

HEALS Academy, L.L.C. Privacy Policy

Last Modified: March 19, 2025

Introduction

HEALS Academy, L.L.C. (“Company” or “We” or “Our”) respects your privacy and is committed to protecting it through compliance with this policy.

By purchasing or accessing any of our products, services, or programs, you (“User” or “you”) agree to be bound by this Policy as well as our [Terms & Conditions](#), [Earnings Disclaimer](#) and [Refund & Fulfilment Policy](#).

The Company develops, operates, and distributes software applications, including web applications, hosted applications, and applications for mobile devices. These applications, along with the services for communications, coordination, and management by patients and healthcare professionals regarding medical conditions, as well as the data collection, storage, analysis, and reporting tools, functions, and services provided via the applications, are collectively referred to as the Service.

This policy outlines the types of information we may collect from you or that you may provide when you visit <https://www.rasgpt.ai>, www.thehealsacademy.com, use our mobile or online application, use our Application Programming Interface (“API”), use our Software-as-a-Service Product (“SaaS”), use our AI Features, or enter information on a website of one of the Providers that utilize our SaaS (collectively referred to as “Service” or “Services”). It also details our practices for collecting, using, maintaining, protecting, and disclosing that information.

Capitalized terms used herein without definition will have the same meanings as defined in the Terms of Service and any applicable Master Services Agreement, API License Agreement, or Software-as-a-Service Agreement (“Sales Agreements”) applicable to the Service.

This policy applies to information we collect:

- On this Service.
- In email, text, and other electronic messages between you and this Service.
- Through mobile and desktop applications you download from this Service, providing dedicated non-browser-based interaction between you and this Service.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.
- When you use our SaaS, API services, and AI Features.
- When you enter information on a Provider’s website through their use of our Service.
- When you enter information into any of our applications.
- When you use our Services through third-party vendors.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by the Company or any third party (including our affiliates and subsidiaries).
- Any third party (including our affiliates and subsidiaries), through any application or content (including advertising) that may link to or be accessible from the Service.

Please read this policy carefully to understand our practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Service. By accessing or using this Service, you agree to this privacy policy. This policy may change from time to time. Your continued use of this Service after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Children Under the Age of 13

Our Service is not intended for children under 13 years of age. No one under age 13 may provide any information on the Service. We do not knowingly collect personal information from children under 13. If you are under 13, do not use this Service, make any purchases through the Service, use any of the interactive or public comment features of this Service, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. 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: rasgpt@thehealsacademy.com

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see Your California Privacy Rights for more information.

Information We Collect About You and How We Collect It

We gather various types of information from and about users of our Service, which includes:

- Information Collected During Account Registration: This encompasses details you provide during the setup process for our Service.
- Personal Identification Information: We collect data such as your name, postal address, e-mail address, telephone number, or other identifiers that allow you to be contacted both online and offline.
- Protected Health Information (PHI): As outlined by the Health Insurance Portability and Accountability Act ([HIPAA](<https://www.hhs.gov/answers/hipaa/what-is-phi/index.html>)), we may collect information considered as PHI.
- Non-Personally Identifiable Information: This refers to data about you that doesn't reveal your identity directly, alongside details about your internet connection, and the devices you use to access our Service.
- Data Entered into AI Features: When you interact with our AI features, such as chat and prompt logs, we collect those interactions as well as output logs, content, and anonymized usage data.

Methods of Data Collection:

- **Directly from You:** Information you provide us by filling out forms on our Service, using our AI Features, our customer's websites through our API, or on our own websites. This includes but isn't limited to, registration, subscribing to our services, or requesting further services.
- **Automatic Collection as You Navigate the Service:** As you use our Service, we automatically collect data such as usage details, IP addresses, and information via cookies, web beacons, and other tracking technologies.
- **From Third Parties:** Occasionally, we might receive information about you from our business partners and other sources.

Information You Provide to Us Includes:

- **Form Submissions:** Any information you input into forms on our Service, including registration data, subscription information, and any details provided for service requests.
- **Correspondence Records:** If you contact us, we keep records and copies of that correspondence (including email addresses).
- **Survey Responses:** Your feedback on surveys we may ask you to complete.
- **Transaction Details:** Information about transactions you've carried out through our Service, which may require financial information before an order is placed.
- **Usage Information:** Specific data regarding your interaction with our Service, such as demographic details, profile data, and how frequently or long you use our Service.
- **Search Queries:** The searches you conduct on the Service.

User Contributions:

You may also provide information meant to be seen or shared with others via public areas of the Service or transmitted to other users or third parties. While you can control who sees some of this information through your account settings, remember that no security system is impenetrable. Moreover, we cannot control the actions of other Service users with whom you might share your information. Thus, we cannot promise that your shared User Contributions will not be viewed by unauthorized persons.

Information We Collect Through Automatic Data Collection Technologies

As you interact with our Service, we employ various automatic data collection technologies to gather information regarding your equipment, browsing habits, and patterns, which include:

- **Visit Details:** We capture specifics of your engagements with our Service, such as traffic patterns, location data, logs, and the resources that you utilize.
- **Claims Information:** We receive information about prescriptions from Providers.
- **Device and Connection Info:** Details about your computing device, including your IP address, operating system, and browser type, are collected.
- **Behavioral Tracking:** We may analyze your online behavior over time and across different sites and services. For guidance on opting out of behavioral tracking and how we comply with web browser signals for consumer privacy, please contact us.

The automatically collected information might include personal data, which we may then associate with other personal information gathered from you or received from third parties. This process aids us in enhancing our Service and delivering a more tailored experience by enabling us to:

- **Analyze Audience Size:** Assess the size and usage patterns of our audience.
- **Customize User Experience:** Save your preferences to tailor our Service to your individual interests.
- **Enhance Service Speed:** Facilitate quicker search functionality.
- **User Recognition:** Identify you upon your return to our Service.

Technologies Utilized:

- **Cookies:** Small files stored on your device's hard drive that can be declined by modifying your browser's settings. If you choose to block cookies, access to certain parts of our Service might be restricted.
- **Web Beacons:** Our pages and emails may include web beacons, also known as clear GIFs or pixel tags, allowing us to count visits or confirm system and server integrity.

Third-Party Cookies and Tracking

Content or applications on our Service, including advertisements, may be delivered by third parties, such as ad networks, content providers, and application vendors. These parties may use cookies and other tracking technologies to collect information about you when you use our Service. This data could be linked to your personal information or include details about your internet activities across various sites and services, potentially used for delivering targeted advertising.

We do not manage these third-party tracking technologies or their use. For queries about targeted content or ads, please directly contact the respective provider. For info on opting out from targeted advertising from several providers, please get in touch with us at rasgpt@thehealsacademy.com (for RAS-GPT) or info@thehealscademy.com (for general HEALS Academy).

How We Use Your Information

We use the information we collect about you or that you provide to us, including personal information, in the following ways:

- **Internal Analysis and Service Improvement:** We do not share your Personal Data or Personal Information with any third party, except as detailed below. While your IP address is used to gather broad demographic data and monitor service usage trends, it is not linked to personally identifiable information.
- **Sharing for Support:** Traffic Data may be shared with specific third parties for technical and customer support purposes to enhance service functionality.
- **Analytics Production:** We collect, store, process, and analyze Service Data to produce Analytics. These are derived from your use of the Service and developed either in

aggregate with other data or in a manner that does not reveal any specific Service Data or the identity of any Provider.

- Utilization of Service Data and Analytics: Your Service Data and Analytics are utilized for various purposes as outlined in the Terms of Service and applicable sales agreements, including communication with you and Providers, enhancing the Service, and for marketing and promotional efforts.
- Service and Account Notices: We may use your information to send you service-related notices, including any renewals or expiration notices for your account.
- Improvements and Research: Your information helps us to improve our Services and conduct research, especially for enhancing AI Features.
- Provision of Requested Services: We provide you with the services or information you request from us.
- Contractual Obligations and Rights: We use your information to fulfill our obligations and enforce our rights arising from any contracts between you and us, including for billing and collection.
- Interactive Features: Your information allows you to participate in interactive features on our Service.

Disclosure of Your Information

We may disclose the information we collect from you in the following ways:

- To Affiliates and Subsidiaries: We may share your information within our corporate family for the purposes described in this privacy policy.
- To Service Providers: Information may be shared with contractors, service providers, and other third parties we use to support our business. These parties are contractually obligated to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- For AI Features: Information may be disclosed to third-party LLM vendors (e.g., OpenAI) for the enhancement of AI Features.
- During Business Transfers: In the event of a merger, divestiture, restructuring, reorganization, dissolution, or sale of some or all of our assets, personal information held by us about our Service users may be transferred as part of the assets.
- For Marketing: We may share your information with third parties for marketing purposes if you have not opted out of such disclosures.
- With Consent: We may also disclose your information for any other purpose disclosed by us when you provide the information and with your consent.

Protection of Rights and Compliance with Laws: We may disclose your information to comply with legal processes or to protect the rights, property, or safety of HEALS Academy, L.L.C., our customers, or others. This includes exchanging information with other companies for fraud protection and credit risk reduction.

Your information is a crucial part of how we improve and manage our Service. We are committed to maintaining the trust and privacy of the information you share with us.

Choices About How We Use and Disclose Your Information

We are dedicated to offering you control over the personal information you provide to us. Below are the options available to you regarding this information:

- **Tracking Technologies and Advertising:** You have the ability to configure your browser settings to decline all or some browser cookies, or to alert you when cookies are being sent.
- **Promotional Offers from the Company:** If you prefer not to have your email address used by the Company for promoting our own or third parties' products or services, you can opt out by emailing us at rasgpt@thehealsacademy.com. This does not apply to information provided to the Company as a result of a product purchase, warranty registration, product service experience, or other transactions.
- **Third-Party Advertising:** We do not share personal information with third-party advertisers, advertising agencies, or marketing agencies. For options to opt-out of receiving targeted ads from members of the Network Advertising Initiative ("NAI"), visit the NAI's website.
- **State-Specific Rights:** Residents of California and Nevada may have additional rights regarding personal information. California residents can refer to California privacy laws for more details, and Nevada residents wishing to exercise their sale opt-out rights can contact us at the designated address.

AI Features

- Our third-party LLM providers might receive details of your interactions with our AI Features to improve their services. Your account information is not shared with these providers or developers. Remember, sharing sensitive personal information with bots is unnecessary.

Health Insurance Portability and Accountability Act of 1996 (HIPAA)

- We aim to comply substantially with HIPAA. Accordingly, some collected information may constitute PHI.

Telecom Consumer Protection Act (TCPA) Consent and Privacy

- Despite any prior preferences, by using our Service, you consent to receive communications from us and our representatives for any purpose related to the Service. This includes SMS messages, calls using pre recorded messages or artificial voice, and calls delivered using an automatic dialing system. You may revoke your consent and opt out of communications by contacting us at rasgpt@thehealsacademy.com.

These measures are part of our commitment to uphold your privacy and provide transparency about how your information is used and shared. Please contact us for more information or to exercise your privacy rights.

Do Not Track Policy

Our current policy is that we do not share Personal Data with third parties for purposes unrelated to the Service or our arrangements with Providers. However, there are circumstances under which we may disclose Personal Data:

- When it's necessary for us or our service providers to operate the Service, including processing your queries, responses, and other messages.
- To communicate with Patients, Clinicians, and Providers.
- As permitted under our Privacy Policy, Terms of Service, and Terms of Sale.
- When we believe it's necessary to comply with legal, regulatory, law enforcement, or similar requirements, to protect or defend the rights or property of our Company or a third party, or to enforce our Terms of Service and Terms of Sale.
- When authorized by you.

Third-Party Connections

You may be able to access and communicate with the Service through applications, devices, platforms, and websites owned and operated by Providers, which are not under our control. These external platforms have their own privacy and security practices, for which we are not responsible.

Accessing and Correcting Your Information

You can review and amend your personal information through our mobile app or by emailing us at rasgpt@thehealsacademy.com. We can only delete your personal information by also deleting your user account, and we reserve the right not to accommodate changes that would violate laws or result in incorrect information.

Deleted User Contributions may remain in cached or archived pages or might have been copied or stored by other Service users. The use of information provided on the Service is governed by our Terms of Service.

Data Security

We implement measures designed to protect your personal information from unauthorized access, use, alteration, and disclosure. Despite these efforts, the transmission of information via the internet is not entirely secure, and we cannot guarantee the complete security of your personal information.

Your California Privacy Rights

Privacy Rights Under the California Consumer Privacy Act (CCPA):

As a California resident, you have specific rights regarding your personal information under the CCPA. This includes the right to know the categories of personal information we collect, the purposes for collecting it, and your rights to request access to or deletion of your personal information. HEALS Academy does not sell personal information, and you have the right to opt-out of any future sales.

To exercise your CCPA rights, you may contact us through the methods listed. You may also authorize an agent to exercise these rights on your behalf, provided we receive written permission from you.

For more detailed information about your California privacy rights, including how to submit a request regarding your personal information and our process for verifying and responding to requests, please refer to the full privacy policy or contact us directly at rasgpt@thehealsacademy.com (for RAS-GPT) or info@thehealsacademy.com (for general HEALS Academy).

Non-US Users

As a Non-US User, by accessing our Service, you explicitly consent to the transmission, collection, storage, processing, and use of your analytics and personal data in alignment with this Privacy Policy. Your personal data may be handled across international borders, including within, to, and from the United States, where data protection laws may not be as comprehensive as those in your country.

Changes to Our Privacy Policy

We are committed to transparency about how we handle personal information. Any amendments to our privacy policy will be posted on this page, accompanied by an update notice on our Service's homepage. Should there be significant modifications in our privacy practices, you'll be notified directly on our homepage. The revision date of the privacy policy is always indicated at the top of this page. You play a vital role in keeping your contact information current and are encouraged to periodically review this privacy policy for any updates.

Termination

Upon terminating your Service registration or account, or if it is terminated by us for any reason, we will remove your Service Data from our systems. However, we reserve the right to retain and utilize your Service Data, albeit in an aggregated or de-identified format, as outlined in this Privacy Policy.

Contact Information

For any inquiries, feedback, or concerns regarding this privacy policy and our privacy practices, you're welcome to contact us:

- Emails: rasgpt@thehealsacademy.com (for RAS-GPT) or info@thehealsacademy.com (for general HEALS Academy)

To register a complaint or express a concern, please reach out to us via email at rasgpt@thehealsacademy.com (for RAS-GPT) or info@thehealsacademy.com (for general HEALS Academy). We are here to address your privacy-related questions and are committed to ensuring a secure and respectful use of your personal data.

