



Privacy Policy

Introduction

Last Updated: October 18th, 2021

This Privacy Policy ("**Privacy Policy**") describes the data protection practices of Oar Health, LLC and its affiliates (collectively, "**Oar**," "**we**," "**our**," or "**us**"), including when you visit any Oar website that links to this Privacy Policy (including www.oarrx.com) (our "**Website**") or otherwise provide data to Oar. We refer to the Website and other services provided by Oar together in this Privacy Policy as the "**Services**."

This Privacy Policy describes how Oar collects, uses, and discloses Personally Identifiable Information ("PII"). PII includes information about you that is personally identifying such as your name, email address, and phone number and which is not otherwise publicly available.

This Privacy Policy does not apply to information that is protected health information ("PHI") under the Health Insurance Portability and Accountability Act ("HIPAA"). Any collected information that constitutes PHI is governed by, and will be used and disclosed solely as permitted under, the business associate agreement between Oar and your healthcare provider (each, a "Provider"), as required by law, to safeguard PHI. Any information provided directly to a Provider is treated in accordance with the [Oar Medical P.A. Notice of Privacy Practices](#) (for patients located in Florida) or the [Wheel Provider Group Notice of Privacy Practices](#) (for all other patients).

By accessing or using the Services, you consent to our collection, use, and sharing of your information in accordance with this Privacy Policy. This Privacy Policy is not a contract and does not create any contractual rights or obligations.

The Information we Collect and the Sources of Such Information

We obtain information about you through the means discussed below when you use the Services. Please note that we need certain types of information, so that we can provide the Services to you. If you do not provide us with such information, or ask us to delete it, you may no longer be able to access or use part or all of our Services.

1. Information You Provide to Us

We collect PII and other information that you provide directly to us. For example, we collect PII from you through:

- Account registration and administration of your account



- Processing your orders and requests for treatment
- Questions, communications, or feedback you submit to us via forms or email
- Your participation in research and surveys
- Requests for customer support and technical assistance
- Uploads or posts to the Services

The specific types of PII we collect will depend upon the Services you use, how you use them, and the information you choose to provide. The types of data we collect directly from you includes, without limitation:

- Name, address, telephone number, date of birth, and email address
- Information about your medical conditions, treatment options, physician referrals, prescriptions, and lab results or other related health information, such as your physical and emotional characteristics
- Log-in credentials, if you create an account
- Billing information, such as shipping address, credit or debit card number, verification number, expiration date, and identity verification information, collected by our payment processors on our behalf
- Information about purchases or other transactions with us
- Information about your customer service and maintenance interactions with us
- Demographic information such as your gender and age
- Any other information you choose to directly provide to us in connection with your use of the Services.

2. Information We Collect Through Automated Means

We collect certain information about your use of the Services and the devices you use to access the Services, as described in this Section. As discussed further below, we and our service providers (which are third party companies that work on our behalf), may use a variety of technologies, including cookies and similar tools, to assist in collecting this information.

Our Website. When you use our Website, we collect and analyze information such as your IP address, browser types, browser language, operating system, the state or country from which you accessed the Services, software and hardware attributes (including device IDs) referring and exit pages and URLs, platform type, the number of clicks, files you download, domain names, landing pages, pages viewed and the order of those pages, the amount of time spent on particular pages, the terms you use in searches on our sites, the date and time you used the Services, error logs, and other similar information.

Location Information. When you use the Services, we and our service providers may automatically collect general location information (e.g., IP address, city/state and or postal code associated with an IP address) from your computer or mobile device. This information allows us to enable access to content that varies based on a user's general location (e.g., to provide you with accurate sales tax information and to deliver content customized to your location). We will ask your permission before collecting your precise GPS location information. In such instances, we



will use your precise geo-location information to provide customized services, content, promotional offers and other information that may be of interest to you. If you no longer wish for us and our service providers to collect and use GPS location information, you may disable the location features on your device. Please see your device manufacturer settings.

Our Use of Cookies and Similar Online Tools. To collect the information discussed in this Section, we and our service providers use web server logs, cookies, tags, beacons, SDKs, tracking pixels, and other similar tracking technologies. We use these technologies to offer you a more tailored experience and gather information that helps us optimize our services.

- A web server log is a file where website activity is stored.
- An SDK is a set of tools and/or code that we embed in our Apps and software to allow third parties to collect information about how users interact with the Services.
- A cookie is a small text file that is placed on your computer or mobile device when you visit a site, that enables us to: (i) recognize your computer/device; (ii) store your preferences and settings; (iii) understand the parts of the Services you have visited and used; (iv), enhance your user experience by delivering and measuring the effectiveness of content and advertising tailored to your interests; (v) perform searches and analytics; and (vi) assist with security and administrative functions.
- Tracking pixels (sometimes referred to as web beacons or clear GIFs) are tiny electronic tags with a unique identifier embedded in Website, online ads and/or email that are designed to: (1) collect usage information like ad impressions or clicks and email open rates; (2) measure popularity of the Services and associated advertising; and (3) access user cookies.

As we adopt additional technologies, we may also gather information through other methods.

Please note that you can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Please consult the "Help" section of your browser for more information. Please note that by blocking, disabling, or managing any or all cookies, you may not have access to certain features or offerings of the Services.

Our third party vendors or third party service providers may use their own cookies and/or other third-party cookies together (subject to their own privacy policies) to (a) inform, optimize, and serve ads across the web based on your past visits to our Services and others and (b) report to us how your ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to our site. For example, if and to the extent from time to time we use Double Click or another Google brand for ad serving, analytics, remarketing, retargeting, etc., you can set certain preferences and opt-outs using Google Ads Settings, and Google



Analytics' currently available opt-outs, found here <https://www.google.com/ads/preferences/> and here <https://adssettings.google.com/>.

3. Information We Collect From Social Media and Other Content Platforms

When you "like" or "follow" us on Facebook, Instagram, Twitter, or other social media sites, we may collect some information from you including your name, email address, and any comments or content you post relevant to us. We also collect your information if you sign up for one of our promotions or submit information to us through social media sites.

4. Information We Receive From Other Sources

We work closely with third parties (including, for example, third party intermediaries, such as the physicians, medical professionals, and pharmacies with whom we partner to provide you with the Services and their health care services, sub-contractors in technical, advertising networks, analytics providers, and search information providers). Such third parties will sometimes provide us with additional information about you.

How We Use Your Information

In connection with providing you with the Services, we may use your information, including PII, for our business purposes to:

- Carry out, improve, and manage the Services and, as applicable, facilitate the provision of health care services to you by physicians or other health care providers and ensure that the physicians or health care providers have the services and support necessary for health care operations.
- Engage in internal research to understand the effectiveness of our Services, improve our Services, and better understand our user base.
- Communicate with you about the Services, your use of the Services, or your inquiries related to the Services and send you communications on behalf of physicians or other health care providers utilizing the Services to meet your needs.
- Communicate with you by email, postal mail, or phone about surveys, promotions, special events or our products and Services and those of our subsidiaries, affiliates, and parent companies and any of their related businesses and those of our third-party partners.
- Provide you with technical support and customer service.
- Verify your identity and administer your account, including processing your payments and fulfilling your orders.
- Ensure that content from our Services is presented in the most effective manner for you and for your computer or device, allow you to participate in interactive features of our Services (when you choose to do so), and as part of our efforts to keep our Services safe and secure.



- Measure or understand the effectiveness of advertising and content we serve to you and others, and to deliver and customize relevant advertising and content to you.
- Help us better understand your interests and needs, such as by engaging in analysis and research regarding use of the Services.
- Comply in good faith with any procedures, laws, and regulations which apply to us where it is necessary for our legitimate interests or the legitimate interests of others.
- Establish, exercise, or defend our legal rights where it is necessary for our legitimate interests or the legitimate interests of others.
- Carry out any other purpose for which the information was collected.

Combined Information. For the purposes discussed in this Privacy Policy, we may combine the information that we collect through the Services with information that we receive from other sources, and use and share such combined information in accordance with this Privacy Policy.

Aggregate/De-Identified Data. We may aggregate and/or de-identify any information collected through the Services so that such information can no longer be linked to you or your device ("Aggregate/De-Identified Information"). We may use Aggregate/De-Identified Information for any purpose, including for research and marketing purposes, and may also share such data with any third parties, including advertisers, promotional partners, and sponsors. Once Aggregate/De-Identified Information, the data does not personally identify you, is no longer personal information, and is not subject to this Privacy Policy.

Online Analytics and Advertising

1. Online Analytics

We may use third-party web analytics services (such as those of Google Analytics (including Google Signals, Google User-ID, and other Google Analytics features) and MixPanel) on our Services to collect and analyze usage information through cookies and similar tools; engage in auditing, research, or reporting; assist with fraud prevention; try to locate the same unique users across multiple browsers or devices to better tailor services and features; and provide certain features to you. If you have a Google account with personalized advertising enabled, through Google Signals, Google will also be able to gather for us analytics and engagement information from across the various devices you use to access the Services. To prevent Google from using your information for analytics (including cross-device tracking for personalization purposes), you may install the Google Analytics Opt-out Browser Add-on. And to opt out of Google Signals, please open your "Settings" app, locate and tap "Google," select "Ads," and turn ON "Opt out of Ads Personalization." You may also be able to disable cross-device tracking through your



Android or Apple device-based settings. You may review Google Analytics' security and privacy principles by clicking [here](#) and opt out of the use of cookies in web browsers by Google Analytics by clicking [here](#).

If you receive email from us, we may use certain analytics tools, such as clear GIFs to capture data such as when you open our message or click on any links or banners our email contains. This data allows us to gauge the effectiveness of our communications and marketing campaigns.

2. Online Advertising

The Services may integrate third-party advertising technologies (e.g., ad networks and ad servers such as Facebook, Google Ad Words, Criteo and others) that use cookies and other technologies to deliver relevant content and advertising for Oar products on the Services, as well as on other Website you visit and other applications you use. The ads may be based on various factors such as the content of the page you are visiting, information you enter such as your searches, demographic data, and other information we collect from you. These ads may be based on your current activity or your activity over time and across other Website and online services.

We sometimes provide our customer information (such as email addresses) to service providers, who may "match" this information in de-identified form to cookies (or mobile ad identifiers) and other proprietary IDs, in order to provide you with more relevant ads when you visit other Website and mobile applications.

We neither have access to, nor does this Privacy Policy govern, the use of cookies or other tracking technologies that may be placed on your device you use to access the Services by non-affiliated third party advertising network services. If you are interested in more information about tailored browser advertising and how you can generally control cookies from being put on your computer to deliver tailored advertising, you may visit the [Network Advertising Initiative's Consumer Opt-Out link](#), the [Digital Advertising Alliance's Consumer Opt-Out link, or Your Online Choices](#) to opt-out of receiving tailored advertising from companies that participate in those programs. If you are interested in more information about Criteo's privacy practices or opting-out of Criteo's advertising services, you may view their [Privacy Policy](#). To opt out of Google Analytics for display advertising or customize Google display network ads, visit the [Google Ads Settings page](#). We do not control these opt-out links or whether any particular company chooses to participate in these opt-out programs. We are not responsible for any choices you make using these mechanisms or the continued availability or accuracy of these mechanisms.

Please note that if you exercise the opt out choices above, you will still see advertising when you use the Services, but it will not be tailored to you based on your online behavior over time.

3. Mobile Advertising



When using mobile applications from us or others, you may also receive tailored in-application advertisements. We may use third-party service providers to deliver advertisements on mobile applications or for mobile application analytics. Each operating system, iOS for Apple phones, Android for Android devices, and Windows for Microsoft devices provides its own instructions on how to prevent the delivery of tailored in-application advertisements. We do not control how the applicable platform operator allows you to control receiving personalized in-application advertisements; thus, you should contact the platform provider for further details on opting out of tailored in-application advertisements. You may review the support materials and/or the device settings for the respective operating systems to opt-out of tailored in-app advertisements.

4. Notice Concerning Do Not Track

Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. We are committed to providing you with meaningful choices about the information collected on our website for third party purposes, and that is why we provide the variety of opt-out mechanisms listed above. However, we do not currently recognize or respond to browser-initiated DNT signals. Each browser communicates "Do Not Track" signals to websites differently, making it unworkable to honor each and every request correctly. In order to alleviate any communication error between browsers and our Services, we do not respond to or honor "Do Not Track" signals at this time. As the technology and communication between browser and website improves, we may elect in our discretion to reevaluate the ability to honor "Do Not Track" signals and may make changes to our policy. To learn more about Do Not Track, you can do so [here](#).

How We Share and Disclose Your Information

We may share your information, including your PII, for our business purposes in the following ways:

- **Affiliates and Subsidiaries.** We may share information we collect within any Oar member or group (i.e., our subsidiaries and affiliates, including our ultimate holding company and its subsidiaries) to deliver products and services to you, ensure a consistent level of service across our products and services, and enhance our products, services, and your customer experience.
- **Health Care Providers and Services.** We share your information with health care providers: (i) to schedule and fulfill appointments and provide health care services as part of the Services, (ii) to whom you send messages through our Services, and (iii) for other treatment, payment or health care operations purposes, including pharmacy, laboratory, radiology or other ancillary services, upon your request.
- **Service Providers.** We provide access to or share your information with select third parties who use the information to perform services on our behalf. They provide a variety of services to us, including billing, sales, marketing, advertising, analytics, research, customer service, shipping and fulfillment, data storage, IT and security, fraud prevention, payment processing, and auditing and legal services. These entities may also



include health care organizations, pharmacies, and other third parties we use to support our business or in connection with the administration and support of the Services.

- **Protection of Oar and Others.** By using the Services, you acknowledge and agree that we may access, retain and disclose the information we collect and maintain about you if required to do so by law or in a good faith belief that such access, retention or disclosure is reasonably necessary to: (a) comply with legal process (e.g. a subpoena or court order); (b) enforce our Terms of Use or other contracts with you, including investigation of potential violations thereof; (c) respond to claims that any content violates the rights of third parties; (d) respond to your requests for customer service; and/or (e) protect the rights, property or personal safety of Oar, its agents and affiliates, its users and/or the public. This includes exchanging information with other companies and organizations for fraud protection, and spam/malware prevention, and similar purposes.
- **Business Transfers.** As we continue to develop our business, we may buy, merge, sell or partner with other companies. We may also share your PII with a third party in the context of a reorganization, divestiture, restructuring, reorganization, dissolution, bankruptcy or other business or corporate transaction. In such transactions, (including in contemplation of such transactions) user information, including PII may be among the transferred assets. If a portion or all of our assets are sold or transferred to a third-party, customer information (including your PII) would likely be one of the transferred business assets. If such transfer is subject to additional mandatory restrictions under applicable laws, we will comply with such restrictions.
- **Consent.** We may also disclose your information in other ways you direct us to and when we have your consent.
- **Aggregate/De-Identified Information.** We reserve the right to create Aggregate/De-Identified Data from the information we collect, including PII, through the Services and our sharing of such Aggregate/De-Identified Data is in our discretion.
- **Other.** We may also use your data in other ways described herein, and as otherwise permitted or required by applicable laws.

Your Marketing Choices

You may instruct us not to use your contact information to contact you by email, postal mail, or phone regarding products, services, promotions and special events that might appeal to your interests by contacting us at [privacy@OarRx.com] or at the address listed below. In commercial email messages, you can also opt out by following the instructions located at the bottom of such emails. Please note that, regardless of your request, we may still use and share certain information as permitted by this Privacy Policy or as permitted or required by applicable law. For example, you may not opt out of certain operational emails, such as those reflecting our relationship or transactions with you.



Third Party Services and Notice About Health Information

This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices, including data privacy and security process and standards of any third parties, including physicians and other health care providers using the Services, the manufacturer of your mobile device and other IT hardware and software, and any other third party mobile application, website, or service to which our Services may contain a link. These third parties may at times gather information from or about you. Once you leave Oar's Website, we have no control over the privacy practices of these third parties. The collection, use, and disclosure of your information will be subject to the privacy policies of the third-party Website or services, and not this Privacy Policy. We urge you to read the privacy and security policies of these third parties prior to sharing any information, including PII.

How We Protect Your Information

Oar takes a variety of technical and organizational security measures to protect your information against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access. However, no method of transmission over the Internet, and no means of electronic or physical storage, is absolutely secure. As such, you acknowledge and accept that we cannot guarantee the security of your information transmitted to, through, or on our Services or via the Internet and that any such transmission is at your own risk.

Where we have given you (or where you have chosen) a password that enables you to access the Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. The information you share in public areas may be viewed by any user of the Services.

Data Storage & Processing (International Transfers)

Your personal information may be stored on servers in the United States and may also be stored or processed in other countries by our service providers, if and to the extent compliant with law. You understand and agree that We may collect, use, disclose, and otherwise process the information you provide as described in this Privacy Statement even if you are from an area outside the United States. Your personal information may be disclosed in response to inquiries or requests from government authorities or to respond to judicial process in the United States. We will retain your personal information for as long as it is needed to provide you with the Services, or to fulfill any legal or contractual obligations we may have.



Revisions to Our Privacy Policy

We reserve the right to change this Privacy Policy at any time to reflect changes in the law, our data collection and use practices, the features of our Services, or advances in technology. We will make the revised Privacy Policy accessible through the Services, so you should review it periodically. The date this Privacy Policy was last revised is identified at the top of the document. You are responsible for periodically monitoring and reviewing any updates to the Privacy Policy. If we make a material change to the Privacy Policy, we will provide you with appropriate notice in accordance with legal requirements. Your continued use of our Services after such amendments (and notice, where applicable) will be deemed your acknowledgment of these changes to this Privacy Policy.

Contacting Us

Oar is committed to resolving questions or concerns about your privacy and our collection or use of your PII. If you have a specific question or concern about your privacy rights with respect to your PII you can contact us by emailing us at privacy@OarRx.com.

If you have any questions about this Privacy Policy or Oar's privacy practices, please contact us at:

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