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PRIVACY POLICY

Bi-State Primary Care Association ("**Company**", "**us**", "**we**" or "**our**") respects the privacy of the visitors to the Website, the home page of which is located at <http://www.bistatepca.org>, and the users of our services ("**Services**") and the Company connectivity software (the "**Company Software**").

This privacy policy (the "**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 you submit to us through our Services and/or the Company Software. Unless otherwise defined herein, capitalized terms shall have the meanings assigned to such terms set forth in the Terms of Service Agreement for the Company Services (at <http://www.bistatepca.org/privacy-privacy>) and any Company License Agreement (at <http://www.bistatepca.org/privacy-privacy>). This Privacy Policy will be continuously assessed against new technologies, business practices and our visitors' and users' needs. Access to and use of the Website and Company Services is available only to individuals who can form legally binding contracts under applicable law. If you do not qualify, you may not use the Website and Company Services. If you are a minor under the age of 13, you are not authorized to register, become a Company member or use the Services.

"**Personal Information**" is information about you that is personally identifiable to you like your name, address, e-mail address, or phone number.

"**Anonymous Information**" means information that is not associated with or linked to your Personal Information; Anonymous Information does not permit the identification of individual persons. Anonymous Information, such as information regarding your hardware IDs and device type, your carrier, your carrier user ID, basic usage statistics about your device, your location and your use of the Company Software and Services, does not by itself identify you to Company, though such information may be unique or consist of or contain information that you consider personal.

We collect and use Personal Information and Anonymous Information as described in this Privacy Policy.

I. USER CONSENT

By submitting Personal Information through our Services and/or the Company Software and using our Website, Services and/or Company Software, you agree to the terms of this Privacy Policy and to our use of your Personal Information for the purposes given where the information is collected. You expressly consent to the processing of your Personal Information according to this Privacy Policy. If you do not agree to this Privacy Policy, you are not authorized to use our Website, Services and/or Company Software.

By consenting to this Privacy Policy, you confirm that your command and knowledge of English is sufficient to understand the terms and conditions set forth herein.

For persons in the European Union, as used herein, terms such as "Personal Information" refer to "personal data" as defined by the Directive 95/46/EC of the European Parliament and of the Council of

24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data. We will not collect any personal data from you unless you provide it to us voluntarily with your freely given specific and informed consent. By using our Website, Services and/or the Company Software, you agree that we may transfer your Personal Information outside the European Union in connection with the purposes stated in this Privacy Policy. Your personal data may be transferred to the United States (and/or other non-European Union jurisdictions, as applicable).

You agree that 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.

II. INFORMATION YOU PROVIDE TO US

Company collects Personal Information from its online visitors and users on a voluntary basis and only to the extent necessary to fulfill your requests and to create or enhance our relationship with you. The Personal Information we gather from you helps us learn about our members and potential members of our community and the users of the Company Software. We collect Personal Information that you submit to us voluntarily through our Service and/or the Company Software. We may collect Anonymous Information passively or actively. The types of Personal Information and Anonymous Information we collect are:

- When you contact us by sending us an e-mail, we will collect your e-mail address and any information contained in the e-mail you send us.

III. INFORMATION COLLECTED VIA TECHNOLOGY

We may collect general, aggregated, demographic, and non-personal information from our online visitors and users. The non-personal information will not be linked to any Personal Information of our online visitors or users, through cookies or other means, without consent. This type of anonymous, aggregated profiling and session data may include information provided to us through surveys, polls, etc., but will not be tied to any Personal Information without consent. The non-personal information collected may also include aggregated Anonymous Information about site usage and the customer base.

As you navigate our Website or use the Company Community Services, certain information may also be collected passively, including your Internet protocol address, browser type, 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 for which you searched and viewed. This type of information is collected to better understand how you use our community and make the community and the Services we provide more useful to you. Most browsers are automatically set to accept Cookies. Please contact your PC consultant if you need additional information on Cookies. Personal information collected through the use of cookies and other technology will be handled in accordance with this Privacy Policy. If you would like more information about cookies and how to control and delete cookies in various browsers, such as Internet Explorer, Firefox, Safari, Opera and Chrome, please visit <http://www.aboutcookies.org/>.

When you use our Company Software to improve your connectivity, the Services collects information about the device on which the Company Software is executed, including without limitation, the hardware address of its network adapter, basic usage statistics about your device and your use of the Company Software and Services.

The Company Software also transmits information to the Services regarding the Access Points you are using to establish an online connection, including, without limitation, the names (SSIDs) of the Access Points, location and identification of the Access Points, connection status, speed and duration and access control methods. We may connect such information with Personal Information we have collected from you to provide you with specific location-based services that are tailored to meet your needs or interests, to improve our Company Software and Services or to enforce the agreements, terms and conditions related to our Company Software and Services.

Visitors to this website who have javascript enabled are tracked using **Google Analytics**. Google Analytics collects various types of information from users, including, without limitation, the following:

- Type of user agent (web browser) used, software manufacture and version number.
- Type of operating system
- Screen colors (color processing ability of the users screen)
- Javascript support
- Flash version
- Screen resolution
- Network location and IP address
 - Can include country, city, state, region, county, or any other geographic data.
 - Hostname
 - Bandwidth (internet connection speed)
- Time of visit
- Pages visited
- Time spent on each page of the website
- Referring site statistics
 - The website (URI) the user came through in order to arrive at this website (example: clicking on a hyperlink from Yahoo.com that took the user to this website)
 - Search engine query used (example: typing in a phrase into a search engine like Google, and clicking on a link from that search engine)
- Google Analytics data is shared with Google. For more information on Google's Privacy Policies, visit:<http://www.google.com/intl//privacypolicy.html>

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.

"**Cookies**" are small pieces of information that a website sends to your computer's hard drive while you are viewing a website. 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 Website. Persistent Cookies can be removed by following Internet browser help file directions. If you choose to disable Cookies, some areas of the Website may not work properly.

We may also contract with third parties in order to promote the products and/or services of these third parties by placing ads on the Website. We may use information that was posted by Company Members to tailor the display of ads to the interest of the Users. Clicking on such ads will direct you to the website of the third party and the third party may also use Cookies in connection with these ads. Please be

advised that we are not responsible for these other websites or any content on these other websites and that this Privacy Policy does not govern your visit of these other websites. You are encouraged to check the privacy policies of advertisers and/or ad services to learn about their use of cookies and other technology. The ads appearing on our Website may be delivered to you by third-party advertising companies. These companies may use information about your visits to this and other web sites in order to provide advertisements on this site and other sites about goods and services that may be of interest to you. If you would like more information about this practice and to know your choices about not having this information used by these companies, please click here http://www.networkadvertising.org/optout_nonpii.asp.

IV. PERSONAL INFORMATION WE RECEIVE FROM OTHER SOURCES

We may receive Personal Information about you from other sources like telephone or fax, or from third parties that provide services for us in connection with the Company Services. We may add, and you hereby agree to the addition of, this information to the information we have already collected from you via our Website or through the Company Software in order to improve our community and our Services.

V. USE OF INFORMATION

In general, Personal Information you submit to us is used by us either to sign you up for our community, respond to requests that you make, to improve our community and Services and to better tailor the features, performance and support of the Services and the Company Software, and to offer you additional information, opportunities, and functionality. We may also use your Personal Information to provide you with electronic newsletters or promotional e-mails, should you request to receive such communications from us.

VI. FEEDBACK

If you provide feedback to us, we may use and disclose such feedback for any purpose, provided we will not associate such feedback with your Personal Information. We will collect any information contained in such communication and will treat the Personal Information in such communication in accordance with this Privacy Policy.

You acknowledge and agree that all feedback is the sole and exclusive property of Company and may be used by Company (or its affiliates, publishing partners, distributors, licensors and licensees) for any purpose. If and to the extent you are deemed to have retained, under applicable law, any right, title or interest in or to any portion of your feedback, you hereby transfer, grant, convey, assign and relinquish solely and exclusively to Company all of your right, title and interest in and to the feedback, without reservation and without additional consideration, under applicable patent, copyright, trade secret, trademark and other similar laws or rights, in perpetuity, and in the alternative to the extent such assignment is ineffective under applicable law, you hereby grant to Company the sole and exclusive, irrevocable, sublicensable, transferable, worldwide, paid-up license to reproduce, fix, adapt, modify, translate, reformat, create derivative works from, manufacture, introduce into circulation, publish, distribute, sell, license, sublicense, transfer, rent, lease, transmit, publicly display, publicly perform, provide access to electronically, broadcast, communicate to the public by telecommunication, display, enter into computer memory, and use and practice the feedback all modified and derivative works thereof, all portions and copies thereof in any form, all inventions, designs, and marks embodied therein, and all patent, copyright, trade secret, trademark and other intellectual property rights thereto, or to incorporate the same in other works in any form, media, or technology now known or later

developed. To the extent permitted by applicable laws, you hereby waive any moral rights or rights of publicity or privacy you may have in the feedback.

VII. DISCLOSURE OF PERSONAL INFORMATION

Except as otherwise stated in this Privacy Policy, we do not trade, rent, or share your Personal Information with third parties, unless you ask or authorize us to do so. We may provide your Personal Information to third party service providers who work on behalf of or with us to provide some of the services and features of the Company Services and to help us communicate with the Company Members. However, these service providers do not have any independent right to share this information (except pursuant to a legal requirement such as a subpoena or warrant).

Although we currently do not have a parent company, any subsidiaries, joint ventures, or other companies under a 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.

You understand that we may enter into strategic marketing alliances, partnerships or agreements with third parties who may be given access to Personal Information you have provided to us, including, but not limited to, your name and email address, for the purpose of providing you with information regarding products and services that we think will be of interest to you or for other business services. In connection with any such arrangements, we intend to enter into agreements with these third parties regarding the maintenance of confidentiality, security, and integrity of any information that we share with them. We expect the third parties to protect the information that is shared with them by having developed and implemented privacy policies. We will generally retain ownership over all information provided by our online visitors, users and Company Members in connection with the Services; provided, however, we make no guarantees with respect thereto. In addition, we will NOT share information regarding your personal financial data or Social Security number, if the same has been collected. By using the Services, you agree to allow such sharing of your personal information with third parties and you further waive any claims that could be made against us in relation thereto.

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. You hereby agree and consent to such transfer or assignment of your Personal Information or to a change of control of Company, and you further waive any claims that could be made against us in relation thereto

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 the rights or property of us, users and visitors of our Website or Services, or third parties.

VIII. YOUR CHOICES REGARDING YOUR PERSONAL INFORMATION

We offer you choices regarding the collection, use and sharing of your Personal Information. When you receive newsletters or promotional communications from us, 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 at aspreeman@bistatepca.org. Despite your indicated e-mail preferences, we may send you administrative e-mails regarding the Company Services or notices of any updates to our Terms of Service for the Company Services, any Company License Agreement, or this Privacy Policy.

IX. REGARDING CHILDREN

Our Website, Services and/or the Company Software are not directed toward anyone under the age of 13. If you are under the age of 13, you may not give us any Personal Information, you may not create Company Profile or register on our Website or through the Company Software, and you may not sign up for or participate in any of our Services. Except as may be required by law, we will not knowingly collect, maintain, or disclose any Personal Information from children under the age of 13. If you are between the ages of 13 and 18, please let your parent or guardian know about this Privacy Policy and get his or her permission before you give us any of your Personal Information, before you sign up or participate in any of our Services or use the Company Software. Do not disclose your real name on publicly available sections of the Company Services, and never tell anyone online anything private about yourself or your family, including your phone number and address. We encourage parents and guardians to spend time online with their children to become familiar with the types of content available on the Internet, including our Website. Parents and guardians should regularly oversee their children's use of e-mail and other online communications and transactional features. Control tools are available from online services and software manufacturers that can help provide a safe online environment for kids.

If you are a parent or guardian who has discovered that your child has submitted his or her Personal Information without your permission or consent, we will take reasonable steps to promptly remove that information from our database at your request. To request removal of your child's information, please send an e-mail to aspreeman@bistatepca.org, and be sure to include in your message the same account name, password, and email address that your child submitted.

We do not intentionally gather Personal Information about visitors or users who are under the age of 13. If you believe that we have collected Personal Information about a visitor or user who is under the age of 13, please contact Company at aspreeman@bistatepca.org, and such Company Profile will be deleted.

X. OTHER SITES

Our provision of links to other websites or locations is for your convenience and does not signify our endorsement of such other websites or location or its contents. Links to other websites or locations may also be posted by other Company Members. We have no control over, do not review, and cannot be responsible for these outside websites or their content. Please be aware that the terms of our Privacy Policy do not apply to these outside websites. If you are concerned about the privacy policy of a certain third party, you may contact them directly or visit their individual web sites to learn more about their individual privacy policies.

XI. SECURITY

We recognize our responsibility to protect the Personal Information you entrust to us. We use reasonable administrative, technical, personnel and physical measures to safeguard your Personal Information in our possession against loss, theft and unauthorized use, disclosure or modification. We store Personal Information provided by our online visitors and users of our Services and Company Software in a database that is accessible by authorized employees only on a need-to-know basis in a secure physical environment behind a firewall. A password will be required from you and any authorized Company employee who has access to your data prior to gaining access. Whenever you give Company sensitive or confidential information, such as credit card numbers, we will use standard encryption technology when transferring or receiving such information to ensure that your privacy is protected. Unless otherwise specified herein or on the site where you make a purchase, credit card numbers are

used only for payment processing and are not retained for marketing purposes. In addition, we also use reasonable methods to make sure that your Personal Information is accurate, up-to-date and appropriately complete.

While we take precautions against possible breaches in our Website and customer databases, no website or Internet transmission is completely secure. Accordingly, we cannot guarantee that unauthorized access, hacking, data loss, or other breaches will never occur and cannot be held liable for any unauthorized access or use of the data you have supplied to us. Your use of our Website, Services and/or the Company Software is at your own risk. We urge you to take steps to protect your Personal Information when you are on the Internet. Change your passwords often using a combination of letters and numbers, and make sure you use a secure Internet browser.

XII. CONTACT US

If you think that the use of your Personal Information is not in alignment with the purpose for which you have provided it to Company, as described in this Privacy Policy, or if you have any questions or suggestions regarding this Privacy Policy, please contact us at aspreeman@bistatepca.org. We will duly process your questions, requests and suggestions.

XIII. TERMS OF SERVICE

The terms of this Privacy Policy are incorporated into our Terms of Service. Please review our Terms of Service <http://www.bistatepca.org/Privacy Policy>.

This Privacy Policy is subject to occasional re vision, and changes will be posted on this page. If we make any substantial changes in the way we use or disclose your Personal Information, we will notify you at the email address listed in your Company Profile and obtain your consent to a change in the use or disclosure of your Personal Information. Please check back from time to time to ensure you are aware of any such notices of changes in our privacy practices. Your continued use of our Website, Services and/or Company Software will signify your acceptance of these changes. If you object to any such changes, we will delete your Company Profile.

This Policy was last updated in February 2013.