

## Privacy Policy

Pathway Health Partners will use reasonable measures to protect the personally identifiable information you provide through the Service (Your Information) from loss, misuse, and unauthorized access, alteration, and destruction.

Pathway Health Partners has provided this notice to describe the online information collection and use practices in connection with the Service. This privacy policy applies only to the information collected directly for the Service, and does not apply to any other information that Pathway Health Partners collects about you on other Pathway Health Partners owned, operated, or sponsored web sites, or in other forums, including in e-mail correspondences or over the telephone.

Pathway Health Partners may use Your Information to create non-identifiable summary information or aggregated data, and may share this non-identifiable summary or aggregated data with your employer or health plan.

Such information will also be used to help improve the quality of the Service. If required for tax reporting, Pathway Health Partners may also share with your employer or health plan information relating to any cash or non-cash incentives received by you. Other than as stated in this policy, Pathway Health Partners will not disclose, give, sell, rent, or loan any of Your Information to any other party, unless legally required to do so or unless you specifically direct or authorize us to do so.

In some circumstances, Pathway Health Partners' use of your information will also be subject to the requirements of the Health Information Portability and Accountability Act (frequently referred to as HIPAA). This may be the case when you submit information to Pathway Health Partners when it is acting on behalf of your health plan (e.g., when you complete a Preventive Care Assessment online using the Service as a health program offered by your health plan), in which case your health plan's HIPAA Notice of Privacy Practices will apply. Any uses and disclosures of your personal information described in this policy will then be further limited to only those uses and disclosures also stated in your plans HIPAA Notice of Privacy Practices.

Health care providers and other persons whom you authorize to access your Pathway Health Partners records will have access to portions of Your Information. Their access will be limited based on the choices you make in your authorizations. If you select "Email Recommendations" or "Email Personal Health Record", all applicable content available to you online, including Your Information, if applicable, will be emailed to the email address you have entered in your profile in unencrypted form. Your personalized results will be available to you after you've completed the survey. An agent of Pathway Health Partners hosts the registration page and the entire Service. The Service analyzes your responses, and that information is stored on the servers owned by the hosting company. The hosting company has agreed to maintain the privacy and security of Your Information and to return all of your responses to Pathway Health Partners. Please be aware that it is possible that technical staff at the hosting company will see your answers while helping Pathway Health Partners solve technical problems.

Pathway Health Partners reserves the right to modify, amend or restate the Privacy Policy at any time and to post any changes to the membership information area. It remains your responsibility, as a participant, to periodically review the Privacy Policy and to contact Pathway Health Partners within seven business days after any changes to this policy if you do not accept any amendments. Your failure to notify Pathway Health Partners that you do not accept any changes in the Privacy Policy made by Pathway Health Partners means that you accept the changes and that the amended terms will apply to you. This version of the privacy policy is effective as of **January 29, 2018**. Please note that if your information is also protected by HIPAA and so also subject to your health plans Notice of Privacy Practices, then the more restrictive of this policy and that Notice will apply to describe what uses and disclosures we may make of any personally identifiable information you provide to us.

The Service contains links to other Web sites not operated by Pathway Health Partners. These links are provided as a convenience and do not constitute an affiliation with, endorsement or sponsorship of the third parties that operate those Web sites. Pathway Health Partners is not responsible for the availability or reliability of the content of these third party Web sites. Any information you provide to those third parties is not subject to the terms of this privacy policy, and Pathway Health Partners is not responsible for the treatment of the information you provide to those third parties. We recommend that you review the privacy policy of that third party, and of any third party to whom you provide personally identifiable information online.