

HOMEFREE PHARMACY SERVICES - PRIVACY POLICY

Last Updated: [12/2021]

Integrated Medication Management, LLC d/b/a HomeFree Pharmacy Services (“**HomeFree**”, “**we**”, “**our**”, or “**us**”) recognizes the importance of protecting your privacy. This Privacy Policy explains the information we collect through www.homefreerx.com and its subdomains as well as the HomeFree mobile applications and other sites where this privacy policy is posted or linked (collectively, the “**Services**”). This Privacy Policy is not applicable to any information that is protected health information (“**PHI**”) under the Health Insurance Portability and Accountability Act (“**HIPAA**”). Any information that is PHI is governed by, and will be used and disclosed solely as permitted by the HomeFree Notice of Privacy Practices.

Please review this Privacy Policy, which is incorporated into and made part of our [Terms and Conditions](#). By accessing or using the Services, you consent to our collection, use and disclosure of your information in accordance with this Privacy Policy and Terms of Use. If you do not agree to our Privacy Policy or Terms and Conditions, you may not use the Services.

Information We Collect

Personal Information We May Collect

"Personal Information" is information that can be used to identify, contact or locate you. Examples of Personal Information include your name, physical address, email address, telephone number and other information you provide.

Information You Provide to Us

We collect information, including Personal Information you provide directly to us. For example, we collect information when you: create an account, use the interactive areas and features of the Services, subscribe to a newsletter or email list, participate in a survey or events, pay a bill, request customer or technical support, or otherwise communicate with us.

The types of information we may collect from you include:

- a) **Account Information**, such as your name, email address, password, postal address, phone number, date of birth and any other information you choose to provide.
- b) **Transaction Information**, such as your health insurance information and limited payment information from you, such as payment method and payment card information; however, we do not collect or store full payment card numbers and all transactions are processed by our third-party payment processor.
- c) **Health Information**, such as your past and present medical condition, medication information, and treatment history.

- d) **Other Information You Choose to Provide**, such as when you participate in a survey, assessment, contest, promotion or interactive area of the Services or when you request technical or customer support.

Information We Collect Automatically When You Use the Services

When you access or use the Services, the types of information we may automatically collect about you include:

- a) **Log Information:** When you visit the Services, our servers automatically record certain log file information, such as your Internet Protocol (“IP”) address, operating system, browser type and language, referring URLs, access times, pages viewed, links clicked and other information about your activities on the Services.
- b) **Mobile Device Information:** We collect information about the mobile device you use to access or use the Services, including the hardware model, operating system and version, unique device identifiers, mobile network information and information about your use of our mobile applications. With your consent, we may also collect information about the precise location of your device and access and collect information from certain native applications on your device (such as your device’s camera, photo album and phonebook applications) to facilitate your use of certain features of the Services. For more information about how you can control the collection of location information and/or our access to other applications on your device, please see “Your Choices” below.
- c) **Information Collected by Cookies and Other Tracking Technologies:** We and our service providers use various tracking technologies, including cookies and web beacons, to collect information about you when you interact with our Services. Cookies are small data files stored on your hard drive or in device memory that help us improve the Services and your experience, see which areas and features of the Services are popular, and count visits. Web beacons are electronic images that may be used in the Services or emails and help deliver cookies, count visits and understand usage and campaign effectiveness. For more information about cookies, and how to disable them, please see “Your Choices” below.

Information Collected From Other Sources

We may also obtain information about you from other sources. For example, we may collect information about you from third parties, including but not limited to Health Insurance Companies and Pharmacy Benefit Mangers. Once we combine information from other sources with your information collected pursuant to this policy, we apply this policy to the combined information as long as it is combined.

How We Use Information

HomeFree uses the information about you for various purposes, including to:

- Provide, maintain and improve our Services and provide you with relevant information;
- Send you technical notices, updates, security alerts and support and administrative messages;
- Respond to your comments, questions and requests and provide customer service;

- Communicate with you about products and services offered by us and others, and to provide news and information we think will be of interest to you;
- Monitor and analyze trends, usage and activities in connection with our Services;
- Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of HomeFree and others;
- Maintain appropriate records for internal administrative purposes;
- To de-identify and aggregate information. Once de-identified and aggregated (for example, we may aggregate Personal Information to calculate the percentage of our users who have a particular telephone area code), it is no longer Personal information. Such de-identified and/or aggregated information which does not identify individuals is not subject to this Privacy Policy; and
- Carry out any other purpose described to you at the time the information was collected.

Please note, use of your protected health information is explained in the Notice of Privacy Practices, not in this Privacy Policy. Please contact us at hello@homefreerx.com for a copy of our Notice of Privacy Practices.

Disclosure of Information

We may share information about you, including Personal Information, as follows, or as otherwise described in this Privacy Policy:

- With vendors, consultants and other service providers who need access to such information to carry out work or perform services on our behalf;
- In response to requests from local, state, provincial or federal law enforcement officials, any judicial, administrative or similar proceeding or order, such as a subpoena if we believe disclosure is in accordance with, or required by any applicable law;
- If we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of HomeFree and others;
- To investigate suspected fraud, harassment, physical threats, or other violations of any law, rule or regulation, the Services' rules or policies, or the rights of third parties or to investigate any suspected conduct which we deem improper;
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company;
- Between and among HomeFree and our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership;
- With your consent or at your direction;
- To comply with transparency or other public reporting obligations; and
- As otherwise permitted or required by law.

We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

We are based in the United States and the information we collect is governed by U.S. law. By accessing or using the Services or otherwise providing information to us, you consent to the processing and transfer of information in and to the U.S. and other countries, where you may not have the same rights as you do under local law. Where this is the case, we will take appropriate measures to protect information about you in accordance with this Privacy Policy.

Children's Privacy

HomeFree is committed to protecting the privacy of children. Our Services are not intended for, or designed to attract children. In addition, we do not collect Personal Information from any person known by HomeFree to be a child under the age of 13.

Security

We seek to use reasonable physical, technical, and administrative measures designed to protect personal information within our organization. Unfortunately, no data transmission, processing or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us in accordance with the "Contacting Us" section below.

Links to Third-Party Websites

Our Services may reference or provide links to third-party websites. Other websites may also reference or link to our Services. Because these websites are not controlled by HomeFree, we are not responsible for the third-party websites. We encourage our users to be aware when they leave our Services to review the privacy policies posted on each and every website that collects personally identifiable information. Please be aware that HomeFree does not control, endorse, screen or approve, nor are we responsible for, the privacy policies or information practices of third parties or their websites or mobile applications. Visiting these other websites is at your own risk.

Advertising and Analytics Services Provided by Others

We may allow others to provide analytics services and serve advertisements on our behalf across the web and in the mobile applications. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of the Services and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in apps, links clicked, and conversion information. This information may be used by HomeFree and others to, among other things, analyze and track data, determine the popularity of certain content, and better understand your online activity. For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, please visit www.aboutads.info/choices. Your device may also include a feature ("Limit Ad Tracking" on iOS or "Opt Out of Interest-Based Ads" or "Opt Out of Ads Personalization" on Android) that allows you to opt out of having certain information collected through apps used for behavioral advertising purposes.

Do Not Track Signals

HomeTree does not respond to Do Not Track signals to the extent received from a web browser. Because there currently is not a universally accepted technological or legal standard for recognizing or honoring DNT signals as reflections of user choice, we do not respond to them at this time. Once such technology is created and has received applicable regulatory approval, we will consider (a) whether it is possible; and (b) if so, how it can be incorporated within HomeFree's environment in the future.

Your Choices

Account Information

You may update, correct or modify information about you at any time by logging into your online account if applicable or by contacting us at 1-888-300-3006. If you wish to delete or deactivate your account, please email us at hello@homefreerx.com, but note we may continue to store information about you as required by law or for legitimate business purposes.

Notice to California Residents

- “Sales” of Personal Information
 - We do not sell your personal information and have not done so within the past 12 months.
- California Privacy Rights
 - Privacy Rights – Under the CCPA, California residents may have certain privacy rights, including the rights to: (i) request additional disclosures about the Personal Information we collect, use, and disclose, i.e., a “Request to Know (Categories of Information)”; (ii) obtain a copy of Personal Information, i.e., a “Request to Know (Specific Pieces of Information),” sometimes called the Right to Access; (iii) request deletion of Personal Information, i.e., a “Request to Delete Information,” sometimes called the Right to Be Forgotten; and (iv) opt out of the sale of Personal Information, i.e., a “Request to Opt Out.”
 - How to Exercise Privacy Rights – If you wish to exercise any of these rights, please email hello@homefreerx.com or call us at 1-888-300-3006. The rights described herein are not absolute and we reserve all of our rights available to us at law in this regard. Additionally, if we retain your data only in de-identified form, we will not attempt to re-identify your data in response to a data subject rights request.
 - We will not discriminate against you because of your exercise of any of the privacy rights provided in this notice.
 - If you make a request related to Personal Information about you, we will need to verify your identity. To do so, we will request that you match specific pieces of information you have provided us previously. If it is necessary to collect additional information from you, we will use the information only for verification purposes and will delete it as soon as practicable after complying with the request. For requests related to particularly sensitive information, we may require additional proof of identification. If you make a request through an authorized agent, we will require written proof that the agent is authorized to act on your behalf. We will process your request within the time provided by applicable law.
 - You may also authorize someone to contact us or exercise any of the above rights on your behalf, but we will require documentation that you have requested an authorized agent to make a request on your behalf. If we have collected information on your minor child, you may exercise the above rights on behalf of your minor child. We must be able to reasonably verify your identity and authority to exercise these rights before fulfilling a request. There are also various exclusions and exceptions that apply to these rights under applicable laws.
- Additional Privacy Rights for California Residents (California Shine the Light)

- If you are a California resident, California Civil Code Section 1798.83 permits you to request information about our practices related to the disclosure of your personal information to certain third parties for their direct marketing purposes. You may be able to opt-out of our sharing of your personal information with unaffiliated third parties for the third parties' direct marketing purposes in certain circumstances. Please send your request (along with your full name, email address, postal address, and the subject line labeled "Your California Privacy Rights") at hello@homefreerx.com.

Communications with HomeFree:

We want to communicate with you in ways you want to hear from us. Examples include email, text messages, and newsletters, which may contain special offers and new product announcements. To the extent that you are receiving marketing communications from the Services you may unsubscribe or opt-out of future communications as follows:

- If you no longer wish to receive texts you may text the word "STOP" to the telephone number that messaged you, from the mobile device you wish to no longer receive texts.
- If you no longer wish to receive emails you may click on the hyperlink titled "Unsubscribe" at the bottom of any marketing related email sent to you by HomeFree, and then follow the directions to unsubscribe from email. Please note that if you opt out of receiving promotional communications from us, we may still send you transactional communications, including emails about your account or purchases.

Native Applications on Mobile Device

Some features of our mobile applications may require access to certain native applications on your mobile device, such as the camera and photo storage applications (*e.g.*, to take and upload photos) and the phonebook application. If you decide to use these features, we will ask you for your consent prior to accessing the applications and collecting information. Note that you can revoke your consent at any time by changing the settings on your device.

Cookies and Your Ad Choices

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 browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of the Services.

Push Notifications

With your consent, we may send promotional and non-promotional push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device or within our mobile applications.

Contact Us

If you have any questions about this Privacy Policy or concerns about the way HomeFree processes your information, or require assistance in managing your privacy choices, please get in touch with us at: hello@homefreerx.com .