



## Privacy Policy

**Last Updated as of December 7, 2020**

We at ISABEL HEALTHCARE<sup>1</sup> (“Isabel,” “we,” “us,” or “our”) provided this privacy policy (this “Privacy Policy”) because we know that you care about how personal information you provide to us is used and shared. This Privacy Policy relates to the personal information collection and use practices of Isabel when you access and use this website (<https://symptomchecker.isabelhealthcare.com>) (the “Website”) or access and use our proprietary software products (“Products”, or sometimes the “Symptom Checker”) via the Website. By visiting our Website, or accessing and using our Products, you are agreeing to the terms of this Privacy Policy and the accompanying Terms and Conditions. Access to and usage of our Products is also governed by the applicable data subscription or other similar agreement between Isabel and you or your employer.

*<sup>1</sup> With respect to all US residents, the relevant entity is Isabel Healthcare, Inc. With respect to all non-US residents, the relevant entity is Isabel Healthcare Limited, a business incorporated in England and Wales (company number 04759944 is the Data Controller under the Data Protection Act 2018 and the European Union General Data Protection Regulation).*

### Information We Collect Directly from You

When you contact us via our Website or sign up to receive our newsletters or Product information on the Website, we collect the contact information you provide, via browser forms or online request forms or via email, which may include: name, e-mail address, name of your organization and phone number. Information Isabel collects includes the following:

- Navigation data – IP address from which you are accessing the Website;
- any website from which you linked to the Website;
- If you register with Isabel, we will collect various details about you, including (without limitation) your name, email address and information as to how you heard about the Website;
- When you provide symptoms or any other information to us, all that information including any details of medical symptoms, history and conditions and any other data you provide, including any information on racial or ethnic origin and sexual orientation;
- Your views on the effectiveness and ease of use of the Website; and
- Isabel uses session cookies to store information about your current Website session. These cookies are deleted when you leave the Website and close your browser. If you so choose, Isabel will also use a cookie to collect and store your Username and Password. Isabel may also use cookies to collect statistical information about your use of the Website. Please see below for more information about Cookies.

## **How We Use Information Collected from You**

We use information we collect from you for the following purposes:

- to provide possible conditions which are suggested by the symptoms which you report to us;
- so that Isabel can administer and support the Website and to provide you with access to the appropriate areas and functions of the Website;
- to contact you from time to time, in order to ask for your views on the Website and to notify you occasionally about important changes or developments to the Website;
- where it includes your views about the Website and improvements you would like to see made, or statistical information collected, so that Isabel can improve its service to you and others or make visits to the Website more useful and rewarding; and
- To limit use of the Symptom Checker and the availability of the free trials of other functionality of Isabel's websites.

Any processing of information will be undertaken for the legitimate interests pursued by Isabel in accordance with GDPR Article 6 paragraph 1(f), which are running websites which provide on a viable and profit making basis, assistance to health professionals and to others in making conditions of symptoms, to accumulate data which enables analysis and reporting of circumstances and medical outcomes assistance and ancillary purposes.

## **Information We Collect from Cookies**

Cookies are small files stored in your computer's hard drive by your web browser. When you access the Website our computer server will access these cookies so that it can recognise your computer and make using the Website easier for you. For example, cookies allow the Website to remember your Username and Password to save you having to retype it every time you visit the Website. Most web browsers automatically accept cookies, but you can alter your settings to allow you to be prompted every time a cookie is sent to you or you can choose not to receive cookies at all. However, please note that if you have 'disabled' cookies in your browser this way you may not be able to use certain features on the Website.

## **Information We Collect for Analytics Services**

Like most organizations, we rely on automatic data collection technology, when you visit our Website, or license, access or use our Products online. These technology services may collect information on our behalf such as your IP Address, geolocation information, Internet service provider, browser type, operating system and language, referring and exit pages and URLs, date and time, amount of time spent on particular pages, what sections of the Website you visit, number of links you click while on the Website, search terms, and other data. This information is collected automatically and anonymized. The third parties we currently work with include the following (click on the links to view these organizations' privacy policies and find out more about what data they hold about you, what they do with it, and how to opt-out from certain data collection). Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Website.

## **Aggregate Data**

In an ongoing effort to better understand our users and the Website, we might analyze your information in aggregate form to operate, maintain, manage, and improve the Website. This aggregate information does not identify you personally. We may share this aggregate data with our affiliates, agents, and business partners. We may also disclose aggregated user statistics in order to describe our Products and the Website to current and prospective business partners and to other third parties for other lawful purposes. Finally, we may also disclose aggregated and depersonalized user statistics with other members of the healthcare community for purposes of detecting and tracking public health trends, all subject to and in accordance with applicable law.

## **Additional Uses**

We also use contact information and other information collected pursuant to this Privacy Policy to respond to general inquiries, solicit feedback regarding our Website, Products and support, provide relevant content on our Website including advertisements regarding Products and third party products, and to communicate with you via email regarding our current and future Products; verify your identity; provide, activate, and manage your access and use of our products; provide technical, product and other support and to help keep the service working, safe and secure; develop new products, improve our services, identify usage trends, determine the effectiveness of our promotional campaigns and for our business purposes, such as data analysis, research, audits; diagnose technical problems; provide to our third-party service providers who provide services such as website hosting, payment processing, email delivery services, credit card processing, text messaging services, customer service, auditing services and other similar services to enable them to provide services; or comply with our legal obligations, resolve disputes, and enforce our agreements.

## **Our Disclosure of Personal Information to Third Parties**

Isabel will not disclose your personal information except as specifically described in this Privacy Policy.

## **Onward Transfer to Third Parties**

Like many businesses, we hire other companies to perform certain business-related services. We may disclose personal information to certain types of third-party companies but only to the extent needed to enable them to provide such services. The types of third parties that may receive personal information and their functions are: direct marketing assistance, lead generation services, order fulfillment, billing, customer service, data storage, hosting services, disaster recovery services, and sales support companies. All such third-parties function as our agents, performing services at our instruction and on our behalf. We may also disclose personal information to our affiliates from time to time in order to support marketing, sale and delivery of Products. You may opt out of having your personal information transferred to any or all of our categories of agents by contacting us at [support@isabelhealthcare.com](mailto:support@isabelhealthcare.com). Please allow us a reasonable time to process your request.

**WE DO NOT SELL OR RENT YOUR PERSONAL INFORMATION TO THIRD PARTIES. WE DO NOT SHARE YOUR INFORMATION TO SOCIAL NETWORKS OR OTHER PUBLIC OR SEMI-PUBLIC PLACES.**

## **Business Transfers**

In the event of a merger, reorganization, dissolution or similar corporate event, or the sale of all or substantially all of our assets, we expect that the information that we have collected, including personal information, would be transferred to the surviving entity in a merger or the acquiring entity. If we are involved in a merger, acquisition or asset sale, or in the unlikely event of a bankruptcy, liquidation or receivership of our business, and your personal information becomes subject to a different Privacy Policy, we will provide affected users notice through the Website.

## **Disclosure to Public Authorities**

We may be required to disclose personal information in response to lawful requests by public authorities, including for the purpose of meeting national security or law enforcement requirements. We may also disclose personal information to other third parties when compelled to do so by government authorities or required by law or regulation including, but not limited to, in response to court orders and subpoenas.

## **Other Disclosures**

We may also disclose personal information to third parties if we have a good-faith belief that such disclosure is reasonably necessary (a) to enforce or apply our Terms of Use, including investigations of potential violations thereof, (b) to protect the rights, property or safety of Isabel, other users or other third parties, (c) to any law enforcement authority, such as a police department or regulatory authority in connection with an investigation, or (d) to detect, prevent or otherwise address fraud, security or technical problems that may arise.

We may disclose non-personal information to any third party for any reason in our sole discretion.

## **Right of Access; Marketing Opt-Out**

### **Access to personal information**

Isabel acknowledges that EU individuals have the right to access the personal information we maintain about them. Upon request to [support@isabelhealthcare.com](mailto:support@isabelhealthcare.com), we will provide you with confirmation as to whether we are processing your personal information, and have the data communicated to you within a reasonable time. You have the right to correct, amend or delete your personal information where it is inaccurate or has been processed in violation of this privacy policy. We may require payment of a non-excessive fee to defray our expenses in this regard. Please allow us a reasonable time to respond to your inquiries and requests.

### **Opt-Out for Direct Marketing; Email Management**

You may opt out at any time from the use of your personal information for direct marketing purposes by contacting us at [support@isabelhealthcare.com](mailto:support@isabelhealthcare.com). Please allow us a reasonable time to process your request. You may manage your receipt of marketing and non-transactional communications by clicking on the "Manage Email Preferences" link located on the bottom of any Isabel marketing email and following the instructions found on the page to which the link takes you. You cannot opt out of receiving transactional e-mails related to their account or purchase orders inquiries and requests.

## **Retention of Personal Information**

We will retain your personal information in a form that identifies you only for as long as it serves the purpose(s) for which it was initially collected as stated in this privacy policy, or subsequently authorized. We may continue processing your personal information for longer periods, but only for the time and to the extent such processing reasonably serves the purposes of archiving in the public interest, journalism, literature and art, scientific or historical research and statistical analysis, and subject to the protection of this privacy policy. After such time periods have expired, we may either delete your personal information or retain it in a form such that it does not identify you personally.

## **How We Protect Your Information**

Isabel is strongly committed to data security and we take reasonable and appropriate steps to protect the security of your personal information from unauthorized access, loss, misuse, alteration or corruption. Isabel has put in place reasonable and appropriate physical, electronic, and managerial procedures to safeguard and secure the security of the information you provide to Isabel. These steps include (without limitation) communicating this Privacy Policy to Isabel employees and relevant contractors. Only authorised employees and contractors under strict controls will have access to your personal information. HOWEVER, WHILE ISABEL STRIVES TO PROTECT YOUR PERSONAL INFORMATION, DUE TO THE NATURE OF THE INTERNET ISABEL CANNOT GUARANTEE THE SECURITY OF ANY INFORMATION YOU TRANSMIT TO ISABEL. WITH THIS IN MIND, YOU MUST TAKE EVERY PRECAUTION TO PROTECT YOUR PERSONAL INFORMATION WHILE YOU ARE ON THE INTERNET.

## **Children**

We do not knowingly collect personal information from children under the age of 13 through the Website or the Products. If you are under 13, please do not give us any personal information. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children to never provide personal information through the Website or the Products without their permission. If you have reason to believe that a child under the age of 13 has provided personal information to us, please contact us, and we will endeavor to delete that information from our databases.

## **Important Notice to Non-U.S. Residents**

Our servers are located in the U.S. If you are located outside of the US, please be aware that any information provided to us, including personal information, will be transferred from your country of origin to the U.S.

## **California Privacy Rights**

Under California law, specific disclosures are required, and California residents have additional rights regarding their personal information. Please review this section to learn more. You can download a printable copy of this Privacy Policy.

The following details the categories of Personal Information that we collect and have collected over the past twelve (12) months: contact information, including full name and email address;

information you submitted for purposes of accessing or using the Products; location information and Internet, including geolocation data; and customer service information.

Under the California Consumer Protection Act of 2018 (“CCPA”), a California consumer has the following special rights:

- right to request that the business disclose what personal information it collects, uses, discloses, and sells;
- right to request the deletion of their personal information collected by the business; and
- the right, at any time, to direct a business that sells personal information about the consumer to third parties not to sell the consumer’s personal information (“right to opt-out”).

Over the past twelve (12) months, we have disclosed the following categories of Personal Information to service providers or other parties for business purposes: contact information, including full name and email address; information you submitted for purposes of accessing or using the Products.

Based on our understanding of the term "sell" under the CCPA, we do not sell your Personal Information.

For any of the above-mentioned rights, you may designate an authorized agent to make a request on your behalf. In the request, you or your authorized agent must provide including information sufficient for us to confirm the identity of an authorized agent. We are required to verify that your agent has been properly authorized to request information on your behalf and this may take additional time to fulfil your request.

To exercise their rights and request copies of the data collected about them in the past 12 months, that their personal information collected by Isabel be deleted or to exercise their right of opt out, California residents may make a request at [support@isabelhealthcare.com](mailto:support@isabelhealthcare.com). Such request must include sufficient information to allow us to verify that you are the person about whom we have collected personal information and describes your request in sufficient detail to allow us to understand, evaluate, and respond to it. Opt-Out Requests may be cancelled by making an Opt-In Request.

We will work to respond to your valid request within 45 days of receipt. We will not charge you a fee for making a valid request unless your valid request(s) is excessive, repetitive, or manifestly unfounded. If we determine that your valid request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

We will use the information you provide to make your CCPA rights requests to verify your identity, identify the personal information we may hold about you and act upon your request. We strongly recommend that you submit the email that you used when you registered with the Services. After you submit a CCPA rights requests using one of our forms, you will be required to verify access to the email address you submitted. You will receive an email with a follow-up link to complete your email verification process. You are required to verify your email in order for us to proceed with your CCPA rights requests. Please check your spam or junk folder in case you can't see the verification email in your inbox. If you are a California resident and have any questions regarding your CCPA rights under this Privacy Notice, please contact us at.

## **Right to be free from discrimination.**

You may exercise any of the above rights without fear of being discriminated against. We are permitted to provide a different price or rate to you if the difference is directly related to the value provided to you by your data.

## **California Online Privacy Protection Act**

CalOPPA requires a person or company in the United States that operates websites collecting personally identifiable information from individual consumers residing in California to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals with whom it is being shared, and to comply with this policy. See more at: <http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf>

California Customers may request further information about our compliance with California's privacy law, and may request to review and request changes to their personal information collected and stored by Isabel by e-mailing [support@isabelhealthcare.com](mailto:support@isabelhealthcare.com) or contacting us as stated below.

## **Shine The Light Law**

California's "Shine the Light" law, Civil Code section 1798.83, requires certain businesses to respond to requests from California customers asking about the business' practices related to disclosing personal information to third parties for the third parties' direct marketing purposes. If you wish to opt-out of our sharing of your information with third parties for the third parties' direct marketing purposes or to find out more about your opt-out rights, please contact us at:

Isabel Healthcare, Inc.  
1710 Hermitage Road  
Ann Arbor, Michigan 48104  
734-332-0612

Or by email at: [support@isabelhealthcare.com](mailto:support@isabelhealthcare.com).

## **California Do Not Track Disclosure**

Do Not Track is a privacy preference that users can set in their web browsers. When a user turns on the Do Not Track signal, the browser sends a message to websites requesting them not to track the user. At this time, we do not respond to Do Not Track browser settings or signals. For information about Do Not Track, please visit: [www.allaboutdnt.org](http://www.allaboutdnt.org).

## **Fair Information Practices**

Further, in order to comply with Fair Information Practices principles articulated by the Federal Trade Commission (<https://www.ftc.gov/reports/privacy-online-fair-information-practices-electronic-marketplace-federal-trade-commission>) Isabel will notify users of this website who have provided an email address to us via this website via email within 7 business days, should a data breach occur.

Isabel also agrees to the individual redress principle, which requires that individuals have a right to pursue legally enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or a government agency to investigate and/or prosecute non-compliance by data processors.

## **External Websites**

The Website and the Products may contain links to third-party websites. Isabel has no control over the privacy practices or the content of any of these websites. As such, we are not responsible for their content or privacy policies. You should check the applicable third-party privacy policy and Terms and Conditions when visiting any other websites, and before providing any personal information to such external sites.

## **Contact Us**

If you have any questions or concerns regarding this Privacy Policy, contact us at [support@isabelhealthcare.com](mailto:support@isabelhealthcare.com) or at:

Isabel Healthcare, Inc.  
1710 Hermitage Road  
Ann Arbor, Michigan 48104  
734-332-0612

We will respond to requests within a reasonable timeframe. We retain and use your information as necessary to comply with our legal obligations, contractual statute of limitations, resolution of disputes, and enforcement of our agreements. Please note that we may not be able to delete all of your data upon request depending on the reasons above and the nature of your interactions.

## **Changes to This Privacy Policy**

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time, and will post any changes on the Website as soon as they go into effect. We encourage you to periodically review this page for the latest information on our privacy practices. You can always check the “last updated” date at the top of this document to see when the Privacy Policy was last changed.

Your continued use of our Website and/or Products following the effective date of an updated Privacy Policy constitutes your consent to the contents of such policy. However, we will not apply any material changes retroactively to any information we collected from you before such changes took effect, without your affirmative consent to do so. IF YOU DO NOT AGREE TO FUTURE CHANGES TO THIS PRIVACY POLICY, YOU MUST STOP USING THE SERVICE AFTER THE EFFECTIVE DATE OF SUCH CHANGES. Please note that upon your departure from our services, any Privacy Policy in effect immediately prior to your departure shall continue to be binding on you and applicable to the data collected from you prior to such departure.

