

## Healthvana Privacy Notice Addendum for California Residents

**Effective Date:** [DATE]

### 1. Introduction

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This Privacy Notice Addendum for California Residents (the “**California Privacy Addendum**”) supplements the information contained in Healthvana’s Privacy Notice and describes our collection and use of Personal Information (as defined below). This California Privacy Addendum applies solely to all visitors, users, and others who reside in the State of California (“**Consumers**” or “**you**”) and should be read in conjunction with Healthvana’s Privacy Notice. We adopt this notice to comply with the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 (collectively, the “**CPRA**”) and any terms defined in the CPRA have the same meaning when used in this notice.

### 2. Scope of this California Privacy Addendum

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This California Privacy Addendum applies to information that we collect when you use our Platform that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household (“**Personal Information**”). However, publicly available information that we collect from government records and deidentified or aggregated information (when deidentified or aggregated as described in the CPRA) are not considered Personal Information and this California Privacy Addendum does not apply to such information.

This California Privacy Addendum does not apply to employment-related Personal Information collected from our California-based employees, job applicants, contractors, or similar individuals (“**Personnel**”). Please contact our human resources department if you are part of our California Personnel and would like additional information about how we process your Personal Information.

This California Privacy Addendum also does not apply to certain Personal Information that is excluded from the scope of the CPRA, such as health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or Personal Information collected as part of a clinical trial or other biomedical research study.

### 3. Information We Collect About You and How We Collect It

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We collect, and over the prior twelve (12) months have collected, the following categories of Personal Information about Consumers:

Personal Information Category	Applicable Pieces of Personal Information Collected
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<b>Identifiers.</b>	A real name, email address, Internet Protocol address, username, and other similar identifiers.
<b>Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</b>	A name.
<b>Protected classification characteristics under California or federal law.</b>	None.
<b>Commercial information.</b>	None.
<b>Biometric information.</b>	None.
<b>Internet or other similar network activity.</b>	Operating System, Browser Type, Device ID, information on a Consumer's interaction with a website or application.
<b>Geolocation data.</b>	We collect IP-based information about your physical location or movements. This IP-based information can only identify your physical location or movements to a geographic region, such as town, city, state, and country, but will not be used to identify your precise physical location or movements.
<b>Sensitive Personal Information ("Sensitive Personal Information")</b>	None.

Healthvana will not collect additional categories of Personal Information without providing you notice. As further described in [To Whom Do We Sell or Share Your Personal Information](#), we may "sell" any categories of Personal Information for monetary or other valuable consideration and we may "share" any categories of Personal Information for cross-context behavioral advertising.

#### **4. Sources of Personal Information**

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We collect Personal Information about you from the sources described in our Privacy Notice.

#### **5. Purposes for Our Collection of Your Personal Information**

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We only use your Personal Information for the purposes described in our Privacy Notice. Healthvana will not use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

## **6. Third Parties to Whom We Disclose Your Personal Information for Business Purposes**

Healthvana may disclose your Personal Information to third parties for one or more business purposes. When we disclose Personal Information to non-affiliated third-parties for a business purpose, we enter a contract that describes the purpose, requires the recipient to both keep that Personal Information confidential and not use it for any purpose except for the specific business purposes for which the Personal Information was disclosed, and requires the recipient to otherwise comply with the requirements of the CPRA. The CPRA prohibits third parties who purchase the Personal Information we hold from reselling it unless you have received explicit notice and an opportunity to opt-out of further sales.

In the preceding twelve (12) months, Healthvana has disclosed the following categories of Personal Information for one or more of the business purposes described below to the following categories of third parties:

<b>Personal Information Category</b>	<b>Categories of Third-Party Recipients</b>
<b>Identifiers.</b>	Service Providers, business partners, and affiliates .
<b>Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</b>	Service Providers, business partners, and affiliates.
<b>Protected classification characteristics under California or federal law.</b>	None.
<b>Commercial information.</b>	Service Providers, business partners, and affiliates.
<b>Biometric information.</b>	None.
<b>Internet or other similar network activity.</b>	Service Providers; internet cookie information recipients, such as analytics services; operating systems and platforms.
<b>Geolocation data.</b>	Service Providers; internet cookie information recipients, such as analytics services; operating systems and platforms.

<b>Sensitive Personal Information Category</b>	<b>Categories of Third Party Recipients</b>
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<b>Government identifiers (such as a social security number)</b>	None.
<b>Racial or ethnic origin</b>	None.
<b>Health, sex life, or sexual orientation information</b>	None.

We disclose your Personal Information to the categories of third parties listed above for the following business or commercial purposes:

- Helping to ensure security and integrity of our Platform and IT infrastructure to the extent the use of the Personal Information is reasonably necessary and proportionate for these purposes.
- Debugging to identify and repair errors that impair existing intended functionality.
- Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of your current interaction with us. Our agreements with third parties prohibit your Personal Information from disclosure to another third-party and from using your Personal Information to build a profile about you or otherwise alter your experience outside your current interaction with us.
- Performing services on behalf of us, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, providing analytic services, providing storage, or providing similar services on behalf of us.
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.
- For the purposes identified in our Privacy Notice or to fulfill the purpose for which you provide it.

## **7. To Whom Do We Sell or Share Your Personal Information**

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### **“Sale” of Your Personal Information for Monetary or Other Valuable Consideration**

As noted in our Privacy Notice, we do not sell Personal Information as the term “sell” is commonly understood to require an exchange for money.

However, the use of analytics cookies and other tracking technology on our Platform is considered a “sale” of Personal Information as the term “sale” is broadly defined in the CPRA to include both monetary *and other valuable consideration*. Using this broad definition, our “sale” is limited to our use of analytics cookies and their use in understanding how people use and interact with our Platform. Our “sales” of your Personal Information in this matter is subject to your right to opt-out of those sales (see [Your Choices Regarding our “Sale” or “Sharing” of your Personal Information](#)).

### **“Sharing” of Your Personal Information for Cross-Context Behavioral Advertising**

Healthvana may “share” your Personal Information for the purpose of cross-context behavioral advertising, subject to your right to opt-out of that sharing (see [Your Choices Regarding our “Sale” or “Sharing” of your Personal Information](#)). Our “sharing” for the purpose of cross-context behavioral advertising would be limited to our use of third-party advertising cookies and their use in providing you cross-context behavioral advertising (i.e., advertising on other websites or in other mediums). When the recipients of your Personal Information disclosed for the purpose of cross-context behavioral advertising are also permitted to use your Personal Information to provide advertising to others, we also consider this disclosure as a “sale” for monetary or other valuable consideration under the CPRA.

In the preceding twelve (12) months, Healthvana has “sold” for monetary or other valuable consideration, or “shared” for the purpose of cross-context behavioral advertising, the following categories of Personal Information to the following categories of third parties:

<b>Personal Information Category</b>	<b>Sold or Shared</b>	<b>Categories of Third Parties To Whom Your Personal Information is Sold or Shared</b>
<b>Identifiers.</b>	Sold and Shared	Business partners, affiliates Internet cookie information recipients, such as analytics services, operating systems and platforms.
<b>Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</b>	Sold and Shared.	Business partners.
<b>Protected classification characteristics under California or federal law.</b>	Not Sold or Shared	None.
<b>Commercial information.</b>	Sold and Shared	Service Providers, business partners, and affiliates.
<b>Biometric information.</b>	Not Sold or Shared	None.
<b>Internet or other similar network activity.</b>	Sold and Shared	Service Providers; internet cookie information recipients, such as analytics services; operating systems and platforms.

<b>Geolocation data.</b>	Sold and Shared	Service Providers; internet cookie information recipients, such as analytics services; operating systems and platforms.
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<b>Sensitive Personal Information Category</b>	<b>Sold or Shared</b>	<b>Categories of Third Parties To Whom Your Personal Information is Sold or Shared</b>
<b>Government identifiers (social security)</b>	Not Sold or Shared	None.
<b>Racial or ethnic origin</b>	Not Sold or Shared	None.
<b>Health, sex life, or sexual orientation information</b>	Not Sold or Shared	None.

### ***Sale or Sharing of Personal Information of Minors Under the Age of 16***

We do not have any actual knowledge that we “sell” the Personal Information of minors under the age of 16 for monetary or other valuable consideration and we do not have any actual knowledge that we “share” such Personal Information for cross-context behavioral advertising without affirmative consent as required by the CPRA. More information on how minors under the age of 16 may change their choice regarding the “sale” or “sharing” of their Personal Information can be found in [Your Choices Regarding our “Sale” or “Sharing” of Your Personal Information](#).

## **8. Consumer Data Requests**

The CPRA provides California residents with specific rights regarding their Personal Information. This section describes your CPRA rights and explains how to exercise those rights. You may exercise these rights yourself or through your Authorized Agent. For more information on how you or your Authorized Agent can exercise your rights, please see [Exercising Your CPRA Privacy Rights](#).

- **Right to Know.** You have the right to request that Healthvana disclose certain information to you about our collection and use of your Personal Information over the past 12 months (a “**Right to Know**” Consumer Request). This includes: (a) the categories of Personal Information we have collected about you; (b) the categories of sources from which that Personal Information came; (c) our purposes for collecting this Personal Information; (d) the categories of third parties with whom we have shared your Personal Information; and (e) if we have “sold” or “shared” or disclosed your Personal Information, a list of categories of third parties to whom we “sold” or “shared” your Personal Information, and a separate list of the categories of third parties to whom we

disclosed your Personal Information. You must specifically describe if you are making a Right to Know request or a Data Portability Request. If you would like to make both a Right to Know Consumer Request and a Data Portability Consumer Request you must make both requests clear in your request. If it is not reasonably clear from your request, we will only process your request as a Right to Know request. You may make a Right to Know or a Data Portability Consumer Request a total of two (2) times within a 12-month period at no charge.

- **Access to Specific Pieces of Information (Data Portability).** You also have the right to request that Healthvana provide you with a copy of the specific pieces of Personal Information that we have collected about you, including any Personal Information that we have created or otherwise received from a third-party about you (a “**Data Portability**” Consumer Request). If you make a Data Portability Consumer Request electronically, we will provide you with a copy of your Personal Information in a portable and, to the extent technically feasible, readily reusable format that allows you to transmit the Personal Information to another third-party. You must specifically describe if you are making a Right to Know request or a Data Portability request. If you would like to make both a Right to Know Consumer Request and a Data Portability Consumer Request, you must make both requests clear in your request. If it is not reasonably clear from your request, we will only process your request as a Right to Know request. In response to a Data Portability Consumer Request, we will not disclose your social security number, or other government-issued identification number, payment card numbers, health insurance or medical identification number, or your account password or security question or answers. We will also not provide this information if the disclosure would create a substantial, articulable, and unreasonable risk to your Personal Information, your account with Healthvana, or the security of our systems or networks. We will also not disclose any Personal Information that may be subject to another exception under the CPRA. If we are unable to disclose certain pieces of your Personal Information, we will describe generally the types of personal information that we were unable to disclose and provide you a description of the reason we are unable to disclose it. You may make a Right to Know or a Data Portability Consumer Request a total of two (2) times within a 12-month period at no charge.
- **Correction.** You have the right to request that we correct any incorrect Personal Information about you to ensure that it is complete, accurate, and as current as possible. You may review and correct some Personal Information about yourself by visiting the Platform and signing into your “Account” page. You may also request that we correct the Personal Information we have about you as described below under [Exercising Your CPRA Privacy Rights](#). In some cases, we may require you to provide reasonable documentation to show that the Personal Information we have about you is incorrect and what the correct Personal Information may be. We may also not be able to accommodate your request if we believe it would violate any law or legal requirement or cause the information to be incorrect or if the Personal Information is subject to another exception under the CPRA.
- **Deletion.** You have the right to request that Healthvana delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your Consumer Request (see [Exercising Your CPRA Privacy](#)

[Rights](#)), we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies pursuant to the CPRA. Some exceptions to your right to delete include, but are not limited to, if we are required to retain your Personal Information to complete the transaction or provide you the goods and services for which we collected the Personal Information or otherwise perform under our contract with you, to detect security incidents or protect against other malicious activities, and to comply with legal obligations. To the extent that we are unable to delete your Personal Information as a result of a legal obligation, your Personal Information shall be maintained in accordance with Section 10 (Personal Information Retention Periods). As such, in some instances we may only be able to delete your Personal Information by deleting your account.

- **Limiting Our Uses and Disclosures of SPI.** You have the right to request that we limit our use and disclosure of your SPI to only those purposes specifically enumerated in the CPRA. Currently, we do not collect SPI on this site, and when you log into your Healthvana account we do not use or disclose your SPI for purposes other than those expressly permitted by the CPRA. Should this change in the future, we will update this California Privacy Addendum and provide you with methods to limit the use and disclosure of SPI.
- **Non-Discrimination.** We will not discriminate against you for exercising any of your CPRA rights. Unless permitted by the CPRA, we will not do any of the following as a result of you exercising your CPRA rights: (a) deny you goods or services; (b) charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties; (c) provide you a different level or quality of goods or services; or (d) suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

### **Exercising Your CPRA Privacy Rights**

To exercise the rights described above, please submit a request (a “**Consumer Request**”) to us by either:

- Calling us at (855) 705-9515 (toll free)  
or (310) 205-0246
- Emailing us at [info@healthvana.com](mailto:info@healthvana.com)

If you fail to make your Consumer Request in accordance with the ways described above, we may either treat your request as if it had been submitted with our methods described above or provide you with information on how to submit the request or remedy any deficiencies with your request.

Only you, or your Authorized Agent that you authorize to act on your behalf, may make a Consumer Request related to your Personal Information. To designate an Authorized Agent, see [Authorized Agents](#) below.

All Consumer Requests must:



- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an Authorized Agent of such a person. This may include verifying information that we may already have about you, such as your name, birth date, address, and/or email address.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm which Personal Information relates to you or the individual for whom you are making the request as their Authorized Agent.

Making a Consumer Request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to Personal Information associated with that specific account.

We will only use Personal Information provided in a Consumer Request to verify the requestor's identity or authority to make the request.

For instructions on exercising sale opt-out rights, see [Your Choices Regarding our “Sale” or “Sharing” of Your Personal Information](#).

### **Authorized Agents**

You may authorize your agent to exercise your rights under the CPRA on your behalf by providing them with written authorization or with power of attorney to exercise your rights in accordance with applicable laws (an “**Authorized Agent**”). We may request that your Authorized Agent submit proof of identity and that they have been authorized exercise your rights on your behalf. We may deny a request from your Authorized Agent to exercise your rights on your behalf if they fail to submit adequate proof of identity or adequate proof that they have the authority to exercise your rights.

## **9. Your Choices Regarding our “Sale” or “Sharing” of Your Personal Information**

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### **“Sale” of Your Personal Information**

If you are 16 years of age or older, you have the right to direct us to not sell your Personal Information for monetary or other valuable consideration at any time (the “right to opt-out”). We do not sell the Personal Information of Consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the “right to opt-in”) from either the Consumer who is between 13 and 16 years of age, or the parent or guardian of a Consumer less than 13 years of age. Consumers who opt-in to Personal Information sales may opt-out of future sales at any time.

### **“Sharing” of Your Personal Information**

We will not share your Personal Information for purposes of cross- context behavioral advertising.

### **How You May Opt-Out of Our Sale or Sharing of Your Personal Information**

To exercise the right to opt-out of the “sale” of your Personal Information for monetary or other valuable consideration and of “sharing” your Personal Information for the purposes of cross-context behavioral advertising, you (or your Authorized Agent) may:

- Adjust your cookie preferences setting your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. However, if you do not consent to our use of cookies or select this setting you may be unable to access certain parts of our Platform. You can find more information about cookies at <http://www.allaboutcookies.org>.
- Submit a request to us by using our Opt-Out link:

#### **Do Not Sell or Share My Personal Information**

- Set the privacy control signal on your browser, if your browser supports it. We currently recognize and support the following privacy signals sent by browsers:
  - Global privacy control (for more information on how to configure your browser to send this signal, please see <https://globalprivacycontrol.org/>).

When we receive one of these privacy control signals, we will opt you out of any further “sales” or “sharing” of your Personal Information when you interact with our Platform through that browser and on that device. In the event you have affirmatively opted-in to our “sale” and “sharing” of your Personal Information as described above and we receive a privacy control signal from your browser, we will request further instructions from you before you are opted out of any further “sale” or “sharing.”

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize Personal Information sales. However, you may change your mind and opt back into the sale of Personal Information at any time by exercising your opt-out rights as described in this notice.

You do not need to create an account with us to exercise your opt-out rights. You may be required to provide us with additional contact information so that we may verify your request to opt-in to the sale of your Personal Information. We will only use Personal Information provided in an opt-out request to review and comply with the request.

### **10. Personal Information Retention Periods**

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Healthvana will keep your Personal Information for no longer than is necessary for the purpose(s) it was provided. Further details of the periods for which we retain Personal Information are available on request. However, we may retain any or all categories of Personal Information when your information is subject to one of the following exceptions:

- When stored in our backup and disaster recovery systems. Your Personal Information will be deleted when the backup media your Personal Information is stored on expires or when our disaster recovery systems are updated.
- When necessary for us to exercise or defend legal claims.
- When necessary to comply with a legal obligation.

- When stored in the same document or record with other Personal Information. Your Personal Information will be deleted upon the expiration of the last exception that applies to such document or record; or
- When necessary to help ensure the security and integrity of our Platform.

## **11. Changes to This California Privacy Addendum**

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Healthvana reserves the right to amend this California Privacy Addendum at our discretion and at any time. When we make changes to this California Privacy Addendum, we will post the updated addendum on the Platform and update the addendum's effective date. **Your continued use of our Platform following the posting of changes constitutes your acceptance of such changes.**

## **12. Contact Information**

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If you have any questions or comments about this California Privacy Addendum, the ways in which Healthvana collects and uses your information described above and in the Privacy Notice, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

**Phone:** (855) 705-9515 (toll free)

or (310) 205-0246

**Website:** <https://www.healthvana.com/contact>

**Email:** [info@healthvana.com](mailto:info@healthvana.com)