



1 True Health – Care Management, Inc. Privacy Policy

This is the privacy policy (the “Privacy Policy”) governing the collection and use of information gathered from you through 1thcm.com and the 1 True Health – Care Management downloadable Apps (collectively referred to as the “Site”). The Site is operated by 1 True Health – Care Management, Inc. (“1THCM”). By using our Site, including on behalf of the organization for which you are accessing the Site (the “Organization”), you are agreeing for yourself and your Organization to the terms of this Privacy Policy (and to the Site’s [Terms of Use](#)) which is incorporated by reference. Use of the term “you” herein shall mean you, the Organization or any users you authorize on the Site. Use of the term “us” or “we” herein shall mean the employees, agents or assigns of 1 True Health – Care Management, Inc. Please review this information before you use the Site to be sure you agree with them and our information collection and use practices.

1. Type of Information Collected and When It May Be Collected.

- a. **Your Information.** As you use the Site, we may gather information from you, including information by which you may be identified (“**Personally Identifiable Information**”). We may gather information from you if you voluntarily provide it through the Site, such as if you sign up to use Site services, including using an Organization-assigned user id, and if you e-mail or text us with information.

Personally Identifiable Information we gather in these ways may include your name, Federal Employer Identification Number (FEIN) or Social Security Number (SSN), e-mail address, address, telephone number, place of work, for example. We may also gather information from you and your use of the Site through use of Cookies, such as the nature of your use of the Site, your email address, your password, and information about your computer. Cookies are forms of technology through which a computer or server stores information, including on your computer or server, about you or your computer when you visit the Site. The Cookies enable the system to recognize the person or their computer when they return to the Site. You may be able to set your browser to disable some or all Cookies or to notify you when a Cookie is set.

- b. **Personal Health Information.** A key function of the Site is to provide a technical communication system through which Patients (as individuals or through users acting on their behalf) may send and receive queries and information about their health and wellness to 1THCM employees and also to authorized Healthcare Practitioners. The information exchanged includes



personal health information by which individuals and patients may be identified (“Personal Health Information”). In providing this system, for purposes of this Privacy Policy, 1THCM does not consider its action of handling, transmitting, and/or ferrying of requests, information and responses as 1THCM’s use or disclosure of such information, as 1THCM in such capacity is merely providing a service to its users and is serving as the carrier of the information. However, all such communications and Personal Health Information exchanged through the Site may be stored by us (or our service providers for us) only as required by Law. By using this Site to send or receive any such Personal Health Information, you are acknowledging and confirming that you have secured any necessary permission to do so.

c. How We Use and Disclose the Information.

- i. **We (and our agents or assigns)** may use and disclose information we gather about you, including your Personally Identifiable Information: to operate the Site, to perform the functions and provide the goods and services you request, to improve, correct and maintain the Site, to facilitate and improve your experience on the Site, to contact you about the Site and new features and services available, and to provide the information to our service providers as needed in order for them to assist us with the operations of the Site, and as otherwise stated in this Privacy Policy.
- ii. With respect to communications including Personal Health Information exchanged through the Site’s services, these communications and the information may be stored by us or our service providers, on our behalf as required by Law.
- iii. With respect to any information gathered through the Site, including Personally Identifiable Information and Personal Health Information, we may unless prohibited by law: (A) aggregate this information so that individuals may not reasonably be identified and, once de-identified in this way, may use it and disclose it to others for any purpose; (B) share it with and transfer our rights in it to any successor entity to 1THCM, which entity would have the right to use and disclose the information as 1THCM did; and, (C) share it with our authorized agents and/business partners for deployment and marketing to You of 1THCM products and services. In addition, unless prohibited by law, we may use and disclose this information, including Personally Identifiable Information and Personal Health Information: (D) if we believe that any law or regulation requires us to do so; (E) to respond to a subpoena or governmental request; (F) as we deem advisable to protect our safety, rights, privacy or property, or that of others; and (G) to enforce or respond to a possible violation of any law or regulation, this Privacy Policy or our Terms of Use.



2. Updates and Corrections, Access.

If you register to use Site services, or provide us with your Personally Identifiable Information, we ask that you keep information we maintain about you and your Organization on our systems, such as your name, email address, and other contact information, complete and up to date. You may update and access this information by [contacting us](#).

3. No Direct Marketing.

We will not rent, sell or license your Personally Identifiable Information or Personal Health Information to others for their use in direct marketing to you. Notwithstanding the above, we may use and/ or disclose to our business partners and agents your Personally Identifiable Information to contact you about the Site as well as new features and services offered by 1THCM and our business partners.

4. Links to other sites and services.

From time to time, this Site may contain links to other sites. These other sites are not governed by this Privacy Policy and we caution you to review and make sure you are comfortable with any such site's privacy policy before using the site or providing any information to its operators.

5. User Locations.

This Site is intended to be used only by users located within the continental United States, Alaska and Hawaii.

6. Security.

We will use reasonable security measures to protect the Site and information gathered from you through use of this Site, and at least those security measures required by law. However, we are not responsible for any breach of security or for the unauthorized use by others of your information.

7. Other Sources of Information About You.

This Privacy Policy governs only information gathered from you through this Site. It does not govern information gathered from you through other means.

8. Monitor Your Use.

1THCM reserves the right to monitor your use of the Site at any time, without notice.

9. Updates to Privacy Policy.

We reserve the right to change this Privacy Policy at any time in our discretion. We will post a notice on the Site for at least thirty (30) days, providing a mechanism through which you may opt out of application of the revised Privacy



Policy to your previously gathered Personally Identifiable Information, if applicable. With this mechanism you will be given a time frame (often 30 days) to exercise this opt out option. If you continue to use the Site after the effective date of the change, the revised Privacy Policy will apply to any information we thereafter gather from you through the Site. If you do not opt out with respect to previously gathered Personally Identifiable Information through the mechanism and in the time frame provided, then that information, and any additional information gathered from you through the Site after the effective date of the change, will also be governed by the revised Privacy Policy.

10. Questions.

If you have any questions about this Site and its operations, please [contact us](#).

1 TRUE HEALTH – CARE MANAGEMENT IS COMMITTED TO PRIVACY OF PATIENT INFORMATION. WE USE PROVEN INFORMATION SECURITY SAFEGUARDS:

- We employ safeguards designed to protect the confidentiality of each patient’s medical records, patient accounts, and clinical information from information systems.
- We secure all protected health information, utilize progressive technology and enforce regulatory mandates to limit access to medical information systems for patient privacy.
- We ensure patient information is protected and secure
- We protect the transfer of protected health information between approved submitters and receivers.
- We hold ourselves accountable to our privacy principles
- We established a Regulatory and Compliance Committee to ensure that the corporate culture of high ethics is continually emphasized. The committee structure includes representation from all business units and provides a forum for communication, discussion of topics essential to an effective compliance program and assurance that policies address the needs of the company.
- We also conduct internal and external assessments of our operational security and privacy practices.
- We provide all 1THCM employees with training programs designed to educate our employees about the meaning and requirements of our privacy practices and procedures. Employees who violate these commitments are subject to disciplinary action up to and including dismissal. Employees are expected to report any violations to their manager or to the 1THCM Privacy Officer.
- We extend these privacy principles to our healthcare partners
- We require companies we select as our healthcare partners to agree to keep patient medical information confidential and secure.
- Our healthcare partners must also protect patient medical information against unauthorized access, use, or disclosure by the healthcare partner, and limit its use to the purposes for which it was accessed.



1 true health
CARE MANAGEMENT

Questions

Please contact us at support@1thcm.com if you have questions about 1 True Health – Care Management or our Privacy Policy.