# **Privacy Policy**

# PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING OUR SERVICES OR WEBSITE.

**IMPORTANT NOTE** - Our Notice of Privacy Practices is a separate document that outlines how protected health information ("PHI") about you may be used and disclosed in connection with the healthcare services, in accordance with the Health Insurance Portability and Accountability Act ("HIPAA").

# I. Introduction

This Privacy Policy (the "Privacy Policy") outlines how Libra Rx collects and utilizes Personal Data about you via our website and through email, text, and other electronic communications between you and Libra Rx. The terms "we," "us," "our," and "Libra Rx" refer to Libra Rx, a limited liability company located at [Your Business Address].

For further inquiries or assistance, please contact us at: Libra Rx 2225 Sycamore St. #5032 Harrisburg, PA 17111 Email: support@getlibrarx.com Phone: 844.923.5500

Libra Rx is dedicated to respecting your privacy and is committed to protecting it in accordance with this policy. This Privacy Policy describes the types of information we and our affiliates may collect from you or that you may provide when you use our services through Libra Rx's website (the "website" or the "Platform").

For further inquiries or assistance, please contact us at: support@getlibrarx.com

This Privacy Policy also details our practices for collecting, using, maintaining, protecting, and disclosing that information. Your use of the Platform is governed by this Privacy Policy and our Terms of Service, which is incorporated into this Privacy Policy. All capitalized terms used in this Privacy Policy but not defined herein have the meanings assigned to them in the Terms of Service. By accessing or using the Platform, you acknowledge that you have read, understood, and agreed to be legally bound by this Privacy Policy and our Terms of Service. If any term in this Privacy Policy is unacceptable to you, please refrain from using the Platform or providing any Personal Information. This Privacy Policy may be updated periodically, and your continued use of the Platform after we make changes constitutes your acceptance of those changes. Therefore, we encourage you to review this Privacy Policy regularly for updates.

This Privacy Policy does not extend to information collected by any third parties, including through any applications or content (including advertisements) that may link to, be embedded in, or otherwise accessible from the Platform. Additionally, you may be subject to different privacy policies or terms of service when accessing other websites or applications.

Libra Rx is committed to protecting your privacy. We provide this Privacy Policy to clarify the types of information we collect and to inform you about our specific practices and guidelines designed to protect

the security and confidentiality of your personal information. For further inquiries or assistance, please contact us at: support@getlibrarx.com

# II. Information We Collect About You and How It's Collected

# Information About You and Your Health Care Treatment and Payment.

Libra Rx collects various types of information from and about users of our Platform, including: For further inquiries or assistance, please contact us at: support@getlibrarx.com

- **Personal Information**: Information by which you may be personally identified, including, but not limited to, your name, mailing address, email address, telephone number, account information, postal address, gender, occupation, and billing information. This may also include any information related to your eligibility or any other data that qualifies as personally identifiable information under applicable law ("Personal Information").
- Health-related Information: Health-related data, such as clinical history and conditions, as well as any information exchanged via emails, texts, chats, or calls between you and Libra Rx. For further inquiries or assistance, please contact us at: support@getlibrarx.com
- **Technical Information**: Information regarding your Internet connection, the equipment you use to access our Platform, and usage details.
- User Information: Information about your interactions with our Platform, including whether you are a current user, your product interests, location, demographics, or information pertinent to your inquiries or requests.
- **Other Requested Information**: Any other information we specifically request from you.

## Methods of Collection:

We collect this information through the following methods:

- Directly from You: Information you provide to us directly.
- Automatically: Information collected automatically as you navigate through the Platform (e.g., usage details, IP address, and information obtained through cookies, web beacons, and other tracking technologies).
- **From Third Parties**: Information obtained from third parties with whom we collaborate to provide services, such as physicians, medical professionals, and pharmacies.

## Information You Give to Us.

The information we collect on or through our Platform may include:

• **Browsing Information**: Data collected when you browse our website, even if you do not create an account. We may collect some information described in this section even without registration.

- **Registration Information**: Information you provide when you sign in or register for an account on the Platform or for services provided by our affiliates, or through communications with you via the Platform or as a result of any healthcare services.
- Inquiry Information: Information necessary to process or respond to your inquiries related to treatment requests, payment, customer service, or feedback you provide regarding our Platform. This includes payment processing information such as your name, address, email address, and payment card information. When you provide or update your payment information, we transmit it via an encrypted connection to a third-party credit card processor. Libra Rx does not collect or store your complete credit card details.

For further inquiries or assistance, please contact us at: support@getlibrarx.com

- **Correspondence Records**: Records and copies of your correspondence (including email addresses) if you contact us, such as when you report an issue with our Platform or services.
- **Public Information**: Information you provide for display or posting on the Platform, including data shared through social media and/or testimonials. If you provide a testimonial, your first name may be published alongside the testimonial. Please refrain from providing information for public display that you do not wish to be shared.
- Search Queries: Your search queries on the Platform.

As you navigate through and interact with our Platform, we may utilize automatic data tracking technologies to collect certain information regarding your equipment, browsing actions, and patterns, which may include:

- Visit Details: Details of your visits to our Platform, including traffic data, location data, logs, language, date and time of access, frequency, and other communication data, as well as resources that you access and utilize on the Platform.
- **Connection Information**: Information about your computer and Internet connection, including your IP address, operating system, host domain, and browser type.
- **Referring Websites**: Details of referring websites (URL). We may also use these technologies to gather information about your online activities over time and across third-party websites or services (behavioral tracking).

The information collected automatically may include statistical data and may also contain Personal Information. We may maintain this data or associate it with Personal Information you provide or that we collect from other sources or third parties. This information assists us in improving our Platform and providing a better, more personalized service, enabling us to:

- Estimate how users access and use our Platform.
- Store information regarding your preferences.
- Accelerate your searches.
- Recognize you upon your return to our Platform.

The Platform may utilize cookies to enhance functionality. Cookies are text files sent by servers to web browsers and stored on your computer. They inform us about the parts of the Platform you have visited, allowing Libra Rx to address software compatibility issues and retain your preferences for future visits. Certain cookies and other technologies may help recall Personal Data previously provided by a user. For further inquiries or assistance, please contact us at: support@getlibrarx.com

We use information collected from cookies and related technologies to enhance your user experience and the overall quality of our services. Cookies help us identify and track visitors, their usage of the Platform, and their access preferences. We may use your Personal Data to determine which web pages you visit on our websites, which websites you accessed prior to visiting our site, and your subsequent online activity after leaving our site. This information enables us to develop statistics to understand how visitors utilize our websites and identify areas for improvement. Visitors who do not wish to have cookies placed on their computers should adjust their browser settings to refuse cookies before using the Platform; however, Libra Rx disclaims, and you hereby waive, any claims or liabilities that may arise due to your partial or incomplete access to the content of the Platform as a result. Additionally, visitors may utilize the Global Privacy Control ("GPC") add-on or browser preference, which signals that you do not wish for personal information to be collected by websites you visit. Our Platform is designed to respond to GPC signals.

For further inquiries or assistance, please contact us at: support@getlibrarx.com

- Payment Processors: We utilize Intuit's QuickBooks and/or Stripe as our payment processors. To
  enable these services to function properly, a cookie is stored on your browser to assist in
  detecting and preventing fraud. These are session cookies that typically remain on your browser
  for 24 hours. For more information, please visit their respective privacy policies at <u>QuickBooks</u>
  Privacy Policy and <u>Stripe Privacy Policy</u>.
- **Third-Party Tools**: We also employ other third-party tools to track the performance of our Platform. These tools provide us with information about errors, website performance, and other technical details we may use to improve our Platform and services.

We may also collect data using "pixel tags," "web beacons," "clear GIFs," or similar technologies (collectively, "pixel tags"), which allow us to know when you visit our Platform. Through pixel tags, we collect non-Personal Information or aggregate data that can enhance your online experience and help us understand traffic patterns.

# Information We Receive From Other Sources.

This includes information we receive about you if you utilize any of the other websites we operate or other services we provide. We may collaborate with third parties who sometimes provide information about you. We obtain such information from third parties with whom we work to offer specific services (including, for example, subcontractors, analytics providers, advertising networks, and search information providers, or third parties who share your information to provide healthcare services, such as medical providers who include your information when communicating with other medical providers or Libra Rx).

We may combine information received from other sources with information you provide and information we collect about you. Depending on the types of information received, we will utilize the information received from other sources or the combined information for the purposes described in Section III below.

# III. How We Use Your Information

At Libra Rx, we may use the information we collect about you, including Personal Information, in various ways, including:

- **Transaction Fulfillment**: To process any registrations or transactions you initiate online, such as payment processing, determining eligibility, and managing associated benefits.
- Healthcare-Related Purposes: For purposes related to treatment, payment, and healthcare operations.
- **Communication Outreach**: To communicate with you regarding our healthcare offerings and any products or services you request. Such communication may be delivered through telephone calls, voicemails, emails, SMS/text messages, or notifications within our Platform.
- Service Notifications: To reach out to you concerning healthcare services provided as a result of your engagement with our Platform.
- Account Management: To oversee your account, including processing payments and fulfilling orders related to the healthcare services accessed via the Platform.
- **Operational Support**: To maintain and enhance the Platform and deliver associated services, which includes providing technical support.
- Information Requests: To respond to inquiries you make and provide requested information.
- **De-identified Data Creation**: To generate de-identified information that cannot identify you personally, including aggregate statistics about service usage.
- Evaluating Communication Effectiveness: To assess the effectiveness of communications we send, including advertising, and to provide relevant content, such as surveys, newsletters, and other updates from Libra Rx.
   For further inquiries or assistance, please contact us at: support@getlibrarx.com
  - For further inquines or assistance, please contact us at: support@getilbrarx.com
- Audience Insights: To gain insights into our audience and improve the security, safety, and performance of our products and services. This involves verifying identities and preventing or detecting fraudulent or illegal activities.
- **Product Development and Innovation**: To design, develop, and communicate features, products, and services related to our offerings and those of our subsidiaries, affiliates, parent companies, and third-party partners, where legally permissible.
- Service Updates: To inform you about any changes to our services or the Platform.

- **Policy Enforcement**: To enforce this Privacy Policy and any other agreements you have entered into, ensuring the protection of the rights, property, and safety of Libra Rx LLC, our customers, and others, including the copyright-protected content of the Platform. For further inquiries or assistance, please contact us at: support@getlibrarx.com
- **Consent-Based Actions**: For any purposes for which you have provided explicit consent, as required by law.
- Legal Compliance: To adhere to applicable federal, state, and local laws and regulations.

# **IV. Disclosure of Your Information**

Libra Rx may disclose the Personal Information we collect or that you provide in the following circumstances:

- **Healthcare Operations**: For purposes associated with treatment, payment, or healthcare operations.
- **Authorized Parties**: To individuals or entities authorized under this Privacy Policy or any other consent or authorization you provide.
- Service Provider Collaboration: To third-party service providers that assist in the maintenance, improvement, and optimization of our Platform, including those involved in the technology and security infrastructure that supports the Platform, or those providing services such as email delivery, auditing, and related functions.
- **Medical Providers**: To healthcare professionals, including physicians, healthcare facilities, pharmacies, and laboratories involved in providing services to you. You acknowledge that medical providers rendering services may access any information you provide.
- Affiliated Entities: To employees of Libra Rx and its affiliated entities, or third parties who provide services to us or to those affiliated entities.
   For further inquiries or assistance, please contact us at: support@getlibrarx.com
- **Service Fulfillment**: To fulfill the purposes for which you provided your information. For instance, if you register for specific services, we may share your information to facilitate those services.
- **Payment Processing**: To third-party credit card processors using an encrypted connection for processing your payments.
- Legal Compliance: To any third parties deemed necessary or appropriate for compliance with applicable laws.
- Marketing and Advertising Support: To organizations that assist us with marketing and advertising efforts.

- **Consent-Based Disclosures**: For any additional purposes disclosed to you at the time of providing information or with your consent.
- Legal Obligations: If required to disclose your Personal Information to comply with applicable law, enforce our Terms of Service, or protect the rights, property, or safety of Libra Rx, our customers, or others. This may include sharing information for fraud protection and credit risk management.

For further inquiries or assistance, please contact us at: support@getlibrarx.com

- **De-identified Information Use**: For any purposes concerning de-identified information without restriction.
- **Business Transactions**: In the event of a sale, merger, consolidation, change in control, transfer of substantial assets, reorganization, or liquidation, we may transfer, sell, or assign to third parties information regarding your relationship with us, including Personal Information and other relevant details.
- Related Usage Purposes: For any purpose associated with the uses outlined in Section III: How We Use Your Information.

# V. Options About How We Use and Disclose Your Information

Libra Rx is committed to providing you with choices regarding your Personal Information. We have established mechanisms to give you control over how your information is managed: For further inquiries or assistance, please contact us at: Libra Rx 2225 Sycamore St. #5032 Harrisburg, PA 17111 Email: support@getlibrarx.com Phone: 844.923.5500

- **Tracking Technologies and Advertising Options**: You have the ability to set your browser to refuse all or some cookies, or to alert you when cookies are being sent. Please note that if you choose to disable or refuse cookies, some portions of our Platform may become inaccessible or may not function correctly.
- **Do Not Track Signals**: Currently, we do not respond to "Do Not Track" signals.

# VI. Data Security

At Libra Rx, we have put in place measures designed to protect your Personal Information from accidental loss, as well as unauthorized access, use, alteration, and disclosure. For further inquiries or assistance, please contact us at:

If we have provided you with (or you have selected) a password to access specific areas of our Platform, it is your responsibility to keep that password confidential. We strongly recommend that you do not share your password with anyone. Please remember that any information you share in public areas can be accessed by any user of the Platform.

While we endeavor to safeguard your Personal Information, the transmission of data over the Internet is never completely secure. Although we will take all reasonable precautions to protect your data, we cannot guarantee the security of any information you transmit to our Platform; such transmission is at your own risk.

When you access our Platform, there is a possibility that your protected health information (PHI) may be stored in an unencrypted format on your mobile device. We implement various technical safeguards to minimize the risk of your PHI being exposed on your mobile device; however, we cannot guarantee that these safeguards will always be effective.

# **VII. Third-Party Platforms**

Our Platform may contain links or references to websites that are outside the control of Libra Rx. Please be aware that this Privacy Policy does not extend to these third-party websites. We encourage you to review the privacy policies and terms of service for any linked or referenced sites you visit. These external websites may deploy their own cookies and tracking technologies, log your IP address, and gather information or solicit Personal Information from you. For further inquiries or assistance, please contact us at: Libra Rx 2225 Sycamore St. #5032

Harrisburg, PA 17111 Email: support@getlibrarx.com Phone: 844.923.5500

Libra Rx does not manage and is not responsible for the actions of third parties regarding their websites or how they manage your Personal Information. We advise you to exercise caution and consult the privacy policies of each third-party site for further information. For further inquiries or assistance, please contact us at: support@getlibrarx.com

## VIII. No Services to Persons Under the Age of 18

Libra Rx does not knowingly provide services to individuals under the age of 18. For further inquiries or assistance, please contact us at: support@getlibrarx.com

## IX. California Resident Privacy Rights

As a California resident, you have additional rights concerning your Personal Information under the California Consumer Privacy Act ("CCPA"). This section outlines the types of Personal Information we collect, how we use and disclose that information, and how you can exercise your privacy rights under the CCPA.

Your rights under the CCPA do not encompass all information we may collect, use, or disclose. For instance, the CCPA does not apply to PHI governed by HIPAA, "medical information" governed by the California Confidentiality of Medical Information Act ("CMIA"), or other patient information handled similarly to PHI or "medical information." The CCPA also excludes certain categories of information. When we collect, use, or disclose information not covered by the CCPA, we do so as outlined in this Privacy Policy (excluding this Section IX) and our Notice of Privacy Practices. If you wish to learn more about our handling of information not covered by the CCPA or to understand your rights under HIPAA and other laws, please refer to this Privacy Policy (excluding this Section IX) and our Notice of Privacy Practices.

For your Personal Information that falls under the CCPA, your rights are detailed below:

# I. Personal Information Disclosures

In the last twelve (12) months, Libra Rx has collected the following categories of Personal Information: For further inquiries or assistance, please contact us at: support@getlibrarx.com

- Identifiers: This includes your name, mailing address, email address, telephone number, and unique identifiers like your IP address and cookies.
- **Protected Characteristics:** Information such as your gender or age, classified under California or federal law.
- Internet and Electronic Network Activity Information: This encompasses your browsing history, activity, and pages visited on our Platform to enhance your experience.
- Geolocation Data
- Professional or Employment Information: Such as your occupation.
- Audio or Similar Information: Collected when you contact our customer support via phone.
- Inferences: Drawn from the aforementioned information.

We obtain this Personal Information directly from you when you provide it, automatically as you navigate our Platform, or from third-party sources to help us determine whether Libra Rx's products or services are suitable for you and to send promotional communications to customers and potential customers. For details on the sources from which we collect your Personal Information, please refer to Section II above. For further inquiries or assistance, please contact us at:

Libra Rx 2225 Sycamore St. #5032 Harrisburg, PA 17111 Email: support@getlibrarx.com We collect and use your Personal Information for our operational needs, including providing services to you, auditing interactions on the Platform, securing our Platform, and detecting, protecting against, and investigating security incidents, as well as improving our Platform (for instance, identifying bugs, repairing errors, and ensuring that services function correctly). For more information on how we use your Personal Information, please see Section III above.

The Personal Information we disclose is outlined in Section IV above. In the past twelve (12) months, we have shared specific information with third parties (such as our service providers) as described below for business or operational purposes.

## II. Categories of Personal Information and Categories of Third-Parties

- Identifiers: Including information such as your email address, IP address, account login details, cookies, and similar data.
- **Service Providers:** Entities that assist us by providing professional or technical support, professional services, or analytics for our Platform.
- Internet or Network Activity Information: Encompasses browsing history, activities, and service pages visited to improve your experience, search history, and interactions with our Platform.
- Geolocation Data

## **III. California Resident Privacy Rights**

If you are a California resident, you possess the following rights:

- **Right to Know:** You have the right to be informed about the Personal Information we have collected, used, and disclosed about you in the twelve (12) months preceding your request. After verifying your identity, we will provide you with specific details of your Personal Information, including the categories of information collected, the purposes for which it was collected, the sources of that data, the categories of third parties with whom we shared it, and the categories of third parties to whom we sold Personal Information.
- **Right to Deletion:** You can request the deletion of your Personal Information that we have collected. We will comply with your request unless an exception applies, such as when the information is needed to fulfill the transaction for which it was gathered.
- **Right to Opt-Out of Sale:** You have the right to request that we do not sell your Personal Information to third parties. While we do not traditionally "sell" your data, the CCPA broadly defines this term, including specific uses of third-party advertising and marketing services as previously described.
- Right to Non-Discrimination: Libra Rx does not discriminate against you for exercising any of your privacy rights under the CCPA or applicable law. This means we will not deny you goods or services, charge you different prices or rates for goods or services, including through discounts or benefits, or provide a different level of quality of goods or services.

For further inquiries or assistance, please contact us at: support@getlibrarx.com

# **IV. How to Exercise Your Privacy Rights**

To exercise your "Right to Know" and "Right to Deletion," please complete your request by reaching out to the Compliance Officer via email. We must verify your identity or authority to make the request and confirm that the Personal Information pertains to you or others. To verify, we may collect your name, email address, and phone number. We may also contact you via email or phone to confirm your identity and ask additional questions to match your identity with the data we have about you. In certain cases, we may require you to declare under penalty of perjury that you are the consumer whose Personal Information is the subject of the request.

You may also designate an authorized agent to submit a request on your behalf. To do this, you or your authorized agent must:

- Provide proof that the authorized agent is registered with the California Secretary of State and that you have authorized them to act on your behalf.
- Submit evidence that you have granted the authorized agent power of attorney under the California Probate Code.
- Provide the authorized agent with written and signed permission to act on your behalf, verify your identity with us, and directly confirm with us that you have granted them permission to submit the request.

We may deny a request from an authorized agent who does not provide sufficient proof to act on your behalf.

For "Right to Opt-Out of Sale" requests, please note that we collect cookies on our website, and each requires a separate opt-out from you. You can opt-out of these cookies by clicking on the "CCPA Do Not Sell My Personal Information" link in the footer of our website and modifying your cookie settings.

## X. Revisions to Our Privacy Policy

Libra Rx reserves the right to amend this Privacy Policy at any time. It is our policy to post any changes we make to this Privacy Policy on this page. The date this Privacy Policy was last modified is noted at the top of the page. You are responsible for ensuring that we have your current, active, and deliverable email address and for periodically reviewing any updates to this Privacy Policy. Your continued use of our Platform following any changes will be considered your acknowledgment of those amendments. For further inquiries or assistance, please contact us at: support@getlibrarx.com

## **XI. Contact Information**

If you have any questions or comments regarding this Privacy Policy and our privacy practices, please reach out to us through the Platform or contact us at: support@getlibrarx.com

# **Privacy Practices**

Last updated: January 1, 2024

# THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

# I. Who We Are

This Notice of Privacy Practices ("Notice") outlines the privacy practices of Libra Rx and its affiliates, including associated professional entities, healthcare providers, and personnel ("we" or "us"). For further inquiries or assistance, please contact us at:

Libra Rx 2225 Sycamore St. #5032 Harrisburg, PA 17111 Email: support@getlibrarx.com Phone: 844.923.5500

## **II. Our Privacy Obligations**

We are legally required to protect the privacy of your health information ("Protected Health Information" or "PHI") and to provide you with this Notice detailing our legal duties and privacy practices concerning your PHI. We are also obliged to notify you in the event of a breach involving unsecured PHI. When we use or disclose your PHI, we will comply with the terms of this Notice (or other notice in effect at the time of the use or disclosure).

# III. Permissible Uses and Disclosures Without Your Written Authorization

In certain situations, outlined in Section IV below, we must obtain your written authorization to use and/or disclose your PHI. However, we do not need any type of authorization for the following uses and disclosures:

# A. Uses and Disclosures for Treatment, Payment, and Healthcare Operations.

We may use and disclose PHI, but not your "Highly Confidential Information" (as defined in Section IV.B

below), to treat you, obtain payment for services rendered, and conduct our "Healthcare Operations" as described below:

- **Treatment.** We may use and disclose your PHI to provide treatment, for instance, to diagnose and treat your illness or injury. We may also share your PHI with other healthcare providers involved in your care.
- **Payment.** We may use and disclose your PHI to secure payment for services we provide to you.
- Healthcare Operations. We may use and disclose your PHI for our healthcare operations, which encompass internal administration, planning, and various activities aimed at improving the quality and cost-effectiveness of the care we provide. For example, we may use PHI to evaluate the quality and competence of our healthcare providers. We may also disclose PHI to address any complaints you may have, as well as to your other healthcare providers when necessary for them to treat you or receive payment for their services.

# B. Disclosure to Relatives, Close Friends, and Other Caregivers.

We may use or disclose your PHI to a family member, relative, close personal friend, or any other person you identify when you are present for or otherwise available before the disclosure, provided we (1) obtain your agreement; (2) give you the opportunity to object, and you do not object; or (3) reasonably infer that you do not object to the disclosure.

If you are not present, or if providing an opportunity to agree or object is not practicable due to your incapacity or an emergency, we may exercise our professional judgment to decide whether a disclosure is in your best interest. We will only disclose information that we believe is directly relevant to the individual's involvement in your healthcare or payment related to your healthcare. We may also disclose your PHI to notify (or assist in notifying) such individuals of your location, general condition, or death.

# C. Public Health Activities.

We may disclose your PHI for the following public health activities: (1) reporting health information to public health authorities to prevent or control disease, injury, or disability; (2) reporting child abuse and neglect; (3) reporting information about products and services under the jurisdiction of the U.S. Food and Drug Administration; (4) alerting a person who may have been exposed to a communicable disease; and (5) reporting information to your employer as required under laws addressing work-related illnesses and injuries.

# D. Victims of Abuse, Neglect, or Domestic Violence.

If we reasonably believe you are a victim of abuse, neglect, or domestic violence, we may disclose your PHI to a governmental authority authorized to receive reports of such abuse.

## E. Health Oversight Activities.

We may disclose your PHI to health oversight agencies overseeing the healthcare system and ensuring compliance with government health program rules, such as Medicare or Medicaid.

## F. Judicial and Administrative Proceedings.

We may disclose your PHI in response to a legal order or other lawful process during a judicial or administrative proceeding.

# G. Law Enforcement Officers.

We may disclose your PHI to law enforcement officials as required or permitted by law, or in compliance with a court order or subpoena.

# H. Decedents.

We may disclose your PHI to a coroner, medical examiner, or funeral director as authorized by law.

# I. Research.

We may use or disclose your PHI without your consent or authorization if an Institutional Review Board or Privacy Board approves a waiver of authorization for disclosure.

# J. Health or Safety.

We may use or disclose your PHI to prevent or lessen a serious and imminent threat to a person's or the public's health or safety.

# K. Specialized Government Functions.

We may use and disclose your PHI to government units with special functions, such as the U.S. military or the U.S. Department of State under certain circumstances.

# L. Workers' Compensation.

We may disclose your PHI as authorized by and to the extent necessary to comply with state law relating to workers' compensation or similar programs.

# M. As Required by Law.

We may use and disclose your PHI when required to do so by any other law not previously referred to in the preceding categories.

# IV. Uses and Disclosures Requiring Your Written Authorization

# A. Use or Disclosure with Your Authorization.

We must obtain your written authorization for uses and disclosures of PHI for marketing purposes and disclosures that constitute the sale of PHI. Other uses and disclosures not described in this Notice will only occur with your written permission on an authorization form ("Your Authorization"). For example, you will need to complete and sign an authorization form before we can send your PHI to your life insurance company or to an attorney representing another party in a lawsuit involving you.

# B. Uses and Disclosures of Your Highly Confidential Information.

Federal and state law requires special privacy protections for certain highly confidential information about you ("Highly Confidential Information"). This may include subsets of your PHI regarding: (1) mental health and developmental disabilities services; (2) alcohol and drug abuse prevention, treatment, and referral; (3) HIV/AIDS testing, diagnosis, or treatment; (4) sexually transmitted diseases; (5) genetic testing; (6) child abuse and neglect; (7) domestic abuse of an adult with a disability; or (8) sexual assault. To disclose your Highly Confidential Information for purposes not permitted by law, we must obtain Your Authorization.

## C. Revocation of Your Authorization.

You may withdraw (revoke) your Authorization regarding your Highly Confidential Information (except to

the extent we have acted in reliance upon it) by delivering a written statement to the Privacy Officer identified below. A revocation form is available upon request.

# V. Your Rights Regarding Your Protected Health Information

# A. For Further Information and Complaints.

If you would like more information about your privacy rights, believe we have violated your privacy rights, or disagree with a decision we made about your access to your PHI, you may contact our Compliance and Privacy Officer. You may also make a complaint by calling (844) 357-3601 or by filing written complaints with the Director, Office for Civil Rights of the U.S. Department of Health and Human Services. The Compliance and Privacy Officer can provide you with the correct address for the Director. We will not retaliate against you for filing a complaint with us or the Director.

# B. Right to Request Additional Restrictions.

You have the right to request a restriction on the uses and disclosures of your PHI (1) for treatment, payment, and healthcare operations purposes, and (2) to individuals involved in your care or payment related to your care. For instance, you have the right to request that we do not disclose your PHI to a health plan for payment or healthcare operations if that PHI pertains solely to a healthcare item or service for which we have been involved and which has been fully paid out of pocket. Unless otherwise required by law, we are obligated to comply with such requests. For all other requests for restrictions on the use and disclosure of your PHI, we are not required to agree but will attempt to accommodate reasonable requests when appropriate. To request additional restrictions, please obtain a request form from and return it to our Compliance and Privacy Officer, who will respond in writing.

# C. Right to Receive Confidential Communications.

You may request, and we will accommodate, any reasonable written request for you to receive your PHI by alternative means of communication or at alternative locations.

# D. Right to Inspect and Copy Your Health Information.

You may request access to your medical record and billing records maintained by us to inspect and obtain copies. In limited circumstances, we may deny access to a portion of your records. To access your records, please request a Release of Information Form from the Privacy Officer and submit the completed form to: support@getlibrarx.com. If you request copies, we will charge a cost-based fee that includes (1) labor for copying the PHI; (2) supplies for creating a paper copy or electronic media; (3) our postage costs, if you request mailing; and (4) if you agree in advance, the cost of preparing an explanation or summary of the PHI.

## E. Right to Request to Amend Your Records.

You have the right to request that we amend PHI in your medical record or billing records. If you wish to amend your records, please obtain an Amendment Request Form from the Compliance and Privacy Officer and submit it to support@getlibrarx.com. We will comply with your request unless we believe the information is accurate and complete or other special circumstances apply.

## F. Right to Receive An Accounting of Disclosures.

Upon request, you may obtain an accounting of certain disclosures of your PHI made by us during any time before your request, provided such period does not exceed six years. If you request an accounting

more than once in a twelve-month period, we may charge a reasonable fee for additional accountings and will inform you in advance of any fee.

# G. Right to Receive A Copy of this Notice.

Upon request, you may obtain a copy of this Notice, either by email or in paper format. Please submit your request to: support@getlibrarx.com

# VI. Effective Date and Duration of This Notice

**A. Effective Date.** This Notice is effective on January 1, 2024.

# B. Right to Change Terms of this Notice.

We may change the terms of this Notice at any time. If we do so, the new notice terms may apply to all Protected Health Information we maintain, including any information created or received before issuing the new notice. You may also obtain any new notice by contacting: support@getlibrarx.com.

VII. Privacy Officer Libra Rx 2225 Sycamore St. #5032 Harrisburg, PA 17111 Email: support@getlibrarx.com Phone: 844.923.5500

# **Medical Consent**

## **IMPORTANT NOTICE:**

WE ARE NOT A REPLACEMENT FOR EMERGENCY MEDICAL SERVICES. IF YOU HAVE A MEDICAL EMERGENCY, SEEK EMERGENCY MEDICAL CARE IMMEDIATELY IN-PERSON OR DIAL 911 OR YOUR LOCAL EMERGENCY NUMBER.

## I. Changes to Terms

We may change these terms at any time, as required by law. This may include adding, removing, or modifying terms in response to legal, business, competitive, or other reasons not listed here.

# **II. Telehealth Consent**

## **Telehealth Overview:**

Telehealth is a method of providing healthcare services through audio-video interfaces, such as videoconferencing.

## **Data Security:**

The electronic systems we use will incorporate security protocols to protect the confidentiality of client identification and imaging data, ensuring its integrity against any intentional or unintentional corruption.

# **Expected Benefits:**

- Improved access to weight loss management healthcare by enabling services across distances.
- More efficient healthcare delivery, including medical evaluation and management.
- Access to expertise from distant specialists.
- Continuity of care with established providers in other locations.

## **Possible Risks:**

While telehealth offers many benefits, there are potential risks, including:

- Insufficient information transmitted (e.g., poor image resolution) that may hinder appropriate medical decision-making.
- Delays in evaluation and treatment due to equipment failures.
- Rare security breaches that may compromise personal medical information.
- Adverse drug interactions or allergic reactions due to incomplete medical records.

## By consenting to telehealth services, I understand the following:

## 1. Confidentiality Protection:

Laws protecting the privacy of medical information also apply to telehealth. My identifiable information will not be disclosed to researchers or other entities without my consent.

## 2. Right to Withdraw Consent:

I have the right to withhold or withdraw my consent for telehealth services at any time without affecting my right to future care.

## 3. Access to Information:

I have the right to inspect all information obtained during telehealth interactions and may receive copies for a reasonable fee.

## 4. Alternative Methods:

I understand that various alternative methods of weight loss management are available and that I may choose them at any time.

# 5. Disclosure of Other Providers:

It is in my best interest to inform my healthcare provider about any other healthcare providers involved in my care.

# 6. Anticipated Benefits:

I may expect the anticipated benefits from telehealth services, but no results can be guaranteed.

# **Client Consent to Telehealth**

I have read and understood the information regarding telehealth and have discussed it with my healthcare provider. All my questions have been answered to my satisfaction. I hereby give my informed consent for the use of telehealth in my weight loss management healthcare. I have been offered a copy of this form for my records.

My continued use of the services constitutes my understanding and acceptance of these terms, and I authorize the use of telehealth in my diagnosis and treatment.

## **III. HIPAA Consent**

The Health Insurance Portability and Accountability Act (HIPAA) safeguards your privacy. Implementation of HIPAA requirements began on April 14, 2003. This is a simplified version; a complete text is available in our office.

## What This Means:

HIPAA regulates who may see or be notified of your Protected Health Information (PHI). It also ensures certain rights and protections for patients. We balance these needs with our commitment to providing quality care. More information is available at the U.S. Department of Health and Human Services website: <u>www.hhs.gov</u>.

## **Our Policies:**

- Patient information is confidential and shared only as necessary to provide services and manage administrative matters related to care, including sharing information with other healthcare providers, laboratories, and health insurance payers.
- Patient files may be stored in open file racks without coding that identifies the patient's condition or any other information not already a matter of public record.
- Records may be temporarily left in administrative areas (e.g., reception, examination rooms) and will be accessible only to office staff and authorized third-party providers.

- Appointment reminders may be communicated through phone, email, U.S. mail, or any means requested by you.
- We utilize vendors who may access PHI but must comply with HIPAA confidentiality rules.
- You may expect inspections of the office and reviews of documents, including PHI, by government agencies or insurance payers in their normal course of duties.
- Your confidential information will not be used for marketing or advertising products, goods, or services.
- We will provide you access to your records per state and federal laws.

You have the right to request restrictions on the use of your PHI and changes in office policies. However, we are not obligated to change internal policies based on your requests.

My continued use of services constitutes my understanding and acceptance of the terms in the HIPAA Information Form and any future policy changes.

# **IV. Financial Consent**

I understand and accept the terms that a credit card may be kept on file, and that any remaining balances for services rendered must be paid in full. I authorize Libra Rx LLC to submit on my behalf and release any medical records or other information necessary to process my consultation order. Fee schedules and receipts for all professional services are available upon request. For further inquiries or assistance, please contact us at: support@getlibrarx.com

- I authorize Libra Rx to make invoice changes and debit my account for orders placed, goods received, and/or services rendered that are not fully covered by third-party vouchers or credits. For further inquiries or assistance, please contact us at: Libra Rx
   2225 Sycamore St. #5032
   Harrisburg, PA 17111
   Email: support@getlibrarx.com
   Phone: 844.923.5500
- I authorize Libra Rx to charge my credit card account for any unpaid balances due. For further inquiries or assistance, please contact us at: support@getlibrarx.com
- All programs are auto-renewing, and I consent to be automatically charged for any program I participate in unless I explicitly request to cancel before my payment is processed. There are no refunds or exchanges. I certify that I am an authorized user of this credit card and will not dispute payments with my credit card company.

## V. Shipping Authorization

All prescription medications are dispensed according to state and federal law, approved by the pharmacist in charge, and in compliance with relevant Medical Boards and State Boards of Pharmacy. By requesting shipping, I disclaim and agree to hold harmless Libra Rz for any delays or errors during shipping. Medication is considered dispensed when it is signed out for shipping, not when it is delivered.

My continued use of the services constitutes my understanding and acceptance of the above terms, and I give permission for Rx to ship medication to me at the address provided in my intake form or any other address I provide.

# **Privacy Statement - California**

Last updated: January 1, 2024

This PRIVACY NOTICE IS APPLICABLE TO CALIFORNIA RESIDENTS ("consumers" or "you") ONLY and supplements the information in **Libra Rx** general Privacy Statement. We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA"), the California Privacy Rights Act ("CPRA"), and other California privacy laws. Any terms defined in the CCPA or CPRA have the same meaning when used in this notice. For further inquiries or assistance, please contact us at: Libra Rx

2225 Sycamore St. #5032 Harrisburg, PA 17111 Email: support@getlibrarx.com Phone: 844.923.5500

## **Information We Collect**

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("Personal Information").

We have collected the following categories of Personal Information from California consumers since January 1, 2024 on Libra Rx Platform:

Category	Examples	Collected
A. Identifiers.	Account Name, Address, Beneficiary Name, Beneficiary Relationship, Client ID Number, Client Reference Number,	Yes

Category	Examples	Collected
	Contract Number, Date of Birth, Date of Death, Driver's License Number, Email Address, Emergency Contact Name, Emergency Contact Number, Employee Identification Number, Name, Passport Number, Phone Number, Policy Number, Policy Rating Information	
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories	Yes
C. Characteristics of protected classifications under California or federal law.	Gender, Age, Citizenship Status, Disability, Marital Status	Yes
D. Commercial information.	FEIN, HH Premium, Home Value, Income Line of Business, Lines of Insurance Purchased, Net worth, Payment Information, Pension Dollar Amounts, Personal Property Records, Policy Count by Product, Policy Number, Property Address, Property Ownership, Vehicle Information	Yes
E. Biometric information.	Blood Sample, Health Information, Medical Conditions, Medical Information, Urine Sample, Vital Information	Yes
F. Internet or other similar network activity.	Advertising Recall, App Usage, Browser Type, Chat Transcripts, Cookies, Device, Email Transcripts, HM Drive Usage, Interaction with Website, IP Address, Location, My Account Activity Log, Web Message Transcripts, Web Site Usage	Yes
G. Geolocation data.	Direction of Travel, Latitude, Longitude, Rate of Acceleration, Rate of Speed, Survey Location	No
H. Sensory data.	Audio Recordings of Historic Transfer Requests, Audio Recordings of Medical Interviews, Audio Recordings of Phone Calls	Yes
I. Professional or employment-related information.	Annual Salary, Bank Account Information, Educator vs Non Educator, Employer Name, Employment Location, Employment Status, Hire Date, Household Income, Job Title,	Yes

Category	Examples	Collected
	Length of Service, Number of years working in Education, Occupation, Occupation Code, Percentage of Increase, Resume, Tenure, Termination Date, Transfer Date, Work History	
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No
K. Inferences drawn from othe personal information.	Paperless Preferences, Login Email, Security Preferences, r Address Preferences, Consumer Preferences, Attitudes, Psychographic data, Survey Comments, Investment Strategy, E-delivery Preferences	Yes

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from our clients or their agents. For example, from documents that our clients provide to us related to the services for which they engage us.
- Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services to them and from activity on our website.
- From third parties that interact with us in connection with the services we perform.

# Personal Information does NOT include:

- Information that is lawfully made available from federal, state, or local government records ("Publicly Available Information").
- De-identified or aggregate consumer information (as such terms are defined in the CCPA).
- Information excluded from the CCPA's scope, such as:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data.
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

# Sensitive personal information means Information that reveals:

- Your social security, driver's license, or passport number.
- Your account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to the account.

- Your precise geolocation.
- Your racial or ethnic origin, religious or philosophical beliefs, or union membership.
- Contents of your mail, email, and text messages unless Libra Rx is the intended recipient of your communication.
   For further inquiries or assistance, please contact us at: Libra Rx
   2225 Sycamore St. #5032
   Harrisburg, PA 17111
   Email: support@getlibrarx.com
   Phone: 844.923.5500
- Your genetic data.

Unless the information is publicly available, sensitive personal information also includes:

- Processing of biometric information for the purpose of uniquely identifying you.
- Personal information collected and analyzed concerning your health.
- Personal information collected and analyzed concerning your sex life or sexual orientation.

## **Use of Personal Information**

We may use or disclose the Personal Information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided.
- To issue and service your policy and to offer you other insurance or financial products.
- To provide you with information, products, or services.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis, and product development.
- As reasonably necessary and proportionate to protect the rights, property, or safety of us, our clients, or others.
- To respond to regulatory and/or law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

- To third-party service providers who perform marketing or other services on our behalf.
- To our affiliates and subsidiaries.
- As otherwise required or permitted by law.

We will not collect additional categories of Personal Information from those identified above or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

# **Sharing Personal Information**

We may disclose your Personal Information to a third party for a business purpose.

In the preceding twelve (12) months, we have disclosed the following categories of personal information to third parties for a business purpose: None.

We disclose your Personal Information for a business purpose to the following categories of third parties:

- Our affiliates
- Service Providers and Vendors
- Third parties to whom you authorize us to disclose your personal information in connection with products or services we provide to you.
- Our independent contractor insurance agents.
- To other third parties as required or permitted by law.

## **Selling Personal Information**

We do not sell your Personal Information to anyone.

## **Your Rights and Choices**

The CCPA provides California residents with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

## Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information collected on or after January 1, 2024. Once we receive and verify your request, we will disclose to you any of the following in accordance with your request:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purpose for collecting or selling that Personal Information.
- The categories of third parties with whom we share that Personal Information.
- The specific pieces of Personal Information we have collected about you (also called a data portability request) but only if specifically requested by you.

- If we have sold or disclosed your Personal Information for a business purpose, two separate lists disclosing:
  - Sales, identifying the personal information categories that each category of recipient purchased; and
  - Disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

#### **Correction Requests**

You have the right to request that we correct personal information about you. After we receive and verify your request, we will evaluate the requested changes.

## **Deletion Request Rights**

You have the right to request that we delete (and instruct our Service Providers to delete) your Personal Information from our records. Subject to certain exceptions, we will comply with your deletion request and direct our Service Providers to delete your Personal Information.

#### **Deletion Request Exceptions**

We (or our Service Providers) do not have to comply with your deletion request for Personal Information maintained for the following reasons:

- 1. **Complete Transactions**: To complete the transaction for which we collected your Personal Information, provide a good or service you requested, or perform our contract with you.
- 2. **Security**: To detect security incidents, protect against fraudulent activities, or prosecute those responsible for such activities.
- 3. **Debugging**: To debug products to identify and repair errors that impair functionality.
- 4. **Free Speech**: To exercise free speech or ensure the right of another consumer to exercise their rights.
- 5. **Legal Compliance**: To comply with the California Electronic Communications Privacy Act or other legal obligations.
- 6. **Research**: To engage in public or peer-reviewed research in the public interest, provided that deleting the information would impair the research.
- 7. **Internal Uses**: For internal uses that are reasonably aligned with consumer expectations based on our relationship.
- 8. **Legal Obligations**: To comply with a legal obligation or make other lawful uses compatible with the context in which you provided the information.

#### **Exercising Access, Data Portability, and Deletion Rights**

To exercise your rights to access, data portability, and deletion of your Personal Information, please submit a verifiable consumer request by:

#### Contact: support@getlibrarx.com

#### **Verifiable Consumer Requests**

Only you or an authorized individual registered with the California Secretary of State can make a verifiable consumer request. You may also request on behalf of your minor child.

- You can submit access or data portability requests **twice** within a 12-month period.
- Your request must provide sufficient information for us to verify your identity or authority to make the request.
- We cannot respond to your request if we cannot verify your identity.

## **Response Timing and Format**

We aim to respond to your request within **45 days** of receipt. If more time is needed (up to **90 days**), we will notify you in writing. Our response will cover the 12-month period preceding your request and will explain any inability to comply with the request.

#### **Non-Discrimination**

We will not discriminate against you for exercising your CCPA rights. We will not deny you goods or services or provide a different level or quality of services based on your request.

#### **Changes to Our Privacy Notice**

We reserve the right to amend this Privacy Notice at our discretion. Changes will be communicated via email or a notice on our website homepage.

## **Contact Information**

If you have questions or comments about this notice or your rights under California law, please contact us: support@getlibrarx.com

## HIPAA COMPLIANCE

Libra Rx is committed to complying with all applicable regulations under the Health Insurance Portability and Accountability Act (HIPAA). We are dedicated to maintaining the privacy and security of your Protected Health Information (PHI) and will only use or disclose your PHI as described in our Privacy Policy.

You have the following rights regarding your PHI:

- 1. \*\*Access\*\*: You may request access to your PHI and receive a copy of your medical records.
- 2. \*\*Amendment\*\*: You have the right to request corrections to your PHI if it is incorrect or incomplete.

3. \*\*Restrictions\*\*: You may request restrictions on how your PHI is used or shared, including specific treatment and payment information.

4. \*\*Accounting of Disclosures\*\*: You can request an accounting of disclosures of your PHI.

5. \*\*Confidential Communications\*\*: You may request that communications with you about your PHI be done in a specific manner or at a specific location.

For further details, please refer to our complete Privacy Policy.

For further inquiries or assistance, please contact us at: Libra Rx 2225 Sycamore St. #5032 Harrisburg, PA 17111 Email: support@getlibrarx.com Phone: 844.923.5500