

## Privacy Policy

This Privacy Policy is incorporated by reference into Stay Strong's Terms of Use. The term "Stay Strong," "we," and "us" includes the Department of Veterans Affairs and our affiliates and subsidiaries. The Privacy Policy explains how the Stay Strong application may:

Collect, Use, and Disclose information we obtain through the "Stay Strong Service."

The "**Stay Strong Service**" means any mobile application or Internet services under Stay Strong's control, whether partial or otherwise, used in connection with providing its services. The Stay Strong Service provides a web and mobile platform for health and wellness education, management, and tracking so that individuals can connect and evaluate progress and goals through mobile consults and other offers.

"**Personal Information**" means information that alone or when in combination with other information may be used to readily identify, contact, or locate you. The Stay Strong app does not capture any personal information if you pair to the Fitbit account that was created for you by the VA Stay Strong team as instructed. We do not consider Personal Information to include information that has been anonymized so that it does not allow a third party to easily identify a specific individual.

"**Health-Related Information**" means all individually identifiable health information, including demographic information and information related to an individual's physical or mental health, the provision of health care to the individual, or the individual's payment for the provision of health care. We treat Health-Related Information as Personal Information.

## THE STAY STRONG SERVICE COLLECTS YOUR INFORMATION

We collect Personal Information when you:

- register to use the Stay Strong Service;
- use the Stay Strong Service;
- communicate with us.

We also collect information, such as anonymous usage statistics by using cookies, server logs, and other similar technology as you use the Stay Strong Service.

**Personal Information Collection.** You must register to use the Stay Strong Service. To register, you may provide Personal Information if you provide your real name as your username. You may also provide other optional information.

**Using the Stay Strong Service.** We collect the information, including Personal Information and Health-Related Information, you post through the Stay Strong Service. For example, when you enter information into a survey the Stay Strong Service will collect the information in such submissions, including any Health- Related Information.

**Customer Support.** Customer support is provided by the VA Stay Strong team via toll-free phone call at 1-800-753-3357 (option #3).

**Cookies, Automatic Data Collection, and Related Technologies.** The Stay Strong Service collects and stores information that is generated automatically as you use it, including your preferences and anonymous usage statistics.

When you visit the Stay Strong Service, we and our third-party service providers receive and record information on our server logs from your browser, including your IP address. If you are using a mobile device, we may also receive your mobile device id (UDID/IMEI), or another unique identifier, and mobile operating system.

By using the Stay Strong Service, you are authorizing us to gather, parse, and retain data related to the provision of the Stay Strong Service.

## **HOW STAY STRONG USES YOUR INFORMATION**

Through the Stay Strong application, the Principal Investigator (PI) and/or the research team members can access and use your past or present health information in addition to new health information they may collect for the study named above. The investigators of this study are committed to protecting your privacy and the confidentiality of information related to your health care. Please refer to your informed consent document for more details.

**Internal and Service-Related Usage.** We use information, including Personal Information, for internal and service-related purposes and may provide it to third parties to allow us to facilitate the Stay Strong Service. We may use and retain any data we collect to provide and improve our services. We may access, analyze, decompile and mine the data entered by you.

**Aggregate Data.** We may anonymize and aggregate data collected through the Stay Strong Service and use it for any purpose.

## **Stay Strong MAY DISCLOSE YOUR INFORMATION**

We may share your information:

- with our third-party service providers;
- with other Stay Strong Service users, such as coaches;
- to comply with legal obligations;
- to protect and defend our rights and property.

**We Use Vendors and Service Providers.** We may share some information we receive with vendors and service providers retained in connection with the provision of the Stay Strong Service.

**Displaying to Other Users.** At your direction, the Stay Strong Service may display information, including Health-Related Information, to other users, such as coaches. For example, if you permit a coach to view the contents of your monitoring history, the Stay Strong Service displays the information to that coach.

**Marketing.** We do not rent, sell, or share Personal Information about you with other people or nonaffiliated companies for their direct marketing purposes, unless we have your permission.

**As Required By Law and Similar Disclosures.** We may access, preserve, and disclose your Personal Information, other account information, and content if we believe doing so is required or appropriate to: comply with law enforcement requests and legal process, such as a court order or subpoena; respond to your requests; or protect yours', ours' or others' rights, property, or safety.

Please note, this Privacy Policy does not limit our use or disclosure of any non-Personal Information. We reserve the right to use and disclose such non-Personal Information, as well as any other non-Personal Information we collect, with our advertisers and other third parties at our discretion.

## **SECURITY**

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot guarantee, ensure, or warrant the security of any information, including any Personal Information and/or any Health-Related Information. We do not accept liability for unintentional disclosure and/or loss of any

information, including any Personal Information and/or any Health-Related Information. If we learn of a security system breach, we will notify the Stay Strong study team immediately and will notify you electronically by posting a notice on the Stay Strong Service. You may have a legal right to receive this notice in writing. To receive free written notice of a security breach please call the Stay Strong team at 1-800-753-3357 (option #3).

### **CHILDREN'S PRIVACY**

We do not knowingly collect, maintain, or use Personal Information from people under 18 years of age, and no part of the Stay Strong Service is directed to people under the age of 18. If you learn that anyone under the age of 18 for whom you are responsible has provided us with Personal Information without your consent, you may alert us by calling 1-800-753-3357 (option #3). If we learn that we have collected any Personal Information from anyone under 18, we will promptly take steps to delete such information.

### **INTERNATIONAL USERS**

By using the Stay Strong Service, you will transfer data to the United States. By choosing to visit the Stay Strong Service or otherwise provide information to us, you agree that any dispute over privacy or the terms contained in this Privacy Policy will be governed by the law of the Commonwealth of Virginia and the adjudication of any disputes arising in connection with Stay Strong or the Stay Strong Service will be in accordance with the Privacy policy. **If you are visiting from the European Union or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your information to the United States and processing globally. By providing your information you consent to any transfer and processing in accordance with this Privacy Policy.**

### **UPDATE YOUR INFORMATION OR POSE A QUESTION OR SUGGESTION**

If you would like to update or correct any information that you have provided to us through your use of the Stay Strong Service or otherwise, you may use the functionality of the Stay Strong Service to change or delete such information. If such functionality is insufficient or if you have suggestions for improving this Privacy Policy, please call 1-800-753-3357 (option #3).

### **CHANGES TO OUR PRIVACY POLICY AND PRACTICES**

We may revise this Privacy Policy, so review it periodically.

**Posting of Revised Privacy Policy.** We will post any adjustments to the Privacy Policy on this web page, and the revised version will be effective when it is posted. If you are concerned about how your information is used, bookmark this page and read this Privacy Policy periodically.

**New Uses of Personal Information.** From time to time, we may desire to use Personal Information for uses not previously disclosed in our Privacy Policy. If our practices change regarding previously collected Personal Information in a way that would be materially less restrictive than stated in the version of this Privacy Policy in effect at the time we collected the information, we will make reasonable efforts to provide notice and obtain consent to any such uses as may be required by law.

Attributions:

### **Link to GNU LESSER GENERAL PUBLIC LICENSE:**

<https://www.gnu.org/licenses/gpl.html>