

SEDERA PRIVACY POLICY

INTRODUCTION

Welcome to Sedera! At Sedera, your privacy is a top priority and we work hard to keep your information private and secure. This Privacy Policy outlines the types of Sensitive Information that Sedera, Inc. (“Sedera”), collects through its website, mobile applications, services, and third-party partners.

Sedera does not rent or sell your information to anyone. If you have any questions or concerns, or if you believe that Sedera has failed to follow this Privacy Policy, please send us an email at privacy@sedera.com or contact us via mail as outlined below.

INFORMATION WE COLLECT

Sensitive Information. Sedera’s business operations necessarily involve the collection of Sensitive Information regarding, potential members, participating members (“Member” or “Members”) and/or sponsoring entities (“Sponsoring Entities”) (collectively “Participants”). The Sensitive Information Sedera collects can be divided into three main categories:

- 1) **Participant Identifying Information (“PII”).** PII includes, but is not limited to, names, dates of birth, government-issued identification numbers, address, telephone numbers, email address, driver’s license numbers, and unique Member identification numbers.
- 2) **Participant Medical Information (“PMI”).** PMI includes, but is not limited to, information related to the physical health, mental health, or condition of Participants, the provision of health care to the Participants, or payment for sharing of medical expenses to the Participants.
- 3) **Participant Banking Information (“PBI”).** PBI includes, but is not limited to, financial institution information, bank account numbers, routing numbers, credit card information, security codes, access codes, passwords or certain account information.

PII, PMI, and PBI are collectively referred to as “Sensitive Information.”

Visitor Information. Sedera collect various types of anonymous information about visitors to our website including, but not limited to, device-relate information (including browser type and IP address), server log information (including the date and time of your visit and browsing activity). Sedera also collects information that you provide through forms on our website including requests for information and engaging in our registration process. Sedera uses this information to better understand our visitors, provide services and information you request, and to enhance our services and use experience.

Participant Information. When Participants choose to participate in medical cost sharing through Sedera, we will also collect Sensitive Information as discussed above. If you choose to link a bank account with Sedera, setup direct deposit, provide credit card information, or engage in direct banking/financial transaction with us, Sedera and its partners will collect PBI. You acknowledge and agree that information you provide to Sedera through Dwolla will be treated by Dwolla in accordance with its respective privacy policy (located at <https://www.dwolla.com/legal/privacy/>) and by Sedera according to this Privacy Policy.

Cookies and Pixels. Sedera uses cookies and/or pixels to customize Sedera and improve your overall experience with our site and services. Sedera may store some personal information in a cookie and/or pixel. Cookies, pixels, and other similar technologies are not required for site functionality. You are not required to accept any cookies or pixels to access/use Sedera's website.

Analytics Services. Sedera uses third party analytics tools, such as Google Analytics to collect information about the usage of our site. The Analytics Services collect certain information about users including how often users visit this site, what pages they visit when they do, and what other sites they visited prior to coming to our site. We use the information provided by these Analytics Service to improve this site. You can prevent Google Analytics from recognizing you on return visits to our site by disabling cookies or you can opt-out of Google Analytics by installing Google Analytics Opt-out Browser Add-on.

HOW WE MAY USE OR DISCLOSE YOUR SENSITIVE INFORMATION

General Rule. As a general rule, we do not disclose your Sensitive Information without your authorization except for the following circumstances:

For Reimbursement/Payment. When and as appropriate, we may use and disclose Sensitive Information about you to determine eligibility for needs sharing participation, to facilitate/determine reimbursement/payment for treatment and services you receive from health care providers, to determine whether an individual need is shareable, or to coordinate your need sharing in accordance with our Guidelines.

For Sharing the Cost of Treatment. When and as appropriate, we may use or disclose your Sensitive Information to facilitate your medical treatment or services by medical providers. We may disclose Sensitive Information about you to health care providers who are involved in taking care of you.

For Health Sharing Facilitation/Operations. When and as appropriate, we may use and disclose your Sensitive Information for health sharing facilitation/operations.

Disclosure to People Involved with Your Care. We may disclose Sensitive Information about you or your dependents to people involved in your or your dependent's care or payment for that care.

Disclosure to Sponsoring Entity. We may disclose PII or summary PMI to your Sponsoring Entity.

Workers' Compensation. We may use or disclose Sensitive Information about you for workers' compensation or similar programs when necessary to comply with workers' compensation or similar program laws.

To Comply with the Law. We may use or disclose Sensitive Information about you when required to do so by federal, state, or local law.

To Avoid a Serious Threat to Health or Safety. We may use or disclose your Sensitive Information when necessary to prevent a threat to you, another person, or the public.

For Judicial or Administrative Proceeding. We may use or disclose your Sensitive Information in a judicial or administrative proceeding or in response to a court order, search warrant or subpoena.

For Reporting Victims of Abuse, Neglect or Domestic Violence. We may disclose Sensitive Information to the governmental authorities authorized by law to receive such information in the case of actual or suspected abuse, neglect or domestic violence.

Military and Veterans. If you are a member of the armed forces, we may release Sensitive Information about you as required by military command authorities.

To Secure Vendors/Service Providers. We may disclose your Sensitive Information to our secure vendors/service providers that perform functions on our behalf or provide us with services if the information is necessary for such functions or services.

Other Uses. If you are an organ donor, we may release your Sensitive Information to organizations that handle organ procurement or organ, eye, or tissue transplantation or to an organ donation bank, as necessary to facilitate organ or tissue donation and transplantation. Sedera may release your Sensitive Information to a coroner or medical examiner. If you are an inmate of a correction institution or under the custody of a law enforcement official, we may release your Sensitive Information to the correctional institution or law enforcement official.

Uses and Disclosure with Written Authorization. Sedera will generally not disclose your Sensitive Information for any purpose not described in this Privacy Policy or the Guidelines without your written authorization. Furthermore, certain federal or state laws may impose a stricter privacy standard for certain Sensitive Information. If the laws are not preempted, Sedera will comply with the stricter law.

YOUR RIGHTS CONCERNING CERTAIN SENSITIVE INFORMATION

Right to Inspect and Copy Sensitive Information. You have the right to inspect and obtain a copy of your Sensitive Information that may be used to make decisions about your medical cost sharing. Upon written request by the Member, Sedera will make electronic records of Sensitive Information available within fifteen (15) days, and written records within (30) days. If a written copy is requested, a reasonable fee for the costs of copying, mailing, or other supplies associated with the request will be charged. In certain limited circumstances related to the wellbeing of the Member, the request may be denied. If you are denied access to your PMI, you may request that the denial be reviewed by submitting a written request to Sedera as described below.

Right to Request Amendment of Sensitive Information. If you feel that Sensitive Information about you is incorrect or incomplete, you may ask Sedera to amend the information. Your request must be in writing and must provide the reasons for the requested amendment. Sedera will communicate any approval or denial of an amendment of Sensitive Information. If Sedera denies your request, you will be permitted to submit a statement of disagreement for inclusion in your records.

Right to Receive an Accounting of Certain Disclosures. You have the right to request an accounting of certain Sensitive Information disclosures made during the six years prior to your request. This accounting does not include: (i) disclosures of information made for reimbursement/payment, sharing the cost of treatment, health sharing facilitation/operation; (ii) disclosure made to you or pursuant to an authorization; (iii) incidental to other permitted disclosures; (iv) to correctional institution or law enforcement; or (v) other disclosures for which federal law does not require an accounting. To request this accounting, the Member must submit a request in writing to Sedera.

Right to Ask to Restrict the Use of Sensitive Information. You have a right to request a restriction of uses and disclosures of your Sensitive Information. You also have the right to restrict communication of their Sensitive Information if you inform Sedera at privacy@sedera.com that the communicating the information may endanger you. Requests will be deemed unreasonable if they limit the access and use that is necessary for facilitating medical cost sharing. There may also be policies on dependent access that authorizes your dependents to request certain restrictions. Please note that while we will try and honor your request, we are not required to agree to any restriction.

Right to Request Alternative Communication Means or Locations. Participants may request to receive communications concerning their Sensitive Information by alternative means or at alternative locations. For example, Participants may ask to be called only at work rather than at home. We will accommodate reasonable requests where a disclosure of all or part of Participants Sensitive Information otherwise could endanger the Participant. In certain circumstances we will accept your verbal request to received alternative communications, however, we may also require Participant to confirm your request in writing. All requests to modify or cancel a previous request for alternative communications must be in writing.

Right to Notification. You have the right to be notified in the event that Sedera discovers a breach of your unsecured PMI.

Right to Receive a Copy of this Privacy Policy. A copy of this Privacy Policy will be posted on the Sedera website. You are entitled to receive a paper copy of this Privacy Policy upon reasonable request.

OTHER KEY PRIVACY INFORMATION

Former Participants. If you are a former Participant in Sedera, these policies apply to you and we treat your information with the same care as the information of our current Participants.

Acceptance of This Privacy Policy. By using and/or continuing to use the Sedera website, mobile application, or services, and/or the services of our partners, or providing us with Sensitive Information you agree to the terms and conditions of this Privacy Policy and any update hereto. This policy may change from time to time and supersedes any early version. Our Guidelines take precedence over any conflicting privacy policy provision.

Changes to the Privacy Policy. Sedera may modify this Privacy Policy without prior notice by posting a new version of this privacy policy, which is your responsibility to review. Any changes to the Privacy Policy will be reflected on this page and will become effective immediately upon posting. Sedera encourages you to periodically review this privacy policy to stay informed about how we are protecting the Sensitive Information that we collect. When material changes occur, we will do our best to notify Participants via email or through a notification on our site or mobile application.

Complaints. If you believe Sedera has violated this Privacy Policy or that your privacy has been violated, you can file a complaint in writing at the address listed below or by sending an email to privacy@sedera.com. Sedera will not retaliate against you for filing a complaint.

Usage by Children. Sedera's services are not directed toward anyone under the age of 18. If a parent or guardian determines that his or her child has created an account with Sedera and provided us with Sensitive Information, please contact us as outlined below.

Questions. If you have any question on our Privacy Policy or need to provide written notice, please contact us at:

Via Email at: privacy@sedera.com

Via Mail at:

Attention: General Counsel
Sedera, Inc.
7171 Southwest Parkway

Building 300. Suite 350
Austin, TX 78735

PRIVACY POLICY LAST UPDATED: December 1st, 2018