

PRIVACY POLICY

Last Updated: December 2023

PLEASE READ THIS PRIVACY POLICY CAREFULLY TO UNDERSTAND HOW WE TREAT YOUR PERSONAL INFORMATION AND WHAT CHOICES AND RIGHTS YOU HAVE IN THIS REGARD. IF YOU DO NOT AGREE WITH THE TERMS AND CONDITIONS OF THIS POLICY, YOU SHOULD NOT ACCESS OR USE THE SITE OR ENGAGE IN COMMUNICATIONS WITH US CONCERNING OUR PRODUCTS OR SERVICES.

THIS SITE IS INTENDED FOR USERS LOCATED IN THE UNITED STATES, AND IT IS NOT INTENDED FOR USERS LOCATED IN OTHER COUNTRIES, INCLUDING THE EUROPEAN UNION AND THE EUROPEAN ECONOMIC AREA. BY USING THIS SITE, YOU ACKNOWLEDGE AND AGREE THAT YOU ARE USING THE SITE FROM WITHIN THE UNITED STATES.

INTRODUCTION

Watershed Health (also referred to herein as “we,” “us,” and “our”), is committed to protecting the privacy and security of the personal information we collect, use, share, and otherwise process as part of our business. We also believe in transparency, and we are committed to informing you about how we treat your personal information.

When Does This Policy Apply? This Privacy Policy (the “**Policy**”) describes our online and offline practices regarding your personal information and the rights you have regarding your personal information. We collect and process personal information online via our website, www.watershedhealth.com (the “**Site**”) and via our social media channels. This policy does not apply to employment-related information or information that we host on behalf of our customers. When we are providing services for a “Covered Entity” customer (for example, a health care provider) under the Health Insurance Portability and Accountability Act of 1996 (“**HIPAA**”), we act as a “Business Associate,” and we use and disclose Protected Health Information (“**PHI**”) only as permitted or required under applicable law and our Business Associate Agreements. The Covered Entity’s notice of privacy practices describes and controls how we use and disclose PHI.

WHAT PERSONAL INFORMATION DO WE COLLECT?

What Personal Information Do We Collect? We may collect the personal information described below:

Category	Description of Data and Purposes
Contact Information	When you visit the Site, request to schedule a training with us, or contact us, we will collect your name, organization, email address, and phone number.
Your Communications and Feedback	If you provide us with feedback, contact us for support or to ask us questions, report a problem, request a demo, respond to our surveys, or otherwise contact us, we will collect your Contact Information, the subject matter of your message, and any comments or responses that you choose to provide. If you receive email communications from us, we use certain tools to capture data related to if/when you open our message and if/when you click on any links or banners it contains. Other information collected through this email tracking feature includes: your email address, the date and time of your “click” on the email, a

	message number, the name of the list from which the message was sent, a tracking URL number, and a destination page.
Cookies and Similar Technologies	Our Site uses cookies and similar technologies. Please see the “ <i>Cookies and Similar Technologies</i> ” section of this Policy for more information.
Usage Data	When you visit the Site, we automatically collect information from your browser and your device, which includes the date and time of your visit as well as your location, Internet Protocol (IP) address or unique device identifier, domain server, browser type, access time, and data about which pages you visit.

Cookies and Similar Technologies

What are first and third-party cookies? A “cookie” is a small file created by a web server that can be stored on your device (if you allow) for use either during a particular browsing session (a “session” cookie) or a future browsing session (a “persistent” cookie). “Session” cookies are temporarily stored on your device and remain there until they expire at the end of your browsing session. “Persistent” cookies remain stored on your device until they expire or are deleted by you. Local shared objects (or “flash” cookies) are used to collect and store information about your preferences and navigation to, from, and on a website. First-party cookies are set by the website you are visiting, and they can only be read by that site. Third-party cookies are set by a party other than that website.

What are “similar technologies”? In addition to cookies, there are other data collection technologies, such as Internet tags, web beacons, pixels (clear gifs, pixel tags, and single-pixel gifs), and navigational data collection (log files, server logs, etc.) that can be used to collect data as you navigate through and interact with a website. For example, web beacons are tiny graphics with unique identifiers that are used to understand browsing activity. UTM codes are strings that can appear in a URL when you move from one web page or website to another. The string can represent information about your browsing, such as which advertisement, page, or publisher sent you to the receiving website.

What cookies and similar technologies are in use on the Site? The Site uses cookies and similar technologies to improve Site functionality, to measure and track how you interact with the Site, to perform analytics, to market to you, to track ad-driven activity, and to otherwise tailor our communications with you.

Google Analytics. We use Google Analytics to collect and process statistical data about the number of people using the Site and to better understand how they find and use the Site. The data collected includes data related to your device/browser, your IP address, and on-site activities to measure and report statistics about user interactions. The information stored is reduced to a random identifier. Any data collected is used in accordance with this Policy and Google’s privacy policy. You may learn more about Google Analytics by visiting <https://www.google.com/policies/privacy/partners/> and <https://support.google.com/analytics/answer/6004245>. You can learn more about Google’s restrictions on data use by visiting the Google Privacy Policy at: <https://www.google.com/policies/privacy>. To opt-out of Google Analytics, visit <https://tools.google.com/dlpage/gaoptout> and install the opt-out browser add-on feature. For more details, visit the “Google Analytics opt-out browser add-on” page located at <https://support.google.com/analytics/answer/181881?hl=en>.

Other third-party technologies. Some third parties may use data collection technologies to collect information about you when you browse the Internet. We do not control these third parties’ technologies or how they may be used. If you have questions about targeted content, you should contact the responsible party directly or consult their privacy policies.

Choices about cookies and similar technologies. Most web browsers are set by default to accept cookies. If you do not wish to receive cookies, you may set your browser to refuse all or some types of cookies or to alert you when cookies are being stored. These settings may affect your enjoyment of the Site's functionality. Adjusting the cookie settings may not fully delete all of the cookies that have already been created. To delete them, you should review your web browser settings after you have changed your cookie settings. The links below provide additional information about how to disable cookies or manage the cookie settings:

Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en>

Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Microsoft Edge: <https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09>

Safari: <https://support.apple.com/guide/safari/manage-cookies-sfri11471/mac> and <https://support.apple.com/en-us/HT201265>

For more information about how to modify your browser settings to block or filter cookies, visit <http://www.aboutcookies.org/>. You may learn more about internet advertising practices and related consumer resources at <https://youradchoices.com/control>, <https://thenai.org/about-online-advertising/faq>, and <http://www.networkadvertising.org/choices>.

HOW DO WE USE AND SHARE YOUR INFORMATION?

How do we use the information described in this Policy? We use the information described above in order to:

- Operate and improve our business and the Site;
- Provide you with the services, products, content, and functionality you request;
- Honor our terms of use and contracts;
- Manage our relationship with you;
- Process payments, orders, and other transactions;
- Improve our products and services and develop new products and services;
- Maintain our databases and back-ups, including records of our communications with you;
- Ensure the privacy and security of the Site and our services;
- Detect fraud and prevent loss;
- Improve our customer service;
- Communicate with you and respond to your feedback, requests, questions, or inquiries;
- Send you technical notes, updates, security alerts, or administrative messages;
- Notify you about changes to your account the Site, or any products or services we offer or provide through it;
- Promote our products and services to you;
- Contact you about other products and services;
- Improve our marketing efforts, including by providing more tailored advertising;
- Administer a contest, promotion, or survey;
- Assess the success of our marketing and advertising campaigns;
- Support and improve the Site, including evaluations of functionality and features;
- Analyze use of the Site and our services and prepare aggregate traffic information;
- Recognize your device and remember your interactions;

- Provide you with a more personal and interactive experience on the Site;
- Determine and track user interests, trends, needs, and preferences;
- Facilitate corporate mergers, acquisitions, reorganizations, dissolutions, or other transfers;
- Obtain and maintain insurance coverage, manage risks, and obtain professional advice;
- Accomplish any other purpose related to and/or ancillary to any of the purposes and uses described in this Policy;
- Accomplish another purpose described to you when you provide the information, for which you have consented, or for which we have a legal basis under law;
- Comply with federal, state, or local laws;
- Comply with a civil, criminal, governmental, or regulatory inquiry, investigation, subpoena, order, summons, or other process;
- Cooperate with law enforcement agencies;
- Exercise or defend legal rights or claims; and
- Create, use, retain, or disclose de-identified or aggregated data.

How do we disclose or share the information described in this Policy? Where permitted by applicable law, we may share the information described in this Policy in the following contexts:

Category	Description
Corporate Affiliates	We may share your information with our subsidiaries and affiliates and with their respective officers, directors, employees, professional advisors, and agents.
Acquisitions and Similar Transactions	We may disclose your information in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our company assets. If our business is acquired by or merged with another company, your information may be transferred to the new owners.
Disclosures with Your Consent	We may ask if you would like us to share your information with other unaffiliated third parties who are not described elsewhere in this Policy. We will only disclose your information in this context with your consent.
Legal Obligations and Rights (Subpoenas, Court Orders, and Warrants)	We may disclose your information in response to subpoenas, warrants, court orders, or other legal process, or to comply with relevant laws. We may also share such information to establish or exercise our legal rights or claims; to defend against a legal claim; and to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our contracts.
Public	Some areas of our Site may offer forums or provide the opportunity for users to post comments or reviews in a public forum. Please remember that any information disclosed in these areas becomes public information, and you should exercise caution when deciding to disclose your information. If you decide to submit your information in these areas, you do so at your own risk, and you acknowledge that the information will be publicly available.
Third Parties	We may provide information about you to third parties that may offer products and services specifically requested by you.
Professional Advisors	We may share your information with our and our affiliates' insurers, auditors, and professional advisors, including attorneys and accountants, that need access to your information to provide operational or other support services on our behalf.
Service Providers	We may share your information with our service providers that need access to such information to provide operational or other support services on our behalf. Among other things, service providers help us to administer the Site;

	provide technical support; support our operations; send marketing, promotions and communications; and assist with other legitimate purposes permitted by law.
Deidentified or Aggregated Data	We may disclose aggregated information or de-identified information that does not identify any specific individual, such as groupings of demographic data or customer preferences.

HOW LONG DO WE KEEP YOUR INFORMATION?

We will keep your information for as long as is necessary to fulfill the purposes for which it was collected, to comply with our business requirements and legal obligations, to resolve disputes, to protect our assets, to operate our business, and to enforce our agreements.

We may delete your information if we believe it is incomplete, inaccurate, or that our continued storage of it is contrary to our objectives or legal obligations. When we delete data, it will be removed from our active servers and databases, but it may remain in our archives when it is not practical or possible to delete it.

We may retain and use anonymous, de-identified, or aggregated information for as long as is permitted under applicable law.

HOW DO WE PROTECT YOUR INFORMATION?

We have adopted security measures that are designed to protect the personal information under our control. From time to time, we review our security procedures and consider new technologies and methods.

But, no security system is perfect, and no data transmission is 100% secure. Although we strive to protect personal information, we cannot guarantee or warrant the security of any information transmitted to or from the Site. Your use of the Site is at your own risk. We cannot guarantee that your data will remain secure in all circumstances.

If a data breach compromises your personal information, we will notify you and any applicable regulator when we are required to do so by applicable law.

YOUR RIGHTS AND CHOICES

Please use the “Contact Us” details at the end of this Policy to exercise your rights and choices under this Policy. We honor requests when we are required to do so under applicable law.

Email Opt-Out. If you no longer wish to receive communications from us via email, you may opt-out by clicking the “unsubscribe” link available at the bottom of our email communications or by contacting us at info@watershedhealth.com. Please provide your name and contact information in your request, and we will respond to your request in accordance with applicable law.

Update Your Information. Our goal is to keep your information accurate, current, and complete. If any of the information you have provided to us changes, please let us know via the “Contact Us” details at the end of this Policy. We are not responsible for any losses arising from any inaccurate, inauthentic, deficient, or incomplete personal data that you provide to us.

Complaints. If you believe that your rights relating to your personal information have been violated, you may lodge a complaint with us by contacting us via the “Contact Us” details at the end of this Policy.

California. Under California Civil Code § 1798.83, California residents who provide personal information in obtaining products or services for personal, family, or household use may be entitled to request and obtain from us, once each calendar year, information about the information we shared (if any) with other businesses for direct marketing uses. We do not currently share your personal information with third parties for those third parties' direct marketing purposes. Please be aware that not all information sharing is covered by the California's "Shine the Light" requirements, and only information regarding covered sharing (if any) will be included in our response. As part of the California Online Privacy Protection Act, all users of our Sites may make any changes to their information at any time by contacting us at info@watershedhealth.com.

Nevada. You may submit a verified request to us at info@watershedhealth.com to request that we not make any sale (as defined under Nevada law) of any covered information (as defined under Nevada law) that we have collected or will collect about you. Please provide your name and contact information in your request, and we will respond to your request in accordance with Nevada law.

THIRD-PARTY SITES AND SERVICES

This Policy only applies to the Site. It does not apply to any websites, applications, or services from third parties.

The Site may include links to, or content from, third parties. These links are to external resources and third parties that have their own privacy policies. It may not always be clear which links are to external, third-party resources. If you click on a third-party link, you will be redirected away from the Site. You can check the URL to confirm whether you have left the Site.

We cannot and do not (1) guarantee the privacy or security practices of third parties or any content provided by third parties; (2) control third parties' collection or use of your information; or (3) endorse any third-party information, products, services, applications, or websites.

Any information provided by you or collected from you by a third party will be governed by that party's privacy policy and terms of use. You should review their privacy policy and terms of use carefully.

CHILDREN'S ONLINE PRIVACY PROTECTION ACT COMPLIANCE

Our Site and services are not directed to children under the age of 13, and we do not knowingly collect information from children under the age of 13. No one under the age of 13 may access, browse, or use the Site or provide any information to us. If we learn that we have collected or received personal information from a child under the age of 13 without a parent's or legal guardian's consent, we will take steps to stop collecting that information and to delete it. If you believe we have any received information from a child under the age of 13, please contact us using the "Contact Us" details provided below.

For more information about Children's Online Privacy Protection Act, please visit the Federal Trade Commission's website at: <https://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/childrens-online-privacy-protection-rule>.

UPDATES AND CHANGES TO THIS POLICY

We may update this Policy from time to time. If we change this Policy, we will post the revised version on our Site. Any changes, updates, and modifications will be effective immediately upon posting. If we make material changes, we may also notify you through a notice on the Site's homepage, and/or we may send you an email regarding the updates.

You should read this Policy carefully before using the Site, and you should review it from time to time so that you are aware of its current terms. Your continued use of the Site after the “Last Updated” date will constitute your acceptance of and agreement to any changes and to our collection, use, and sharing of your information according to the then-current Policy. If you do not agree with this Policy, you should not use the Site.

CONTACT US

For more information, or if you have any questions or concerns regarding this Privacy Policy, you may contact us using the information below, and we will do our best to assist you. Please note, if your communication is sensitive, you may wish to contact us by postal mail.

In Writing: Watershed Health | ATTN: LEGAL | 800 W Commerce Rd, Suite 120 | New Orleans, LA 70123

By Email: info@watershedhealth.com