

1. Introduction

Jubel, LLC (us, we, or “Jubel”) is committed to protecting the private information of our customers, visitors, and other users of JubelHealth.com (the “Site”) and related websites, applications, services and mobile applications provided by Jubel and on/in which this Privacy Policy is posted or referenced, including as referenced in the applicable Terms and Conditions for each of the foregoing (collectively, the “Services”). Your use of the Services is governed by this Privacy Policy and by the Jubel Terms and Conditions. We may provide additional or supplemental policies to individuals for specific products or services we offer at the time we collect personal information. These supplemental policies will govern how we may process the information in the context of the specific product or service.

BY USING THE SERVICES, YOU AGREE TO THE PRACTICES AND POLICIES OUTLINED IN THIS PRIVACY POLICY AND YOU HEREBY CONSENT TO THE COLLECTION, USE, AND SHARING OF YOUR INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY, YOU CANNOT USE THE SERVICES.

This Privacy Policy does not apply to any other website or digital service that you may be able to access through the Services or any website or digital services of Jubel’s business partners, each of which may have data collection, storage and use practices and policies that may differ from this Privacy Policy. We encourage you to review the privacy statements of websites you choose to link to from the Services so that you can understand how those websites collect, use and share your information.

2. Information We Collect

2.1. Personal Information Generally

When you access the Services, we will ask you to provide us certain information that personally identifies you, or the individual for whom you are using this Application, or could be used to personally identify you or the individual for whom you are using this Application, or that you provide to create profiles for additional users who you intend to invite (“users”) to use your Application (“Personal Information”). Personal Information about you, or others, or your users may include: (i) contact data (such as name, e-mail address and phone number); (ii) demographic data (such as gender, date of birth and zip code); (iii) insurance data (such as insurance carrier, insurance plan, member ID, group ID and payer ID); (iv) medical data (such as the doctors, dentists, pharmacies or other healthcare specialists, professionals, providers, or organizations (collectively, “Healthcare Providers”) visited, reasons for visit, medical history, and other medical and health information you choose to share with us); and (v) other identifying information that you choose to provide to us including, without limitation, unique identifiers such as passwords. You may still access and use some of the Services if you choose not to provide

us with any Personal Information, but features of the Services that require your and your users' Personal Information will not be accessible to you.

2.2. PHI

We may create, collect, receive, maintain or transmit information between you and us that is considered protected health information as defined under the Health Insurance Portability and Accountability Act of 1996 as amended from time to time including Sections 13400 through 13424 of the Health Information Technology for Economic Clinical Health Act and the corresponding Standards for Privacy of Individually Identifiable Health Information, Security Standards and Notification in Case of Breach of Unsecured Protected Health Information (collectively, ("HIPAA")). HIPAA defines such information as "PHI". You can learn more about HIPAA at <http://www.hhs.gov/ocr/privacy/>. Jubel is not required to comply with HIPAA.

3. How We Collect Information

We collect information (including Personal Information and Traffic Data) when you use and interact with the Services, and in some cases from third party sources. Such means of collection include:

- When you voluntarily provide information in free-form text boxes through the Services or through responses to surveys, questionnaires and the like;
- If you download and install certain applications and software we make available, we may receive and collect information transmitted from your computing device for the purpose of providing you the relevant Services, such as information regarding when you are logged on and available to receive updates or alert notices; and
- Through cookies, web beacons, website analytics services and other tracking technology (collectively, "Tracking Tools"), as described below.

4.1. Use of Cookies

Jubel may use "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. One of the primary purposes of cookies is to provide convenience features to save you time. For example, if you personalize a web page, or navigate within a site, a cookie helps the site to recall your specific information on subsequent visits.

We may automatically collect certain data when you use the Services, such as (i) IP address; (ii) type of device(s) used to access the Services; (iii) web browser(s) used to access the Services; and (iv) other statistics and information associated with the interaction between your browser or device and the Services (collectively "Traffic Data").

4.2. Use of Web Beacons or GIF Files

Jubel's websites or mobile sites may contain electronic images know as web beacons – sometimes also called single-pixel gifs – that allow us to count users who have visited the Application or website to deliver services. We may also include web beacons in promotional email messages or newsletters in order to determine whether messages have been opened and acted upon.

4.3. Options for Opting out of Cookies and Mobile Device Identifiers

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of Jubel's services or websites you visit.

You have the right, at any time, to review and/or modify any of your personal information that you provided during registration, or any other voluntarily provided information. We respect your privacy and give you an opportunity to opt-out of receiving announcements of certain information. Users may opt-out of receiving any or all communications from Jubel by contacting us at support@jubelhealth.com. To protect your confidentiality, we can only send a requested profile to the email address listed in the profile. In any event, for legal compliance purposes, we may retain information about you in a legal archive until such time as we no longer have legal obligations for such information. Our back-up files will maintain copies of your personal information until we complete normal operational overwriting of such files, but no longer than 90 days from the date your information was removed from our primary files pursuant to your request. We reserve the right to contact former users from time to time.

5. Use of Personal Information

Jubel may keep track of the screens, views, and actions that our users take when they use the Services in order to determine what Jubel services are the most popular. This data is used to deliver customized content within the Services to users whose behavior indicates that they are interested in a particular subject area.

In addition, we also use information, including Personal Information, to provide the Services and to help improve the Services. Such use may include:

- Providing you with the products, services and information you request;
- Contacting you when necessary or requested;
- Combining information received from third parties with information that we have from or about you and use the combined information for any of the purposes described in this Privacy Policy;
- Using statistical information that we may collect as permitted by law, including from third parties in connection with their commercial and marketing efforts; and
- Fulfilling our legally required obligations, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.

6. Disclosure of Personal Information

In certain circumstances, and in order to perform the Services, we may disclose certain information that we collect from you. We may share your Personal Information and Traffic Data with our partners who perform operational services (such as hosting, billing, fulfillment, data storage, security, insurance verification or website analytics) and/or who make certain services, features or functionality available to our users. In every circumstance in which we share or disclose Personal Information to such partners, we will require each such partner to sign an agreement that limits their use of Personal Information to only those uses that enable us to provide the services to you as set forth in this Privacy Policy and in which they commit to protect the Personal Information in the same manner as we commit to protect it in this Privacy Policy.

In addition, we may also disclose your Personal Information to the extent necessary or appropriate to government agencies, advisors and other third parties in order to comply with applicable laws, the service of legal process, or if we reasonably believe such action is necessary to: (i) respond to a court order or request from a federal or state regulatory authority or to comply with any law or regulation requiring such disclosure; (ii) protect and defend the rights or property of Jubel; (iii) prevent or aid in the investigation of a crime or protect national security; or (iv) act under exigent circumstances to protect the personal safety of users of Jubel's services or the public).

We may also disclose your Personal Information in connection with an audit of our books and records, a merger, reorganization, dissolution, liquidation, or sale of some or all of our assets, stock or business.

We do not sell, rent or lease our customer lists to third parties.

7. Security of Personal Information

The security of your personal information is important to us. Jubel employs a number of organizational, technical and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and Jubel cannot guarantee the security of your personal information.

8. Children Under Sixteen

Jubel does not knowingly collect Personal Information from children under the age of 13. If you are under the age of 16, you must ask your parent or guardian for permission to use the Services. If we become aware that a user under the age of 16 has registered or is attempting to register, we will notify the user that the user is not eligible for registration. We will then expunge any related Personal Information from our records.

10. Changes to this Policy

Jubel will occasionally update this Privacy Policy to reflect company and customer feedback, changes in the law, or other updates. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service. We may also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via e-mail (if you have an account where we have your contact information) or another manner through the Services.

Any modifications to this Privacy Policy will be effective upon our posting the new terms and/or upon implementation of the new changes on the Services (or as otherwise indicated at the time of posting). We encourage you to periodically review this Privacy Policy to be informed of how Jubel is protecting your information. Your continued access of the Services constitutes your agreement to this Privacy Policy and any updates or revisions.

11. California Privacy Rights

California Civil Code Section 1798.83 permits users of the Services who are California residents to request certain information regarding Jubel's disclosure of personally identifiable information to third parties for their direct marketing purposes. To make such a request, please write to us at: support@jubelhealth.com.

Jubel does not serve advertising on the Services.

12. Contact Information

Jubel welcomes your questions or comments regarding this Privacy Policy. Please direct any questions or comments about this Policy or privacy practices to support@jubelhealth.com.