

VELA Application Privacy Policy

(Revised: January 06, 2021)

Seniorlink, Inc. and its affiliated entities, (“the Company,” “we” or “us”) is committed to protecting the privacy and security of information about you and the consumers whose information is contained herein (“you”)This policy addresses how we handle and protect personal information on the Seniorlink website, or a related website controlled by the Company (the “Site”), Vela services ("Vela") or any SMS, instant messaging or other Company application or service (collectively with the Site and VELA, the “Services”). Policies regarding your privacy when receiving services through any covered entity are addressed elsewhere in the Notice(s) of Privacy Practice that has been issued to you. This Privacy Policy will explain only how we collect, access, use, and disclose information about those using the Services provided in and through this Site or VELA. By using the Services you consent to this Privacy Policy.

INFORMATION WE COLLECT

- **Personal Information**

When you have a user id and password with access to the Services relating to your own care or the care of a person who has authorized you to use the Service, and you have successfully completed the registration process, you will become a “User” of the Services. As a User, you will have the opportunity to create one or more profiles (“Profiles”) and to add information, data, and connections to your Profile(s). At the time that you register, create a Profile, and at other times, we collect information that personally identifies you, such as your name, address, mobile telephone number, e-mail addresses, as well as other information that you provide to us or that you include in any Profile, along with information about your care coordination such as calendar events, contact and address book data, and provider information (together, your “Personal Information”). Your decision to provide Personal Information, or to include health-related information such as medical conditions, names of providers, treatments and other care information, is voluntary. If, however, you choose not to provide the requested information, you may not be able to use VELA or certain other features of the Services. Without limiting the generality of the previous statement, you understand that if we ask you for consent to receive SMS text messages, this consent is not required as a condition of using the Services, but you may not be able to use certain features and functionality of the Services which require the use of SMS text messages.

In some cases, individuals may have authority (either expressly given by a payer, a health care service provider, an individual or under State law) to create a Profile on behalf of a User of the Services. If you are such a person, you must comply with State and other laws and act in the best interests of the User and on behalf of the User. When this policy refers to "you," it is addressing the privacy of the User of the Services and anyone on whose behalf the User is receiving the Services. As a User, you may have the opportunity to invite Caregivers and other third parties ("Third Parties") to access the Profiles and Virtual Care Room(s) that have been created and include other information about them. If you elect to invite a Third Party to access your Profile(s) or Personal Information, that Third Party will receive an invitation to register with the Services and will need to complete the registration process to become a User. In addition, any Third Party that you invite to access your Profile(s) or Personal Information may have full access to all Profile content within your Profile(s) as well as the ability to add, distribute, download and edit the same. Because of the sensitive and private nature of your healthcare and the healthcare of those loved ones on whose behalf you may be creating a Profile, we recommend that you protect the private and sensitive information contained within your Profile(s) and consider carefully whether to permit any Third Party to access your Profiles or Personal Information. All Users are responsible for monitoring the Profile content uploaded or added to their Profiles, whether uploaded by you, by another authorized User, or by other third parties. Please note that you, and not the Company, are responsible for maintaining and protecting all Profile content. We may disclose to Third Parties that you are a User as well in order to connect Users to Third Parties and allow them to gather and share information. This feature allows you to connect with Third Parties and allows them to communicate directly with each other. From time to time, we may check for updates to your data and/or require that you provide additional or new information regarding contacts and/or calendar events or update such information.

If you invite a Third Party to access your Profile or Personal Information, you understand that the Third Parties will be able to view and, in some cases, revise, add to, delete and/or further disclose your Personal Information. We do not regularly monitor or moderate any information, and you invite others as Third Parties at your own risk. Information you provide, or provided for you, may be re-disclosed and, after being further disclosed, will not enjoy the protection that it would otherwise have.

- **Usage Data**

We automatically collect usage information regarding how you, Users, and other Third Party Users access and use the Services ("Usage Data"). For example, we may automatically collect information on the device you use and your location, the type of web browser you use, your

Internet Service Provider, your IP address, the pages you view, the functions you utilize, the time and duration of your visits, crash logs and other information relating to your use of the Services. We use this information to analyze trends, administer the Services and Company's businesses, troubleshoot any User problems, and to enhance and update the Services. In addition, we may disclose Usage Data to other parties for research, general marketing administration, or other purposes. Other than as set forth in the "Other Transfers" section of this Privacy Policy, we do not, however, sell any information that would identify you (such as name, address, or social security or patient numbers) or that would contain sensitive information about you such as credit card numbers.

- **Activity Data**

When you, other Users, or a Third Party or others provide, or we collect, information, or carry information between Users such as through allowing Users or Third Parties to see calendar information or send and receive text messages using our Services, we may process and store such data and other related information ("Activity Data") in order to provide these Services to you. Some Activity Data may be retained or not completely deleted. Accordingly, we cannot and do not guarantee that the Activity Data will be completely deleted, and therefore any Activity Data that you send or allow to be accessed is sent or provided at your own risk.

COOKIES AND DO NOT TRACK

Like many other websites, we use cookies on the Site and in VELA and other Services (a small, removable data file that is stored by the web browser on your computer that identifies your computer and browser when you visit our Site or use our Services). We do not use cookies to collect Personal Information but rather to improve the quality of the Services. Most web browsers and our applications are initially set up to accept cookies. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. Please note, however, that certain features of the Site may not function if you delete or disable cookies. Some of the Service Providers (as defined below) that we work with may use their own cookies in connection with the services they perform on our behalf. The Site's cookies do not access a User's hard drive to collect any information stored on the hard drive.

Additionally, your browser may offer you a "Do Not Track" option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. Our Services do not support Do Not Track requests at this time,

which means that we collect information about your online activity while you are using our Services. We do not collect online activity after you leave our Services.

HOW WE USE THE INFORMATION WE COLLECT AND WHEN WE MAY SHARE THAT INFORMATION

As a general policy, we use Personal Information and Activity Data for internal purposes only. We will not disclose Personal Information or Activity Data to third parties without your consent, except as explained in this Privacy Policy. We may at times analyze Personal Information of many Users in a way that does not identify any single User, usually by taking out any information that would identify you. Such analysis can be very helpful in finding out which treatments are helpful or what certain types of patients have in common, or for helping us be more efficient in our business. It can also be helpful to healthcare providers, researchers, insurance companies, drug manufacturers and others, and we may share our analyses with such individuals and companies. Other than as set forth in the “Other Transfers” section of this Privacy Policy, we will not, however, ever sell information that identifies you without your explicit consent.

SUPPORT SERVICES

Company may use your Personal Information to contact you regarding the Services. For example, we may message you or provide a notification through an application to let you know about new releases, patches and other updates to the Services.

From time to time, we may establish business relationships with other businesses that we believe are trustworthy and who have confirmed that their privacy practices are consistent with ours (“Service Providers”). For example, we may contract with Service Providers to provide certain services, such as hosting and maintenance, customer relationship management and data storage and management. We provide our Service Providers with only the information necessary for them to perform these services on our behalf. Each Service Provider must agree to use reasonable security procedures and practices, appropriate to the nature of the information involved, in order to protect your Personal Information and Activity Data from unauthorized access, use or disclosure. Service Providers are prohibited from using Personal Information or Activity Data in any other manner than as specified by Company.

We may also work with third party marketing and advertising companies. These companies may collect and use information about your use of the Services in order to provide advertisements

about goods and services that may be of interest to you or for direct marketing campaigns. Advertisements may be shown via the Services or third party websites. These companies may place or recognize a unique cookie on your computer or device or use other similar technologies.

STANDARD ANALYTICS INFORMATION

We may use and disclose to third parties certain Usage Data regarding the Services. We use certain Service Providers to help analyze how users use the Service. They may use cookies to collect information such as how often users visit the Service, what pages they visit, and what other sites they used prior to coming to the Service. We use this information to improve our Service. A Service Provider may plant a persistent Cookie on your web browser or device to identify you as a unique member the next time you visit the Service.

OTHER TRANSFERS

We may share Personal Information, Usage Data and Activity Data with businesses controlling, controlled by, or under common control with Company. If Company is merged, acquired, or sold, if Company acquires a new business unit or affiliate, or in the event of a transfer of some or all of our assets, we may disclose or transfer Personal Information, Usage Data and Activity Data in connection with such transaction without your further consent.

COMPLIANCE WITH LAWS AND LAW ENFORCEMENT

Company cooperates with government and law enforcement officials to enforce and comply with the law. We may therefore disclose Personal Information, Usage Data, Activity Data, and any other information about you, if we deem that it is reasonably necessary to: (a) satisfy any applicable law, regulation, legal process (such as a subpoena or court order) or enforceable governmental request; (b) enforce the Terms of Service, including investigation of potential violations thereof; (c) detect, prevent, or otherwise address fraud, security or technical issues; (d) comply with health monitoring and reporting requirements or recommendations; or (e) protect against harm to the rights, property or safety of Company, its users or the public as required or permitted by law.

BE CAREFUL HOW YOU SHARE YOUR OWN INFORMATION

Certain Profile information, including your name, location, and any video or image content that you have uploaded to the Services, may be displayed to other users to facilitate user interaction within the Services or address your request for our services. Please remember that any content you or any User uploads to your Profile, along with any Personal Information or content that you

or any user voluntarily discloses online or through the Services in a manner other Users can view (in calendar events, in messages and chat areas, etc.) becomes publicly available to these other Users, and can be collected and used by these other Users, and transferred or made public without our consent. You agree that any use or disclosure of your Personal Information or any other content by another User of the Services is not a use or disclosure by us. Your User name may also be displayed to other Users if and when you send messages or comments or upload images or videos through the Services, and other Users can contact you through messages and comments. We do not control the policies and practices of any other third party site or service. Additionally, when you share information with third parties, using the Services or otherwise, that information may be passed along or made public by others. Therefore, anyone with access to such information can potentially use it for any purpose, including sending unsolicited communications.

SECURITY

Company is committed to protecting the security of your Personal Information. We employ reasonable security measures designed to protect your Personal Information from unauthorized access in accordance with accepted industry practices. Regardless of our efforts, no data transmission over the Internet or other network, including any of Company's services, can be guaranteed to be 100% secure. Accordingly, we cannot and do not guarantee the security of any information you or any user transmits on or through the Services, and any information you transmit is sent at your own risk.

CHILDREN'S PRIVACY

We do not knowingly collect or solicit Personal Information from children under the age of 13. By using the Services, you represent that you are at least 13 years old (except with regard to VELA, in which case you represent that you are at least 18 years old). If you are under 13, please do not attempt to register for the Services or send any personal information about yourself to us. If you are under 18, please do not attempt to download, register for, or create a Profile for VELA. If we become aware that we have inadvertently received or collected Personal Information from a user of the Services who is under the age of 13, we will attempt to immediately delete that information from our files and records. Furthermore, we encourage Users of the Services that are minors that are 13 years of age or older to ask their parents or guardians for permission before sending any information about themselves over the Internet.

If you believe a child who is under the age of 13 has provided us with Personal Information, please contact us at:
Seniorlink Vela

120 St. James Avenue
4th Floor
Boston, MA 02116

WHERE INFORMATION IS MAINTAINED

Please be aware that your Personal Information and Activity Data may be transferred to and maintained on servers or databases located outside your state, province, or country. By using the Services, you agree that the collection, use, transfer, and disclosure of your Personal Information and communications will be governed by the applicable laws in the United States.

ACCURACY AND RETENTION

You can always review, correct, update, or change your Profile. Upon your request, we will: (1) stop sending direct marketing or other emails that are not administrative in nature and related to your Profile or your use of the Services, to your email address if you wish to opt out of our direct marketing efforts; and/or (2) disable your account to prevent any future activity through that account. You may make any of these requests by emailing the request to support@vela.care. If you have questions or concerns regarding this Privacy Policy, please e-mail them to support@vela.care. Please do not email any sensitive information.

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to ask us for a notice identifying the categories of Personal Information which we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to support@vela.care.

CHANGES TO THE PRIVACY POLICY

We may periodically change this Privacy Policy. If we decide to change this Privacy Policy, we will inform you by posting the revised Privacy Policy on the Site, within the Application or otherwise. Those changes become effective upon posting, the date of which is shown as the “Revised On” date in the revised Privacy Policy. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected. By continuing to use the Services, you agree to be bound by the revised Privacy Policy. However, in the case of a material

change of this Privacy Policy (for example, a change in the use of data that we have already collected), we will request your express consent to the new use.