

## **CanSurround General Privacy Policy**

CanSurround, PBC provides a website(s) and software applications (collectively, the "**General Website**") for your use. The General Website provides a User portal to CanSurround's integrated services to support the reduction of psychosocial distress in the cancer experience for both patients and those caring for patients (collectively, "**Services**"). This CanSurround Privacy Policy ("**Privacy Policy**") applies to any information about you that CanSurround and its Services collect. In addition, there is a separate Health Information Privacy Notice that applies specifically to any Health Information about you during use of the Services.

This Privacy Policy, collectively with all applicable Terms of Use agreements, the Health Information Privacy Notice and all other applicable rules and policies constitute the "Agreement" between you and CanSurround ("we, or "us") for your access to and use of the General Website and the Services. All capitalized terms used in this Privacy Policy that are not defined in this Privacy Policy shall have the meaning given to them in the applicable terms of use or agreements.

### **Purpose**

This Privacy Policy identifies and describes the way CanSurround uses and protects the information we collect about our customers and Users of our General Website and the Services ("**Personal Information**"). All uses of CanSurround's Website and Services are subject to this Privacy Policy. Health Information is also subject to the Health Information Privacy Notice.

### **The Information We Collect, How We Collect It, And How We Use It.**

We may collect different types of personal and other information based on your use of our General Website and the Services and our business relationship with you.

Personal Information may include:

- Contact Information that allows us to communicate with you -- including your name, address, telephone number, and e-mail address;
- Equipment, Performance, CanSurround General Website Usage, Viewing and other Technical Information about your use of our network, services, products or websites;
- Health Information. The uses of your Health Information are discussed in the Health Information Privacy Notice.

We collect information in three primary ways:

- You give it to us;
- We collect it automatically when you visit the General Website and use the Services;

- We obtain it from other sources, such as other users you invite to use the Services.

We may use the information we collect in a variety of ways, including to:

- Provide you with the best customer experience possible;
- Provide the services you use, and to respond to your questions;
- Communicate with you regarding service updates, offers, and promotions as permitted;
- Deliver customized content and advertising that may be of interest to you as permitted;
- Address network integrity and security issues;
- Investigate, prevent or take action regarding, for example, illegal activities and violations of our terms of use;
- Improve our level of service;
- Provide notifications on the latest site features; and
- For Health Information, other uses described in the Health Information Privacy Notice.

### **Online Activity Tracking**

We collect information about your activity on the General Website and use of the Services for a number of purposes using technologies such as cookies, Flash cookies, Web beacons, widgets and server log files. To limit the use of Flash cookies from our General Website or the Services, simply right-click on our site and adjust the Adobe Flash Player settings bar under "Local Storage" to your desired setting. Since cookies are now used as industry standard, most Web browsers automatically accept cookies, but you can usually change your browser to decline them. If you prefer not to enable cookies, you may choose to disable them; however, please note that certain features of our products and services will not be available to you once cookies are disabled.

We may market products and services to you on the General Website or the Services, as permitted by law and our policies. Our non-affiliated third party partners may use that information, as well as other information they or we may have, to help tailor the ads you see on our sites to you and to help make decisions about treatment options and other products. We will obtain your permission as necessary.

We may use your IP address and information about the site pages you visit to gather broad demographic information, as well as information about your interests and behaviors, to gain a better understanding of our customers and Users. For example, information may be used to analyze and improve our site design and functionality.

### **Information Sharing**

We do not sell your Personal Information or Health Information to anyone for direct marketing purposes without your consent. Period.

**Sharing With CanSurround Affiliates:** Subject to applicable legal and our policy restrictions, CanSurround and its corporate affiliates may share your Personal Information among themselves to make sure your experience with our products and services is as seamless as possible and you have the full benefit of what CanSurround has to offer.

**Sharing With Non-Affiliate Third Parties:** Subject to applicable legal and our policy restrictions, we may share your Personal Information only with non-affiliate third parties that perform services on your or our behalf, and only as necessary for them to perform those services. such as to perform related services, including without limitation, maintenance services, database management, fulfillment, web analytics, and improvement of the features or functionality; or to assist us in analyzing how our products and services are being used. We require those non-affiliate third parties to protect any Personal Information they may receive in a manner consistent with our policies.

**In Other Circumstances:** We may provide Personal Information to non-affiliate third parties for purposes such as:

- Complying with court orders, requests by government agencies and law enforcement officials and other legal process, or exercising our legal rights to defend against legal claims;
- Enforcing our terms of use, agreements and rights;
- Obtaining payment for products and services, including the transfer or sale of delinquent accounts to third parties for collection; and
- Transferring business assets, such as in connection with a merger, acquisition, reorganization, sale of assets, or bankruptcy.
- Other purposes described in the Health Information Privacy Notice for Health Information.

Please note that if you use any bulletin board, chat room, comment posting feature, or other public communication service, forum, or feature offered through CanSurround, or post any information available for viewing by other Users, any of the information that you share will be visible to other Users. The information that you make available can be read, used, and collected by other Users to send you unsolicited messages outside of CanSurround products and services. CanSurround is not responsible for the manner in which the Personal Information or Health Information that you decide to share will be used by other Users.

#### **Anonymous & Aggregate Information**

We collect some information on an anonymous basis. We also may anonymize the Personal Information and Health Information we collect about you.

We obtain aggregate data by combining anonymous data that meet certain criteria into groups. When we employ non-affiliate third parties to anonymize or aggregate

data on our behalf, as stated above, we require those non-affiliate third parties to protect any Personal Information and Health Information they may receive in a manner consistent with this policy. We may share aggregate or anonymous information in various formats with trusted third parties, and may work with those entities to do research and provide products and services, as permitted by laws and our policies.

#### **Our Online Privacy Policy for Children**

Our products and services are not designed to attract children under the age of 13. We do not knowingly collect personally identifying information from anyone under the age of 16.

#### **Safeguarding Your Information: Our Policy on Data Protection and Security**

We maintain information about you in our business records while you are a customer or User, or until it is no longer needed for business, tax, or legal purposes. We have implemented encryption or other appropriate security controls to protect Personal Information when stored or transmitted by CanSurround. Your information may be transferred to and maintained on computers and servers located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to provide information to us, CanSurround transfers Personal Information and Health Information to the United States and processes it there. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

#### **How Can You Control Your Personal Information?**

We believe that choice in how and when you are contacted is key to customer satisfaction, so we offer several ways for you to update your contact information, change your preferences, or opt out of receiving future communications:

If you have an online account on our General Website and the Services, you may be able to log on and update or change your contact or account information. Check the site for further information.

You may unsubscribe to any of our online e-mail updates by following the unsubscribe instructions in the body of any e-mail message.

You may write to us directly if you wish to: (a) update or delete your contact information; (b) ask that we not share your Personal Information with third parties; or (c) request that we cease sending you promotional or other information via mail or e-mail. Such written requests should be sent to Chief Privacy Officer, CanSurround Attn: Legal, 1815 W. 13<sup>th</sup> St., Suite 5, Wilmington DE, 19806. In those instances, we will retain your information in a "do not promote" file in our database. You may also contact us at [legal@CanSurround.com](mailto:legal@CanSurround.com) for any inquiry or request regarding our Privacy Policy or the handling of your Personal Information and Health Information.

We will take commercially reasonable steps to implement your opt-out requests promptly, but you may still receive promotional information, as permitted by law and our policies, from us by mail for up to 60 days due to printing and mailing schedules, and up to 10 days for e-mail.

### **Third Parties and Links**

In the event that you provide Personal Information to any third party via any CanSurround website or any offer made available to you by CanSurround, you understand that CanSurround is not responsible for such third parties' use or misuse of your Personal Information. You should review the privacy and information sharing practices of such third parties. Additionally, CanSurround may offer links to or from the General Website and Services it controls to other sites among CanSurround affiliates as well as to sites operated by third parties, as permitted by law and our policies, so that you can conveniently visit our vendors and advertisers or locate other content likely to be of interest. We are not responsible for the content, practices or policies of sites operated by third parties and urge you to inquire about them before providing any personally identifiable information. You further acknowledge and agree that CanSurround shall not be responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused by or in connection with use of or reliance on any such content, goods or services available on or through any such site or resource.

### **Consent and Acceptance of Privacy Policy**

By using CanSurround products and services, including the Services and its websites, you signify your agreement to this Privacy Policy. CanSurround reserves the right to change this Privacy Policy at any time. All matters relating to this Privacy Policy, the Agreement, and the CanSurround websites are governed by the laws of the State of Delaware in the United States irrespective of its conflicts of law provisions. Lawsuits against CanSurround must be brought in federal or state court in Delaware. CanSurround will use, share, and disclose all Personal Information and Health Information and other User information in accordance with the Privacy Policy in effect at the time the information is collected. Please review the Privacy Policy published on CanSurround websites regularly so that you are always aware of what information we collect, how we use it and under what circumstances we may disclose it. Continued use of a CanSurround product or service, including its websites, following changes to the Privacy Policy will mean that you accept the changes.

### **California Privacy Rights/Other State Laws**

California Civil Code Section 1798.83 entitles California customers and Users to request information concerning whether a business has disclosed Personal Information to any third parties for the third parties' direct marketing purposes. California customers or Users who wish to request further information about our compliance with this law or have questions or concerns about our privacy practices and policies may contact us at [legal@CanSurround.com](mailto:legal@CanSurround.com) or write us at CanSurround, Attention: Legal, 1815 W 13<sup>th</sup> St., Suite 5 Wilmington De, 19806.

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