

Valhalla
Mobile App Privacy Policy for Primary Users

Last modified: 03/13/2018

1. Introduction

This Privacy Policy describes how Valhalla Healthcare, Inc. (“**Company**”, “**Valhalla**,” “**we**” or “**us**”) protects your information, and your patients’ information, when you use the Company’s website, the Allevia web-based application (“**Allevia**”), and all related products and services. All references to you include your employees (if any) who you authorize to access your Allevia account. We respect our users’ 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 and your patients 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 the Primary User's 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 the Primary User's Primary User Information if the Primary User closes his/her account?	Yes	N/A
Do we stop all disclosure of Primary User Information if you close your account?	No	N/A
Do we have Security Measures that are reasonable and	Yes	Yes

Uses/Disclosures of Information	Types of Information	
	Primary User Information (including Health Data, Personal Information, and Activity Logs)	De-Identified Aggregate Data
appropriate to protect Primary User Information, in any form, from unauthorized access, disclosure, or use?		
Do we store Primary User Information in the U.S. only?	Yes	Yes
Do we keep Activity Logs for 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 individuals**. For example, De-Identified Aggregate Data might include statistical data that is calculated from a combination of your patient's Health Data and the Health Data of other Primary Users. It is "de-identified" and cannot ever be connected to any individual personally.

Health Data

Health Data is a patient's health information that you, the Primary User, and the other members of the Primary User's 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 Health Data. Allevia will collect your Personal Information as well the Primary User's Personal Information.

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 have been invited to participate as a Provider in a Primary User's Network..

Primary User Information

When a patient signs up for and use Allevia, that patient provides information about him/herself, and authorizes his/her Network Members to provide information about that patient to Allevia. This information, including the Primary User's 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 the Primary User personally. Primary User Information does *not* include De-Identified Aggregate Data, which cannot be connected with any individual.

Primary User Information also does *not* include the Provider's Personal Information.

Examples of Primary User Information include:

- The Primary User's name and contact information, such as address, phone number, or email address

- The Primary User's Health Data
- The Primary User's Health Profile
- The Primary User's medical history, conditions, treatments, medications, and health insurance information
- The Primary User's Personal Information (non-health information that may be used to identify the Primary User, such as age, gender, ethnicity, and occupation)
- Information that is collected automatically when the Primary User uses Allevia, such as Activity Logs, IP address, and "cookie" preferences

As described further below, we may use a 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 the Primary User's 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 a Primary User's invitation to access and interact with the Primary User's Health Data and Health Profile. You are signing up as a Provider.

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, other Providers, and the Primary Users when it is entered into Allevia.
- From other apps that a Primary User may use (such as fitness and health trackers) when a Primary User provides approval for Allevia to synchronize with and/or obtain information from such other apps.
- Automatically when you use Allevia.

We Collect: Information That You and Your Patients Provide to Us.

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

- 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: Primary Users' Health Data

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

We will treat all Primary User Health Data (and the Health Profile that Allevia automatically assembles from 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.

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, a web application, does not use “web beacons.” It does 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.healthcare.

5. Information Collection from Providers

In general, Valhalla collects all information that you supply directly to Allevia. We also may collect information from you about Primary Users who expressly authorized you to join their Networks. When a Primary User invites you, a Provider, to join his/her Network, the Primary User also authorizes us to collect information about the Primary User from you, from your support staff, and from other practitioners affiliated with your and your practice.


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; How We Use the Primary User's Health Data

Valhalla uses your Personal Information, as well as the Primary User's 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 Personal Information for product development or product enhancement without your express, written permission.

If you accept a Primary User's invitation to join his/her Network and agree to this Privacy Policy, then Valhalla may use your information to facilitate the exchange of information and communication between you, the Primary User, and anyone else in the Primary User's Network.

By agreeing to this Privacy Policy, you delegate to Valhalla the right to use, disclose, and obtain Protected Health Information ("PHI," as defined under the Health Information Portability and Accountability Act of 1996 ("HIPAA")) from the Primary User on your behalf for the purpose of facilitating health care communications and coordination between and among members of the Primary User's Network, to the fullest extent permitted by law. You hereby consent to allow Valhalla to transfer possession, custody, or control of such PHI to any other person or entity, including without limitation to the members of a Network, to the fullest extent permitted by law.

Each time an additional Provider is invited to join a Network, that new user may be provided with certain elements of your Personal Information (including your name and the name and location of your practice).

By inviting Providers to your Network, each Primary User must acknowledge and agree that some or all of the Primary User's Health Data and Health Profile may be sent to his/her Provider Network through the Services or through interfaces with other Providers' information systems. To use the Services, the Primary User must understand and acknowledge that such Health Data and Health Profile may be incorporated into the health record that you (and other Providers in the Network) maintain.

By agreeing to this Privacy Policy, and pursuant to the terms of (a) the Primary User's Authorization to Use and Disclose PHI and (b) the Business Associate Agreement between you and Valhalla, you acknowledge and agree that Valhalla may disclose any information in a Primary User's Health Data and Health Profile (including without limitation PHI) to all other Network Members in the Primary User's Network, and may transfer possession, custody, and/or control of such Health Data and Health Profile (including without limitation PHI) to subcontractors (such as cloud storage providers) who have been made to enter into a Business Associate Agreement.

As a Provider, it will be your decision whether to incorporate some or all of a Primary User's Health Data or Health Profile into the medical records that you maintain

for that Primary User, and to comply with all regulations regarding the privacy, security, and custody/maintenance of such records.

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 never sell or rent your Personal Information without your written consent. We will not use or disclose your Personal Information, except as described in this Privacy Policy, the Terms of Use, or as permitted or required by law.

We will not use, sell, or disclose any Primary User Information – the Primary User’s 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 use the information that we collect 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.

Each Primary User has been notified that the Providers in his/her Network may use the Primary User's Health Data and Health Profile to facilitate the Primary User's health care, develop his/her medical record, bill governmental and private payers, and other purposes in the Provider's 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 the Primary User Information – that is, Personal Information, Health Data, Health Profile, and Activity Logs – that we collect from the Primary User or that you or another Provider in your Network provides:

- To fulfill the purpose for which you provide it. For example, if you use a feature on Allevia that asks a patient to join Allevia and invite you to his/her 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 other Members of a Primary User's Network.

- To Valhalla’s subsidiaries and affiliates (Applies to Personal Information only; we will not disclose 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.

Each Primary User has been notified that the Providers in his/her Network may disclose the Primary User’s Health Data and Health Profile to facilitate his/her health care, develop his/her medical record, bill governmental and private payers, and other purposes in the Provider’s 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.

The Primary User in a Network may revoke any Provider's membership in that Network. If that should happen, you, as the Provider, may no longer access or use the Services with respect to that Primary User's Network and Primary User Information. Please keep this in mind when determining whether and when to include certain Primary User Information in the medical records that you keep for a Primary User.

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 in transmission with SSL technology, and will be encrypted at rest with AES-256.

The safety and security of your information – and the information of the Primary User – 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.

When a Primary User invites you into his/her Network, the Primary User has given you access to the Primary User's confidential health information, including the Health Data and Health Profile. It is extremely important that you take the utmost care to maintain and protect the confidentiality of that information. This includes, but is not limited to, compliance with all requirements of HIPAA. In addition, be aware that a Primary User may choose to share the communications and information transmitted between you and the Primary User with other members of that Primary User's Network. If, in your judgment, such sharing would be inappropriate in a particular situation, it is your responsibility to take proper precautions. Such precautions may include instructing the Primary User not to share certain information with other Network Members, or transmitting highly sensitive information to the Primary User offline (i.e. not by means

of Allevia). You agree that you will not seek to hold us liable for any damages that you may suffer as a result of the conduct of the Primary User or other Network Members.

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: _____