

# LifeLine Incorporated

## Privacy Policy

### Introduction

LifeLine Incorporated® wants you to understand what kinds of information it collects on its Websites, and how it uses, shares, and protects that information. The following discloses LifeLine Incorporated's® information gathering and dissemination practices for this Website. As used in this Privacy Policy, “we”, “us”, and “our” refers to LifeLine Incorporated, and its affiliated group of companies (including Choice Learning Inc., Ready Rescuers, Medical Data Corp., and Safety Data Corp. ), and the “Site” refers to [www.lifelinei.com](http://www.lifelinei.com), its subdomains and any other Website on which this Privacy Policy appears. This Privacy Policy also applies to your use of the Site through a mobile application or via a mobile optimized website. This Privacy Policy does not apply to any offline data collection or practices of LifeLine Incorporated.

The Site resides upon servers located in the United States of America. If you are located outside the United States, please be aware that information you provide on the Site is being transferred to and stored in the United States. The Site's personal information practices and the terms of this Privacy Policy may or may not comply with foreign law, so if you do not agree with this, please do not use the Site.

This Policy is broken down into several sections as listed in the Table of Contents.

### Table of Contents

- General
- Information We Collect on the Site and How We Use It
- How We Share Your Information
- Communications From the Site and Your Choices
- Children's Privacy
- For Persons Outside the United States
- Security
- Other Site-Related Items
- Acceptance of this Privacy Policy
- Contacting Us
- Changes to this Privacy Policy

### General

As used in this Privacy Policy, “personal information” means information that may be used to identify a specific individual, or that is about an identifiable individual, including but not limited to name, email address, phone number or credit card number. “Aggregate information” refers to combined demographic information which has been derived from

personal information but which cannot be reasonably used to identify any individual.

## **I. Information We Collect On the Site and How We Use It**

You can visit our Web Site and learn about the services we provide without providing personal information. You do need to provide personal information, however, to purchase items, receive notifications, maintain safety records, and to participate in our user forums and other interactive portions of the Site. We do not collect any personal information on the Site unless you provide it voluntarily. However, certain non-personally identifiable information, such as IP address, is collected automatically from every Site visitor, even if not voluntarily provided.

We collect and use personal information in the specific ways listed below, and generally to improve our Site and services to you, as well as to meet our legal obligations. We also use personal information you provide for other purposes consistent with the reason you provide such information to us.

**1. Registration Information.** Our site's registration process requires users to provide us valid and accurate contact information including name, title or position, address, phone number, birth date and email address (collectively, "Registration Information"). For fraud prevention purposes, users electing to provide as their sole email contact an email address at the time of registration.

In certain circumstances your registration information may be verified through so-called "credit header" information. You may be required to answer a multiple-choice questionnaire compiled from information managed by consumer and business information sources. These questions can include elements from your financial history. This is done as an identity verification and fraud prevention measure.

We collect certain information submitted during transactions on the Site based on your activities, including buying, as well as shipping and billing information, and other information you provide in connection with buying or shipping an item. We may also collect certain personal information that you provide through message board discussions, chats, correspondence or dispute resolution.

Registration Information, and other personal information that you provide may be used in the following ways:

- For fraud protection at the time of registration;
- To send you notifications about recalls, other safety related events or information, regular documentation requirements that you carry out on the Site;
- To perform our billing, administration and collections functions (and to contact you when necessary about these functions);
- To report information about your account, including late payments, missed payments or other delinquencies or defaults on your accounts, to credit reporting bureaus;
- To communicate with you and carry out actions requested by you (such as medical oversight documentation, safety documentation, subscriptions to newsletters); and
- When facilitating the investigation of fraud or illegal activity, to share information with

law enforcement or other governmental agencies or authorized third parties when requested pursuant to a criminal investigation or alleged illegal activity or any other activity that may expose you, us or another Site user to legal liability.

Please see “Communications From the Site and Your Choices” below for information on controlling communications from us.

**2. Financial Information.** If you purchase any of LifeLine Incorporated's products or services, we collect financial information including bank account and/or credit card number, expiration date, card security code and billing address. As noted under “Registration Information” above, we also collect credit card information from those who register using an email address from a free email provider such as Yahoo!™ Mail or Hotmail™ or Google’s Gmail. Financial information is used to bill you for transactions you carry out on the Site or off-Site and to collect on fees and debts incurred through the use of the Site. If your account is past due and collection must be pursued, your contact and financial information may be shared with collection agents and/or credit reporting agencies. We share financial information with non-affiliated third parties to facilitate the completion of product and service transactions as specified above, to respond to subpoenas, for other legal compliance purposes, and for billing and collections.

**3. Contests and Surveys.** If you decide to enter contests or surveys featured from time to time on the Site, you may be asked for personal information in addition to your Registration Information. This information is used in order to administer the contest or survey (for example, to contact the winner) or as otherwise disclosed on the Site at the time we collect the information.

**4. Information Requests.** We may ask you to provide personal information in order to allow us to respond to your requests for information or other requests made over the Site.

**5. Emails from Lifeline Incorporated.** Any email messages generated by the Site result directly from the User's actions (such as registration information, confirmation of listing an item or medical device, or the user’s choice to subscribe to certain communications), or as necessary to inform you of changes to the Site or events related to the Site, special pricing on products or services, or changes to the Site rules or policies. Users may opt-out of receiving many future mailings; see the section below entitled “Communications from the Site and Your Choices.”

Emails from our Site may contain web beacons or “clear .gifs.” These are small graphic images that can be used for recording when an email has been opened in order to track the performance of email marketing campaigns. We and our third party service providers currently log responses from web beacons, but this information is not stored or linked to your personal information in our systems.

**6. Non-personal information.** We automatically collect your IP address when you visit our Site. We use your IP address to help diagnose problems with our server, and to administer our Site. Your IP address is used to gather broad demographic information, and to track usage patterns in the Site. We also may collect geo-location information, device identification number and type, computer and connection information, statistics about page views and standard web log information. We do not correlate this information

with data about individual users (though our third-party advertisers, if any, identified in this Privacy Policy, may do so – see below under “Third Party Advertising”).

**7. Cookies.** We, on our own or in collaboration with our third party partners, may use a technology referred to as “cookies” (or other similar technology), which are pieces of data on your computer tied to information about you. Based on your browser type and other information provided by our cookies, we use cookies to: (i) customize certain Site content and access; (ii) track usage patterns on the Site; (iii) allow the Site to remember your user name and password if you so choose; (iv) enable third parties to target marketing promotions to you (see “Third Party Advertising Below”) and (v) for any other purposes permitted under applicable law from time to time.

You can decide if and how your computer will accept cookies by configuring your preferences option within your web browser. To disable this function in your web browser, choose the “help” menu and follow the instructions for deleting cookies and preventing your browser from downloading additional cookies. If you choose to reject cookies, you can still browse our Site, but you may be unable to post on the Site or use the Site's services as a customer, purchase additional products or services, or otherwise to access certain aspects of the services available on the Site. We do not store personal or confidential information in cookies (although our third party advertisers may – see below under “Third Party Advertising”)

**8. General Uses.** In addition to the foregoing, we will use your personal information as specifically described on the Site at the time of collection (for example, to share with a charity in the case of your participation in a community fundraiser or charity). We may also use your information internally to customize your experience with our company and our Site (for example, adapting the Site to your browser), to help us develop new products and services, to verify your identity, to collect debts or fees owed to us, or to investigate or settle inquiries or disputes, and for other legally required or permissible purposes.

## **II. How We Share Your Information**

We do not sell or rent your personal information collected on the Site to non-affiliated third parties unless you have opted in to such sharing. However, we may share your personal information submitted at the Site among other members of our affiliated group of companies (listed in the introduction), who may use that information only to the extent consistent with the policies described in this Privacy Policy.

Other than as described in the paragraph above or as specifically described elsewhere in this Privacy Policy, we will not share your personal information collected on the Site with third parties without your permission, except as necessary or appropriate to (i) carry out the transaction, activity or request made by you on the Site, (ii) comply with any applicable law, court order or other judicial process, or (iii) enforce or apply agreements with you, or protect the rights, property or safety of us or third parties, or as otherwise required or permitted by law.

In the event of a corporate transaction such as a sale, merger or reorganization or in the unlikely event of a bankruptcy or similar restructuring involving all or a portion of Lifeline Incorporated or its subsidiaries and/or affiliate company(ies) (including but not limited to

a spinoff of an affiliate, and subsequent acquisition of that affiliate by a new third party), or a sale or transfer of assets, we reserve the right to disclose or transfer your personal information to non-affiliated third party acquiring company(ies) and other third parties. In the event of such a sale or transfer, we will use reasonable efforts to direct the transferee(s) to use personal information you have provided through this Site in a manner that is consistent with this Privacy Policy. We may collect and share aggregate website statistical information (such as sales, service, traffic patterns or related information) with third parties.

We hire contractors to provide certain services on our behalf, including trend and statistical analysis, information processing and storage, and development of new products and services. As part of their services to us, these contractors may have access to some or all of the data that we maintain, including transaction data and your personal information, but they are always required to maintain the confidentiality of information they receive from us and are restricted from using the information for any purposes other than those authorized by us.

We do not share your personal information with any third parties for such third parties' marketing purposes, unless you have opted into such sharing.

Except as otherwise provided, this Privacy Policy only addresses the information that we collect from you, but not about how third parties to whom you disclose your information may use and disclose it. If you disclose your personal information to third parties on or off our Site, other rules may apply to how they use and disclose information provided to them. We do not police or influence the privacy policies of third parties. When providing your personal information to third parties, their privacy policies govern their use and disclosure of your personal information. Before disclosing your personal information to a third party, you should familiarize yourself with their privacy policy. We also encourage you to disclose your privacy policies to third parties with whom you are dealing through our Site. When Users interact with each other, they may have access to each other's name, user id information, email address and other contact information. By using our Site, you agree to use other Users' information only for LifeLine Incorporated transaction-related purposes or other purposes for which a User explicitly chooses.

### **III. Communications From the Site and Your Choices**

The Site sends three types of email communications: (1) Notifications related to safety and medical device activity, (2) Service related contact and notifications, (3) Billing and collection communications, and (5) opt-in newsletters and promotional email messages.

(1) Notifications related to safety and medical device activity are generated as a result of registering as a user of the Site. Fulfillment of the medical oversight program requires contacts from the organization be registered and login at regular intervals to fulfill the doctors prescription and standing orders. These notifications may include industry warnings or updates for all the devices covered by LifeLines' safety monitoring program, and other notifications related to activity on the Site. **You cannot opt out of receiving notifications related to the medical oversight program as long as you are an active user in the organization's account;** however, if you do not wish to be an active user you can request to be removed and your email can be put on a opt out list and you will not receive any such notifications from the Site. **Medical oversight notices are**

**sent frequently and cannot be opted out of other than by closing your personal account with us or the account of the organization.**

(2) Service related contact and notifications on behalf of manufactures and LifeLine Incorporated are to be expected and are part of the medical oversight program spelled out in your documentation from LifeLine Incorporated. Removal from the medical oversight program or maintenance program closing the personal and or organizations account as stated above. Otherwise you are choosing by default to an opt in status with LifeLine Incorporated. Saved Search. You are responsible to notify LifeLine Incorporated of any change of status concerning your account and your desire to receive safety related notices. There are removal instructions at the bottom of every monthly medical oversight notice, but responding to these opt not instruction does not constitute close your account or the account of the organization.

(3) Billing and collection communications will be done by email, phone, and USPS until the account is completely closed and all services and products have been paid in full.

(4) Promotional Messages. Opt-in newsletters and promotional email messages are mailing lists that you choose to subscribe to during registration or by using various opt-in pages or forms on the Site. You may change your preferences for these promotional messages at any time by notifying LifeLine Incorporated of your desire to change your opt in status. All such lists are 100% opt-in; in other words our intent is that you will never receive any newsletter or promotional email from the Site unless you have specifically elected to be on the applicable email list. You may opt out of these mailings at any time and we have made it very easy to do so.

#### **IV. Children's Privacy**

The Site is not intended for or directed to persons less than 18 years of age. We do not knowingly solicit or collect personal information from or about children, and we do not knowingly market our services to children. If you are under 18 years of age, do not use the Site.

#### **V. For Persons Outside the United States**

By consenting to this Privacy Policy, you confirm that your command and knowledge of English is sufficient to understand the terms and conditions set forth herein. You agree that by using the Site, your personal data will be transferred to LifeLine Incorporated servers located in the United States in connection with the purposes stated in this Privacy Policy. You understand that the laws with respect to the protection of personal data in the United States may not be as stringent as those in your home jurisdiction.

#### **VI. Security**

The Site has reasonable security measures in place to protect the loss, misuse and alteration of the information under our control. When you submit sensitive information via our Sites, such as credit card information, that information is subject to secure sockets layer (SSL) encryption technology. However, no data transmission over the Internet can be guaranteed as 100% secure. As a result, while we strive to protect your personal information during transmission, we cannot ensure or warrant the security of any

information you transmit to us or receive from us. We urge you to take steps to keep your personal information safe (including your account password), log out of your account after use, and close your web browser. As part of our Privacy Policy you are not allowed to share your password or account login with anyone, it is not intended to be shared. If you do share your password or personal information with anyone, you are responsible for all actions taken in your account's name. If you lose control of your password, you may lose considerable control over your personal information and may be subject to misuse and false documentation entered on your behalf. Because of this, if the security of your password has been compromised in any way, you are responsible for immediately notifying us and for changing your password.

You can review your personal information by logging into our Site, and you should act to update it promptly upon changes in your personal information or to correct any errors in it. You might not be able to alter or delete a public posting once you make it. At your request, we will close your account and make your personal information not publicly viewable as soon as reasonably possible, in accordance with applicable law.

## **VII. Other Site-Related Items**

(1) Public Forums. The Site makes chat rooms, forums, message boards, and/or news groups available to its users. Please remember that any information that is disclosed in these areas becomes public information and you should exercise caution when deciding to disclose your personal information. We strongly recommend that you do not post your email address or other personal information in our forums because this information is publicly available for anyone to see and unscrupulous third parties may use this information to form 'spam' lists or may otherwise misuse this information. We are not responsible for the use or misuse of information posted by you in public forums by other users of the Site.

(2) Third Party Advertising. Where we have identified a specific third party advertising company below as a "Third Party Advertising Company," we may use such third-party advertising company to serve ads when you visit our Site. This third-party advertising company may also separately place or recognize a cookie file on your browser in the course of delivering advertisements to the Site. Using cookies or other technology, this company may use information about your computer, combined with personally identifiable information or other non-personally identifiable information collected by the advertiser, about your visits to this and other Web sites in order to provide advertisements about goods and services of interest to you on our website, other Web sites, and other forms of media. You may visit the website of the advertiser, shown below, to learn more about its practices with respect to personal data, and to opt-out where possible, or you may visit the following website to opt out of this practice by multiple advertisers: [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp) We will update this section of this Privacy Policy if our practices with respect to advertisers change, including identifying any third party advertising companies making use of the Site, so you should check this section of the Privacy Policy if you are concerned about third party advertising companies.

(3) Other Sites. The Site may contain links to the websites of third parties. We are not responsible for and have no liability for the privacy policies or practices of those

websites. We recommend that you review the privacy policies of each website you visit.

(4) Submissions. Suggestions, materials or other intellectual property sent or transmitted to us via our Site are governed by the separate terms applicable to such materials identified at the time of submission (if any). All such items shall be deemed to be non-confidential, and we shall have no obligation of any kind with respect to such items and shall be free to use and distribute them to others without limitation, including, but not limited to developing and marketing products incorporating them.

### **VIII. Acceptance of Privacy Policy**

By using our Site, you signify your acceptance of this Privacy Policy. If you do not agree with the terms of this Privacy Policy, please do not submit any personal information to us through our Site.

### **IX. Contacting Us**

If you choose to visit the Site, your visit and any dispute over privacy are subject to this Privacy Policy and our User Agreement, including limitations on damages to the extent permitted by law, resolution of dispute procedures, and application of the law of the State of Minnesota, as set forth in our User Agreement.

You may review, update and modify your Registration Information by logging in and visiting [www.lifelinei.com](http://www.lifelinei.com). You may also change your communications preferences by emailing [support@lifelinei.com](mailto:support@lifelinei.com) that you wish to unsubscribe from or opt in to certain email communications from the Site.

If you have any concern about the privacy practices of the Site, please contact us at following address with a detailed description, and we will try to resolve it.

Privacy Issues LifeLine Incorporated 3510 East 28th Street Minneapolis, MN 55406

or

You can contact customer service at [support@lifelinei.com](mailto:support@lifelinei.com)

### **X. Changes to Privacy Policy**

Please check this Privacy Policy periodically to inform yourself of any changes. We reserve the right to modify this Privacy Policy at any time, so you should review it frequently. If we make material changes to this Privacy Policy, we will post such revised policy on our Site.

Effective Date: July 1, 2013 Copyright © 2013 LifeLine Incorporated