

Valhalla
Mobile App Privacy Policy for Primary Users

Get definitions RIGHT – Health Data, Personal Information, Health Profile...

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1. Introduction

This Privacy Policy describes how Valhalla Healthcare, Inc. (“**Company**”, “**Valhalla**,” “**we**” or “**us**”) protects your personal information when you use the Company’s website, the Allevia mobile software application (“**Allevia**”), and all related products and services. We respect your privacy and are committed to protecting it through our compliance with this policy. This policy describes:

- The types of information we may collect or that you may provide when you purchase, download, install, register with, access, or use Allevia.
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to services that we provide through Allevia, and to information we collect in Allevia and in other electronic communications sent through Allevia. This policy also applies to any other products, services, or platforms we may provide or make available to you from time to time, as well as your general dealings with us – including through our website and any other online or mobile platforms (collectively, the “**Services**”).

This policy **does not** apply to information that you provide to or that is collected by any third party.

Please read the Privacy Policy carefully before you start to use Allevia. This is a legally binding agreement and the equivalent of a signed, written contract.

By clicking to agree to the Privacy Policy when this option is made available to you, you represent that you have read and considered this Privacy Policy, are 18 years of age or older, live in the United States, and accept and agree to be bound and abide by this Privacy Policy.

You will not be allowed to access or use Allevia unless you indicate your agreement to this Privacy Policy. Following any revision to the Privacy Policy, you will

not be allowed to continue to access or use Allevia unless you indicate your agreement to the revised version.

If you do not wish to agree to this Privacy Policy or to any revision thereof, then you must not access or use Allevia.

Allevia is offered and available to users who are 18 years of age or older, are competent to enter into agreements, and reside in the United States or any of its territories or possessions. If you do not meet all of these requirements, you must not access or use Allevia.

2. Summary of Data Practices

Uses/Disclosures of Information	Types of Information	
	Primary User Information (including Health Data, Personal Information, and Activity Logs)	De-Identified Aggregate Data
Do we disclose your information for the following purposes?		
<ul style="list-style-type: none"> Marketing and advertising third party products and services 	No	No
<ul style="list-style-type: none"> Marketing and advertising Allevia 	No	Yes
<ul style="list-style-type: none"> Medical and pharmaceutical research 	No	No
<ul style="list-style-type: none"> Creating Reports about our company and our user activity 	No	Yes
<ul style="list-style-type: none"> Improving Allevia features to create a better user experience 	No	Yes
<ul style="list-style-type: none"> To your insurer or employer 	No	No
<ul style="list-style-type: none"> For developing software applications 	No	Yes
Do we require our third party Service Providers to enter agreements that restrict what they can do with your Personal Information?	Yes	N/A
Do we stop all disclosure of your Primary User Information if you close your account?	Yes	N/A
Do we have Security Measures that are reasonable and appropriate to protect Primary User Information, in any form, from unauthorized access, disclosure, or use?	Yes	Yes

Uses/Disclosures of Information	Types of Information	
	Primary User Information (including Health Data, Personal Information, and Activity Logs)	De-Identified Aggregate Data
Do we store Primary User Information in the U.S. only?	Yes	Yes
Do we keep Activity Logs for your review?	Yes	N/A

3. Definitions

Activity Logs

Activity Logs are the Company’s records of when you interact with or through Allevia. This may include when you create, access, modify, delete, release, or export Primary User Information in or from Allevia.

De-Identified Aggregate Data

De-Identified Aggregate Data is Primary User Information that is: (1) grouped so it does not connect to you as an individual; and (2) has names and other identifiers removed or altered. In other words, De-Identified Aggregate Data is **de-identified** data and **cannot be used to identify you as an individual**. For example, De-Identified Aggregate Data might include statistical data that is calculated from a combination of your Health Data and the Health Data of other Primary Users. It is “de-identified” and cannot ever be connected to you personally.

Health Data

Health Data is the health information that you and the members of your Network collect, manage, and share via Allevia.

Health Profile

A Health Profile is a document that analyzes and summarizes the Health Data that the Primary User communicates to Allevia. Allevia will take the Health Data and assemble it into a summary for the Primary User to review and (if necessary) correct.

Allevia will then transform that into a clinical summary for Providers to use. That clinical summary is the Health Profile.

Personal Information

Personal Information means demographic information about you by which you may be personally identified, such as your name, postal address, e-mail address, telephone number, medical record number, and other identifiers and information, not specifically about your health that Allevia collects that are defined as personal or personally identifiable information under an applicable law. Personal Information may also include but is not limited to your financial information or social security number. Personal Information does *not* include your Health Data.

Primary User

A Primary User is the individual at the heart of each Valhalla Network – the person whose health care all members of the Network are working to protect and improve. You are signing up to be the Primary User.

Primary User Information

When you sign up for and use Allevia, you provide information about yourself, and you authorize your Network Members to provide information about you to Allevia. This information, including your Personal Information, Activity Logs, and Health Data, is Primary User Information. Primary User Information includes any information collected or developed by Allevia that can be connected with you personally. Primary User Information does *not* include De-Identified Aggregate Data, which cannot be connected with you.

Examples of Primary User Information include:

- Your name and contact information, such as your address, phone number, or email address
- Your Health Data
- Your Health Profile
- Your medical history, conditions, treatments, and medications

- Your Personal Information (non-health information that may be used to identify you, such as your age, gender, ethnicity, and occupation)
- Information that is collected automatically when you use Allevia, such as your Activity Logs, your IP address, and “cookie” preferences

As described further below, we may use your Primary User Information to achieve the following:

- Operate, improve and manage Allevia’s platform, software, and website
- Maintain and protect our computer systems
- Offer you resources for a better user experience and to improve your health, which may include (for examples) disease-specific education, links to relevant medical supplies, or suggested educational resources.

Comply with the law, such as responding to subpoenas and search warrants.

Provider

A Provider is any healthcare provider, healthcare practice, or hospital that accepts your invitation to access and interact with your Health Data and Health Profile. You and your Providers form your “**Network.**”

Reporting

Valhalla and our Service Providers might report about business activities and users of Allevia to others, such as investors, auditors, potential business partners, or public communities. Such Reports would only include De-Identified Aggregate Data.

Service Provider

A Service Provider is an entity that is hired to perform certain functions for Valhalla to support the development, maintenance, and implementation of Allevia. Service Providers may include software or website designers and data storage providers.

Security Measures

Security Measures include computer safeguards, secured files, encryption, physical safeguards, and employee security training. Valhalla may be required by law to notify you about particular data breaches, if any occur.

4. Information We Collect and How We Collect It

We collect information from and about users of Allevia:

- Directly from you when you enter it into Allevia.
- Directly from the Providers in your Network.
- From other apps that you may use (such as fitness and health trackers) when you **provide approval** for Allevia to synchronize with and/or obtain information from such other apps.
- Automatically when you use Allevia.

We Collect: Information That You Provide to Us.

When you download, register with, or use Allevia, we may ask you provide information:

- That is Health Data.
- Personal Information (defined above).
- That is about you but individually does not identify you, such as your smart phone model and operating system version, your IP address, your internet browser type.

This information includes:

- Information that you provide by filling in forms within Allevia. This includes information provided at the time of registering to use Allevia, subscribing to our service, posting material, entering Health Data, and requesting further services. We may also ask you for information when you report a problem with Allevia.
- Records and copies of your correspondence (including e-mail addresses and phone numbers), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.

- Your search queries on Allevia.

We Collect: Your Health Data

Allevia's main purpose is to facilitate the transmission of medical information between the Primary User and the Providers in his/her Network. This includes the information that you provide in response to Allevia's questions and forms, as well as health-related documents that you may upload. In addition, members of your Network can add information about your health, add items to your Medications List, view your Symptom List, upload laboratory results, radiology reports, health forms, and data from health-tracking applications that you choose to link, and anything else related to your health care that you or your Providers choose to communicate. These types of information are, collectively, your Health Data.

We will treat your Health Data (and the Health Profile that Allevia automatically assembles from your Health Data) as private and highly confidential, and will implement strong Security Measures to safeguard it. Please be aware that no security measures are perfect or impenetrable.

In addition, we cannot control and are not responsible for the conduct of the Providers in your Network. By using Allevia and choosing whom to invite to your Network, you accept and assume the risk that the confidentiality of your Health Data and Health Profile may be breached by your Network Members.

We Collect: Information Via Automatic Collection And Tracking.

When you download, access, and use Allevia, it may use technology to automatically collect:

- **Activity Logs.** When you access and use Allevia, we will automatically collect certain details of your access to and use of Allevia (your Activity Log), including traffic data and other communication data and the resources that you access and use on or through Allevia.
- **Device Information.** We may collect information about your mobile device and internet connection, including the device's unique device identifier, IP address, operating system, browser type, mobile network information, and the device's telephone number.
- **Stored Information and Files.** With your in-app approval, Allevia also may access metadata and other information associated with other files stored

on your device. This may include, for example, photographs, audio and video clips, personal contacts, and address book information.

If you do not want us to collect the information described above, please do not download Allevia or, if already downloaded, delete it from your device. For more information, see the section titled [“Your Choices about Our Collection, Use and Disclosure of Your Information.”](#)

We also may use these technologies to collect information about your activities over time and across third-party websites, apps, or other online services (so-called “behavioral tracking”).

Information Collection And Tracking Technologies. We may use certain technologies for automatic information collection:

- Allevia does not use “web beacons,” “cookies,” or any other automatic information collection technology.
- Our website may employ “cookies.” A cookie is a small file, placed on your computer or mobile device, that contains information such as your site preferences or login status. If you do not wish to accept cookies when you visit our website, it may be possible to reject or disable them by activating appropriate setting on your browser or smartphone. However, this may prevent you from accessing parts of the website and receiving the full benefit of the Service.

NOTE: Children under the Age of 13

Allevia is not intended for children under 13 years of age, and we do not knowingly collect personal information from children under 13. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at: office@valhalla.com.

5. Information Collection from Providers

In general, Valhalla collects all information that you supply directly to Allevia. We also may collect information from your Providers whom you expressly authorize to use Allevia with respect to you and your information. By authorizing a Provider to join your Network, you also authorize us to collect information about you from your Provider's support staff and from other practitioners affiliated with your Provider or in your Provider's practice. Further, we may collect information from other third party information providers that you expressly authorize to send information to your Valhalla account.

6. Automatic Information Collection by Third Parties

When you use your device to visit a website or run any software application, including Allevia and our website, please be aware that certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:

- Advertisers, ad networks, and ad servers.
- Analytics companies.
- Your mobile device manufacturer.
- Your mobile service provider.

These third parties may use tracking technologies to collect information about you when you use Allevia. The information they collect may be associated with you, or they may collect information about your online activities over time and across different websites, apps and other online services websites. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

Click [here](#) for information on how you can opt out of behavioral tracking and behavioral marketing on or through Allevia and how we respond to browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking.

7. How We Use Your Information

Valhalla uses your Primary User Information to provide the Services as described on our website and in our Terms of Use, as well as to enhance the performance of the Services and/or create new services. We will not use your Primary User Information for product development or product enhancement without your express, written permission.

If you choose to invite a Provider to your Network and participate in the Services with you, then Valhalla may use your information to facilitate the exchange of information and communication between you and your Network.

By inviting Providers to your Network, you acknowledge and agree that some or all of your Health Data and Health Profile may be sent to your Provider Network through the Services or through interfaces with other Providers' information systems, and you understand that such Health Data and Health Profile may be incorporated into your health record maintained by your Provider.

Valhalla will not share the content of your Primary User Information except as permitted under this Privacy Policy, the Terms of Use, an Authorization to Use and Disclose Protected Health Information, a Business Associate Agreement, or as required by law, unless all relevant parties expressly consent to or authorize disclosure.

We will not use, sell, or disclose any of your Primary User Information – your Personal Information, Activity Logs, Health Data, and Health Profile – to market products or services. We may use De-Identified Aggregate Data for the limited purpose of promoting Allevia itself. (For example, we may use statistics derived from De-Identified Aggregate Data to demonstrate that Allevia has positive effect on the health of its users.)

We may, however, use Primary User Information to tell you about products and services that are directly related to Allevia, such as notifications of new features and software updates.

Allevia may also send you non-sponsored, marketing-free, and advertisement-free educational materials. Allevia would select the recipients of educational materials automatically, based on the medical conditions that you selected in your profile. The automatic process will be “blind” – we will not have access to the list of recipients of any educational material, or identifying information about any recipient in connection with any diagnosis code.

We may use your Personal Information – name, account information, contact information, etc. – to:

- Provide you with Allevia and its contents, the Services, and any other information, products, or services that you request from us.
- Facilitate your communications with other Network Members.
- Fulfill any other purpose for which you provide it.
- Give you notices about your account, including expiration and renewal notices.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- Notify you when Allevia updates are available, and of changes to any products or services we offer or provide through it.

In addition, Providers in your Network may use your Health Data and Health Profile to facilitate your health care, develop your medical record, bill governmental and private payers, and other purposes in their discretion.

The usage information we collect (including Activity Logs) helps us to improve Allevia and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize Allevia according to your individual interests.
- Speed up your user experience.
- Recognize you when you use Allevia.

8. Disclosure of Your Information

We may disclose aggregated information about our users that does not identify any individual or device – that is, De-Identified Aggregate Data – without restriction, except as otherwise stated in this Privacy Policy.

We may disclose your Primary User Information – that is, your Personal Information, Health Data, Health Profile, and Activity Logs – that we collect or that you or a Provider in your Network provides:

- To fulfill the purpose for which you provide it. For example, if you use the feature on Allevia or website that asks Valhalla to invite a Provider to join your Network, we will include your name and email address in the notification that we send your Provider.
- For any other purpose disclosed by us when you provide the information.
- With your consent.
- To third parties participating in the Services whom you authorize – that is, the Providers in your Network.
- To Valhalla’s subsidiaries and affiliates (Applies to Personal Information only; we will not disclose your Health Data or Activity Logs to these entities).
- To Valhalla’s Service Providers and other third parties we use to provide technical support and other services and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information that we hold about Allevia users is among the assets transferred. (In such case, your Primary User Information would remain subject to the provisions of the Valhalla Privacy Policy that was in effect immediately prior to the transfer unless we provide you notice otherwise.)
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce our rights arising from any contracts entered into between you and us, including without limitation the Terms of Use, and for billing and collection.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Valhalla Healthcare, Inc., our customers, or others.

This includes exchanging information with other companies and organizations for the purposes of fraud protection and risk reduction.

In addition, Providers in your Network may disclose your Health Data to facilitate your health care, develop your medical record, bill governmental and private payers, and other purposes in their discretion.

9. Your Choices about Our Collection, Use, and Disclosure of Your Information

We strive to provide you with choices regarding the Personal Information you provide to us. This section describes mechanisms we provide for you to control certain uses and disclosures of over your information.

- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent.
- **Advertising and Marketing.** We will not advertise or market products or services to you. If we ever change our policy about that, we will notify you and will provide you with the opportunity to refuse advertising and marketing communications at that time.

You may revoke any Provider's authorization to access your Network. You may do so by selecting the option within Allevia to remove that Provider from your Network. Once revoked, the Provider may no longer access or use the Services with respect to you and your Primary User Information. Please keep in mind that Valhalla cannot undo or retrieve any disclosure of your Primary User Information that was made before you revoke an authorization.

10. Data Security

We have implemented Security Measures designed to secure your Primary User Information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions and individual health information will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to Allevia, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your information, we cannot guarantee the security of your information transmitted through Allevia. Any transmission of information is at your own risk. We are not responsible for circumvention of any privacy settings or Security Measures we provide.

By inviting Providers into your Network, you are authorizing us to give them full access to all of your Health Data and Health Profile.

For this reason, please be very careful about whom you invite to join your Network. We cannot control what your Providers will do with your Health Data. While Providers have a legal obligation to protect the confidentiality of your health information, we cannot guarantee that they will uphold their obligations. It is your responsibility to decide whether you wish to entrust any Provider with your confidential information by inviting them to join your Network. You acknowledge and agree that we are not responsible for the actions and omissions of the members of your Provider Network, and you will not sue or seek to hold Valhalla liable for any damages that you may suffer as a result of the conduct of your Providers.

11. Changes to Our Privacy Policy

The date the Privacy Policy was last revised is identified at the top of the page. We may update our Privacy Policy from time to time. If we make material changes to how we treat our users' information, we will post the new Privacy Policy on this page with a notice that the Privacy Policy has been updated. We will also notify you through an in-app alert the first time you use Allevia after we make the change.

12. Contact Information

To ask questions or comment about this Privacy Policy and our privacy practices, contact us at:

Email: support@valhalla.healthcare

Phone: (781) 366-0310

Address: _____