

**Welcome to Twentyeight Health!** We're excited you're here.

If you had an account with **The Pill Club** or **SimpleHealth**, check out details on the transition from the Pill Club [here](#) and SimpleHealth FAQs [here](#).

# Privacy

## Privacy Policy

Effective date: October 15, 2018

We at Twentyeight Health know you care about how your personal information is used and shared, and we take your privacy seriously. Please read the following to learn more about our Privacy Policy. **By using or accessing the Services in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and you hereby consent that we will collect, use, and share your information in the following ways.**

Remember that your use of Twentyeight Health's Services is at all times subject to the [Terms of Use](#), which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the [Terms of Use](#).

### What does this Privacy Policy cover?

This Privacy Policy covers our treatment of personally identifiable information ("Personal Information") that we gather when you are accessing or using our Services, but not to the practices of companies we don't own or control, or people that we don't manage. We gather various types of Personal Information from our users, as explained in more detail below, and we use this Personal Information internally in connection with our Services, including to personalize, provide, and improve our services, to allow you to set up a user account and profile, to contact you, to fulfill your requests for certain products and services, and to analyze how you use the

anyone under the age of 13. If you are under 13, please do not attempt to register for the Services or send any personal information about yourself to us. If we learn that we have collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that a child under 13 may have provided us personal information, please contact us at [contact@twentyeighthealth.com](mailto:contact@twentyeighthealth.com).

Under a federal law called the Health Insurance Portability and Accountability Act of 1996, as amended and supplemented by the Health Information Technology for Clinical Health Act of the American Recovery and Reinvestment Act of 2009, and their respective implementing regulations as amended from time to time (collectively “HIPAA”), some of the demographic, health and/or health-related information that Twentyeight Health collects as part of providing the Services may be considered “protected health information” or “PHI.” Specifically, when Twentyeight Health receives identifiable information about you from or on behalf of your doctors, healthcare specialists, professionals, providers, or organizations (“Healthcare Providers”) that information is PHI. HIPAA provides specific protections for the privacy and security of PHI and restricts how PHI is used and disclosed. Twentyeight Health may only use and disclose your PHI in compliance with HIPAA and as permitted pursuant to the agreements between Twentyeight Health and the Healthcare Providers it works with.

### **Will Twentyeight Health ever change this Privacy Policy?**

We’re constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time as well, but we will alert you to changes by placing a notice on [Twentyeighthealth.com](https://twentyeighthealth.com), by sending you an email, and/or by some other means. Please note that if you’ve opted not to receive legal notice emails from us (or you haven’t provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is collected.

### **What Information does Twentyeight Health Collect?**

#### *Information You Provide to Us:*

We receive and store any information you knowingly provide to us. For example, through the online questionnaire, through your account settings, and/or through your use of the Services, we may collect the following Personal Information:

- name,
- email address,
- phone number,

- payment information,
- identification information (such as photo IDs and picture),
- health or medical information (such as medical records, date of birth, gender, health background, health status, health preference, blood pressure, and laboratory testing results),
- medication information (such as information about your prescribed medication(s) and if/when they may need to be refilled),
- insurance information (such as your insurance carrier, insurance plan, member ID, group ID, and payer ID),
- messages sent on the platform to customer service or doctors (such doctors are affiliated with a professional corporation with whom we partner) and
- third-party account credentials (for example, your log-in credentials for Facebook or other third party sites).

Certain information may be required to register with us or to take advantage of some of our features.

We may communicate with you if you've provided us the means to do so. For example, if you've given us your email address, we may send you promotional email offers on behalf of other businesses, or email you about your use of the Services. Also, we may receive a confirmation when you open an email from us. This confirmation helps us make our communications with you more interesting and improve our services. If you do not want to receive communications from us, please indicate your preference by contacting us at [contact@twentyeighthhealth.com](mailto:contact@twentyeighthhealth.com).

#### *Information Collected Automatically:*

Whenever you interact with our Services, we automatically receive and record information on our server logs from your browser or device, which may include your IP address, geolocation data, device identification, "cookie" information, the type of browser and/or device you're using to access our Services, and the page or feature you requested. "Cookies" are identifiers we transfer to your browser or device that allow us to recognize your browser or device and tell us how and when pages and features in our Services are visited and by how many people. You may be able to change the preferences on your browser or device to prevent or limit your device's acceptance of cookies, but this may prevent you from taking advantage of some of our features.

Our advertising partners may also transmit cookies to your browser or device, when you click on ads that appear on the Services. Also, if you click on a link to a third party website or service, a third party may also transmit cookies to you. Again, this Privacy Policy does not cover the use of cookies by any third parties, and we aren't responsible for their privacy policies and practices.

provided by Google, Inc. ("Google") to analyze how you interact and engage with the Services. Google uses cookies in connection with its Google Analytics services. Google's ability to use and share information collected by Google Analytics about your visits to the Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt out of Google's use of cookies by visiting the Google advertising opt-out page at [www.google.com/privacy\\_ads.html](http://www.google.com/privacy_ads.html) or the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout/>.

Please be aware that cookies placed by third parties may continue to track your activities online even after you have left our Services, and those third parties may not honor "Do Not Track" requests you have set using your browser or device.

Cookies can either be "session cookies" or "persistent cookies". Session cookies are temporary cookies that are stored on your device while you are visiting our Website or using our Service, whereas "persistent cookies" are stored on your device for a period of time after you leave our website or Services. We've provided a quick summary of some of the cookie types we and our service providers use on the Service, but for more information about cookies, visit <http://www.allaboutcookies.org/> or <http://www.aboutcookies.org.uk/>.

- **Essential Cookies:** Essential cookies are required for providing you with features or services that you have requested. For example, certain cookies enable you to log into secure areas of our Services. Disabling these cookies will make certain features and services unavailable.
- **Functional Cookies:** Functional cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These cookies help us to personalize our content for you, greet you by name, and remember your preferences (for example, your choice of language or region).
- **Performance/Analytical Cookies:** Performance/analytical cookies allow us to understand how visitors use our Services such as by collecting information about the number of visitors to the website, what pages visitors view on our website and how long visitors are viewing pages on the website. Performance/analytical cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Service's content for those who engage with our advertising.
- **Retargeting/Advertising Cookies:** Retargeting/advertising cookies collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you.

this data to customize content for you that we think you might like, based on your preferences. We may also use it to improve the Services—for example, this data can tell us

the Services interesting to as many users as possible.

*Information Collected From Other Websites and Do Not Track Policy:*

Through cookies we place on your browser or device, we may collect information about your online activity after you leave our Services. Just like any other usage information we collect, this information allows us to improve the Services and customize your online experience, and otherwise as described in this Privacy Policy. Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. Our Services do not support Do Not Track requests at this time, which means that we collect information about your online activity both while you are using the Services and after you leave our Services.

**Will Twentyeight Health Share Any of the Personal Information it Receives?**

We may share your Personal Information with third parties as described in this section:

**Information that’s been de-identified:** We may de-identify your Personal Information so that you are not identified as an individual, and provide that information to our partners. We may also provide aggregate usage information to our partners (or allow partners to collect that information from you), who may use such information to understand how often and in what ways people use our Services, so that they, too, can provide you with an optimal online experience. However, we never disclose aggregate usage or de-identified information to a partner (or allow a partner to collect such information) in a manner that would identify you as an individual person.

**Advertisers:** We allow advertisers and/or merchant partners (“Advertisers”) to choose the demographic information of users who will see their advertisements and/or promotional offers and you agree that we may provide any of the information we have collected from you in non-personally identifiable form to an Advertiser, in order for that Advertiser to select the appropriate audience for those advertisements and/or offers. For example, we might use the fact you are located in San Francisco to show you ads or offers for San Francisco businesses, but we will not tell such businesses who you are. Or, we might allow Advertisers to display their ads to users with similar usage patterns to yours, but we will not disclose usage information to Advertisers except in aggregate form, and not in a manner that would identify you personally.

Note that if an advertiser asks us to show an ad to a certain audience or audience segment and you respond to that ad, the advertiser may conclude that you fit the description of the audience they were trying to reach.

**Affiliated Businesses:** In certain situations, businesses or third party websites we’re affiliated with may sell or provide products or services to you through or in connection with the Services (or jointly with us). You can recognize when an affiliated business is associated with

over the policies and practices of third party websites or businesses as to privacy or anything else, so if you choose to take part in any transaction or service relating to an affiliated website or business, please review all such business' or websites' policies.

**Agents:** We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you (such as hosting, payment processing, fulfillment, data storage, security, web service analytics or ad serving) and/or who make certain services, features or functionality available to our users on our behalf (such as doctors or insurers). Unless we tell you differently, our agents do not have any right to use the Personal Information we share with them beyond what is necessary to assist us.

**Business Transfers:** We may choose to buy or sell assets, and may share and/or transfer customer information in connection with the evaluation of and entry into such transactions. Also, if we (or our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information could be one of the assets transferred to or acquired by a third party.

**Protection of Company and Others:** We reserve the right to access, read, preserve, and disclose any information that we believe is necessary to comply with law or court order; enforce or apply our Terms of Use<sup>[insert link]</sup> and other agreements; or protect the rights, property, or safety of Company, our employees, our users, or others.

### Is Personal Information about me secure?

Your account is protected by a password for your privacy and security. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

We endeavor to protect the privacy of your account and other Personal Information we hold in our records, but unfortunately, we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

### What Personal Information can I access?

Through your account settings, you may access, and, in some cases, edit or delete the following information you've provided to us:

- name and password,
- email address,
- delivery address,
- notification preference,

The information you can view, update, and delete may change as the Services change. If you have any questions about viewing or updating information we have on file about you, please contact us at [contact@twentyeighthealth.com](mailto:contact@twentyeighthealth.com).

Under California Civil Code Sections 1798.83–1798.84, California residents are entitled to contact us to prevent disclosure of Personal Information to third parties for such third parties' direct marketing purposes; in order to submit such a request, please contact us at [contact@twentyeighthealth.com](mailto:contact@twentyeighthealth.com).

### **What choices do I have?**

You can always opt not to disclose information to us, but keep in mind some information may be needed to register with us or to take advantage of some of our features.

You may be able to add, update, or delete information as explained above. When you update information, however, we may maintain a copy of the unrevised information in our records. You may request deletion of your account by emailing us at [contact@twentyeighthealth.com](mailto:contact@twentyeighthealth.com). Some information may remain in our records after your deletion of such information from your account. We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally.

### **What if I have questions about this policy?**

If you have any questions or concerns regarding our privacy policies, please send us a detailed message to [contact@twentyeighthealth.com](mailto:contact@twentyeighthealth.com), and we will try to resolve your concerns.

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[contact@twentyeighthealth.com](mailto:contact@twentyeighthealth.com)

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Texting only: M-F 9am-5pm ET

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