

PRIVACY POLICY

Effective Date: September 1st, 2013

Introduction

Welcome to the online service location of Shadow Health Inc. (“**Company**” or “**we,**” “**our**” or “**us**”). This “**Privacy Policy**” governs your use of any Shadow Health online service (e.g. website or mobile app), including the Shadow Health Digital Clinical Experience (“**DCE**”), that posts a link to this Privacy Policy (each a “**Site**”) (including, without limitation, both mobile and online versions of our Sites), and also applies to your use of interactive features, widgets, plug-ins, applications, content, downloads and/or other services: (i) that we own and control and make available through a Site; or (ii) that posts a link to this Privacy Policy (collectively, the “**Service**”), regardless of how you access or use them, whether via personal computers, mobile devices or otherwise, but does not apply to data we receive from third parties, unless we combine such data with Personal Information (defined below) that we have ourselves collected under this Privacy Policy. This Privacy Policy does not apply to our data collection activities offline or otherwise outside of our Service (unless otherwise stated below), and does not govern the data practices of third parties that may interact with our Service.

To the extent we provide you notice on our Service of different or additional privacy policies or practices (e.g., at the point of collection), those additional terms shall govern such data collection and use.

In addition, please review the Service’s [Terms of Service](#), which governs your use of the Service. *By using our Service, you consent to our Privacy Policy and Terms of Service and our collection, use and sharing of your information and data, and other activities, as described below.*

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It is important that you read and understand the entire Privacy Policy before using the Service. To ease review, each section below links to the full explanation. Any capitalized terms that appear in but are not otherwise defined in the introduction are intended to have the meanings given to them elsewhere in the Privacy Policy.

1. [What Information Does the Service Collect?](#)

We collect and receive information about you as you interact with our Service.

(a) [Information You Provide to Us](#)

We may collect certain Personal Information that you provide to us when you interact with the Service. For example, we may collect this information through various forms and in various places on the Service, including during registration for the DCE, through “contact us” forms, or when you otherwise interact with the Service.

(b) [Information We Collect and Store As You Access and Use the Service](#)

We may collect certain information from you automatically when you access and use the Service. For example, we may use Tracking Technologies to collect Usage Information based on your Browser or Operating System for a variety of purposes, including debugging and making improvements to the service. You may have certain other choices regarding tracking and/or targeting.

(c) **Information Your School May Provide About You**

We may obtain information about you from third parties.

2. **How Do We Use The Information Collected?**

We use your Personal Information and Usage Information for only limited purposes, such as user identification, communication, and making improvements to the service.

3. **How and When Do We Share Information With Third Parties?**

We may provide your information to third parties under various circumstances detailed in this section. These may include:

(a) **Third Parties Providing Services on our Behalf**

Our vendors may collect your information on our behalf, such as when you purchase a license to use the DCE, or we may share it with them so that they may provide services to us and you.

(b) **To Protect the Rights of Shadow Health and Others**

There are a variety of administrative and legal reasons for which we may share some or all of your information.

(c) **Affiliates and Business Transfer**

We may share your information with our affiliates or in the event of a sale, merger or similar transaction.

(d) **Schools and Faculty**

4. **How Do I Change My Information And Communications Preferences?**

You may change certain account information and communications preferences as more fully detailed in this section.

5. **What Should Parents Know About Children's Privacy?**

Children under 13 years of age are not permitted to use our Service. We do not intend to collect Personal Information from children. If you think we have, let us know.

6. **What About Security?**

No data security is absolute, but we take reasonable steps to secure data appropriately.

7. **What About Changes to the Privacy Policy?**

We may change this Privacy Policy upon posting of a revised Privacy Policy. However, we will continue to treat your Personal Information under the terms of the privacy policy in effect when it was collected unless you consent to the terms of the new policy.

1. What Information Does the Service Collect?

(a) Information You Provide to Us

Personal Information. On the Service, we may ask you to provide us with certain categories of information such as: (1) personally identifiable information, which is information that identifies you personally, such as your first and last name and e-mail address (“**Personal Information**”); and (2) demographic information, such as information about education level (“**Demographic Information**”). We may collect this information through various forms and in various places on the Service, including account registration forms, contact us forms, or when you otherwise interact with the Service. To the extent we combine Demographic Information with your Personal Information we collect directly from you on the Service, we will treat the combined data as Personal Information under this Privacy Policy.

Payment Information. Shadow Health does not collect your credit card information or home address. We use a third party payment processor to enable purchases of licenses to use the Shadow Health DCE. When you purchase a license, you provide payment information directly to the third party payment processor, and are subject to that payment processor’s privacy policy and terms of use. Shadow Health receives from the payment processor only the last four digits of your credit card and expiration date, along with your name and email address to confirm your purchase and is not responsible for your use of the payment processor.

(b) Information We Collect or Store As You Access and Use the Service

In addition to any Personal Information or other information that you choose to submit to us via our Service, we and our third-party service providers may use a variety of technologies that automatically (or passively) store or collect certain information whenever you visit or interact with the Service, including without limitation data regarding your performance, learning, and grades (“**Usage Information**”). This Usage Information may be stored or accessed using a variety of technologies that may be downloaded to your personal computer, browser, laptop, tablet, mobile phone or other device (a “**Device**”) whenever you visit or interact with our Service. To the extent we associate Usage Information with your Personal Information we collect directly from you on the Service, we will treat it as Personal Information.

This Usage Information may include:

- your IP address, UDID or other unique identifier (“**Device Identifier**”). A Device Identifier is a number that is automatically assigned to your Device used to access the Service, and our computers identify your Device by its Device Identifier;
- your Device functionality (including browser, operating system, hardware, mobile network information);
- the URL that referred you to our Service;
- the areas within our Service that you visit and your activities there, including remembering you and your preferences;
- your Device characteristics; and
- certain other Device data, including the time of day, among other information.

We may use various methods and technologies to store or collect Usage Information (“**Tracking Technologies**”). Tracking Technologies may set, change, alter or modify settings or configurations on your Device. A few of the Tracking Technologies include, without limitation, the following (and subsequent technology and methods later developed):

Cookies. A cookie is a data file placed on a Device when it is used to visit the Service. A Flash cookie (or locally shared object) is a data file placed on a Device via the Adobe Flash plug-in that may be built-in to or downloaded by you to your Device. HTML5 cookies can be programmed through HTML5 local storage. Unlike Flash cookies, HTML5 cookies do not require a plug-in. Regular cookies may generally be disabled or removed by tools that are available as part of most commercial browsers, and in some but not all instances can be blocked in the future by selecting certain settings. Each browser you use will need to be set separately and different browsers offer different functionality and options in this regard. Also, these tools may not be effective with regard to Flash cookies or HTML5 cookies. For information on disabling Flash cookies, go to Adobe’s web site www.adobe.com. Please be aware that if you disable or remove cookies, Flash cookies, or HTML5 cookies on your Device, some parts of our Service may not function properly, and that when you revisit our Service your ability to limit cookies is subject to your browser settings and limitations.

Web Beacons. Small graphic images or other web programming code called web beacons (also known as “1x1 GIFs” or “clear GIFs”) may be included in our Service’s pages and messages. Web beacons may be invisible to you, but any electronic image or other web programming code inserted into a page or e-mail can act as a web beacon. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to the Service, to monitor how users navigate the Service, to count how many e-mails that were sent were actually opened or to count how many particular articles or links were actually viewed.

Embedded Scripts. An embedded script is programming code that is designed to collect information about your interactions with the Service, such as the links you click on. The code is temporarily downloaded onto your Device from our web server or a third party service provider, is active only while you are connected to the Service, and is deactivated or deleted thereafter.

ETag, or entity tag. A feature of the cache in browsers. It is an opaque identifier assigned by a web server to a specific version of a resource found at a URL. If the resource content at that URL ever changes, a new and different ETag is assigned. Used in this manner ETags are a form of Device Identifier. ETag tracking may generate unique tracking values even where the consumer blocks HTTP, Flash, and/or HTML5 cookies.

We may use Tracking Technologies for a variety of purposes, including:

Strictly Necessary. We may use cookies or other Tracking Technologies that we consider are strictly necessary to allow you to use and access our Service, including cookies required to prevent fraudulent activity or improve security.

Performance-Related. We may use cookies or other Tracking Technologies that are useful in order to assess the performance of the Service, including as part of our analytic practices or otherwise to improve the content, products or services offered through the Service.

Functionality-Related. We may use cookies or other Tracking Technologies that are required to offer you enhanced functionality when accessing the Service, including identifying you when you sign-in to our Service or keeping track of your specified preferences.

Targeting-Related. We may use Tracking Technologies to deliver content relevant to your interests on our Service based on how you interact with our content.

There may be other Tracking Technologies now and later devised and used by us in connection with the Service. Further, third parties may use Tracking Technologies with our Service. We may not control those Tracking Technologies and we are not responsible for them. However, you consent to potentially encountering third party Tracking Technologies in connection with use of our Service and accept that our statements under this Privacy Policy do not apply to the Tracking Technologies or practices of such third parties. Our third party vendors may also use Tracking Technologies with our service. For more information on our vendors, click [here](#).

(c) Information Your School May Provide About You

Your school may offer the ability to sign-up for Shadow Health DCE through your school's website. Should you do so, your school will share with Shadow Health your name and email address. Your teachers have the ability to provide feedback on your progress through the Shadow Health DCE and in that feedback may include your Personal Information. To the extent we combine information we receive from those sources with your Personal Information we collect on the Service, it will be treated as Personal Information and we will apply this Privacy Policy to such combined information, unless we have disclosed otherwise.

2. How Do We Use the Information Collected?

Use of Information by Us. We may use your Personal Information, Demographic Information or Usage Information that is subject to this Privacy Policy: (1) to provide you with information or services or process transactions that you have requested or agreed to receive; (2) to process your registration with the Service, including verifying your information is active and valid; (3) to improve the Service or our services, to customize your experience on the Service, or to serve you specific content that is relevant to you; (4) to contact you with regard to your use of the Service and, in our discretion, changes to the Service and/or Service's policies; (5) for internal business purposes; and (6) for purposes disclosed at the time you provide your information and that you consent to, or as otherwise set forth in this Privacy Policy.

Please note that information submitted to the Service via a "contact us" or other similar function may not receive a response; we will not use that information so provided to contact you for marketing purposes unrelated to your inquiry unless you agree otherwise.

3. How and When Do We Share Information with Third Parties?

We may share non-Personal Information, such as aggregated user statistics, with third parties. We do not share your Personal Information with third parties for those third parties' direct marketing purposes. In addition, we may share the information we have collected about you, including Personal Information, as described below or otherwise in this Privacy Policy. Company may disclose your information as follows:

(a) Third Parties Providing Services on Our Behalf. We may use third-party vendors to perform certain services on behalf of us or the Service, such as hosting the Service, designing and/or operating the Service's features, tracking the Service's activities and analytics, and performing other administrative services. We may provide these vendors with access to user information, including Device Identifiers and Personal Information, to carry out the services they are performing for you or for us. Third-party analytics and other service providers may set and access their own Tracking Technologies on your Device and they may otherwise collect or have access to information about you, potentially including Personal Information. Some may offer you certain choices regarding their practices, and information we have been informed of regarding such choices is available [here](#). We are not responsible for the effectiveness of or compliance with any third parties' opt-out options.

(b) To Protect the Rights of Shadow Health and Others. To the fullest extent permitted by applicable law, we may also disclose your information if we believe in good faith that doing so is necessary or appropriate to: (i) protect or defend the rights, safety or property of Shadow Health or third parties (including through the enforcement of this Policy, our [Terms of Service](#), and other applicable agreements and policies); or (ii) comply with legal and regulatory obligations (e.g., pursuant to law enforcement inquiries, subpoenas or court orders). To the fullest extent permitted by applicable law, we have complete discretion in electing to make or not make such disclosures, and to contest or not contest requests for such disclosures, all without notice to you.

(c) Affiliates and Business Transfer. We may share your information, including your Device Identifiers and Personal Information, Demographic Information and Usage Information with our parent, subsidiaries and affiliates (“**Affiliates**”). We also reserve the right to disclose and transfer all such information: (i) to a subsequent owner, co-owner or operator of the Service or applicable database; or (ii) in connection with a merger, consolidation, restructuring, the sale of substantially all of our interests and/or assets or other corporate change, including, during the course of any due diligence process.

(d) Schools and Faculty. Your school and your teachers have access to your Personal Information, Demographic Information, along with certain Usage Data, such as your performance, learning, and grades on exams taken through Shadow Health DCE.

4. How Do I Change My Information and Communications Preferences?

You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information provided as part of registration. The Service may allow you to review, correct or update Personal Information you have provided through the Service’s registration forms or otherwise, and you may provide registration updates and changes by contacting us at Support@ShadowHealth.com. If so, we will make good faith efforts to make requested changes in our then active databases as soon as reasonably practicable. With respect to our mobile and other applications (i.e., when we are the application publisher), you can prospectively stop all collection of information by the application by uninstalling the application. You may use the standard uninstall process as may be available as part of your applicable Device or potentially via the appropriate application or app marketplace. Please note that it is not always possible to completely remove or delete all of your information from our databases and that residual data may remain on backup media or for other reasons. When you edit your Personal Information or change your preferences on the Service, information that you remove may persist internally for Company’s administrative purposes. Please note that we reserve the right to send you certain communications relating to your account or use of our Service, such as administrative and service announcements and these transactional account messages may be unaffected if you choose to opt-out from receiving other types of communications. If you have any questions about the Privacy Policy or practices described in it, you should contact us in the following ways: Postal Mail: **15 SW 1st Ave, Gainesville, FL 32601**; E-mail: **Support@ShadowHealth.com**

5. What Should Parents Know About Children’s Privacy?

We understand the importance of protecting children’s privacy in the interactive world. We do not use the Service to knowingly collect Personal Information from children under the age of thirteen (13) without parental consent. If you are a child under 13 years of age, you are not permitted to use the Service and should not send any information about yourself to us through the Service.

In the event that we become aware that we have collected Personal Information from any child, we will dispose of that information in accordance with the Children’s Online Privacy Protection Act and other applicable laws and regulations. If you are a parent or guardian and you believe that your child under the age of 13 has provided us with information without your consent, please contact us at

Support@ShadowHealth.com, and we will take reasonable steps to ensure that such information is deleted from our files.

6. What About Security?

We incorporate commercially reasonable safeguards to help protect and secure your Personal Information. However, no data transmission over the Internet, mobile networks, wireless transmission or electronic storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure the security of any information you transmit to us, and you use our Service and provide us with your information at your own risk.

7. What About Changes to the Privacy Policy?

We reserve the right to change this Privacy Policy at any time. Any changes will be effective immediately upon the posting of the revised Privacy Policy and your use of our Service indicates your consent to the privacy policy posted at the time of use. However, we will not use your previously collected Personal Information in a manner materially different than represented at the time it was collected without your consent. To the extent any provision of this Privacy Policy is found by a competent tribunal to be invalid or unenforceable, such provision shall be severed to the extent necessary for the remainder to be valid and enforceable.

//End Privacy Policy//

The following third parties that collect information from you on the Service have given us notice that you may obtain information on their policies and practices, and in some instances opt-out of certain of their activities, as follows:

Party	Service	For More Information	Use of Tracking Technologies	Privacy Choices
Google/DoubleClick	Google Analytics for Display Advertisers, Ads Preferences Manager, and Google Analytics Opt-out Browser Add-on	http://support.google.com/analytics/bin/answer.py?hl=en&topic=2611283&an... http://www.google.com/settings/ads/onweb/?hl=en&sig=ACi0TCg8VN3Fad5_pDOs..... https://tools.google.com/dlpage/gaoptout/	Yes	See the information available at the provided links.
Heroku	Provides web hosting on Amazon Cloud Services.	https://www.heroku.com/about	Yes	https://www.heroku.com/policy/privacy
Stripe	Merchant credit card	https://stripe.com/us/help/faq	Yes	https://stripe.com/us/

	services			privacy
New Relic	Web application health monitoring	http://newrelic.com/about	No	http://newrelic.com/privacy

PLEASE NOTE: We are not responsible for third-party policies or practices. We try to keep this information current, and will add to and subtract from the chart above as appropriate, but it is provided as a courtesy and may not be current or accurate. Please contact the applicable third parties regarding their privacy and data security policies and practices.