

HWHC PRIVACY POLICY

Scope

This Privacy Policy describes how we handle your personal information in connection with your visits to the HWHC website (the “Site”) and your use of the Site. It also covers our treatment of any information about you that third parties share with us or that we share with third parties. Personal information is information about you that is personally identifiable, such as your name, address, email address, or telephone number, and that is not otherwise publicly available.

By accessing and using this Site, you are accepting and agreeing to be legally bound by this Privacy Policy and thus are expressly consenting to our collection, storage, use, transfer, analysis, and disclosure of your personal information as described in this Privacy Policy. It is important to read this Privacy Policy carefully.

Collection of Your Information

You can browse the public areas of the Site without telling us who you are or revealing any personal information about yourself. However, once you give us your personal information, you are no longer anonymous to us. If you choose to provide us with personal information, you consent to the transfer and storage of that information on our servers and/or the servers of our third-party host.

We may collect and store the following personal information:

- Your name, telephone number, email address, and address if provided to us through the Site;
- Transactional information based on your activities on the Site, such as content you submit to the Site;
- Correspondence through the Site, and any correspondence sent to us;
- Computer sign-on data, statistics on page views, and traffic to and from the Site;
- Other information, including IP addresses and standard web log information; and
- Information from third parties.

User Content

By default, all content posted or uploaded by a user to the Site (“User Content”) is public and published so that anyone can view it. You should assume that anything you post or upload to the Site is publicly accessible. Please keep in mind that anything you share with another user may be posted publicly by that user. User Content posted and shared publicly is accessible to everyone, including search engines, and you may lose any privacy rights you might have regarding such content. Additionally, information shared publicly may be copied and shared throughout the Internet.

Protected Health Information

The Site is not designed or equipped to collect, and does not desire to receive, protected health information. It is the Site's policy that no user may submit any protected health information, whether belonging to the user or others, to the Site. Further, your content may be without warning if you submit content which we reasonably believe, in our sole and absolute discretion, contains protected health information.

Use of Your Information

Our primary purpose in collecting personal information is to provide the Site and provide you with a smooth and efficient Site experience. You agree that we may use your personal information to:

- Provide, enhance, improve, and develop the Site;
- Resolve disputes and troubleshoot problems, including fighting spam, malware, and identity theft;
- Prevent potentially unsafe, prohibited, or illegal activities and enforce this Privacy Policy; and
- Measure and improve our services and the Site's content and layout, including by identifying popular content.

Use for Research Purposes

The Health Enhancement Research Organization ("HERO"), one of the managers and supporters of the Site, is a national non-profit organization focused on identifying and sharing best practices in the employee health management field for the purpose of improving the health and well-being of employees, retirees, and their families. In furtherance of HERO's purposes, we may use any information collected through the Site, including, but not limited to, your personal information and information provided through or derived from User Content, for research in the field of employee and community health management, such as aggregating examples of business-sponsored community health initiatives, success stories, and best practices. By using, and/or providing User Content to, the Site, you agree that we may use your personal information and information provided through or derived from User Content for HERO's research purposes.

Our Communications

You may occasionally receive emails and other communications from us, such as surveys, which you can opt-out of receiving. Additionally, we may use your personal information, including your name, email address, address, and telephone number, to respond to communications from you. We may also use your personal information to respond to your requests for additional information or updates related to the Healthy Workplaces Healthy Communities ("HWHC") initiative, the Site, content provided on the Site, and general information regarding employee and community health and well-being.

Disclosure of Your Information

Public Nature of User Content & Interactions with the Site

As noted above, User Content posted or uploaded to the Site is shared with the public. This kind of information can be seen by anyone and may be indexed by search engines. Thus, you should be careful about what you choose to disclose publicly and make sure that it is information you are willing, and permitted, to share with everyone.

Disclosure to Third-Party Service Providers

In some cases, we may share information that we collect, including, but not limited to, personal information, with third parties, such as service providers, consultants, and other agents (“Service Providers”), for the purpose of operating, enhancing, and improving the Site; developing new services; responding to communications from you; and responding to your requests for additional information or updates related to the HWHC initiative, the Site, content provided on the Site, and general information regarding employee and community health and well-being. For example, we may share information with such Service Providers in order to fight spam. Service Providers with whom we share such information for these reasons are generally bound by confidentiality obligations, and, unless we tell you differently, our Service Providers do not have any right to use information we share with them beyond the scope and duration of what is necessary to assist us.

Disclosure to Third Parties for Research Purposes

As described above, in furtherance of HERO’s purposes, we may use any information collected through the Site for research in the field of employee and community health management. In some cases, HERO may conduct such research by collaborating and working with third parties, and we may share any information that we collect through the Site, including, but not limited to, personal information and information provided through or derived from User Content, with such third parties for research purposes. By using, and/or providing User Content to, the Site, you agree that we may disclose your personal information and information provided through or derived from User Content to third parties for research in the field of employee and community health management.

Disclosure upon Your Request

Additionally, we may also share your personal information with third parties to whom you explicitly ask us to send your information.

Additional Disclosure Rights

We also reserve the right to access, preserve, and disclose any information, including, but not limited to, personal information, as we reasonably believe is necessary, in our sole and absolute discretion, to respond to legal requirements, including responding to law enforcement or other governmental officials in response to a verified request relating to a criminal investigation or alleged illegal activity. In such events, we may disclose information such as an email address, user history, content history, and other information requested by law enforcement. Similarly, we

reserve the right to access, preserve, and disclose any information as we reasonably believe is necessary, in our sole and absolute discretion, to enforce our policies, including this Privacy Policy, including investigation of potential violations of such policies; to detect, prevent, or otherwise address fraud, security, trust and safety, or technical issues; to respond to user support requests; to respond to claims that content violates the rights of others; or to protect the rights, property, health, or safety of ourselves, our users, any third parties, or the public in general.

We may share or disclose non-private information or other non-personally identifying information with people and entities that we do business or collaborate with.

Marketing

We do not sell or rent your personal information to third parties for their marketing purposes without your explicit consent. We may combine your information with information we collect from third parties, such as demographic data, to improve and personalize our services. If you do not wish to receive marketing communications from the Site, simply contact us at **HWHC@hero-health.org** and opt-out. Please note that even if you opt-out, we may still, at our option, contact you via email regarding Site information, including, without limitation, scheduled maintenance, changes in terms, enforcement of this Privacy Policy, and as otherwise described in this Privacy Policy.

Cookies

We use “cookies” (small files placed on your hard drive) on certain pages of the Site to help analyze our web page flow, customize our services, measure Site and promotional effectiveness, and promote trust and safety. We may set and access cookies on your computer. All users can access and delete cookies through their web browser settings.

A few important things you should know about cookies are that:

- We offer certain features that are only available through the use of cookies.
- We use cookies to help identify you.
- Most cookies are “session cookies,” meaning that they are automatically deleted from your hard drive at the end of a session.
- You are always free to decline our cookies if your browser permits, although doing so may interfere with your use of the Site.
- Other companies’ use of their cookies is subject to their own privacy policies, not this Privacy Policy. Other companies do not have access to our cookies.

Third Parties

This Privacy Policy addresses only the use and disclosure of information the Site collects from you or that third parties share with us. It does not apply to the practices of third parties that we do not own, control, employ, or manage, including, but not limited to, any third party websites, services, applications, or businesses (“Third Party Services”). Additionally, this Privacy Policy does not govern the practices of other users of the Site. If you disclose your information to others,

whether they are users or businesses on our site or other sites throughout the Internet, different rules may apply to their use or disclosure of the information you disclose to them. You acknowledge that if you provide information to third parties, that information will be subject to the privacy policies of those third parties, which may differ from this Privacy Policy. We are not responsible for the content or privacy policies of other users or Third Party Services, and we encourage you to ask questions before disclosing your personal information to others.

Children

We are very sensitive to children's privacy issues. We encourage parents and guardians to supervise their children's online activities and consider using parental control tools available from online services and software manufacturers. These tools can prevent children from disclosing their name, address, and other personal information online without parental consent.

It is the Site's policy that no individual under the age of 13 may submit any personal information to the Site, including, for example, a name, address, telephone number, or email address. Further, your content may be deleted without warning if we believe that you are under 13 years of age, if we believe that you are under 18 years of age and you represent your age as 18 or older, or if we believe you are over 18 and you represent yourself as under 18.

Security

Third parties may unlawfully intercept or access transmissions or private communications. Therefore, although we work very hard to protect your privacy, we cannot guarantee the security of information or that your personal information or private communications will always remain private. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of user information at any time.

No Spam or Spoofing

To report Site-related spam or spoof emails to the Site, please forward the email to **HWHC@hero-health.org**. You may not use the Site to send spam.

Changes to the Privacy Policy

We may amend this Privacy Policy at any time by posting the amended Privacy Policy on the Site. All amended terms automatically take effect after they are initially posted on the Site, unless a change in any applicable law requires immediate amendment. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

Questions & Concerns

If you have any questions or concerns regarding this Privacy Policy, please contact us at: **HWHC@hero-health.org**.