

Robin Healthcare Inc. Privacy Policy

Version: 1.0

Last Updated: October 16, 2019

We at Robin Healthcare, Inc., believe in the rights to privacy of our clinician customers (“Clinicians”); patients served by such Clinicians (“Patients;”) and other visitors to our Site (as defined below), and we follow the practices set forth in this Privacy Policy regarding Personal Information and Anonymous Information of such Clinicians, Patients, and visitors to our Site. In this Privacy Policy, “you” means, collectively, Clinicians, Patients, and visitors to the Site, unless the context indicates otherwise. The homepage of our website is located at robin.co (“Site”).

We respect the privacy of Clinicians and Patients, of all visitors to the Site, and of users of our evolving internet-based and other technologies, products and services (including, without limitation, the medical scribe and other services we provide to Clinicians, “Products and Services”). This Privacy Policy is intended to inform you of our policies and practices regarding the collection, use and disclosure of any Personal Information and Anonymous Information that you submit to us or that we collect through your or your Clinician’s use of our Products and Services and/or interaction with our Site. “Personal Information” is information about Clinicians, Patients, or visitors that is personally identifiable, like name, address, e-mail address, or phone number, as well as other non-public information that is associated with the foregoing. “Anonymous Information” means information that is not associated with or linked to Personal Information; Anonymous Information does not permit the identification of individual persons. We collect and use Personal Information and Anonymous Information as described in this Privacy Policy from both users of our Products and Services (including for this purpose Patients) and visitors to our Site.

User Consent

BY SUBMITTING PERSONAL INFORMATION THROUGH OUR SITE OR BY USING OUR PRODUCTS AND SERVICES, YOU AGREE TO THE TERMS OF THIS PRIVACY POLICY AND THE PROCESSING OF PERSONAL INFORMATION ACCORDING TO THIS PRIVACY POLICY. IF YOU ARE A CLINICIAN, YOU EXPRESSLY AGREE TO THE TERMS OF THIS PRIVACY POLICY AND CONSENT TO THE PROCESSING OF PERSONAL INFORMATION FOR YOU, YOUR STAFF AND YOUR PATIENTS ACCORDING TO THIS PRIVACY POLICY. YOUR PERSONAL INFORMATION MAY BE PROCESSED BY US IN THE COUNTRY WHERE IT WAS COLLECTED AS WELL AS OTHER COUNTRIES (INCLUDING THE UNITED STATES) WHERE LAWS REGARDING PROCESSING OF PERSONAL INFORMATION MAY BE LESS STRINGENT THAN THE LAWS IN YOUR COUNTRY.

HIPAA

“Protected health information” is a type of Personal Information of Patients that is protected by the Health Insurance Portability and Accountability Act of 1996 and its implementing regulations (“HIPAA”).

If we have protected health information of Patients through a business associate agreement with a Clinician (a “Business Associate Agreement”), we follow the Business Associate Agreement regarding how we use or disclose that type of Personal Information. A Business Associate Agreement is a requirement of HIPAA. We follow HIPAA and any applicable Business Associate Agreement when we use or disclose Patients’ Personal Information that is covered by HIPAA or any applicable Business Associate Agreement. If there are conflicts between what HIPAA or any applicable Business Associate Agreement permits or requires and this Privacy Policy, we follow the provisions of HIPAA and such any applicable Business Associate Agreement. For example, this Privacy Policy may give you certain rights or commit to certain obligations to protect the privacy of protected health information. If HIPAA or the Business Associate Agreement requires (or, subject to other applicable law, allows) us to treat that information differently, we may (and if required to, will) do so. Your Clinician is the best person to tell you of your rights and obligations under HIPAA and any applicable Business Associate Agreement and how your health information can be used or shared by us.

Collection of Personal Information

The Personal Information we gather from Clinicians, Patients and visitors to our Site helps us learn about users of our Products and Services, Clinicians and Patients' engagement and understanding of our Products and Services, and visitors to the Site. We use this information to better tailor the features, performance and support of our Products and Services, and to offer you additional information and opportunities.

We collect the following Personal Information that you submit to us voluntarily:

- When you request a demonstration of our proprietary software, we collect your name, e-mail address, phone number and the name of your company.
- When you request to be added to our distribution list for product updates and news, we collect your name, company name, job title and e-mail address.
- When you fill out our "Contact Us" form we collect your name, company name, job title, e-mail address, phone number and the state/region in which you reside.
- When you contact us by e-mail with an inquiry, or to apply for a position at Robin Healthcare, Inc., we will collect your name, e-mail address and any information contained in the e-mail you send us, as well as any documents and materials attached to such e-mail.
- When you provide us with feedback, we will collect your name, e-mail address, phone number and the feedback that you submit.

We never collect, store, or process sensitive personal information about Clinicians or visitors to the Site, such as financial information, social security number or other government identification numbers, race, religion, social media related data, political opinions, trade union membership, sexual orientation, health information that is unrelated to the execution of our Services, biometric data, or genetic data, except in the form of Anonymous Data.

However, we do collect protected health information of Patients with their written consent and under the provisions of our Services and Business Associate Agreements in accordance with HIPAA and in order to execute the agreed upon responsibilities for clinical and other documentation and related administrative duties on behalf of Clinicians:

- When Patients consent to our Services, we adhere to the Privacy, Security, and Breach Notification Rules of HIPAA. When performing Services for Clinicians, we limit the use or disclosure of, and requests for, protected health information to that which is necessary in accomplishing the intended purpose.
- Once Patients consent to our Services, we collect and use their protected health information only in connection with clinical and other documentation and related Services, and only for so long as permitted by applicable law and for the purposes of performing (and assessing and improving the quality of) the Services we agree to provide for Clinicians.
- In time, we may request permission from Clinicians in order to request feedback directly from Patients regarding the impact of our Products and Services in order to learn how we may improve and augment our Services.

Other than to provide previously agreed-upon Services for Clinicians in the execution of clinical and other documentation and related Services and an administrative duties, we never collect, store, or process Patients' sensitive personal information such as financial information, social security number or other government identification numbers, race, religion, social media related data, political opinions, trade union membership, sexual orientation, health information, biometric data, or genetic data except in the form of Anonymous Information.

Personal Information Collected via Technology

As you use our Services and navigate the Site, certain information may also be collected passively, including your Internet protocol address, browser type, domain names, access times, and operating system. We also use

Cookies and navigational data like Uniform Resource Locators (URL) to gather information regarding the date and time of your visit and the information and services for which you searched and which you viewed. This type of information is collected to make our Products and Services and the Site more useful to you.

An "Internet protocol address" or "IP Address" is a number that is automatically assigned to your computer when you use the Internet. In some cases your IP Address stays the same from browser session to browser session; but if you use a consumer internet access provider, your IP Address probably varies from session to session. We track IP Addresses solely in conjunction with session cookies to analyze our web page flow. If you are a visitor to the Site and also a Patient, we cannot tell from your IP Address that you are a Patient, and all references in this Privacy Policy to visitors to this Site refer only such persons in their capacity as such (and not as Patients or Clinicians, as the case may be). We do not collect IP Addresses from Patients as part of the Products or Services we provide to Clinicians.

"Cookies" are small pieces of information that a web site sends to your computer's hard drive while you are viewing a web site. 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 provide you with a more personal and interactive experience on the Site. Persistent Cookies can be removed by following Internet browser help file directions. If you choose to disable Cookies, some areas of the Site may not work properly.

Our third-party advertising partners and affiliates may employ a software technology called clear gifs, which is also known as Web Beacons/Web Bugs, that help us better manage content on the Site by informing us what content is effective. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on Web pages and are about the size of the period at the end of this sentence. We do not tie the information gathered by clear gifs to our customers' personally identifiable information.

Use of Information

In general, Personal Information you submit to us is used by us either to respond to inquiries and requests that you make, to enable us to get in contact with you, to distribute updates about our Products and Services and other company-related news, or to aid us in providing Products and Services to you. We will use resumes that you submit to us to consider you for a position at Robin Healthcare, Inc. We may also use your Personal Information to provide you with updates to our Products and Services and other company-related news, unless you request not to receive such communications from us. If you are a Patient or Clinician, we also use Personal Information to provide the Services that we have agreed to provide with the applicable Clinician.

We may create Anonymous Information records from Personal Information by excluding information (such as your name) that makes the information personally identifiable to you. We may use this Anonymous Information to analyze inquiry, request, and usage patterns so that we may enhance Products and Services and Site. Robin Healthcare reserves the right to use and disclose Anonymous Information to third parties in its discretion. Anonymous Information regarding Patients meets the requirements of HIPAA for de-identification of protected health information.

Feedback

If you provide feedback on any of our Products or Services to us, we may use such feedback for any purpose, provided we will not associate such feedback with your Personal Information. If you submit Personal Information in the feedback, we will treat the Personal Information in such communication in accordance with this Privacy Policy. We may also use, from time to time, a third-party service provider to host our feedback page and for software support.

Disclosure of Personal Information

Except as otherwise stated in this Privacy Policy, we do not generally trade, rent, or share your Personal Information with third parties unless you ask us to do so.

Although we currently do not have a parent company, any subsidiaries, joint ventures, or other companies under common control (collectively, "Affiliates"), we may in the future. We may share some or all of your

Personal Information with these Affiliates, in which case we will require our Affiliates to honor this Privacy Policy.

If our company or our assets are acquired by another company, that company will possess the Personal Information collected by us and it will assume the rights and obligations regarding your Personal Information as described in this Privacy Policy. This Privacy Policy and any personal data we collect may be assigned and transferred to any organization that may acquire or merge with us in the future.

Regardless of any choices you make regarding your Personal Information (as described below), we may disclose your Personal Information if we believe in good faith that such disclosure is necessary to (a) comply with relevant laws or to respond to subpoenas or warrants served on us; or (b) to protect and defend our rights or property or those of third parties. Where your Personal Information has been requested by any governmental entity or other third party pursuant to a subpoena or similar legal process, we will notify you as quickly as practicable before providing any such information, unless we are legally prohibited from doing so or we believe in good faith that disclosure is or may be necessary to protect life, avoid serious physical injury or property loss or damage, or to prevent or investigate an ongoing crime. We may also share your Personal Information with third party service providers.

We will undertake efforts to see that any third party with which we share or otherwise disclose personal data is under an obligation to use the personal data solely for the purposes for which the data was disclosed.

Your Choices Regarding Your Personal Information

We offer you choices regarding the collection, use and sharing of your Personal Information. When you receive updates or newsletters, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to “opt-out” by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly (please see contact information below). Despite your indicated e-mail preferences, we may send you notices of any updates to our Terms of Service or Privacy Policy.

If you request via U.S. mail or by e-mailing us at privacy@robin.co, we will provide you a summary of any of your Personal Information that we have. You may modify, correct, change, delete or update your Personal Information by contacting us via U.S. mail at the addresses below or by emailing us at privacy@robin.co. You may also request deletion of your e-mail address by contacting our webmaster at privacy@robin.co. Other data that you have provided to us will continue to remain within our files at our discretion even though your e-mail is deleted. We will respond to your request to access this data within 30 days of our receipt of the request. Despite anything herein to the contrary, we will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Third-Party Advertising

In the event that we use a third-party advertising company to serve ads when you visit our Site, the third-party advertising company may use cookies or similar technologies to track visitors of the Site and gather demographic information about them. This data may be used to deliver customized content and promotions to users whose behavior indicates that they are interested in a particular subject area. If we engage such third-party advertising company services, we will post a link to their Privacy Policy herein. Our provision of a link to any other website or location is for your convenience and does not signify our endorsement of such other website or location or its contents. If you do not want information concerning your website visits to be used for the purposes described above you can gladly inform us via email or air mail. All data ascertained is subject to the data protection regulations. Robin will only engage a third-party advertising company, who participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework and also with the EU Standard Contractual (Model) Clauses.

Regarding Children

We do not intentionally gather Personal Information about visitors to Robin’s Site who are under the age of 13.

Other Sites Security

We are committed to protecting the security of your Personal Information. We use a variety of industry-standard security technologies and procedures to help protect your Personal Information from unauthorized access, use, or disclosure.

Even though we have taken significant steps to ensure that your Personal Information is not intercepted, accessed, used, or disclosed by unauthorized persons, you should know that we cannot fully eliminate security risks associated with Personal Information. We are not responsible for the security of information transmitted through the Internet.

Contact Us

Should you have any questions or concerns regarding this Privacy Policy or wish to contact our data controller, please contact us at:

[Robin.co](https://robin.co)

1845 Berkeley Way Berkeley, CA 94703

privacy@robin.co

Privacy Policy Updates

This Privacy Policy is subject to occasional revision, and if we make any substantial changes to it, we will post an alert on this page. If you object to any such changes, you must cease using our Product and Services and/or Site. Continued use of our Product and Services and/or Site following notice of any such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.