

Privacy Policy

Please Read Carefully

This Online Privacy Policy describes the information Savvysherpa, LLC (d/b/a UnitedHealth Group Research and Development) and its affiliates, authorized service providers and agents (collectively, the “Company”, “us” or “we” or “our”) collect in connection with your use of ProtectWell™ and its associated websites (collectively, the “Site”), mobile applications (collectively, the “App”), and all other related services (the “Services”), how we use and share that information, and the privacy choices we offer. This policy applies to information we collect when you access or use our App, Site, or Services or when you otherwise interact with us in connection with ProtectWell.

Your use of the App, Site, and Services is sponsored either by your employer as an occupational health service, or by your school as part of its health and safety measures (such employer or school, as applicable, hereinafter referred to as your “Sponsor”). This is not a healthcare benefit. Any information disclosed to us in connection with the Site and the ProtectWell App is not protected health information, as defined under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) at 45 C.F.R. Parts 160 & 164.

Changes to this Online Privacy Policy

We may change this Online Privacy Policy from time to time. If we make changes, we will notify you by posting the updated policy on our Site and revising the “Last Updated” date below. We encourage you to review this Online Privacy Policy whenever you use the Services to stay informed about our information practices and about ways you can help protect your privacy.

Confidentiality of Medical Information

If your Sponsor has subscribed for certain lab testing reporting services, then in using the App, Site, or Services, you may be directed to visit a healthcare provider for lab testing. Certain health information that you disclose to the provider may be protected health information or, for a provider at your educational institution’s facility, subject to educational privacy laws. Please review the provider’s HIPAA Notice of Privacy Practices or your Sponsor’s Annual Notification of Rights under the Family Educational Rights and Privacy Act (FERPA) to learn more about their privacy practices regarding your health information. However, once your health information, such as lab results and diagnosis, is disclosed to us, our Site, or our Services, that information will no longer be protected by HIPAA.

We may communicate low-sensitivity health information, such as your name, provider, test date, and other information with you via unencrypted methods. By using the App, Site, or Services, you acknowledge, accept, and consent that such

communications may be sent to you via unencrypted methods and there is some risk of disclosure or interception of the contents of these communications.

Use of App, Site, and Services

Your access to and use of the App, Site, and Services are subject to, and conditioned upon, certain terms and conditions as set forth in our Terms of Use, in which this Online Privacy Policy is hereby incorporated by reference.

Collection of Information

Information We Collect About You

We may collect the following information from you, your Sponsor, or your provider:

- name
- email address
- mailing address
- worksite or campus location
- phone number
- symptom checker responses
- lab results (if your Sponsor subscribed for such Services)
- diagnosis

Information We Collect from Your Use of the Services

We collect information about you when you use our App, Site, and Services, including, but not limited to the following:

- **Device Information.** We may automatically collect certain information about the computer or devices (including mobile devices) you use to access the Services. For example, we may collect and analyze information such as (a) IP addresses, browser types, browser language, operating system, the state or country from which you accessed the App, Site, or Services; and (b) information related to the ways in which you interact with the App, Site or Services, such as: referring and exit pages and URLs, platform type, the number of clicks, domain names, landing pages, pages and content viewed and the order of those pages, the amount of time spent on particular pages, the date and time you used the App, Site, or Services, the frequency of your use of the App, Site, or Services, error logs, and other similar information. As described further below, we may use third-party analytics providers and technologies, including cookies and similar tools, to assist in collecting this information.

- **Cookies and Other Electronic Technologies.** We may use the tools outlined below in order to better understand users. As we adopt additional technologies, we may also gather additional information through other methods.

- **Cookies:** “Cookies” are small computer files transferred to your computing device that contain information such as user ID, user preferences, lists of pages visited and activities conducted while using the App, Site, or Services. We may use Cookies to help us improve or tailor the App, Site, or Services by tracking your navigation habits, storing your authentication status so you do not have to re-enter your credentials each time you use the App, Site, or Services, customizing your experience with the App, Site, or Services, and for analytics and fraud prevention.

Other Cookies used by our business partners may collect information when you use the App, Site, or Services, such as the IP address operating system, browser, web page interactions, the geographic location of your internet service provider, and demographic information. These Cookies help us learn more about our users’ demographics and internet behaviors.

For more information on cookies, visit <http://www.allaboutcookies.org>.

- **Web Beacons:** “Web Beacons” (a.k.a. clear GIFs or pixel tags) are tiny graphic image files imbedded in a web page or email that may be used to collect anonymous information about your use of the App, Site, or Services, and the emails or newsletters that we send you. The information collected by Web Beacons allows us to analyze how many people are using the App, Site, or Services or opening our emails, and for what purpose.
- **Website Analytics:** We may use third-party website analytics services in connection with the App, Site, or Services, including, for example, to register mouse clicks, mouse movements, scrolling activity and text that you type into the website or mobile application. These website analytics services generally do not collect personal information unless you voluntarily provide it and generally do not track your browsing habits across websites which do not use their services. We use the information collected from these services to help make the website easier to use.

Aggregate or De-identified Data

We may generate or derive aggregate and/or anonymized, non-personally identifiable information from information collected by the App, Site, or Services or via other means so that the information is not intended to identify you. We may use and disclose such non-personally identifiable information:

- to provide the Services, keep the Services secure and up to date, and improve the Services; and
- for research and use for health and wellness, including to develop therapies, diagnostics, and other products and services for health and wellness, and/or
- in a database made accessible or available to federal and state governmental agencies for their use COVID-19 response planning to further public health;

in each case, in accordance with applicable laws and regulations.

Use of Information

We use the information that we collect for the following purposes:

- For the purposes for which you provided the information;
- To provide, maintain, administer, improve, or expand the App, Site, or Services;
- To contact you when necessary or requested in performing the Services;
- **To communicate low-sensitivity health information, such as your name, provider, test date, and other information with you via unencrypted methods. By using the App, Site, or Services, you acknowledge, accept, and consent that such communications may be sent to you via unencrypted methods and there is some risk of disclosure or interception of the contents of these communications.**
- To customize and tailor your experience of the App, Site, or Services;
- To send you news and information about the App, Site, or Services;
- To track and analyze trends and usage in connection with the App, Site, or Services;
- To better understand who uses the App, Site, or Services and how we can deliver a better user experience;
- To use statistical information that we collect in any way permitted by law;
- To prevent, detect, and investigate security breaches, fraud, and other potentially illegal or prohibited activities;
- To enforce the legal terms that govern your use of the App, Site, or Services;
- To generate aggregate or de-identified data (that is not personally identifiable) and use such aggregate or de-identified data as described above;
- To administer and troubleshoot the App, Site, or Services; and
- For any other purpose disclosed to you in connection with the App, Site, or Services.

We may use third-party service providers to process and store personal information in the United States and other countries.

Sharing of Information

We may share personal information about you as follows:

- With third parties to provide, maintain, and improve the App, Site, or Services, including service providers who access information about you to perform services on our behalf;
- In connection with, or during the negotiation of, any merger, sale of company stock or assets, financing, acquisition, divestiture or dissolution of all or a portion of our business (but only under non-disclosure and confidentiality agreements and protections);
- If we believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process or governmental request; to enforce applicable user agreements or policies; to protect the security or integrity of the App, Site, or Services; and to protect us, our users or the public from harm or illegal activities;
- We may share information about your COVID-19 symptom check responses and results and COVID-19 testing status and results with your Sponsor to support you and your Sponsor's decision-making regarding ready-to-work or return-to-school status;
- We may also share your personal information in other ways with your consent; and
- We may also share aggregated and/or anonymized, non-personally identifiable information with third parties as described above under Aggregate or Anonymous Data.

Security

We take reasonable measures, including administrative, technical, and physical safeguards, to help protect personal information from loss, theft, misuse, unauthorized access, disclosure, alteration, and destruction. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, Company cannot ensure or warrant the security of any information you transmit to us or from our App, Site, Services, or other online products or services, and you do so at your own risk.

Your Privacy Choices

How You Can Access and Update Your Information

You may update or correct information about yourself at any time or by emailing us at protectwell@uhg.com.

Cookies

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject cookies; however, the App, Site, or Services may not function properly if you do so.

Links to Other Websites

The App, Site, or Services may contain links to other websites and those websites may not follow the same privacy practices as Company. We are not responsible for the privacy practices of third-party websites. We encourage you to read the privacy policies of such third parties to learn more about their privacy practices.

Children

Company does not knowingly collect or maintain personally identifiable information from persons under 13 years of age without verifiable parental consent, and no part of the App, Site, or Services are directed at persons under 13. If you are under 13 years of age, then please do not use the App, Site, or Services. If Company learns that personally identifiable information of persons less than 13 years of age has been collected without verifiable parental consent, then Company will take the appropriate steps to delete this information. To make such a request, please contact us at protectwell@uhg.com.

Your California Privacy Rights

California law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties. If you are a California resident and would like to request this information, please submit your request in an email to protectwell@uhg.com.

No Rights of Third Parties

This Online Privacy Policy does not create rights enforceable by third parties.

How to Contact Us

Please contact us with any questions or concerns regarding this Online Privacy Policy at:

UnitedHealth Group
5995 Opus Parkway
Minnetonka, MN 55343
Attention: General Counsel, Research and Development
Email: protectwell@uhg.com

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