

Kyros Privacy Policy

Effective Date: March 1, 2021; **Last Updated:** [December, 5, 2022]

Applicability

This Policy describes Kyros Care PBC's information collection and use practices on the places where it appears. This includes our website and web application. It also includes our mobile app. This Policy does not describe our practices on sites where it does not appear. It also does not apply to the practices of subsidiaries or affiliates. It does not apply to information about our employees. When you interact with a provider or medical group through our applications, this Policy does not apply. Your provider is responsible for providing you with a Notice of Privacy Practices and other applicable consents or authorizations for those interactions. We are not responsible for the information collection and use practices of clinicians and providers.

Information We Collect

The type of information we collect depends on our relationship with you. Listed below are details about the categories of information we may collect:

Contact information. We collect your name and phone number. We also collect your address and email address.

Demographic information. We collect information such as your gender and date of birth. We may collect information about your location. This includes city, state, and zip code.

Eligibility information. We may collect information about your eligibility for our services. This may include information about your medical history. We will also collect information about your insurance.

Payment information. We may collect payment card billing information.

Professional information. We collect resumes, education, and employment history from job applicants and provider applicants. This includes information about your skills and qualifications. We also collect information about your certifications and credentials.

Site usage information. We collect logs and session data when you visit our website. This may include location information. We collect browser and operating system information. We collect what site you came from or what site you visit when you leave us. We also look at the areas of our site you visit and any actions you make. We collect your IP address. We also collect device identifiers. This might include your hardware model.

Business Purposes for Information Use

We use information to respond to your requests. We use information to respond to you. We also use information to communicate with you about our policies and terms.

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This should be the first date a privacy policy was available on the website. We used the date on the current website policy but if there's any earlier dates, you would list that here.

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Since the subs/affiliates all sound like they will be provider entities (e.g., Covered Entities) we clarified this here so that it is clear Kyros Care is the entity owning/operating the app and web assets. The provider entities as CEs would have their own obligations for certain notices under HIPAA and other laws that would be in addition to what Kyros Care here would furnish. Confirm you agree with this approach.

We use information to provide and improve our services. We use information to provide you with our services. This includes checking your eligibility and assisting you in completing registration. We also use information to make our website and services better. For example, customizing your experience with us.

We use information for marketing purposes. We may use information to let you know about our services. This may be by phone, email, or on social media platforms. We also use information to send you newsletters or other content we think you may find interesting. We may send you surveys.

We use information to protect our company and constituents. We use information to protect our company. We use information to identify fraud and secure our systems.

We use information for other purposes as permitted by law or as we may disclose to you.

How We Collect Information

We collect information directly from you. We collect information if you contact us or create an account. We also collect information from you if sign up for email communications, or otherwise submit it to us. This could be in person. It may also be over the phone, or online.

We collect information passively. We use tracking tools to collect information. Tracking tools include browser cookies and web beacons. To learn more about cookies visit the FTC's [Online Tracking page](#). We do this on our websites and in emails that we send to you. We collect information about users over time when you use our website and app. We have third parties collect personal information this way.

We collect information about you from third parties. For example, our business partners may provide information about you to us. This includes the information we obtain from or on behalf of community or group home organizations that offer our services as a benefit.

We Combine Information

We combine information we collect from you on the website and app with information we receive from you offline. We combine information that we have collected across other third party sites. We also combine information you provide with information we obtain from third parties.

When We Share Information with Others

We share information as described here.

We may share information within our family of companies. We may share information with our affiliates, subsidiaries and other related companies. This includes current and future companies.

We share information with vendors who perform services on our behalf. We may share information with trusted vendors that help us deliver our services and operate our platform. For example, we may share information with vendors who help us host and operate the platform.

We share information if we think we have to in order to comply with the law or to protect ourselves. We share information we collect about you to respond to a court order or subpoena. We share

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A general reminder that marketing involving PHI requires separate authorization separate and a part from this policy/terms. This describes any non-PHI marketing instances, general website visitors that could sign up, etc.

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Link to https://consumer.ftc.gov/articles/how-protect-your-privacy-online#understanding_cookies

information in response to a government agency or investigatory body request. We share information we collect when we investigate potential fraud.

We share information with any successor to all or part of our business. If all or part of our business was sold, we may share your information as part of that transaction. If there is a merger or acquisition, we may also share your information. If there is a financing or bankruptcy, we may share your information.

We share information as permitted by law and for other reasons we may describe to you.

You Have Certain Choices and Rights

You can opt out of receiving our marketing emails. To stop receiving our promotional emails, follow the “unsubscribe” instructions in any promotional message you get from us. Even if you opt out of getting marketing messages, we will still send you transactional messages. These include responses to your questions or other necessary information about your account.

You can control cookies and tracking tools. Your browser may give you the ability to control cookies or other tracking tools. How you do so depends on the type of tool. Certain browsers can be set to reject browser cookies. If you block cookies, certain features on our sites may not work. If you block or reject cookies, not all of the tracking described here will stop. Additionally, the Self-Regulatory Program for Online Behavioral Advertising provides consumers with the ability to manage certain choices online [here](#) and provides a tool for managing mobile choices [here](#).

Our Do Not Track Policy: Some browsers have “do not track” features that allow you to tell a website not to track you. These features are not all uniform. We do not currently respond to those signals. If you block cookies, certain features on our sites may not work. If you block or reject cookies, not all of the tracking described here will stop. Options you select are browser and device specific.

Rights. Depending on where you live, you may have certain rights related to the information we collect about you. You can send us a request to the email address listed below. We may need more information from you to process your request and to verify your identity. Certain exceptions may apply to your request or you may not be eligible.

Security Measures

We use reasonable security measures as required by relevant law. The Internet is not 100% secure. We cannot promise that your use of our sites or apps will be completely safe. We encourage you to use caution when using the Internet. This includes not sharing your passwords.

We Store Information in the United States

Information we collect is stored in the United States. This site is intended for people who are in the United States. If you live outside of the United States and choose to use this site you understand that it is at your own risk. If you live outside of the US, you understand and agree that we may transfer your information to the US. Our sites and businesses are subject to US laws, which may not afford the same level of protection as those in your country. By submitting your information, you agree to the processing of it in the US.

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Given that you do not currently operate in California, and have no near-term plans to do so, there's specific kind of content omitted here.

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Link to <https://optout.aboutads.info/?c=2&lang=EN>

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Link to <https://youradchoices.com/appchoices>

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While Kyros PBC is not really subject to any laws that would require offering rights (Kyros Recovery, in its provider role would have to), we see that the current website privacy policy offers certain rights.

In practice, if Kyros Care received any rights request, it is likely that such request would be forward to the provider and managed through them as the CE.

That said, to remove discussion of rights would be a material change to the policy, thus we have kept in but just at a higher level.

Third Party Sites and Links

If you click on a link to a third party site, you will be taken to websites we do not control. This includes our pages on social media sites. This policy does not apply to the privacy practices of these websites. Read the privacy policy of other websites carefully. We are not responsible for these third party practices.

Information Collection from Children

Our sites and apps are meant for adults. We do not knowingly collect personally identifiable information from children under 13 without permission from a parent or guardian. If you are a parent or legal guardian and think your child under 13 has given us information, you can email us. You can also write to us at the address listed at the end of this policy. Please mark your inquiries "COPPA Information Request." Parents, you can learn more about how to protect children's privacy on-line [here](#).

Contact Us

If you have questions about this Policy, you can email us at hello@kyros.care.

Policy Updates

We may make changes or updates to this Policy. We will notify you of any material changes to this Policy as required by law. All changes will also be posted on our website. Please check our site periodically for updates.

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Link to <https://www.ftc.gov/tips-advice/business-center/privacy-and-security/children%27s-privacy>

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Confirm this is the right email address to list.