

## **PRIVACY POLICY**

**Effective: August 10, 2018**

This Privacy Policy governs the manner in which Soleo Health Holdings, Inc. and its subsidiaries (“*Soleo Health*”) collects, uses, maintains and discloses information collected from users (“*you*,” “*your*” or “*User*”) of its soleohealth.com web site and any derivative or affiliated web sites on which this Privacy Policy is posted (collectively, the “*Site*”). Soleo Health reserves the right, at its discretion, to change, modify, add or remove portions of this Privacy Policy at any time by posting such changes to this page. You understand that you have the affirmative obligation to check this Privacy Policy periodically for changes, and you hereby agree to periodically review this Privacy Policy for such changes. The continued use of the Site following the posting of changes to this Privacy Policy constitutes an acceptance of those changes.

### **Privacy**

Soleo Health is committed to safeguarding the information you entrust to Soleo Health and believes that every User should know how it utilizes the information collected from Users. Please note that the Site may contain links to other web sites, and the Site allows Users to download or otherwise access Content (including software), controlled by third parties. Soleo Health is not responsible for the privacy practices of these or any other web sites or Content controlled by third parties, and you access and utilize such Content and web sites entirely at your own risk. Soleo Health recommends that you review the privacy and other practices governing any other web sites that you choose to visit and any Content you wish to download or otherwise access.

Soleo Health is based, and this web site is hosted, in the United States of America. If you are from the European Union, Canada or other regions of the world with laws governing data collection and use that may differ from U.S. law and you are registering an account on the Site, visiting the Site, purchasing products or services from Soleo Health or the Site, or otherwise using the Site, please note that any personally identifiable information that you provide to Soleo Health may be transferred to or utilized by Soleo Health or its affiliates in the United States. Any such personally identifiable information provided may be processed and stored in the United States by Soleo Health or a service provider acting on its behalf.

### **The Information Soleo Health Collects**

Users browsing the Site without registering an account or affirmatively providing personally identifiable information to Soleo Health do so anonymously; however, certain non-personally identifying information is collected, as provided further below.

Users may provide and Soleo Health may collect personally identifiable information from Users in a variety of ways. Personally identifiable information may include, without limitation, (i) contact data (such as a User’s name, mailing and e-mail addresses); (ii) demographic data (such as a User’s zip code or age); (iii) financial information collected to process Orders and purchases made from Soleo Health via the Site or otherwise (such as credit card, debit card or other payment information); and (iv) other information requested during the Soleo Connect account registration process. Soleo Health does not collect social security numbers. If you communicate with Soleo Health by e-mail or otherwise, post User Content to the Site, post messages to any forums, complete online forms, surveys or entries, provide information outside of the Soleo Connect account registration process, or otherwise interact with or use the features on the Site, any information you provide may be collected by Soleo Health.

Soleo Health may also collect information about how Users use the Site, for example, by tracking the number of unique views received by the pages of the Site, or the domains and Internet Protocol (“**IP**”) addresses from which Users originate. While not all of the information that Soleo Health collects from Users is personally identifiable, it may be associated with personally identifiable information that Users provide Soleo Health through the Site or otherwise. Additionally, certain information regarding your computer systems, network locations, IP address and software may be communicated to Soleo Health in certain circumstances by the digital rights management systems associated with certain Content that you download or access via the Site in order to prevent unauthorized use or distribution of the associated Content. Non-personally identifiable information collected by Soleo Health (such as patterns of utilization) is exclusively owned by Soleo Health and may be used as it sees fit in accordance with applicable law.

### Cookies

Like most web sites, the Site uses cookies and web log files to track site usage. A cookie is a tiny data file that resides on your computer that allows Soleo Health to recognize you as a User when you return to the Site using the same computer and web browser. Like the information you enter during account registration, cookie and log file data is used to customize your experience on the Site. One type of cookie, known as a “persistent” cookie, is set once you have logged in to your Site account. The next time you visit our Site, the persistent cookie will allow us to recognize you as an existing User so you will not need to log in before using the Site. In order to access or change any of your private information, you must log in with your password even if your computer contains your persistent cookie. Additionally, if you log out of the Site you will need to re-enter your password the next time you visit in order to log in to your account. Another type of cookie, called a “session” cookie, is used to identify a particular visit to the Site. Session cookies expire after a short time or when you close your web browser. You can choose to disable cookies on your browser or allow your browser to notify you when a cookie is being sent, however this may prevent you from utilizing certain features of the Site.

### IP Addresses

Due to the communications standards on the Internet, we automatically receive the uniform resource locator (URL) of the web site from which you came and the web site to which you proceed once you leave the Site. We also receive the IP address of your computer (or the proxy server you use to access the World Wide Web), your computer operating system and type of web browser you are using, as well as the name of your Internet service provider (ISP). This information is used to analyze overall trends to help us improve the Site. The linkage between your IP address and your personally identifiable information is shared with third parties in accordance with this Privacy Policy.

### Web Beacons and Ad Networks

We may allow other companies, called ad networks, to serve advertisements to Users via the Site. Ad networks include third party ad servers, ad agencies, ad technology vendors and research firms. Soleo Health may “target” some ads to Users that fit a certain general profile. To deliver these ads properly, the Site may include a file, called a web beacon, from these ad networks within pages served by the Site or implement other monitoring technologies so the networks may provide anonymous, aggregated auditing, research and reporting for advertisers as well as to target ads to you while you visit other web sites. These general targets may also be used by ad networks to display targeted ads on other web sites as a substitute for random, irrelevant ads. In addition, the Site may use the technology of ad networks to serve ads only when you visit this Site. Ad networks may use non-personal information, such as your state or zip code, in order to provide advertisements about goods and services that may be of particular interest to you while you visit this Site. Because your web browser must request these advertisements and web beacons from the ad network’s servers, these companies can view, edit or set their own cookies, just as if you had requested a web page from their site.

### Log Files

We use log files in connection with our Site. Log files track Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks. We utilize this information to analyze trends, administer the Site, prevent fraud, track website navigation in the aggregate, and gather broad demographic information for aggregate use.

### Social Networking

The Site may permit you to use third party social networking platforms such as Facebook, Pinterest, Twitter, LinkedIn and Google+. This may include the use of social media plugins and features such as Facebook’s “Like” features, Twitters “Tweet” features, Pinterest’s “Pin” features, Google’s “+1” features, etc. When you use these social networking platforms and plugins, your username connected to the information about you or collected from you on these services may be shared with us. When you use social networking platforms and plugins, you share your information with the applicable third party social network platforms and their specific privacy policies, terms of service, terms of use, and/or other terms and conditions apply disclosure of such information. In addition, such third party social network platforms may be able to collect information about you, including your activities and traffic and/or may notify your connections through their platform about your use of the Site. Such services may allow your activity to be monitored across multiple websites for purposes of delivering more targeted advertising. Please note that the specific privacy policies, terms of service, terms of use, and/or other terms and conditions of the applicable third

party social network platform providers will apply in those situations and we encourage you to read them. We may add new social networking plugins, features, and buttons to our Site from time to time.

### Third Party Advertising Services

Over time, we may employ various different advertising or remarketing services that serve you targeted advertisements to make your online experience more focused to your interests. We will not distribute any Personally Identifiable Information collected from the Site or any landing page(s) to advertisers or remarketing services.

### Google Analytics

We use a tool called “Google Analytics” to collect information about use of the Site. Google Analytics collects information such as how often Users visit this site, what pages they visit when they do so, and what other sites they used prior to coming to any of the Site. We use the information we get from Google Analytics only to improve the Site and related services. We do not combine the information collected through the use of Google Analytics with Personal Information. Google’s ability to use and share information collected by Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Use (available at <https://www.google.com/analytics/tos.html>) and the Google Privacy Policy (available at <https://www.google.com/privacypolicy.html>). You can prevent Google Analytics from recognizing you on return visits to any website by disabling cookies on your browser. You can also download a Google Analytics opt-out add-on to your browser.

### **How Soleo Health Uses Information**

Soleo Health may use personally identifiable information collected through the Site for the specific purposes for which the information was collected, to process requests made via the Site, to contact Users regarding Content, products and services offered by Soleo Health, and otherwise to enhance Users’ experience with Soleo Health. Soleo Health may also use information collected through the Site for research regarding the effectiveness of the Site and the business planning, marketing, advertising and sales efforts of Soleo Health, its trusted affiliates, independent contractors and business partners. Information collected from you may also be used to ensure compliance with certain terms and conditions and agreements entered between you and Soleo Health as well as to prevent unauthorized use or disclosure of Content downloaded or otherwise accessed via the Site.

Soleo Health will communicate with you through email and notices posted on this Site. These may include a series of welcome emails which help inform new Users about various features of the Site, emails and confirmations regarding actions taken by you on the Site or requests placed by you through the Site, and notices relating to the proper functioning of the Site or your account. Soleo Health may use your personal information to send you promotional information relating to the Content, products and services offered by third parties that Soleo Health feels may be of interest to you, if permitted under HIPAA privacy regulations. The personal information you provide will allow us to alert you to new developments, new products, features and enhancements; special offers; upgrade opportunities; and surveys, contests and events of interest. We strive to limit use of the information you provide to those offers that we think you would appreciate receiving. To opt out of further communications from a marketing partner or sponsor with whom your information has been shared, please contact that partner directly. We may also send Soleo Health emails that may contain information regarding third-party products or services in a way that is compliant with HIPAA privacy regulations; however, this doesn’t mean that we’ve traded your personal information to any party.

### **Disclosure of Information**

Soleo Health may disclose personally identifiable information collected from Users to its parent, subsidiary and other related companies, trusted affiliates, independent contractors and business partners who will use the information for the purposes outlined above, as necessary to provide the services offered by the Site and the Site itself, and for the specific purposes for which the information was collected. Soleo Health may disclose personally identifiable information at the request of law enforcement or governmental agencies or in response to subpoenas, court orders or other legal process, to establish, protect or exercise Soleo Health’s legal or other rights, to defend against a legal claim or as otherwise allowed by law. Soleo Health may disclose personally identifiable information in order to protect the rights, property or safety of a User or any other person. Soleo Health may disclose personally identifiable information to investigate or prevent a violation by User of any contractual or other relationship with Soleo Health or where Soleo Health has a good faith belief that access, preservation or disclosure of such information is reasonably necessary to protect the rights, property or safety of Soleo Health, its users or the

public or the perpetration of any illegal or harmful activity. Soleo Health may also disclose aggregate, anonymous data based on information collected from Users to Content developers, investors, advertisers and potential partners. Finally, Soleo Health may disclose or transfer personally identifiable information collected from Users in connection with or in contemplation of a sale of its assets or business or a merger, consolidation or other reorganization of its business. All of these actions will be subject to compliance with HIPAA privacy regulations if the information we collect about you is protected under HIPAA. For more information about HIPAA privacy protections, see our Notice of Privacy Practices on our soleohealth.com website.

### **Personal Information Provided as Part of User Content**

If a User includes such User's personally identifiable information as part of the User Content that such User posts to the Site, such information may be made available to any parties using the Site and/or such User Content. Soleo Health does not edit or otherwise remove such information from User Content before it is posted on the Site. If a User does not wish to have such User's personally identifiable information made available in this manner, such User must remove any such information from the User Content before posting. User contact information (which may include, without limitation, a User's username and email address) may be included with any User Content that a User posts via the Site. Soleo Health is not liable for any damages caused or incurred due to personally identifiable information made available in the foregoing manners.

### **Security of Information**

Information about Users that is maintained on Soleo Health's systems is protected using industry standard security measures. In order to secure your personal information, access to your data is password-protected, and sensitive data is protected by SSL encryption when it is exchanged between your web browser and the Site. However, no security measures are perfect or impenetrable, and Soleo Health cannot guarantee that the information submitted to, maintained on or transmitted from its systems will be completely secure. Soleo Health is not responsible for the circumvention of any privacy settings or security measures contained on the Site by any Users or third parties.

### **Children's privacy**

Although our website is a general audience site, we restrict the use of our service to individuals age 18 and above. We do not knowingly collect personal information from children under the age of 13.

### **Updating Personal Information; Opt-Out**

If your personally identifiable information changes, Soleo Health will endeavor to provide a way to correct, update and/or remove your previously provided personal data. This can be done by emailing a request to Soleo Health at [contact@soleohealth.com](mailto:contact@soleohealth.com). When you sign up for our updates or receive e-mail messages from soleohealth.com, you will always be given the chance to opt-out of special offers and site updates. You may change your preferences at any time and will only be contacted in manners consistent with your stated preferences. All retained personally identifiable information will continue to be subject to the terms of the Privacy Policy to which you have previously agreed.

### **Your California Privacy Rights and Online Tracking**

**California Civil Code Section 1798.83 permits users that are residents of California to request certain information regarding Soleo Health's disclosures of personally identifiable information to third parties for such third parties' direct marketing purposes. If you are a California resident and would like to make such a request, please email Soleo Health at [contact@soleohealth.com](mailto:contact@soleohealth.com) or write to us using the contact information noted in the "Contact Us" section below.**

The California Online Privacy Protection Act ("**CalOPPA**") requires Soleo Health to disclose how it responds to Do Not Track signals set in a User's web browser. Please note that the Site does not interpret or respond to "Do Not Track" signals. However, you may set your web browsers to not accept new cookies or web beacons, be notified when you receive a new cookie, or disable cookies altogether. Please note that without enabling these features, your experience on the Site may not be as smooth and you will not be able to take full advantage of the Site's features that involve web browsing. Please see the "Help" section of your web browsers for instructions on managing this security preference.

## **Correcting, Updating, Accessing or Removing Personal Information**

To the extent applicable, if a User's personally identifiable information changes (such as a User's zip code), or if a User no longer desires to receive non-account specific information from Soleo Health, Soleo Health will endeavor to provide a way to correct, update and/or remove that User's previously-provided personal data. This can be done by emailing a request to Soleo Health at [contact@soleohealth.com](mailto:contact@soleohealth.com). Additionally, you may request access to the personally identifiable information as collected by Soleo Health by sending a request to Soleo Health as set forth above. Please note that in certain circumstances, Soleo Health may not be able to completely remove a User's information from its systems. For example, Soleo Health may retain a User's personal information for legitimate business purposes, if it may be necessary to prevent fraud or future abuse, for account recovery purposes, if required by law or as retained in Soleo Health's data backup systems or cached or archived pages. All retained personally identifiable information will continue to be subject to the terms of the Privacy Policy to which the User has previously agreed.

## **Contacting Soleo Health**

If you have any questions or comments about this Privacy Policy, you may contact Soleo Health via any of the following methods:

Soleo Health

Attn: Communications Department

7850 Collin McKinney Parkway, Suite 101

McKinney, TX 75070

Telephone: 214-592-0850

Email: [contact@soleohealth.com](mailto:contact@soleohealth.com)