



# HEALTH DATA ANALYTICS INSTITUTE

## Health Data Analytics Institute, Inc. Privacy Policy

Effective: August 8, 2023

### Introduction

This Privacy Policy (“Policy”) describes how Health Data Analytics Institute, Inc. (“HDAI,” “we,” “our,” “us”) collects, uses, and discloses certain personal information obtained through our website (“Website”), which is located at <https://www.hda-institute.com>, as well as information that we process as part of offering you our services (collectively with the Website, the “Services”). By using the Services, you are agreeing to the terms of this Policy.

HDAI does not sell the personal information that you provide us when you contact us. We are committed to being transparent about our privacy practices and will continue to update this Privacy Policy as necessary.

### What Information We Collect and Maintain About You

We collect personal and other information from you directly when you provide it to us through the Website. We also automatically collect certain information about you and your computer, smartphone, or other device when you use, access, or interact with the Services. We may also collect information from third parties in relation to providing you the Services.

***Other personal information collected through the Website.*** You can visit the Website without submitting any information that we can use to identify you personally. However, to use certain features, such as the “Contact us” and “Request a Demo” features, you will be required to provide personal information. Such information could include, for example, your name, email address, organization name, organization industry, job title, phone number and country.

***Web log data.*** When you use the Website, we automatically receive and record certain information from your device and your browser. This may include such data as your IP address and domain name, the pages you visit on the Website, information about your activity on a page, the date and time of your visit, the files that you download, the URLs from the websites you visit before and after navigating to the Website, your software and hardware attributes (including device IDs), your general geographic location (e.g., your city, state, or metropolitan region), and certain cookie information (see below). To obtain such information, we may use web logs or applications that recognize your computer (or other device) and gather information about its online activity.

***Cookies.*** We use cookies on the Website. Cookies are small files that are stored on your computer (or other device) by your web browser. A cookie allows the Website to recognize whether you have visited before and may store user preferences and other information. For example, cookies can be used to collect or store information about your use of the Website during your current session and over time (including the pages you view and the files you download), your computer’s or device’s operating system and browser type, your Internet service provider, your domain name and IP address, your general geographic location, the website that you visited before visiting the Website, and the link you used to leave the Website. If you are concerned about having cookies on your computer, you can set your browser to refuse all cookies or to indicate when a cookie is

being set, allowing you to decide whether to accept it. You can also delete cookies from your computer or device. However, if you choose to block or delete cookies, certain features of the Website may not operate correctly.

**Web beacons.** The Website or the emails that you receive from HDAI may use an application known as a “web beacon” (also known as a “clear gif” or “web bug”). A web beacon is an electronic file that usually consists of a single-pixel image. It can be embedded in a web page or in an email to transmit information, which could include personal information. For example, it can allow an email sender to determine whether a user has opened a particular email.

**Third-party online tracking and behavioral advertising.** We may partner with certain third parties to collect, analyze, and use the personal and other information described in this section. For example, we may allow third parties to set cookies or use web beacons on the Website or in email communications from us. This information may be used for a variety of purposes, including online interest-based advertising, as discussed below (see the section entitled “With Whom and Why We Share Your Information”).

## **How We Use and Process Your Information**

We use the information that we collect for a variety of purposes. Our legal bases for processing your personal information are: 1) our legitimate interest in running and maintaining our business; 2) performance and fulfillment of our contracts; 3) your consent; and 4) compliance with our legal obligations. In many instances, more than one of these legal bases apply to the processing of your personal information.

The purposes for which we use your information include to:

- Provide you with the Services;
- Respond to your questions or requests concerning the Services;
- Send you information about the Services and other topics that are likely to be of interest to you, including newsletters, updates, or other communications, including promotional emails;
- Deliver confirmations, account information, notifications, and similar operational communications including service announcements;
- Improve your user experience and the quality of our products and Services;
- Comply with legal and/or regulatory requirements;
- Aggregate and deidentify information;
- Serve advertisements;
- Analyze how visitors use the Services and various Services features, including to count and recognize visitors to the Services;
- Create new products and Services; and
- Manage our business.

We may link information gathered through the Website with information that we collect in other contexts. But in that event, we will handle the combined information in a manner consistent with this Policy.



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## With Whom and Why We Share Your Information

We share your information with other parties for a variety of purposes, as described below.

***Third-party service providers.*** HDAI uses third-party service providers that perform services on our behalf, including web-hosting companies, mailing vendors, and analytics providers. These service providers may collect and/or use your information, including information that identifies you personally, to assist us in achieving the purposes discussed above.

***Business transfers.*** We may choose to sell our company or certain of our assets. In these types of transactions, customer information, including personal information about customers, is typically one of the business assets that are transferred.

***Analytics.*** We partner with certain third parties to obtain the automatically collected information discussed above and to engage in analysis, auditing, research, and reporting. These third parties may use web logs or web beacons, and they may set and access cookies on your computer or other device. In particular, the Website uses [Google Analytics](#) to help collect and analyze certain information for the purposes discussed above. You may opt out of the use of cookies by Google Analytics [here](#).

***Interest-based advertising.*** The Website also enables third-party tracking mechanisms to collect information about you and your computing devices for use in online interest-based advertising. For example, third parties may use the fact that you visited our Website to target online ads to you. In addition, our third-party advertising networks might use information about your use of our Website to help target advertisements based on your online activity in general. For information about interest-based advertising practices, including privacy and confidentiality, visit the [Network Advertising Initiative](#) website or the [Digital Advertising Alliance](#) website.

The use of online tracking mechanisms by third parties is subject to those third parties' privacy policies, and not this Policy. If you prefer to prevent third parties from setting and accessing cookies on your computer or other device, you may set your browser to block cookies. Additionally, you may remove yourself from the targeted advertising of companies within the Network Advertising Initiative by opting out [here](#), or of companies participating in the Digital Advertising Alliance by opting out [here](#). Our Website currently does not respond to "Do Not Track" signals.

***Legal purposes.*** We may use or share your information with third parties when we believe, in our sole discretion, that doing so is necessary:

- To comply with applicable law or a court order, subpoena, or other legal process;
- To investigate, prevent, or take action regarding illegal activities, suspected fraud, violations of our terms and conditions, or situations involving threats to our property or the property or physical safety of any person or third party;
- To establish, protect, or exercise our legal rights or defend against legal claims; or
- To facilitate the financing, securitization, insuring, sale, assignment, bankruptcy, or other disposal of all or part of our business or assets.



***Aggregated and de-identified information.*** From time to time, HDAI may share aggregated or de-identified information about users. We may, for example, share de-identified information with health providers, government agencies, and insurers to administer certain services to or on your behalf. Such aggregated information will not identify you personally.

## **Your Privacy Rights**

If you want to learn more about the personal information that HDAI has about you, or you would like to update, change, or delete that information, please contact us by email at [info@hda-institute.com](mailto:info@hda-institute.com).

You may opt out of receiving marketing emails from us by following the instructions in those emails or by emailing us at [info@hda-institute.com](mailto:info@hda-institute.com).

If you are a resident of a jurisdiction with an applicable data privacy law, you may have certain rights available to you in relation to your personal information. These rights may include:

- The right to be informed about our data collection practices;
- The right to access and correct your data;
- The right to erase or delete your data;
- The right to data portability;
- The right to opt out of the sale or sharing of your information;
- The right to opt out of targeted advertising;
- The right to opt-out of marketing emails and text messages;
- The right to limit our use of any automated decision-making processes; and
- The right to withdraw consent (to the extent applicable).

To exercise any of the rights listed above, please contact us via email at [info@hda-institute.com](mailto:info@hda-institute.com). We will respond to your request as soon as reasonably possible and within the timeframe required under applicable law. Prior to complying with your request, we will first verify your identity by comparing the information you provide with the information we have on file for you.

Additionally, you may authorize an agent to make a request on your behalf. To designate an agent, please provide a written and signed document by both you and the agent that authorizes the agent to act on your behalf. You may also use a power of attorney. We will still require you to provide information to allow us to reasonably verify that you are the person about whom we collected personal information.

## **External Links**



This Website may contain links to third-party websites. If you use these links, you will leave the Website. We have not reviewed these third-party sites and do not control and are not responsible for any of these sites, their contents, or their privacy policies. Thus, we do not endorse or make any representations about them, or any information, software, or other products or materials found there, or any results that may be obtained from using them. If you decide to access any of the third-party sites listed on our website, you do so at your own risk.

### **Data Security**

We employ physical, technical, and administrative procedures to safeguard the personal information we collect online. However, no website is 100% secure, and we cannot ensure or warrant the security of any information you transmit to the Website or to us, and you transmit such information at your own risk.

### **Data Retention**

We retain personal information about you necessary to fulfill the purpose for which that information was collected or as required or permitted by law. We do not retain personal information longer than is necessary for us to achieve the purposes for which we collected it. When we destroy your personal information, we do so in a way that prevents that information from being restored or reconstructed.

### **International Users**

The information that we collect through or in connection with the Services is transferred to and processed in the United States for the purposes described above. HDAI may subcontract the processing of your data to, or otherwise share your data with, affiliates or third parties in the United States or countries other than your country of residence. The data protection laws in these countries may be different from, and less stringent than, those in your country of residence. By using the Services or by providing any personal or other information to us, you expressly consent to such transfer and processing.

### **Children**

Content on the Website is directed at individuals over the age of 18 and is not directed at children under the age of 13. We do not knowingly collect personally identifiable information from children under the age of 13. If you have reason to believe that a child under the age of 13 has provided personal information to us, please contact us, and we will endeavor to delete that information from our databases.

### **Changes to this Policy**

We may make changes to the Services in the future and as a consequence will need to revise this Policy to reflect those changes. We will post all such changes on the Website, so you should review this page periodically. If we make a material change to the Policy, you will be provided with appropriate notice.

### **How to Contact Us**



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Should you have any questions or concerns about this Policy, you can contact us at [info@hda-institute.com](mailto:info@hda-institute.com).