical, or business developments. We will obtain your consent to any material Policy changes if and where this is required by applicable data protection laws. The date of the most recent version of this Policy will appear at the top of the page.

When we update our Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. For example, we will notify you of any changes to this Policy by posting a new Policy and updating the "last updated" date at the top of this page or by sending the new Policy to you via email, where appropriate.

12. HOW DO I CONTACT BIOCONVERGENT?

We have taken great measures to ensure that your visit to the website is an excellent one and that your privacy is respected. If you have any questions, comments, or concerns about our privacy practices and/or would like to submit a privacy request, please contact us via email at info@bioconvergent.com.

California Shine the Light Law

California Civil Code Section 1798.83 permits users who are California residents to obtain from us once a year, free of charge, a list of third parties to whom we have disclosed personal information (if any) for direct marketing purposes in the preceding calendar year. If you are a California resident and you wish to make such a request, please send an e-mail with "California Privacy Rights" in the subject line to info@bioconvergent.com.

Contact Information

If you have any questions or comments about this notice, the ways in which we collect and use your information described in this Policy, or your choices and rights regarding such use please do not hesitate to contact us at info@bioconvergent.com

Questions about our services should not be directed to this address and will not be replied to.

If you would like your email address removed from our database, please send an email to info@bioconvergent.com and include "Remove from Mailing List" in the subject line.

Please use this contact information only for legal and privacy policy matters. For all other inquiries, refer to the [Contact Us](#) section of our home page.