

## **PRIVACY POLICY**

### **Website Privacy Statement**

**Last Updated:** January 23, 2020

**Your privacy is important to us.** We believe in protecting your information in the same way we want ours protected. Zing Health, Inc., and its authorized agents (collectively, “Zing,” “we,” or “us”), encourage you to become familiar with this Privacy Policy and our [Terms of Service](#).

This Privacy Policy describes what information we collect about you, how we collect it, how we use it, with whom we may share it, and what choices you have regarding it, through [www.MyZingHealth.com](http://www.MyZingHealth.com) or other websites controlled by Zing (collectively, the “Site”). By accessing or using the Site, you are accepting and agreeing to the terms and conditions in our [Terms of Service](#) and acknowledging that you have read our privacy practices (and any uses and disclosures of information about you) that are described in this Privacy Policy.

#### **What information do we collect and how?**

We may collect certain personal identifying information from or about you in connection with your use of or submissions to the Site, including, but not limited to, your name, address, date of birth, email address, health information, and health plan information (together, “Collected Information”). Any health information about you will be collected in the course of your receipt of services such as when you enroll in our health plan.

Our use of such health information is governed by our [HIPAA Privacy Notice](#). In addition, we may retain the content of, and metadata regarding, any correspondence you may have with us or our representatives, regardless of the mode of communication by which such correspondence was made. This information helps us to improve the Site and the online content, materials, and services that we make available on the Site, and to more effectively and efficiently respond to both current and future inquiries.

As with many other websites, the web servers used to operate the Site may collect certain data pertaining to you and the equipment and communications method that you use to access the Internet and our Site and store it in log files. For security reasons and to confirm the integrity of the Site, we may combine components of these data with Collected Information, which may identify you. Unless otherwise described in this Privacy Policy or our [Terms of Service](#), such identifying information will be used solely for our business purposes. In addition, the information we collect may reveal such things as the Internet protocol (“IP”) address assigned to your computer, specific pages that you accessed on the Site or prior to visiting the Site, and the length of time you spent at the Site. We may use this information to help administer the Site and the servers that provide the Site, generate statistical information, monitor and analyze Site traffic and usage patterns, and improve the Site’s content and content delivery, including any online content, materials, and services that we describe or make available on the Site.

Technologies such as: cookies or similar technologies, are used by Zing and our marketing and analytics partners. These technologies are used in analyzing trends, administering the Site, tracking users’ movements around the Site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by our partners on an individual as well as aggregated basis.

We use cookies for remembering user settings. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use the Site, but your ability to use some features or areas of the Site may be limited.

### **3rd Party Advertising:**

We may partner with a third party to either display advertising on the Site or to manage our advertising on other sites. Our third party partner may use technologies such as cookies to gather information about your activities on the Site and other sites in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by contacting us. Please note this does not opt you out of being served ads. You will continue to receive generic ads.

The Site includes links to other Web sites whose privacy practices may differ from those of Zing. If you submit personal information (including any health information) to any of those sites, for example an authorized partner, different rules may apply to their use or disclosure of the information you disclose to them. We do not control the privacy policies or privacy practices of third parties, including our partners, and you are subject to the privacy policies and privacy practices of those third parties where applicable.

When you click on links on the Site you may leave our site. We are not responsible for the privacy practices of other sites, and we encourage you to read their privacy statements and/or policies.

Our Web site may include widgets, such as Google Maps and embedded video players. These features may collect your IP address, which page you are visiting on the Site, and may set a cookie to enable the feature to function properly. Widgets are either hosted by a third party or hosted directly on the Site. Your interactions with these features are governed by the privacy policy of the company providing it.

In addition, the Site may use a third party web analytics service. These features may record mouse clicks, mouse movements, and scrolling activity as you navigate through the website. The Site does not use the feature to collect any personally identifiable information entered in this website or have the ability to view personally identifiable or health information. Furthermore, we do not track your browsing habits across websites we do not own. Your interactions with these features are governed by the privacy policy of the company providing it.

The Site may offer publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your personal information from our blog or community forum, contact us. In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

### **How will we use the information you provide us?**

In addition to the uses described above or in our [Terms of Service](#), we may use the information that we collect from or about you to analyze and improve the content, materials, and services that we make available on the Site, to notify you of changes made to the Site, to evaluate user needs and customize the Site content delivered to you according to those needs, to send you promotional materials that you request from us, and for other legitimate and lawful business purposes. If you contact us for support or assistance, we may use information about you or your system that you provide or that we collect for purposes such as verifying whether your system meets the minimum requirements needed to use the Site and our various services. We will retain your information for as long as your account is active or as needed to provide you

services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We may store Collected Information in the United States, or we may transfer it to other countries.

If you wish to subscribe to our promotional emails, we will use your name and email address to send them to you. Out of respect for your privacy, you may choose to stop receiving our promotional emails by following the unsubscribe instructions included in these emails, accessing the email preferences in your account settings page or you can contact us.

### **With whom do we share the information we collect?**

Zing does not share your protected health information unless required or permitted by State or Federal Law. Our use of such health information is governed by our [HIPAA Privacy Notice](#). We train our employees to ensure that they know the procedures to follow to ensure that your information whether oral, written, or electronic format, is secure and safeguarded. We will not sell, license, transmit or disclose personal information outside of Zing unless it is expressly authorized by you; necessary to enable our contractors or agents to perform certain functions for us; or required or permitted by law.

We will share your personal information with third parties only in the ways that are described in this privacy policy, the [HIPAA Privacy Notice](#), or any service agreement you may enter into with Zing. We do not sell your personal information to third parties.

We may share Collected Information with authorized agents in order to provide services to you, and for other lawful business reasons. If all or part of Zing is sold, merged, or otherwise transferred to another entity, we may transfer Collected Information to such entity as part of that transaction. You will be notified via email and/or a prominent notice on the Site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information. In certain situations, Zing may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

We may disclose Collected Information to the proper authorities if we become subject to a subpoena or court order or if we are otherwise legally required to disclose such information, such as bankruptcy proceedings. We may also use and disclose information about you to establish or exercise our legal rights, to enforce the [Terms of Service](#) to assert and defend against legal claims, or if we believe such disclosure is necessary to investigate, prevent, or take other action regarding actual or suspected illegal or fraudulent activities or potential threats to the physical safety or well-being of any person.

We may provide your personal information to companies that provide services to help us with our business activities. These companies are authorized to use your personal information only as permitted by law and only as necessary to provide these services to us.

## **What choices do you have?**

When corresponding with Zing or our representatives, or when making a request for information or otherwise interacting with us or others through the Site, you choose what information to supply, what questions or comments to submit, whether you wish to receive further information, and by what method of communication such information should be delivered. Please take care to share only such information as is needed or that you believe is appropriate. You are under no obligation to provide us with personally identifiable information, but without it we may not be able to provide you the services you request. You may contact us as indicated below if at any time you would like to ask us about our **data collection practices** and our **information security policy**.

Upon request, Zing will provide you with information about whether we hold any of your personal information. You may correct, update, amend your personally identifiable information (“PII”), delete inaccuracies or deactivate your web accessible account by emailing us or calling us. We will respond to your request within a reasonable timeframe.

**We may change this Privacy Policy.** From time to time, we may change our privacy practices, and this Privacy Policy, because of changes in relevant and applicable legal or regulatory requirements, our business practices, or in our attempts to better serve your needs and those of our other customers. Your continue use of the website after any such modifications shall constitute your agreement to be bound by any such changes. Zing may modify, suspend, or discontinue all or any portion of its website without notice or liability.

**Separate Agreement.** If you have entered into a separate agreement with Zing with respect to the use of the Site or any Collected Information, that agreement will supersede this Privacy Policy to the extent they are in conflict.

## **Any questions? Please contact us at:**

HIPAA Privacy Officer  
Zing Health, Inc.  
303 West Madison, Suite 800  
Chicago, IL 60606  
Phone: 1-866-946-4458 (TTY: 711)  
Email: [privacy@myzinghealth.com](mailto:privacy@myzinghealth.com)

## **Our commitment to your privacy**

In addition to this Privacy Policy, Zing provides a [HIPAA Privacy Notice](#) to everyone who enrolls in a Zing health plan through this site. This Notice, sometimes referred to as a "HIPAA Notice," describes how health information about you may be used and disclosed and how you can get access to this information. In this Notice, we describe the ways that we may use and disclose health information about you. This Notice describes your rights and our obligations regarding the use and disclosure of Personal Health Information (“PHI”). We encourage you to read this Notice and know your rights. If you would like more information regarding your privacy, please refer to our [HIPAA Privacy Notice](#).