**PRIVACY POLICY**

**Last Updated: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

We at Cohero Health, Inc. (“Cohero Health,” “we,” “us,” or “our”) have created this privacy policy (this “Privacy Policy”) because we know that you care about how information you provide to us is used and shared. This Privacy Policy relates to the information collection and use practices of Cohero Health in connection with our Services, which are made available to you through a variety of platforms, including, but not limited to, [www.coherohealth.com/](http://www.coherohealth.com/) (the “Site”) and our mobile app, which is accessible through tablets, smart phones, connected televisions, and other devices (the “App”). The Site and the App are collectively referred to as the “Platform.”

**Description of Users and Acceptance of Terms**

This Privacy Policy applies to visitors to the Site, who view only publicly-available content (“Visitors”), individuals who have signed up to use our Services (“Users”), and clinicians and health care providers who have signed up to use our Services (“Providers”).

By visiting our Site, Visitors are agreeing to the terms of this Privacy Policy and the accompanying Terms of Use.

By signing up, accessing, and/or using the Platform, each User and Provider is agreeing to the terms of this Privacy Policy and the accompanying Terms of Use.

Capitalized terms not defined in this Privacy Policy shall have the meaning set forth in our Terms of Use.

**The Information We Collect and/or Receive**

In the course of operating the Platform and/or providing the Services, we will collect (and/or receive) the following types of information. You authorize us to collect and/or receive such information.

1. Personal Information.

When you sign up to use the Services as a Provider or a User, you will be required to provide us with certain personal information about yourself, such as, your name, and e-mail address.

If you would like to use the App as a User, you will need to download the App from the Apple, Android or any other app store through which the App is made available to you. During the registration process, you will be asked to provide personal information about yourself, such as your first name, last name, and e-mail address.

Users may be able to link their Facebook or other social media account with the App. If you link your Facebook or any other social media account with the App, you are authorizing Cohero Health to collect, store, and use, in accordance with this Privacy Policy, any and all information that you agreed that Facebook, Inc., or such other social media company could provide to Cohero Health through its Application Programming Interface (“API”). Such information may include, without limitation, your first and last name, username, profile picture, unique social media identifier and access token, and e-mail address.

If you would like to know more about our company or are interested in trying our products, you will need to provide your name, e-mail address, and age.

All information we collect and/or receive under this section is collectively called “Personal Information.”

We do not collect any Personal Information from you when you use the Platform unless you provide us with the Personal Information voluntarily.

1. Health Information

When you sign up to use the App as a User, you will also be asked to provide us with background health information that relates to your past, present, or future physical or mental health or condition, including but not limited to, medications, medication schedule, medication usage history, and spirometry data (collectively, “Health Information”). We let you decide what information you want to share, with whom you want to share and how it will be used by selecting the appropriate privacy settings for your account. See below for additional information concerning your choices.

1. Geolocational Information

In order to provide certain features and functionality of the App, we may, with your consent, automatically collect geolocational information from your mobile device, your wireless carrier, or certain third-party service providers (“Geolocational Information”). Collection of such Geolocational Information occurs only when the App is running on your mobile device. You may decline to allow us to collect such Geolocational Information, in which case Cohero Health will not be able to provide certain features of the App to you.

1. Other Information.

In addition to information noted above, we may collect additional information (the “Other Information”). Such Other Information may include:

1. From Your Activity. Information that we automatically collect when you use the Platform, including, without limitation:

* IP addresses, browser type and language, referring and exit pages and URLs, date and time, amount of time spent on particular pages, what sections of the Platform you visit, etc.;
* Information about a mobile device, including universally unique ID (“UUID”), App type and version (e.g., iOS or Android), carrier and country location, hardware and processor information (storage, chip speed, camera resolution, NFC enabled, and network type (WiFi, 2G, 3G, 4G); and
* Activity and usage information occurring via the Platform, including tagging data, favorites, preferences, session lengths; and similar data.

1. From Cookies. We collect information using “cookie” technology. Cookies are small packets of data that a website stores on your computer’s or mobile device’s hard drive so that your computer will “remember” information about your visit. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to help us collect Other Information and to enhance your experience using the Platform. If you do not want us to place a cookie on your hard drive, you may be able to turn that feature off on your computer or mobile device. Please consult your Internet browser’s documentation for information on how to do this and how to delete persistent cookies. However, if you decide not to accept cookies from us, the Platform may not function properly.
2. Third Party Analytics. We use third-party analytics services (such as Google Analytics) to evaluate your use of the Platform, compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to the Platform and mobile and Internet usage. These third parties use cookies and other technologies to help analyze and provide us the data. By accessing and using the Platform, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy.

For more information on our third party analytics providers, including how to opt out from certain data collection, please visit the following links:

For Google Analytics, please visit: <https://www.google.com/analytics>

For Crashlytics, please visit: [insert link to Crashlytics privacy policy/opt-out policy]

Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Platform.

**Information Collected by or Through Third-Party Companies**

We may share Other Information about you with third parties for ad distribution and ad optimization (defined as the tailoring, targeting (i.e., behavioral, contextual, and retargeting), analyzing, managing, reporting, and optimizing of ads). These third parties may use cookies, pixel tags (also called web beacons or clear gifs), and/or other technologies to collect such Other Information for such purposes. Pixel tags enable us, and these third-parties, to recognize a browser’s cookie when a browser visits the site on which the pixel tag is located in order to learn which advertisement brings a user to a given site. You may opt-out of the tailoring of advertising based on information we collect. To learn more about the use of this information, or to choose not to have this information used by our providers or third party advertising partners by opting out, please visit the Network Advertising Initiative by clicking <http://www.networkadvertising.org/managing/opt_out.asp>.

**Treatment and Use of Health Information and Personal Information; Sharing Authorization**

The App provides Users with the ability to provide information to their Providers. Users’ provision of information to their Providers through the App may include Health Information and Personal Information. You (and not Cohero Health) are solely responsible for reviewing and approving any Providers before deciding whether to share your Health Information and Personal Information with such Providers.

As a User of the App, you hereby authorize Cohero Health to make the following disclosures and uses of your Health Information and Personal Information, in addition to the specific uses set forth in the “How We Use and Share the Information” section below:

* Cohero Health may disclose Health Information and Personal Information to those Providers to whom you have granted access to view your Health Information.
* Cohero Health may use Health Information and Personal Information as necessary in connection with the purposes described in the section below entitled “How We Use and Share Your Information.”

If you choose to share any of your Health Information through the App with any Provider, you acknowledge and agree that such information is made available to such Provider and use by such Provider is not subject to the terms of this Privacy Policy. Further, if the Providers that you authorize to receive your Health Information from Cohero Health are not subject to federal or state health information privacy laws, subsequent disclosure by such persons and entities may not be prohibited and/or protected by those laws. You may revoke all or part of the authorization granted to Cohero Health above in writing at any time by sending a signed and dated statement to Cohero Health as set forth in the “How to Contact Us” section below.

**How We Use and Share the Information**

You authorize us to use your Personal Information, Geolocational Information, and Other Information (collectively, the “Information”) to provide and improve our Platform and our Services; to solicit your feedback; and to inform you about our company, products and services and those of our third-party marketing partners.

You also authorize us to use and/or share your Information as described below.

* *Agents, Providers and Related Third Parties.* We may engage other companies and individuals to perform certain business-related functions on our behalf. Examples may include providing technical assistance, order fulfillment, customer service, and marketing assistance. These other companies will have access to the Information only as necessary to perform their functions and to the extent permitted by law. We may also share your Information with any of our parent companies, subsidiaries, or other companies under common control with us.
* *Aggregated Information.* In an ongoing effort to better understand our users and our Platform, we might analyze your Information in aggregate form in order to operate, maintain, manage, and improve the Platform. This aggregate information does not identify you personally. We may share this aggregate data with our affiliates, agents, and business partners. We may also disclose aggregated user statistics in order to describe our Platform and Services to current and prospective business partners and to other third parties for other lawful purposes.
* *De-identified Information*. We may analyze your Information in de-identified form and we may share this de-identified data with our affiliates, agents, and business partners. We may also disclose this de-identified data to current and prospective business partners and to other third parties for other lawful purposes.
* *Business Transfers*. As we develop our businesses, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, your Information may be part of the transferred assets.
* *Legal Requirements*. To the extent permitted by law, we may also disclose your Information: (i) when required by law, court order, or other government or law enforcement authority or regulatory agency; or (ii) whenever we believe that disclosing such information is necessary or advisable, for example, to protect the rights, property, or safety of Cohero Health or others.

**Private Messaging**

Providers may be able to communicate with their Users via direct messages sent through the Services. If you choose to send a direct message through the Services, you acknowledge and agree that none of the information contained in that message (including, without limitation, Personal Information and/or Health Information) is covered by this Privacy Policy and we are not responsible or liable in any way for how the recipient uses that information.

**Accessing and Modifying Information and Communication Preferences**

If you have provided us any Personal Information, you may access, remove, review, and/or make changes to the same by contacting us at [privacy@coherohealth.com](mailto:privacy@coherohealth.com). In addition, you may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located on the bottom of any Cohero Health marketing e-mail. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our subscription databases.

**How We Protect the Information**

We take commercially reasonable steps to protect your Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases or the databases of the third parties with which we may share such information, nor can we guarantee that the information you supply will not be intercepted while being transmitted over the Internet. In particular, e-mail sent to us may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail.

**External Sites**

The Platform may contain links to External Sites. Cohero Health has no control over the privacy practices or the content of these External Sites. As such, we are not responsible for the content or the privacy policies of those External Sites. You should check the applicable third-party privacy policy and terms of use when visiting any External Sites.

**Children**

We do not knowingly collect Personal Information from children under the age of 13 through the Platform. If you are under 13, please do not give us any Personal Information. We encourage parents and legal guardians to monitor their children’s Internet usage and to help enforce our Privacy Policy by instructing their children never to provide Personal Information through the Platform without their permission. 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.

**Important Notice to Non-U.S. Residents**

The Platform, the Services and their servers are operated in the United States. Please be aware that your Information, including your Personal Information, may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to use the Platform and/or the Services, you hereby irrevocably and unconditionally consent to such transfer, processing, and use in the United States.

**California Residents**

Under California Civil Code Section 1798.83, California residents who have an established business relationship with Cohero Health may choose to opt out of our sharing their personal information with third parties for direct marketing purposes. If you are a California resident and (1) you wish to opt out; or (2) you wish to request certain information regarding our disclosure of your personal information to third parties for the direct marketing purposes, please send an e-mail to [privacy@coherohealth.com](mailto:privacy@coherohealth.com) with “Privacy Policy” in the subject line or write to us at:

Cohero Health, Inc.

335 Madison Avenue, 3rd floor

New York, NY 10017

In addition, Cohero Health does not monitor, recognize, or honor any opt-out or do not track mechanisms, including general web browser “Do Not Track” settings and/or signals.

**Changes to This Privacy Policy**

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time with or without notice to you. Any such changes will be posted on the Platform. By accessing the Platform and/or using the Services after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of your information is governed by the Privacy Policy in effect at the time we collect the Information. Please refer back to this Privacy Policy on a regular basis.

**How to Contact Us**

If you have questions about this Privacy Policy, please contact us via e-mail at [privacy@coherohealth.com](mailto:privacy@coherohealth.com) with “Privacy Policy” in the subject line.