WellPrept, Inc. Privacy Policy

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Introduction

WellPrept, Inc. ("WellPrept," "we," "us," or "our") respects your privacy, and we are committed to protecting it through our compliance with this policy. This policy describes the types of information we may collect from you or that you may provide when you access or use our website or mobile application, including any related services (collectively, the "Service" or "Services"), whether as a registered member or an unregistered visitor, and our practices for collecting, using, maintaining, protecting and disclosing that information.

Information We Collect

Information You Provide To Us Directly When you register an account and become a registered user of the Services, we require you to provide certain personal information, such as name, email address, address, phone number, billing information and user ID. Details of subscriptions to our Service and your payment information used to fulfill your subscriptions. You may be required to provide financial information to access our site or app. Registered users have the option to provide additional information to include on their "Welcome" page to introduce themselves to patients and their related parties, including an introductory video, specialty, clinical and professional information, profile photo, fellowship and employment history, publications, memberships and board certifications. Information Collected Automatically When You Use Our Services In addition to your personal information that you provide to us directly, we collect a variety of personal information automatically when you use the Services through the use of "cookies" and similar technologies (e.g., pixels, web beacons and device identifiers). Cookies include activity information such as the date and time that you access our site or app. We collect device information including your IP address (which is a unique numerical address that identifies your device when you access the Internet), your browser and device type and model, operating system, your ISP and mobile carrier, your advertising ID (which is a unique, user-resettable identification number associated with a mobile device), other unique identifiers associated with your computer or mobile device, and the URL of the site from which you access our site. The use of these technologies helps us serve you better by understanding what you're interested in, tracking trends, measuring the effectiveness of our content and saving your preferences. For information about how you can manage your cookie preferences, refer to the "Choices About How We Use and Disclose Your Information" section, below. Children Under the Age of 13 Our Service is not intended for children under 13 years of age. We do not knowingly collect personal information from children under 13. If you are under 13, do not use our Service or provide any information to us, including your name, address, telephone number, e-mail 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 contact@wellprept.com.

SMS and Email Messaging Privacy

WellPrept delivers patient communications, including appointment reminders, pre-procedure preparation instructions, post-procedure care instructions, results notifications, and educational content, on behalf of healthcare practices that use our platform. These messages are sent by SMS and email. How phone numbers and email addresses are collected Patient mobile phone numbers and email addresses are collected through a standardized WellPrept-hosted consent form that identifies the patient's healthcare practice. Patients enter their contact information directly and provide explicit consent by checking an unchecked opt-in box that authorizes automated messaging from the practice through WellPrept. How phone numbers and email addresses are used Patient mobile phone numbers and email addresses are used solely to deliver healthcare messages on behalf of the patient's practice. We do not sell or share patient mobile phone numbers, email addresses, or SMS opt-in consent data with third parties for marketing or promotional purposes. Information collected through the SMS messaging program, including phone numbers and consent records, is not shared with third parties or affiliates for their marketing or promotional purposes under any circumstances. Message frequency Frequency varies based on the patient's care plan. A typical surgical journey involves approximately 5 to 15 messages spread before and after the procedure date. Opt-out Patients may opt out of SMS messages at any time by replying STOP to any message. Patients may also revoke consent through any reasonable method, including calling the practice, emailing the practice, emailing WellPrept at privacy@wellprept.com, or notifying any staff member. Opt-out requests are honored across all channels within 10 business days. Replying HELP to any message provides assistance information. Standard carrier disclosure Message and data rates may apply. WellPrept and the practices that use our platform do not charge for these messages, but the patient's wireless carrier may. Service providers WellPrept uses AWS End User Messaging as its SMS and email delivery infrastructure. Patient phone numbers and email addresses are transmitted to AWS solely for the purpose of message delivery and are subject to a Business Associate Agreement and the applicable HIPAA safeguards. Limitations of SMS Standard SMS is not encrypted end-to-end. WellPrept limits the clinical detail included in SMS messages and routes sensitive content through more secure channels where appropriate. Patients should not communicate urgent medical concerns by text. For emergencies, call 911 or go to the nearest emergency room.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

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To present our Services to you.

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To provide you with information that you request from us.

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To fulfill any other purpose for which you provide it.

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To provide you with notices about your subscription, including expiration and renewal notices.

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To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.

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To notify you about changes to our Services.

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To display any "Welcome" and content pages you create to share with patients and their care community.

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To deliver patient SMS and email communications on behalf of the healthcare practices that use our platform.

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In any other way we may describe when you provide the information.

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For any other purpose with your consent.

Sharing Your Information

Public Access Your "Welcome" page and any content you provide to be shared through our Services will be available publicly to anyone who has access to your page. Service Providers We may share your information with third parties that help us provide the Services and operate our business, including in the areas of website and database hosting and maintenance, telecommunications, information security, fraud detection and prevention, email management, data analytics, marketing, advertising, member support, and identity and professional credential verification. Patient SMS and email information is shared only with messaging delivery providers under written agreements that prohibit any use of that information beyond delivering the messages. Authorities We may access, preserve, and share your information with third parties, as required or permitted by applicable law, if we believe it is reasonably necessary to comply with legal process and law enforcement instructions and orders, such as a search warrant, subpoena, statute, judicial proceeding, or other legal process served on us, which may involve disclosure to law enforcement, courts, or governmental authorities.

Other Third Parties We may access, preserve, and share your information if we determine it is reasonably necessary or appropriate to investigate, prevent or take action regarding suspected fraudulent, harmful, unethical or illegal activities, or any violation of our Terms of Service or to protect and defend our legal rights, safety, and property. With Your Consent We also may share your personal information with a third party in a manner not addressed by this policy with your consent.

Security

We employ technical, administrative and physical safeguards designed to protect your personal information. However, no security measure can guarantee security and that data will not be accessed, disclosed, altered, or destroyed. You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a complex password that nobody else knows or can easily guess, and keeping your log-in credentials private. We are not responsible for any lost, stolen, or compromised passwords or for any unauthorized account activity.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

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Tracking Technologies. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

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Account and Profile Information. If you have registered an account, you may review and update certain personal information through your account settings. If you prefer to submit an update request to us directly, or if you wish to close your account, please contact us at info@wellprept.com.

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SMS and Email Messages. Patients may opt out at any time by replying STOP to any message, by contacting the healthcare practice, or by emailing WellPrept at privacy@wellprept.com.

Accessing and Correcting Your Information

You can review and change your personal information by logging onto your dashboard at app.wellprept.com. You may also send us an e-mail at info@wellprept.com to request access to, correct or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause

the information to be incorrect. If you delete your Welcome page or other content from our Services, copies of such information may remain viewable in cached and archived pages, or might have been copied or stored by other Service users.

Your California Privacy Rights

If you are a user of this service and a California resident under the age of 18, you may request to have your posted content or Information removed from the publicly-viewable portion of this web site by contacting us at info@wellprept.com. In certain situations, however, content or Information cannot be removed from our systems and databases, and shall be retained by us in order to comply with applicable law, legal process and other record retention or data security requirements. California's "Shine the Light" law permits customers who reside in California to request, once per year, disclosure regarding how we share certain of their information with third parties and affiliates for those third parties' and affiliates' own direct marketing purposes. If this law applies to you and you wish to obtain further information about our sharing, you may make one request each year by contacting us at info@wellprept.com.

Changes to Our Privacy Policy

We reserve the right to modify this privacy policy at any time and in our sole discretion. When we make a change, we will update the "Last updated" date and post the updated policy on or through the Service. We may, and if required by law will, also provide notification of changes in another way that we believe is reasonably likely to reach you, such as by e-mail (if you have an account where we have your contact information) or another manner through the Service. Any modifications to this privacy policy will be effective upon posting or as otherwise indicated at the time of posting. In all cases, by continuing to use the Service after posting of the updated policy, you are consenting to the changes. If you object to any changes, you may close your account by contacting us at info@wellprept.com.

Questions?

To ask questions or comment about this privacy policy and our privacy practices, contact us at: info@wellprept.com.