

# Vaica Privacy Policy

15/04/2019

# Privacy Policy

## Statement

We shall continuously improve Our Privacy Policy, and with the extension of the scope of Our Products and service, we may update Our Privacy Policy at any time. Please notice our Privacy Policy regularly to acknowledge the latest update.

Thank You for choosing to use our services - Vaica web portal, API and physical devices. We hope you have a clear understanding of how we collect and use information and what kind of measures you may take to protect your privacy through this Privacy Policy. When you use our services, you consent the validity of this Privacy Policy to You. If you don't agree to Our Privacy Policy, please do not use our services.

Our Privacy Policy offers answers to the following questions:

1. What kind of information we may collect and why we collect such information;
2. How we use the information;
3. The options we provide you with, including how to have access, update & control information;
4. Your obligations in respect of privacy protection;
5. Information security;
6. The collection and processing of Health Information;
7. Cross-border transfer of data and marketing;

We have the highest regard for your privacy. This policy states our obligations and explains the rights that you have regarding your personal information.

## Use of information and why we collect it

We collect your information to enable our services and for improving your experience, facilitating your use of Our Products and services more expediently, and obtaining the information that you need in a faster and more accurate way. The information generated during your use of our services may be categorized into two types:

- a. Identifiable personal information: refers to the information that may be used to directly identify, trade, discern and determine your true identity, such as your name, E-mail address or phone number, etc.
- b. Unidentifiable personal information: refers to the information that may be related to you but cannot be used to directly identify, trace, discern and determine your true identity.

If you use our services without registering, we only collect information through the use of cookies, web beacons and navigational data collection. While we cannot directly identify you, in some jurisdictions, this information is still subject to applicable data protection laws and requires your consent to our cookies policy as described below. If you choose to use Vaica, you can be asked to provide Personal Information (as defined below) and may also be asked to input personal Health Information. It is your decision whether to provide any such Information.

## Collecting and Using Your Personal and Health Information (Actively Provided Information)

In order to provide better services to you, we may record and analyze the use and the method of use of our services and any other relevant information, including hardware model, operating system version, system activities and other device information, Internet Protocol address, account sign-in or sign-out, clicks of advertisements and other log information, as well as Web Beacons or Cookie information, etc..

Whenever you submit information via our Portal, API, or otherwise in connection with your use of the Portal or API, including, but not limited to, by telephone or email with customer service, you consent to the collection and processing of your Health Information and geo-location data, our cookies policy, cross border transfer of data, and the use of your data for marketing purposes, all in accordance with this Privacy Policy.

**“Personal Information”** means information that can be directly associated with a specific person (and includes Health Information). When you register or update your information through our Portal / API, we can collect Personal Information including:

- First and last name
- E-mail address
- Year of birth
- Gender
- Geographic location, including your zip code.

Your use of our Portal / API will signify that you have agreed to authorize us to collect and process your information. We collect and use your information to operate or improve our services, for instance, providing user information services, avoiding your repeated input of identical information when you use Our Products and services, and offering contents tailored to your personality. We use your information but the result of such use may be inaccurate, and therefore you are required to exercise your own and prudent judgement when you use relevant services. You agree that we take no liability for such accuracy in respect of such use.

We may contact you based on your personal information, for instance, sending our product updates information or service information to your email address or mobile phone number. You may opt not to receive such information. The information we have collected may be stored and processed by servers of Vaica or its affiliates or service providers. If we use your information under circumstances other than specified herein, we will obtain your prior consent.

#### **Disclosure and publicity of personal identity information**

We respect and protect your privacy and undertake that we will not disclose users’ personal identity information to any third party institute or person except in accordance with the Privacy Policy, unless:

1. You agree to publicize your personal information;
2. Users’ personal information is required by law, governmental or judicial organizations;
3. In case of emergency and where necessary, the information is required to be disclosed in order to protect the lawful rights and interests of Vaica or other users or the public security and public interest.

During the use of the Portal / API, you may choose to use certain features that will allow you to input other Personal Information with respect to your health, such as the medications you take, the date of your prescription, the number of refills you have made, how often you take your medication, the frequency you would like us to send you reminders to take your medication, whether you take your medication. We will send you reminders to take your medications in accordance with this information.

Sharing of your Personal Information in this manner is solely your responsibility.

We may also use the Personal Information (1) to identify your account for purposes of providing you with customer services and to respond to your requests, (2) to provide you the specific services you select (including the requested reminders), (3) to help diagnose problems with our servers, to make the portal / API more useful, for other internal purposes or to customize the Portal / API and personalize its content for you; and (4) to send you texts, emails or other communications regarding general adherence information, Portal /API maintenance, updates, or changes to this Privacy Policy or any other relevant agreements. Please note that we reserve the right to send you such service-related communications without offering you the opportunity to opt out of receiving them unless you cancel your account. While we take great care to keep your Personal Information confidential and secure, when you share your health or medication information with others or provide feedback regarding health matters, medications and otherwise, including by means of social media sites and such information will not be considered Personal Information by us. You should exercise caution when disclosing any information (including Personal Information) in such ways, as you do not know who will access or use such information and for what purposes. Your Personal Information will not be combined with other information and will not be used for other purposes, except as explained in this policy. Please note that we are not subject to medical secrecy obligations.

Ensuring the accuracy and completeness of the Personal Information and any other information that you provide in connection with your use of the Portal /API is important. Inaccurate or incomplete information will affect the functioning of the Portal / Application, as well as the information you receive from us and our ability to contact you.

#### **Automatic Data Collection**

The Portal / API may automatically collect certain information about you when you use the service, such as the type of computing or mobile device you use, your device’s IP address and/or unique Device ID, your device’s operating system, the language of your operating system and the Internet browser you are using. We may use third party service providers

to collect such information, in order to assist us with the following: anonymized crash tracking, anonymized behavior tracking and testing (including in real time) and anonymized A/B testing. We collect such information in order to facilitate use and ensure technical functioning of the Portal / API, dynamically generate and deliver targeted content, statistically monitor usage of the Portal / API, and improve the overall quality of our users' experiences.

Data collected automatically on the Portal / API may be used, for example, to help diagnose problems with our servers, to make the portal and app more useful, to customize the portal and app and personalize its content for you.

### **Cookies**

A cookie is a small piece of text that is sent to a visitor's browser. The browser provides this piece of text to the device of the originating visitor when this visitor returns. We use cookies to help personalize your portal and app experience. A "persistent" cookie may be used to help save your settings and customizations.

### **Sharing of Your Personal Information with Third Parties and Service Providers**

Our portal and app respects your right to privacy. This privacy policy explains the portal and app policy regarding the collection, use, disclosure and protection of Personal Information. Please read it carefully.

We will not publish your Personal Information without your explicit consent. However, we might share your Personal Information, as is reasonably necessary, without your consent with: (1) our contractors or consultants who are bound by an obligation of confidentiality, provided that we will only share Personal Information to the extent necessary with such contractors or consultants; and 2) affiliates of our company for the purposes of improving our marketing strategies, for research purposes and for entering into commercial contracts in order to provide our users with our services.

Additionally, you may choose to share your Personal Information with pharmacies or patient support companies with which we partner and/or third-party coupon companies, in order that we may send you coupons and/or provide you with reminders to get your prescription refilled. If you choose to share your Personal Information in this manner, please note that such information may be disclosed to the coupon companies and/or pharmacies and will be subject to their privacy practices.

We may share your Personal Information with third parties, such as research institutes, healthcare systems or doctors, for research purposes and so that they can cross-check such information with other information that they have about you, for research purposes and for improvement of our services. Please note that we may share your de-identified data with such third parties without obtaining such consent.

Sometimes we may provide limited access to your Personal Information to the extent necessary to our contractors and consultants, including vendors and suppliers that provide us with development services, technology, services, or content for the operation, development and maintenance of our data and analysis on Portal / API use. Such access is limited to the information reasonably necessary for the contractor or consultant to perform its services to us. We also require that such contractors and consultants agree to protect the privacy of your Personal Information and agree not to use or disclose Personal Information for any purpose other than providing us with products and services and as required by law. In addition, we may share your personal data with third parties, such as law enforcement authorities, courts and tribunals, to respond to law enforcement requests or other legal requests or pursuant to a requirement imposed by law, order, judgment or decree.

We may also share your Personal Information with legal advisors, consultants, or courts in order to protect and defend our rights and property or those of Portal / API users. We may also transfer your Personal Information in the event of a merger, acquisition or sale of all or a portion of our assets.

**Use of Aggregated Data**

We may analyze all information we receive and/or combine your Personal Information, including health Information and information regarding your use of the Portal / API, with information from other users to create aggregated data that may be disclosed to and utilized by us, our affiliates and by third parties without restriction, on commercial terms that we can determine in our sole discretion for purposes of content marketing, for research purposes, in order to understand behavior patterns and in order to increase adherence to medication regimens. We also use a tool called “Google Analytics” to collect information about the use of the portal and Application. Google Analytics collects information such as how often users visit the Portal, what pages they visit when they do so, and what other sites they used prior to coming to the portal. Google Analytics collects only the IP address assigned to you on the date you use the Portal, as well as information regarding your operating system, language and information regarding your use of the Portal, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with Personal Information. We use the information we get from Google Analytics only to improve the portal and Application. Google’s ability to use and share information collected by Google Analytics about your use of the portal and Application is restricted by the Google Analytics Terms of Use located at <http://www.google.com/analytics/terms/us.html> and the Google Privacy Policy located at <http://www.google.com/policies/privacy/>.

**Risks and exemption**

If your personal information or privacy is disclosed due to any of the following events, we will use our best efforts to remedy or assist you, provided, however, that you shall agree that we are not liable:

1. Information divulged due to computer virus, Trojan and hacker attack;
2. Personal information to be provided as required by law or relevant governments;
3. Personal information disclosed because you tell your password to or share your registered account with others;
4. Any other leakage of personal information which is not ascribable to Vaica.

**Disabling the service, access, corrections and deletion**

At any time, you can stop the collection of your information by requesting to unregister your account to the Portal / API. You may also request that your Personal Information be deleted from our active databases. We cannot restore information that we have deleted. You are responsible for backing up the data that you store on the Portal / API. We may retain any data in non-identified form, subject to applicable law.

You may contact us as specified below under “How to Contact Us” to access information that we keep about you or update or correct such information or ask for its deletion. We will retain your information for as long as you continue to use our portal and App and for a reasonable period of time afterwards.

You have the right to object to direct marketing.

**Children**

Our services are intended for use by persons 18 years of age and older. Under no circumstances should the Portal / API be used by children under 14 years of age, and we will not knowingly collect personal Information from any person we know to be in this age group. If you are using the Portal / API for the benefit of a child, please do not provide information relating to such child unless you have obtained the child’s parents’ or guardians’ consent, including their consent to this Privacy Policy. If you discover that your child has been using the Portal / API without your consent, or that someone has been using the Portal / API for or on behalf of your child without your consent, please contact us using the information below under “How to Contact Us,” and we will take reasonable steps to delete the child’s information from our active databases.

**How to Contact us**

If you have any questions, comments, requests, or concerns related to this Privacy Policy please contact us at:

Vaica

Beit Hillel 7, Tel Aviv, Israel

[Info@vaica.com](mailto:Info@vaica.com)

+972-77-700-8699

You may also contact our Chief Data Officer: [cdo@vaicamedical.com](mailto:cdo@vaicamedical.com)

**Changes to privacy policy**

From time to time we may need to change this Privacy Policy. You will be informed of such change in advance, and you will always have the possibility to stop using the service as explained above.

This Privacy Policy was last updated in March 2019.