

Privacy Statement

Initial Effective Date: October 1, 2020 Latest Revised Date: October 1, 2020

Ayin Health Solutions, Inc. values your privacy. In this Privacy Statement, “AYIN”, “we”, “our” or “us” refers to Ayin Health Solutions, Inc., and its affiliates. This Privacy Statement governs the use of your data on the wellness/disease management website, mobile applications and related services for wellness/disease management (collectively, the “Applications”) when such information is not considered Protected Health Information (“PHI”) as defined under the Health Insurance Portability and Accountability Act (“HIPAA”). HIPAA provides its own protection for PHI which can be viewed under our HIPAA Privacy Policy.

This Privacy Statement outlines how your personally identifiable information and other personal data (your “user information”) will be collected, used, and shared in connection with your access to and/or use of the Applications and any content, features, services, or other offerings that AYIN may provide in connection therewith, as well as what information about you we collect through any application on third party sites, social network or social media sites operated by Facebook, Instagram, Twitter, Google, etc. (the “3rd Party Sites”). This Privacy Statement also describes your choices and rights regarding the use, access and correction or deletion of your user information. By using the Applications, you consent to the use of your user information in accordance with this Privacy Statement. You will also be asked to provide clear and unequivocal affirmative consent to the collection, processing, and sharing of your user information via cookies and similar technologies. The Applications are owned and operated by AYIN.

AYIN does not actively target or market to any EU member state and does not, to its knowledge, process or control any EU citizen personally identifiable information: Despite this fact this Privacy Statement and its enumerated policies are intended to comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the “General Data Protection Regulation” or “GDPR”) and provide appropriate protection and care with respect to the treatment of all of our users’ information in accordance with the GDPR.

Summary of Terms

To enhance, personalize, and support your experience on the Applications, among other things, we collect, use, and share your user information. For example, we use aggregated information to develop content targeted to user interests and to generally improve the Applications user experience. As detailed below, your user information may also be used by AYIN and its partners to tailor content and ads, provide social media features (e.g., features that allow you to share content directly to your preferred social media platform), track your preferences, analyze traffic, and provide similar services and content. AYIN is committed to your privacy and will not share any user information with any third party without your consent, except as outlined in this Privacy Statement or as permitted by law. If you have any requests, comments, or questions about this Privacy Statement or your user information, please contact us in the manner provided below.

3rd Party Sites Policies

This Privacy Statement covers this Site. Your use of social media or social network sites or applications such as Facebook, Instagram, Twitter, Google, etc. in general and your relationship with those third party applications are subject to each application’s own privacy policy and other terms and policies, which we strongly recommend that you review. We do not control and are not responsible for how third party applications process your information or data.

Participating Advertiser and Merchant Policies

This Privacy Statement covers the Applications. The Applications may contain links to sites owned and operated by unaffiliated third parties. These links are provided as a service to you as a customer and do not constitute AYIN’s endorsement or support of the third party sites or the information or content contained within the third party sites. Related services and offerings with links from the Application, have their own privacy statements that can be viewed by clicking on the corresponding links within each respective site. Unaffiliated third parties who provide information and links through AYIN are encouraged to participate in industry privacy initiatives and to take a responsible attitude towards consumer privacy. However, because we do not have

direct control over the policies or practices of participating merchants and other third parties, we are not responsible for and do not endorse the privacy practices or content of those sites. We recommend and encourage that you always review the privacy policies of any advertisers, merchants and other third parties before you provide any personal information or complete any transaction with such parties. Please contact each third party provider directly if you have any questions about their privacy policies or the information they require for you to complete any transaction.

Analytics and Advertising Services

The Applications may use Google Analytics (“Google”) services which transmit website traffic data to Google servers in the United States as well as may provide targeted advertising features. Google does not collect personal information, identify individual users or associate your IP address with any other data held by Google. We do not share any PII with Google in connection with their performing of any services on the Applications. We use reports provided by Google to help us understand website traffic and webpage usage. You may opt out by installing the Google Analytics opt out browser add on. Furthermore, if you do not want to use any remarketing advertising feature from Google on the Applications you can disable it by changing the appropriate settings within Googles Ad Settings Manager.

GENERAL INFORMATION WE COLLECT AND HOW WE USE IT

SECTION OVERVIEW: We collect user information when you use the Applications. Sometimes you may submit it to us yourself, other times it may be collected automatically. You can manage and change your preferences as outlined below.

Information Collected

When you use the Applications, your user information may be collected, used, and shared in a variety of manners. As detailed below, the type of user information collected may vary based on how it was gathered, but may include, among other things, your name, email address, and other information that you voluntarily submit (e.g., when setting up an account or submitting a registration or application on the Applications, you may submit your contact information, social media account handles, and/or professional information), information automatically collected about your usage of the Applications which does not include personally identifiable information (e.g., the content that you choose to view), and information about you that our third party partners may share with us if such third party partners have previously received your consent to do so.

Except for registered users within secure sections of the Applications, which data is covered by our HIPAA Privacy Policy, AYIN does not collect or process any data based upon the following: Race or ethnic origin; political opinions; religious or philosophical beliefs; trade union memberships; genetic or biometric data; health or mortality; sexual orientation.

Voluntary Submission

AYIN may collect user information that is voluntarily provided by you or with your permission. For example, we may ask you for information, such as your e-mail address, when you register to become a member of the Applications or register for an AYIN event. You may also provide information to AYIN in other contexts, including, for example, on your member profile page and public profile URL, to enter into a sweepstakes, contest, or promotion. You always have the option not to provide the information we request. If you choose not to provide the information we request, you can still visit most of the Applications, but you may be unable to access certain options and services. When you register or become a member of the Site or provide information to AYIN in any other manner, you agree to provide only true, accurate, current and complete information.

Cookies

A cookie is a small data file that is written to your computer’s hard drive by your web browser. A cookie file can contain and/or automatically collect information, such as a user identification code or IP address that a website will use to track the pages and number of times you have visited. The data read from these cookies may be linked to personally identifying (PII) and non-personally identifying (non-PII) information.

We and our partners may use cookies and similar technologies on the Applications to personalize and optimize your browsing experience and the Applications by: providing you tailored content and advertisements (see below for more information), enabling social media features, safeguarding against spam and malware, analyzing trends, traffic, and user behavior,

administering the website, gathering demographic information about our user base as a whole, tracking web and advertising analytics throughout the Applications, remembering your preferences and voluntarily-submitted information (e.g. preferences, title, class information, licensure and certifications, membership status), performing location-related functionalities and analytics, participating in market research (e.g., website ratings), and educating ourselves about how we can continue to improve the Applications and its various elements.

Cookies fall into the subcategories below.

Essential Cookies. Certain cookies are used for specific purposes that are essential to your secure use and navigation of the Applications. Without them, AYIN may not be able to provide core functions and features of the Applications to you, and the Applications would not operate as well as you or AYIN would like. These cookies collect and use information such as your server preferences, single-session data and corresponding identifier, web beacons and log files (detailed below), and other credential-related information. Essential cookies also help inform AYIN whether you require, or have already been served, an affirmative consent request in connection with our data policies. Essential cookies also include analytics cookies, which provide us data that allows AYIN to better understand its users and improve the Applications based on what we have learned from that data.

Preference Cookies. Other cookies are used to collect and process information about your preferences and similar choices in connection with the Applications in order to optimize your browsing experience. Preference cookies include social media cookies, which collect information about your social media usage and other data you may have provided in connection with such usage (if you access the Site through a social media website or mobile application, you may have social media cookies). If you wish to modify or change your social media cookies, please visit and review the settings related to your applicable social media account(s).

Advertising Cookies. To help support the Applications and further tailor your experience, AYIN and its advertising/messaging partners (and/or their third party providers – i.e. Google and/or Twilio) also use cookies on the Applications to personalize the content and advertisements you may be shown. Such advertisements use cookies to provide you targeted advertisements that may be more consistent with your interests than non-targeted advertisements. Certain AYIN advertising partners may also use cookies to monitor or track the performance of their advertising content. AYIN does not provide user information to advertising partners except in connection with the Applications or as required by law.

NOTE: You have the ability to accept or decline cookies by changing certain settings of your web browser. Most web browsers automatically accept cookies, but generally allow users to modify their browser settings to display a warning before accepting a cookie, to accept cookies only from certain websites, and/or to refuse all cookies. We encourage you to consider keeping your cookies enabled, as if you choose to disable cookies from the Applications, you may not be able to use or benefit from certain features of the Site, particularly the features that are designed to personalize your experience.

If you would like to manage your cookie preferences or learn more information about this practice and your right to decline (or opt-out of) cookies placed by some or all of these companies, please contact us as outlined below.

Web Beacons

Web pages of the Applications may contain electronic images known as web beacons (invisible images often referred to as pixel tags or clear GIFs) on our sites in order to recognize users, assess traffic patterns, identify preferred content and measure site engagement. We may also include web beacons in our e-mail messages, including newsletters, in order to count how many e-mail messages have been opened.

Some of these web beacons may also be placed by third party service providers or 3rd Party Sites to help determine the effectiveness of advertising campaigns. These web beacons may be used by third party service providers to place a persistent cookie on your computer. This allows the service provider to recognize your computer each time you visit certain pages or emails and compile anonymous information in relation to those page views, which in turn enables us and our third party service providers to learn which advertisements and emails bring you to our website and how you use the site.

AYIN and its partners (including advertising partners Google and messaging partners Twilio) also may use web beacons to collect various data provided by your browser while you are on the Applications and elsewhere (i.e., outside of the

Applications) where we may be acting as a 3rd party. This data is collected in the aggregate, but may include or be associated with other non-PII or PII that users have voluntarily submitted.

Log Files

The Site's web and ad servers log information about a user's IP address, browser type and the current URL the user is requesting. This information is always provided by a user's browser and automatically logged by most websites. These log files are stored in a secure location and used in our internal analysis of traffic patterns within our website.

Use of Your Information

Our primary goal in collecting, using, and sharing user information is to enhance your experience on the Site, support the Site, and improve its features, performance, and other elements. Your user information may be used for the purposes outlined below. We will not use your user information without a valid legal basis to do so.

To Target Content and Advertising

To develop and provide content and advertising to you that is targeted to your interests, we use the analytics collected by the systems described above to determine which areas of our website you prefer based upon the frequency of your visits and engagement with those areas. We may make reasonable assumptions based on your browser provided data to target relevant content and advertising to you on our site and elsewhere where we may be acting as a 3rd party. We may also make reasonable geographic and demographic assumptions based on your presented IP address to target relevant content and advertising.

To Provide Interactive Communications from the Site

To enhance your experience we may provide you with interactive communications, such as notifications of activity by topic or contributor to the e-mail address or mobile number that you provide to us. Such interactive communications are provided only to those users who have expressly provided us with their permission to receive them as part of their user profile.

From time to time we may provide e-mails or text messages highlighting new features, promotions or contests on the website to those users who have expressly provided us with their permission to send such communications as part of their user profile.

To Provide Communications from Third Parties

We respect the privacy of our users and will not disclose or distribute our user list to any third party, nor will we permit anyone else to do so. In those cases, your e-mail address and/or mobile number will be transferred to the third party. You can remove your consent to this use or modify your related user information by contacting AYIN as indicated below.

Sharing of Information

You may be requested to voluntarily provide certain user information during your use of the Applications. If you choose to do so, that user information may be shared with AYIN as well as business partners and vendors providing hosting and other services for AYIN.

We use third parties to provide e-mail services, messaging services (Twilio), and hosting services on the Site. When you sign up for services, we will share your user information only as necessary for the third party to provide that service. These third parties are prohibited from using your user information for any other purpose. If you do not want your information to be shared, you can choose not to allow the transfer of your information by not using that particular service.

In addition, if you provide any personally identifiable information via an advertiser promotion, please be aware you are directly providing your personally identifiable information to that advertiser and not to AYIN.

From time-to-time we may provide you the opportunity to participate in contests or surveys on our site. If you participate, we will request certain personally identifiable information from you, such as your name and e-mail. Participation in these surveys or contests is completely voluntary and you therefore have a choice whether or not to disclose this information. We use this personally identifiable information to notify contest winners and award prizes, if applicable.

We may use a third party service provider to conduct these surveys or contests; that company will be prohibited from using our users' personally identifiable information for any other purpose. We will not share the personally identifiable information you provide through a contest or survey with other third parties unless we give you prior notice and you have provided consent.

As Necessary to Provide Services to You

We may occasionally hire other companies to provide limited services on our behalf, such as handling the processing and delivery of newsletter mailings, processing certain transactions, or performing statistical analysis of our services. We will only provide those companies the information they need to deliver the service. In some instances, these companies may collect information directly from you. In these cases, you may or may not be notified of the involvement of the external service provider. In all cases, these companies are subject to agreements that require them to maintain the confidentiality of your information and they are prohibited from using that information for any other purpose.

In the Event of Sale or Bankruptcy

The ownership of the Applications may change at some point in the future. Should that occur, we want this site to be able to maintain a relationship with you. In the event of a sale, merger, bankruptcy or other change in control of AYIN, your information may be shared with the person or business that owns or controls this site. Opting out of receiving information from third parties will not affect our right to transfer your information to a new owner, but your choices will continue to be respected regarding the use of your information. You will be notified as described below in "Changes to Privacy Statement."

As Required By Law

AYIN may disclose your personal information if required to do so by law such as to comply with a subpoena or in the good faith belief that such action is necessary to conform to the edicts of the law, protect your safety or the safety of others, investigate fraud or comply with a judicial proceeding, court order or legal process served on AYIN or to protect and defend the rights or property of AYIN.

AYIN will not process your user information without a lawful basis to do so. In general, AYIN will process your user information on the legal bases of consent, contract (if you have entered into an agreement with us and such processing is a necessary part thereof), or legal obligation (as noted above). AYIN may also process certain user information on the basis of the following legitimate interests, provided that such interests are not overridden by your privacy rights and interests: delivering and continuing to develop and improve the Applications, learning from your behavior on the Applications (e.g., analyzing traffic) to better serve you and other Applications users, helping us modify or enhance the Applications and its content, receiving insight as to what users do (and don't) like about our Applications or aspects thereof, and providing a stable, consistent, and secure user experience in connection with the Applications.

ACCOUNTS AND ACCESS

In some instances, AYIN allows you to create a user account. You can create an account through AYIN.com when you receive an invitation from us to sign up by providing certain required information including your name, email address, company information/affiliation and creating a unique password. This will allow some of your information as outlined above to be stored for future use at the Site.

How We Protect Your Information

AYIN may store and process Personally Identifying Information collected on the Applications on our own servers or on the servers of our business partners. Paper copies containing all or part of the Personally Identifying Information you supply to us may be made and kept in file cabinets as part of the course of normal business activity. To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and

managerial procedures to safeguard and secure the information we collect. We use secure online certificates for our domain. When entering personal information, look for the secure icon and https designation in the address box of your browser window that indicates you are on a secure page. We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. We restrict access to your Personally Identifying Information to employees who need to know that information in order to perform their jobs and provide service to you.

We care about the protection of your user information and use industry standard safeguards to do so. Of course, it's important to keep in mind that no data transmission on the Internet is guaranteed to be 100% secure.

Your information is stored on servers located in the United States. We use industry standard physical, electronic, and organizational safeguards to protect your user information against loss or theft as well as unauthorized access and disclosure to protect your privacy. We employ many different security techniques to protect such data from unauthorized access by users inside and outside the company. However, it must be noted that "perfect security" does not exist on the Internet. If you are concerned that your privacy may have been breached, please contact us as provided below.

How Can You Verify Your Information

You may check your information to verify, update, or correct it, and to have any obsolete information removed. If you have an account on the Applications, you can access and change your account profile yourself. You may ask to review any of your information that we have retained, how we have used it, and to whom we have disclosed it at any time by contacting us as indicated below under "Contacting Data Controller". Subject to exceptions prescribed by law, and provided we can authenticate your identity, you will be given reasonable access to your personal information, and will be entitled to have it amended as appropriate. You may ask us to change your preferences regarding how we use or disclose your information, or let us know you do not wish to receive any further communication from us.

Residents of California

The California Consumer Privacy Act ("CCPA") provides California residents with specific rights as to the privacy and management of their user information. These laws include the Right to Know what user information a business has on its systems, how that user information is used, and a right to request it be deleted. This privacy policy describes such user's rights related to the use of their information. If you would like to exercise your rights under CCPA, you may contact us at

Providence
Department of Legal Affairs
1801 Lind Avenue SW
Renton, WA 98057-9016

If you choose to exercise your rights under CCPA, you may not be discriminated against by us for choosing to do so.

Changes to Privacy Statement

If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on the Applications prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices and to review our most current privacy statement.

Contacting Data Controller

If you have any questions regarding this Privacy Statement or how to remove or modify your user information or related consents, please feel free to contact us by e-mail at:

Providence
Department of Legal Affairs
1801 Lind Avenue SW
Renton, WA 98057-9016

Ayin Health Solutions, Inc. will use commercially reasonable efforts to promptly respond to and resolve any problems or questions.

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