

Ohio Gastro's Privacy Policy

Effective Date: April 23, 2024

Ohio Gastroenterology Group, Inc. (“Ohio Gastro,” “we,” “our,” or “us”) cares about your privacy. Thank you for taking the time to read our privacy policy (“Privacy Policy”). This Privacy Policy covers all Personal Data processed by Ohio Gastro’s website (<https://ohiogastro.com>), services, and procedures (collectively, “Services”). “**Personal Data**” means all data we collect about you except for your Protected Health Information (as defined by the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”)), which is covered by our [Notice of HIPAA Privacy Practices](#). If our privacy practices for certain services differ from those explained in this Privacy Policy, we will let you know at the time we ask for or collect your information.

It is our policy to comply with applicable privacy and data protection laws, state privacy laws regarding the processing of Personal Data and on the free movement of such data. This commitment reflects the value we place on earning and keeping the trust of our customers, business partners, and others who share their Personal Data with us.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. We may make changes to the Privacy Policy from time to time. We, therefore, encourage you to check the Privacy Policy periodically for updates.

We cover a lot of ground in this Privacy Policy. Please use the links below to navigate to later sections of the Privacy Policy of interest to you.

By using or interacting with our website or Services, you accept the privacy practices described in this Privacy Policy. If you disagree with any part of this Privacy Policy, you must not use or access our Services.

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1. What Data We Collect About You

Personal Data means any information about an individual from which that person can be identified, directly or indirectly. It does not include data where the identity has been removed (anonymized data), which we can use for any purpose. Some jurisdictions may consider your Internet Protocol (IP) address to be Personal Data. We may collect different kinds of Personal Data about you which we have grouped together as follows:

Information You Provide Us:

- **Personal Identification Data** include your first name and last name, your login account information to the patient portal, email address, your personal address, phone number, your appointment registration information, Internet Protocol (IP) address, or similar identifiers.
- **Transaction Data** includes your payment and transaction information such as your credit/debit card number, ACH information, your first and last name, and billing address.
- **Employment Related Data** includes information about your business and your title at your business, as well as any information provided by you on your Ohio Gastro job application, if applicable.
- **Communication Data** includes your discussion with our team member(s) via email, the questions you provide us when you seek online support, your feedback that you communicate to us via email, and your language preference.
- **Marketing Data** includes names, mailing addresses, and email addresses.
- **Commercial Data** includes records of Services purchased by you.
- **Other information** you may choose to disclose to us about yourself, for example, on comments or feedback regarding our Services.

Information Automatically Collected by Technology:

In addition, to the information you provide us, we may automatically collect certain information about your equipment, software, and browser to provide you with an efficient and personalized experience. This information includes:

- **Device Data** includes the device's hardware information, operating system, platform information, browser type, language information, bot status, and browser plugin types.
- **Website Usage Data** includes information about how you use our website and our Services, or what website referred you to our site.

Information Collected from Third Parties:

- **Information Provided to Us by Your Other Healthcare Providers or Laboratory.** We may receive information such as information in your medical records from your other

treating providers and laboratories.

- **Information from Other Third-Party Sources.** We may collect personal or anonymized information about you from third-party companies that provide products and services that are used together with our website or our Services. For example, we may collect information such as your name, your social media account username, location, email address, profile picture, and public data for contacts from social networking sites, including Twitter .

Aggregated Data:

We may also collect, use, and share aggregated data such as statistical or demographic data for any purpose (“Aggregated Data”). Aggregated Data could be derived from your Personal Data but is not considered Personal Data as this data will not directly or indirectly reveal your identity. For example, we may aggregate your website usage data to calculate the percentage of users accessing our websites. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy Policy. Personal Data

2. Reason for Processing Your Personal Data

We may process the Personal Data you provide for the following reasons and legal bases:

- To provide you with access to and information about our Services.
- To enroll you as a patient of Ohio Gastro.
- To set up your patient portal account through one of our various engagement portals.
- To process your payment information in connection with the Services we provide to you.
- To receive your feedback and comments about our Services that we provide via our website.
- To respond to your requests and inquiries for technical support and general questions.
- To communicate with you about your comments and feedback regarding our website and Services you provide on third-party social media platforms.
- To allow you to exercise your data privacy rights.
- To send text reminders of appointments and preparatory procedures.

In addition, we may process your Personal Data for the following reasons:

- To carry out our obligations and enforce our rights.

- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may use information that is not Personal Data for any purpose. For example, we may process aggregate usage data from many people in a way that does not identify any individuals to calculate the percentage of users accessing a feature on our website.

3. How We Collect Your Personal Data

We use different methods and sources to collect information from and about you including through:

- **Direct interactions.** You may give us information about you by interacting with our website, by communicating with us via phone, email, or through our online chat application. This includes information you provide by emailing us about our website or Services at marketing@ohiogastro.com.
- **Third-party or publicly available sources.** We may receive information about you from third parties. The information we receive includes analytics information for improvement of our website and Services.
- **Technical and Communication Data from the following parties:** We may collect information from third-party providers such Facebook, Twitter, Instagram, LinkedIn, and Google Analytics. The information we may collect includes your feedback about our Services on the third-party provider's website.

4. How We Use Your Personal Data

The Company may use your Personal Data to:

- **Communicate with you.** This may include: (i) informing you of our Services; (ii) providing information about our Services, including communication regarding your account and billing services; (iii) responding to your feedback about our website and Services, including, for example, technical support and service improvements to our website and Services; (iv) responding to your questions or inquiries, including technical questions and troubleshooting using our Services; (v) responding to your general inquiries; (vi) responding to your privacy inquiries; and (vii) inviting you to participate in market research surveys and to send you newsletters.
- **Develop and manage our relationships with you and our business partners.** This may include: (i) to process payments and refunds; (ii) providing information about our Services; (iii) providing you with a more consistent experience in interacting with us, including by learning more about you and how you use and interact with our website and Services to personalize the website; and (iv) planning, managing, and performing our contractual relationships with you and our partners and service providers.
- **Improve our website and Services.** This may include: (i) customizing our website to your preferences or interests, (ii) making them more compatible with your devices and browsers,

or otherwise making our website and Services easier to use; (iii) maintaining the security of our website and otherwise protecting them; (iv) improving our website and Services; and (v) developing new products, services and platforms.

- **Address legal issues.** This may include: (i) complying with our obligations to retain certain business records for minimum retention periods; (ii) establishing, exercising, or defending legal claims; (iii) complying with laws, regulations, court orders, or other legal processes; (iv) detecting, preventing, fraud or intellectual property infringement claims, violations of our contracts or agreements, violations of law, or other misuse of our website or Services; and (v) protecting our rights or property, or yours or other health, safety, welfare, rights, or property.

We may also use your Personal Data for other uses consistent with the context in which the data was collected or with your consent or lawful purposes.

We may anonymize or aggregate any of the data we collect and use it for any purpose, including research and product development. Such anonymized or aggregated data will not identify you or will be traced back to your personal information.

5. Disclosure of Your Personal Data

- We may share your Personal Data with our affiliates. When we do so, our affiliates will use your data in a manner consistent with this Privacy Policy and all applicable privacy and data protection laws.
- We may also disclose your Personal Data with IT and logistics service providers and subprocessors to perform and support the services and to assist us in processing your Personal Data as described above. These processors are required to treat your Personal Data in compliance with all applicable privacy and data protection laws.
- We may share your Personal Data with third parties when we have a good faith belief that disclosure is necessary:
 - (i) to comply with a law, regulation, court order, or other legal processes;
 - (ii) to detect, prevent, and respond to fraud or intellectual property infringement claims, violations of our contracts or agreements, violations of law, or other misuse of our website or Services; or
 - (iii) to protect our rights or property or yours or others' health, safety, welfare, rights, or property.
- We may disclose your Personal Data with third parties in connection with the sale, purchase, merger, reorganization, liquidation, or dissolution of Ohio Gastro, or under similar circumstances. If such an event occurs, we will take appropriate steps to protect your Personal Data.
- We may share your data with your consent or at your express request.
- We may share anonymized or Aggregated Data internally and with third parties for any purpose. Such information will not identify you individually.

6. Cookies and Automatic Data Collection Technologies

Our website may use automatic data collection technologies to distinguish you from other website users. This helps us deliver a better and more personalized experience when you browse our website. It also allows us to improve our website by enabling us to:

- Estimate our website's visitor traffic and usage patterns.
- Store your preferences, so we may customize our website according to your individual interests.
- Recognize you when you return to our website.

The technologies we use for this automatic data collection may include Cookies. A cookie is a small file placed on the hard drive of your computer. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. However, if you disable or refuse cookies, please note that some parts of these Websites may become inaccessible or not function properly.

7. Third-Party Links

Our website may contain links to other sites served by third parties, content providers and application providers which we do not control. Those websites have their own privacy policies and terms, and we encourage you to read those terms before interacting with third-party sites.

8. Retention

We will retain your Personal Data as reasonably necessary for the disclosed purpose. The retention periods for each category of personal information vary depending on compliance with relevant laws, your request for deletion, and our retention policies. For example, we may need to retain your personal information to comply with our legal or reporting obligations in accordance with the laws or to defend against claims. Consequently, it is not possible for us to provide a definitive length of time. Our retention periods are determined by using and balancing the following criteria:

- The volume, nature, and sensitivity of your information;
- The potential risk of unauthorized access, use or disclosure, or misappropriation;
- The purposes for which we process your personal information; and
- The retention obligations under applicable legal requirements.

9. Children

Our website is not intended for children under 13 years of age. We will not knowingly solicit or collect Personal Data from children under 13, or the relevant minimum age under applicable local legal requirements, except as permitted under applicable law. If we learn that we have received

information directly from a child under 13 without his or her parent's or legal guardian's consent, we will make commercially reasonable efforts to delete such information.

10. Your Rights and Choices

We have created mechanisms to provide you with the following control over your information:

- **Accessing, Updating, and Deleting Your Information.** You can contact us via email at marketing@ohiogastro.com to request access to, correction of, or deletion of Personal Data that you have provided to us. We may also ask you to verify your identity before we respond to your request. Depending on your request, we may not accommodate your request to change information if we believe the change would violate any law or legal requirement or negatively affect the information's accuracy.
- **Cookies and Automatic Data Collection Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. However, if you disable or refuse cookies, please note that some parts of these websites may become inaccessible or not function properly.

11. Security

The security of your Personal Data/information is very important to us. We use physical, electronic, and administrative safeguards designed to protect your Personal Data from loss, misuse and unauthorized access, use, alteration, or disclosure. We will only retain your Personal Data for as long as reasonably necessary to fulfill the purpose of collecting it.

We also require our service providers and business partners to whom we disclose the information to do the same. When you use certain types of information, for example, when you provide us with your credit card or debit card information on our website, we will encrypt the transmission of that information using secure socket layer technology (SSL). We will continue to improve our physical, electronic, and administrative safeguards. However, the Internet environment is not 100% secure, and we cannot guarantee that information we collect will never be accessed in an unauthorized way.

12. Changes To This Privacy Policy

Changes to this Privacy Policy will be posted on this site, along with information on any material changes. The Company reserves the right to update or modify this Privacy Policy at any time and without prior notice. If the changes made to our Privacy Policy are substantial, we will contact you before the changes take place.

13. Contact Us

If you have any questions about this Privacy Policy or our use of your Personal Data, please contact us by email: marketing@ohiogastro.com