**PRIVACY POLICY**

**Last modified: 2019-01-07**

**<u>Introduction</u>**

iTether Technologies, Inc **("Company"** or **"We"**) respect your privacy and 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 visit the website found on www.iTetherTech.com and our mobile and desktop applications, available in the App Stores. (collectively, our **"Platform"**) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- Through the Platform, except as set forth below.

- In email, text, and other electronic messages between you and this Platform.

It does not apply to information collected by:

- Use of the Platform where such use includes providing Protected Health Information ("PHI"), as such term is defined in the Health Insurance Portability and Accountability Act of 1996 and the regulations promulgated thereunder (Company's Business Associate Agreement governs the use and disclosure of PHI);

- us offline or through any other means, including on any other website operated by Company or any third party (including our affiliates and subsidiaries); or

- any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Platform.

Please read this policy carefully to understand our policies and 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 Platform. By accessing or using this Platform, you agree to this privacy policy. This policy may change from time to time (see Changes to Our Privacy Policy). Your continued use of this Platform after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

**<u>Children Under the Age of 18</u>**

Our Platform is not intended for children under 18 years of age. No one under age 18 may provide any information to or on the Platform. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on this Platform or on or through any of its features/register on the Platform, make any purchases through the Platform, use any of the interactive or public comment features of this Platform 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 18 without verification of parental consent, we will delete that information.  If you believe we might have any information from or about a child under 18, please contact us at info@iTetherTech.com.

## **Information We Collect About You and How We Collect It**

We collect several types of information from and about users of our Platform, including information:

- by which you may be personally identified, such as name, postal address, e-mail address, telephone number or ANY OTHER INFORMATION THE WEBSITE COLLECTS THAT IS DEFINED AS PERSONAL OR PERSONALLY IDENTIFIABLE INFORMATION UNDER AN APPLICABLE LAW (**"personal information"**); and/or

- about your internet connection, the equipment you use to access our Platform and usage details.

We collect this information:

- Directly from you when you provide it to us.

- Automatically as you navigate through the site.  Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.

- From third parties, for example, our business partners.

## **Information You Provide to Us.**

The information we collect on or through our Platform may include:

- Information that you provide by filling in forms on our Platform.  This includes information provided at the time of registering to use our Platform, subscribing to our service, posting material, or requesting further services.  We may also ask you for information when you report a problem with our Platform.

- Records and copies of your correspondence (including email addresses), if you contact us.

- Your responses to surveys that we might ask you to complete for research and marketing purposes.

- Your search queries on the Platform.

You also may provide information to be published or displayed (hereinafter, **"posted"**) on public areas of the Platform, or transmitted to other users of the Platform or third parties (collectively, **"User Contributions"**).  Your User Contributions are posted on and transmitted to others at your own risk.  Although, please be aware that no security measures are perfect or impenetrable.  Additionally, we cannot control the actions of other users of the Platform with whom you may choose to share your User Contributions.  Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

**Information We Collect Through Automatic Data Collection Technologies**.

As you navigate through and interact with our Platform, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Platform, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Platform.

- Information about your computer and internet connection, including your IP address, operating system, and browser type.

- General location information derived from your IP address, but we do not collect real-time information about the location of your device.

The information we collect automatically is statistical data and does not/may include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties.  It helps us to improve our Platform and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.

- Store information about your preferences, allowing us to customize our Platform according to your individual interests.

- Speed up your searches.

- Recognize you when you return to our Platform.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).**  A cookie is a small file placed on the hard drive of your computer.  You may refuse to accept browser cookies by activating the appropriate setting on your browser.  However, if you select this setting you may be unable to access certain parts of our Platform.  Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Platform.

- **Flash Cookies.** Certain features of our Platform may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Platform. Flash cookies are not managed by the same browser settings as are used for browser cookies.

- **Web Beacons.** Pages of our the Platform [and our e-mails] may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or [opened an email] and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

## How We Use Your Information

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

- To present our Platform and its contents to you.

- To provide you with information, products, or services that you request from us.

- To fulfill any other purpose for which you provide it.

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

- To notify you about changes to our Platform or any products or services we offer or provide though it.

- To allow you to participate in interactive features on our Platform.

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

- For any other purpose with your consent.

## Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.

- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them].

- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of iTether Technologies, Inc's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by iTether Technologies, Inc about our Platform users is among the assets transferred.

- To fulfill the purpose for which you provide it. For example, if you give us an email address to use the "email a friend" feature of our Platform, we will transmit the contents of that email and your email address to the recipients.

- For any other purpose disclosed by us when you provide the information.

- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.

- To enforce or apply any agreement between you and us, including for billing and collection purposes.

- If we believe disclosure is necessary or appropriate to protect the rights, property or safety of iTether Technologies, Inc, our customers, or others.

## Informed Consent for Health Information

We have entered into separate Business Associate and Qualified Service Organization Agreements with our customers, vendors and subcontractors to comply with the rules on handling of Protected Health Information under the Health Insurance Portability and Accountability Act (**"HIPAA"**) Standards for Privacy of Individually Identifiable Health Information, 45 C.F.R. Part 160 and Part 164, Subpart E (**"Privacy Rule"**), the HIPAA Security Standards, 45 C.F.R. Part 160 and Part 164, Subpart C (**"Security Rule"**), the HIPAA Breach Notification Regulations, 45 C.F.R. Part 164, Subpart D (**"Breach Notification Rule"**), and the federal regulations governing the confidentiality and security of substance use disorder information, 42 C.F.R. Part 2 (the **"Part 2 Regulations"**) (collectively the **"Requirements"**) all as amended from time to time.

You may also be required to sign a Release of Information (**"ROI"**), Consent to Participate in iTether Platform and Disclose Health Information and/or other forms of consent (collectively, your **"Informed Consent"**). The Informed Consent authorizes your health services provider to disclose the health information listed on the Informed Consent to iTether Technologies, Inc and its contracted agents to complete your enrollment and ensure your access to and participation in the iTether Platform but only in the manner set forth in the Informed Consent.

## Accessing and Correcting Your Information

You can review and change your personal information by logging in and visiting your account profile page. If you are a Platform user who was not granted rights to change your

personal information by the iTether customer who purchased your use rights from iTether, please contact the customer to request such rights or changes to your personal information. Contact information for your customer should have been provided to you by the customer at the time you were informed of the Platform by the customer. If you are not sure who to contact, please email us at info@iTetherTech.com and we can identify your customer.

If you are an iTether customer, you may also send us an email at info@iTetherTech.com to request access to, correct or delete any personal information that you or your users have provided to us. We may not be able to delete personal information except by also deleting the 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.

## Your California Privacy Rights

California Civil Code Section § 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to insert email at: info@iTetherTech.com.

## Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Platform, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Platform like message boards. The information you share in public areas may be viewed by any user of the Platform.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Platform. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Platform.

## Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Platform and this privacy policy to check for any changes.

## Contact Information

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