

**SPH Analytics (“SPHA” or “we”)** is a global technology and information service provider to the healthcare industry. SPHA is committed to preserving the privacy and security of the data and information of all users that is transmitted via this website <http://www.symphonyph.com> with its associated web pages (“website”). We have created this website Privacy and Security Policy (“Policy”) to disclose SPHA’s personal information gathering and dissemination practices for the website. This website allows users (“you”) to learn more about our products and services. The provisions of this Policy apply only to information collected via the website. Other privacy policies may apply to information that you provide us outside the website. Further, healthcare providers and health benefits organizations who are authorized through a customer registration process (“Registered Users”) have restricted portal access through the website to certain online services and such portal will further describe the gathering and dissemination practices related to SPHA’s business operations provided through the restricted portal.

#### **Users Outside the United States.**

We make the website available for users located exclusively in the United States of America. Please do not use the website if you are located outside the United States, as this website’s personal information practices and the terms of this Policy may or may not comply with foreign laws.

#### **Types of Information Collected**

**IP Address.** We gather your IP address when you use the website. We use IP addresses for diagnostic and statistical purposes and to administer the website.

**Cookies.** We may also use “cookies” to store your preferences in order to make your use of the website more productive. Cookies are small files created by websites that reside on your computer’s hard drive and store information about your use of a particular website. We also use cookies to track the usage of our website in order to enhance your use of the website. If you do not accept cookies from the domain <http://www.symphonyph.com> you may not be able to access certain portions of the website.

**To Contact You.** Using your contact information, we may also send you e-mail messages under the following circumstances, among others:

- to respond to an inquiry or request for information;
- to thank you for contacting us;
- to explain new product offerings and features of our services;
- to notify you of special promotions; and
- to communicate with you regarding your use of the website.

Your contact information also may be available or provided to third-party service providers and contractors (such as the website webmaster) who are contractually obligated to protect your information as disclosed in this Policy. To maintain accurate records concerning communications that we may have received from or sent to you, SPHA also may indefinitely store any information that you provide through the website.



### Your Information May Be Used and Disclosed

**Aggregated Information.** We may share certain aggregated demographic information with our business partners regarding the users of the website. The aggregated information that we provide is not directly linked to any personally identifiable information.

**Internal Use.** We will share your personally identifiable information within our business for the purposes of furthering our business, including analyzing your information and other uses.

**Protective Actions.** We may use and disclose your personally identifiable information to the extent reasonably necessary to:

- Correct technical problems and malfunctions in how we provide our products and services to you and to technically process your information
- Protect the security and integrity of the website and our Internet service, including without limitation, to enforce the website terms and conditions
- Protect our rights and property and the rights and property of others
- Take precautions against liability
- Respond to claims that your information violates the rights and interests of third parties
- The extent required by law or to respond to judicial process
- The extent permitted under other provisions of law, to provide personal information to law enforcement agencies or for an investigation on a matter related to public safety.

You understand and agree that technical processing of your information is and may be required to:

- Send and receive messages regarding your use of the website
- Conform to the technical requirements of connecting networks
- Conform to the limitations of our service
- Conform to other, similar technical requirements.

**Usage Tracking.** We may monitor your use of the website, including search terms entered, pages visited and documents viewed. This information may be stored with an IP address. SPHA uses this information solely to provide you with a personalized website experience. Aggregated forms of this data may also be used to help us understand areas for future research and to identify future features and functions to develop for the websites.

**Security Precautions.** We use industry-standard technology and equipment to protect data and information under our control from misuse, loss or alteration. We maintain security measures to allow only the appropriate personnel and contractors access to your information. Unfortunately, no system can ensure complete security, and SPHA and its affiliates disclaim any liability resulting from use of the website. If you have any questions about the security at our website, please send an e-mail to: [support@symphonyph.com](mailto:support@symphonyph.com)



**Notification of Changes to Policy.** We reserve the right to change our information collection, use and disclosure practices set forth in this Policy in response to changes in legal requirements or for other reasons. We will post any changes to this Policy on the website so our users and customers are always aware of the information we collect, use and disclose. If at any point we decide to use or disclose your personally identifiable information in a manner different from that stated at the time it was collected, we will notify you in writing, which may or may not be by e-mail. If you object to the change to our Policy, then you must contact us using the information provided in the notice. We will otherwise use and disclose a user's or a customer's personally identifiable information in accordance with the Policy that was in effect when such information was collected.

**Special Provisions for Registered Users.** SPHA receives health record information from healthcare providers and claims and reimbursement information from health benefits organizations, that contain individually identifiable health information regarding individual patients, referred to as "Protected Health Information" ("PHI") in the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). PHI is subject to special protections. SPHA has implemented programs to comply with the transaction standards and privacy and security requirements of HIPAA. SPHA will use and disclose PHI only in accordance with the applicable HIPAA requirements, and to provide its services to Registered Users pursuant to written services agreements and subject to the requirements of the service agreements and restrictions described within the restricted portal for Registered Users. All Registered Users are required to review the SPHA policies, procedures and practices related to the use and disclosure of PHI as described on the Registered Users restricted portal.

Access by Registered Users is controlled through comprehensive security measures, such as login authentication, and limiting access to only the data for which the user is authorized. SPHA also uses policies and procedures to ensure that hardware and software enhancements do not compromise data security, and to prevent, detect, contain and correct security breaches. Our security measures are designed to address physical, technical and security safeguards for electronic PHI. Use, access, transmission and disclosure of PHI shall be in accordance with applicable regulations and as set forth by the written service agreements and restrictions described on the Registered Users restricted portal.

**Questions About Our Web Privacy Policy.** If you have any questions about this Policy and/or the personal information practices of our website, please call our privacy and security representative at [support@symphonyph.com](mailto:support@symphonyph.com).