HelpAround Inc. ("HelpAround", "we" or "us") respects the privacy of users ("User" or "you") of its mobile-application, known as "HelpAround" (the "App") and is committed to protecting your personal information. We believe that you have a right to know our practices regarding the information we may collect and use about you when you use our App. Please read the following carefully to understand HelpAround’s views and practices regarding your personal information and how we treat it.

Table of Contents
About this Privacy Policy
Who we are
Your acknowledgment of this policy
Which information may we collect about Users?
How do we collect information about our Users?
What are the purposes of the collection and processing of information?
Sharing Personal Information with Third Parties
Your Rights
Location of Your Data
Minors
Third-Party Service Providers and Third-Party Software
Links to Third Party Websites
Security
Data Retention
Changes to the Privacy Policy
Have any Questions?

About this Privacy Policy
This Privacy Policy applies when you use our App and describes HelpAround’s practices with respect to data collected from visitors and/or registered Users. This Privacy Policy explains our online information practices and the choices you can make about the way your Personal Information is collected and used in connection with our App.

Additionally, HelpAround maintains a website serving as an informative marketing tool. This website is governed by its own applicable privacy policy.

Capitalized terms that are not defined herein, shall have the meaning ascribed to them in our Terms of Use ("Terms of Use"), into which this Privacy Policy is incorporated by reference.

Who we are
HelpAround Inc. is a company incorporated under the laws of Delaware, USA, with offices at 2658 Legends Way, Ellicott City, MD 21042 US. Individuals wishing to contact us about data protection issues may do so by emailing us at privacy@helparound.co.

Your acknowledgment of this policy
This Privacy Policy ("Privacy Policy") details how your Personal Information collected via the App is used and processed by HelpAround.

By accessing or using the app, and/or by installing and/or downloading the app on your mobile device and/or by creating an Account you acknowledge that you are or have had the opportunity to become aware of and agree, in jurisdiction where such consent is required, to this Privacy Policy and HelpAround’s practices described therein, including the processing, collecting, using, disclosing, retaining and/or disposing of your information under the terms of this policy. If you do not agree to any term provided herein, please cease any access or use of the app.

Which information may we collect about Users?
We collect two types of data and information from you when you use our App:
**Non-personal Information.** The first type is non-identifiable and anonymous information. Non-personal information that is being gathered consists of technical information and behavioral information that does not pertain to a specific individual ("Non-Personal Information").

You may access the App without disclosing personal information, although, like most Apps, we passively collect certain Non-Personal Information from your device, including:

- technical information, such as the type and version of your device and its operating system, the type of browser, screen resolution, keyboard language, Wi-Fi connectivity and the type and name of your device and/or browser, User’s mobile operator service provider, etc.; and
- additional information that may include your click-stream on the App, User activities on the App including time spent on various screens of the App and additional information of a similar nature (collectively, "Technical and Behavioral Information"). We may also use third-party service providers, such as Amplitude, to obtain detailed analytics on the device and User’s behavior on the App.

**Personal Information.** The other type of information we collect is individually identifiable information. To put it simply, this information identifies an individual or is of a private and/or sensitive nature, such as your contact information ("Personal Information"), including:

**Personal Information that is provided voluntarily:**

- **Communications with HelpAround:** Personal Information you provide to us as part of any communications with HelpAround, by any means, including by approaching our customer services, or approaching us in order to receive technical support, including by phone (such information may include marketing and communication data that includes your preferences in receiving marketing from us and your communication preferences). We may record such calls for quality assurance purposes and in order to improve our services.

- **Contact and Registration Details:** Personal Information is collected from the details you provide to the Company as part of the registration process to the App (the "Contact Form"), which includes your first and last name, email address, mobile telephone number, medical condition, and your relation to the patient if you are not yourself the patient. Additional information may be requested in the future. You may, at your sole discretion, provide the Company with any of the following additional personal information: year of birth, gender, location and a profile photo.

Alternatively, you can register to the App using your Facebook account. In such cases, Facebook provides us with access to certain information about you as is stored in your Social Network Account, such as the your names, e-mail, year of birth, and profile picture and/or any other information, which is detailed and displayed to you in the notice that appears during the integration process with such Social Network Account. Please read carefully such notice in order to understand what information is available to us via your Social Network Account. Please remember that the manner in which the applicable social network uses, stores and discloses your information is governed solely by its policies and HelpAround shall have no liability or responsibility for the privacy practices or other actions of the applicable social network. If you do not agree to these practices, please do not use the social network integration feature.

- **User Generated Content:** Personal Information may also be collected from various kinds of content, information and materials that you may upload, publish and/or share with other Users within the App, such as in the public groups, closed groups, chats, etc. (the "User Generated Content").

- **Information provided in the medical and insurance related forms:** Personal Information may also be included in the medical and insurance related forms you may fill out from within the App.

- **Feedback and Support:** You can contact us and provide us with feedback relating to the App either through the App or via email. Once your feedback is received by us, our representative may contact you for further communication.

**Personal Health Information:** Personal information concerning your medical condition ("PHI") will be provided to us by you, whether upon opening an Account, sending us feedback, uploading or submitting User Generated Content or otherwise. Any PHI that you choose to provide us with will be protected in accordance with the strictest standards of the Health Insurance Portability and Accountability Act ("HIPAA") and applicable laws.
**Personal Information collected via technology:**

**Location Data**

Geolocation: While using the App, we will collect, process, monitor and/or remotely store your IP address, which allows us to determine your approximate location (“Geolocation”) using a third-party service provider. We may use this information for analyzing the App’s usage and for security purposes.

Device Location: In such case that you permit the App to use Location Services on your device, we will collect, process and/or remotely store your accurate location information as reported by the device’s GPS sensor. You are able to stop this information collection at any time by disabling location access to the App in your device settings.

Personalization: Your Device Location or Geolocation may be used to personalize your experience and services provided to you via the App. You can disable the personalization in App settings.

**Non-personal Information:** To the extent that the Non-personal Information detailed above under will be linked to or associated with a specific individual, such information will be considered as Personal Information.

**Identifiers:** Internet Protocol (IP) address, IDFA (Apple Mobile Ad ID), AAID (Android Advertising ID).

**Please note:**

We may cross-reference Personal Information with other Personal Information we have about you and any Non-personal Information connected or linked to or associated with any Personal Information shall be deemed as Personal Information as long as such connection, linkage or association exists.

**How do we collect information about our Users?**

There are two main methods we use to collect information:

**We collect information through your entry, connection, access and/or use of the App.** In other words, when you access or use the App we are aware of your usage of the App, and may gather, collect and record the information relating to such usage. For example, when you use the App, we are able to identify which screens you viewed and which buttons you clicked on.

**We collect information that you provide us voluntarily.** For example, we collect Personal Information that you provide via the Contact Form on our App. We will inform you prior to collecting your Personal Information if it is requested on a voluntary basis and the consequences of not providing voluntary Personal Information.

**We collect information we receive from our Medical Provider partners.** As further detailed in the Terms of Use, some Users may be referred to the App via a Medical Provider. The Medical Providers may provide us with contact details, applicable diseases and medication of their patients, who will be referred to the App and may be prompted to download the App to create a user account and become Users.

We may gather, collect and store such information either independently or through the help of our authorized third-party service providers as detailed below.

**What are the purposes of the collection and processing of information?**

**Non-personal Information is processed in order to:**

- Enhance your experience in the App;
- Create statistical information and learn about the preferences of Users and general trends on the App (e.g. understand which features are more popular than others);
- Keep the App safe and secure, prevent fraud;
- Improve, develop and upgrade the App and the HelpAround services; and
- Ensure that content on the App is presented in an optimal way for you and for your device (e.g. tablet, mobile phone);

**Personal Information is processed in order to:**

- Enable the operation of the App and administer your Account;
- Respond to your inquiry;
• Provide the full functionality of the App, with the main purpose of providing you with tailored, personalized and relevant information, services and resources related to a medical condition and/or a particular treatment.
• To allow you to communicate and connect with other Users who are related to a medical condition. Personal Information also allows you to contact your Medical Providers via the App or vice versa;
• Contact you by email or via the App with proposals and tailored information regarding new products, offers, services, features, enhancements, upgrade opportunities, etc.;
• Respond to your technical support requests or other questions concerning the App;
• Send notifications (whether general or User-specific) to your device after you have agreed to accept push notifications from HelpAround. You can deactivate the push-notifications at any time by changing the notification settings within the app or in your device settings;
• Verify your identity when you signs in to the Account in the App, as well as verifying your identity for the purpose of dealing with inappropriate interactions and/or fraudulent use of our App;
• Determine general geo-location information (i.e., state) from which your device is connected to the Internet and GPS information of your device in order for us to show you geographically relevant content, show you other Users nearby and offer places of interest and/or services in your vicinity;
• Share User Generated Content in the App’s posts, messages and forums with other Users;
• Add your contact details to our mailing list for the purposes of sending you information, status updates relevant to your treatment (when applicable), updates about HelpAround’s developments products and services, new offerings, research or news by email, SMS, phone, through web-browser notification or through the post. You have the right to opt-out of marketing messages at any time by following the instructions in any such message or by contacting us at: privacy@helparound.co
• Enable us to contact you for the purpose of providing you with technical assistance and in order to provide the Services;
• Provide you with updates, notices, announcements, and additional information related to HelpAround, including with respect to changes made to our App’s Terms of Use and Privacy Policy;
• Conduct internal operations, including troubleshooting, data analysis, testing, research and statistical purposes;
• Keep the App safe and secure and for prevention of fraud and crime;
• Comply with our legal obligations and in order to be able to protect our rights and legitimate interests;
• Maintain our data processing records and general administrative purposes; and
• Email tracking – we may use tracking technology within the email we may send you in order to improve interactions with you and to better understand whether our emails were opened and read, and such tracking may include capturing the time and date in which you opened our email messages and the type of device you use to open such emails.

Note to our Users in the EU:
In order for HelpAround to process your Personal Information, as detailed herein, such processing must be justified by a “basis” for processing. Please note that the Personal Information processing activities detailed herein may be justified on the basis that:

- the processing is based on your consent - where you provide us with your consent to contact you for marketing purposes, you will be asked to consent to such activities before we can process such information. If you choose not to give us your consent for such processing activities, or if you decide later to remove your consent, this may affect our ability to provide you with the services available on our App;
- the processing is necessary for performance of a contract or in order to take steps prior to entering into a contract - usually your Personal Information will be provided to us because you are interested in using the HelpAround App in order to use our services. As such, we rely on this basis for processing activities that are required in order to enable you to use the App and to let you know of changes to our App’s terms of use and privacy policy;
- the processing is necessary to comply with a legal obligation - we may process your Personal Information for disclosure of information to authorities; and
- the processing is in our legitimate commercial interests - subject to your interests and fundamental rights, under our legitimate interest in providing our services via the App and offering the public
comfortable and safe access to our App, we shall perform the Personal Information processing activities described herein, such as the processing of your Personal Information in order to personalize the App, assisting us to prevent crime and fraud, manage our internal operations, maintain records and email tracking. Where we rely on legitimate interests as a lawful basis, we will carry out a balancing test to ensure that your interests, rights and freedoms do not override our legitimate interests.

**Note to non-EU Users:**

By entering, connecting to, accessing or using the App, you consent to the collection and processing of your personal information as specified herein.

### Sharing Personal Information with Third Parties

HelpAround respects your privacy and will not disclose, share, rent, or sell your Personal Information to any third party, other than as permitted under this Privacy Policy.

In addition to using the information collected by us for the purposes described above, we may also share your information in the following cases:

**HelpAround Personnel:** Personal Information that we collect and process may be transferred to or accessed by personnel of HelpAround for the sole purpose of enabling the operation of the App and to contact you, as detailed above. Please note that all HelpAround personnel that have access to your Personal Information are under an obligation of strict confidentiality with respect to such Personal Information.

**Service Providers:** we share Personal Information with our authorized service providers, including our subsidiary company, commercial software providers, consultants and data processors who perform services on our behalf, including without limitation, companies that provide analysis, messaging services and services that host the App. Please note that we collect, hold and manage your Personal Information through a third party’s cloud-based services, as reasonable for business purposes, which may be located in countries outside of your jurisdiction. For more information regarding our Service Providers, please refer to below regarding Third-Party Service Providers.

**Medical Provider Partners.** The App serves, among other things, as a platform that eases your communications with the applicable Medical Providers. If you are referred to us by a Medical Provider, you hereby acknowledge and agree that your personal information (as defined below) might be shared with such Medical Provider.

**Medical Provider Partners.** The App serves, among other things, as a platform that eases your communications with the applicable Medical Providers. If you are referred to us by a Medical Provider, you hereby acknowledge and agree that your personal information (as defined below) might be shared with such Medical Provider.

In addition, we may share Personal Information in the following cases: (a) to satisfy any applicable law, regulation, legal process, subpoena or governmental request; (b) to enforce this Privacy Policy or any other agreement or terms of service between you and HelpAround, and to defend against any claims or demands asserted against us by you or on your behalf; (c) to detect, prevent, or otherwise address fraud, security or technical issues; (d) to protect the rights, property, or personal safety of HelpAround, its Users or the general public; (e) when HelpAround is undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of the assets of HelpAround (while such acquired company or investor may be located in countries outside of your jurisdiction); and (g) pursuant to your explicit approval prior to the disclosure.

Please note that we are a HIPAA compliant company and require all third parties, including corporate and business affiliates, Service Providers, Medical Providers that are exposed to your PHI to sign a BAA agreement with us.

For avoidance of doubt, HelpAround may transfer and disclose **Non-personal Information** to third parties at its discretion including without limitation for statistical, analytical and research purposes and for customization, developing and improvement of our App.

**Your Rights**

HelpAround acknowledges you have the right to access and change the Personal Information we collect and process. **If you wish to access or to correct, amend, or delete Personal Information, please send us an email to:** privacy@helparound.co and we will respond within a reasonable timeframe, but in any event no later than
permitted by applicable law. Additionally, please note that in order to ensure that you have as much control over your Personal Information and other information as possible, you may modify certain parts of your information by yourself in the App.

**Important:** Uninstalling the App or terminating your Account will not necessarily delete your Personal Information that is stored on our servers. If you wish to delete all Personal Information (including PHI) that we have collected about you, please send a deletion request to privacy@helparound.co and we will delete it within a reasonable timeframe; however, please note that we may be required by applicable laws and regulations to retain certain Personal Information for a longer period.

Aggregate and/or anonymous information derived from your Account and/or use of the App may remain on HelpAround servers indefinitely.

We hereby inform you of the following rights (by virtue of EU law), in respect of your Personal Information:

**Right to access:** you may have the right to request a review of your Personal Information held by HelpAround. We may refuse to comply with your access request if the request is manifestly unfounded, excessive or repetitive in nature.

**Right to rectification:** if the Personal Information processed by HelpAround is incorrect, incomplete or not processed in compliance with applicable law or this Privacy Policy, you may have the right to have your Personal Information rectified.

**Right to erasure:** under certain conditions, you may be entitled to require that HelpAround will delete or "block" your Personal Information (e.g. if the continued processing of those data is not justified).

**Right to Portability:** you may have the right to transfer your Personal Information between data controllers (i.e. to transfer your Personal Information to another entity). The right to data portability only applies where your Personal Information is processed by us with your consent or for the performance of a contract and when processing is carried out by automated means.

**Right to object to or withdraw consent:** where that lawful basis for processing your Personal Information is either “public interest” or “legitimate interests”, those lawful bases are not absolute, and you may have a right to object to such processing. Where you object on grounds of legitimate interest, we shall no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims. If the processing of your Personal Information is based on your consent, you have the right to withdraw your consent to such processing at any time.

The right to restrict processing – under certain circumstances, you may have the right to object to the processing of your Personal Information due to your particular situation.

**Right to lodge a complaint:** you have the right to lodge a complaint before the relevant data protection authority or supervisory authority of your jurisdiction.

**To exercise these rights, where applicable, please contact us by sending an email to:** privacy@helparound.co

**Location of Your Data**

The information collected from you by HelpAround, as detailed in this Privacy Policy, may be transferred to, and stored at, servers that may be located in countries outside of your jurisdiction and in a country that is not considered to offer an adequate level of protection under your local laws. It may also be processed by HelpAround and its suppliers, service providers or partners’ staff operating outside your country.

HelpAround is committed to protecting your Personal Information and will take appropriate steps to ensure that your Personal Information is processed and stored securely and in accordance with applicable privacy laws, as detailed in this Privacy Policy. Such steps include putting in place data transfer agreements or ensuring our third-party service providers comply with HelpAround’s data transfer protection measures.
Note to our Users in the EU:

If you are located in the EU, you have a right to request further information regarding the data transfer mechanisms used by us with respect to data transfers to third countries.

In order to keep your Personal Information safe, we apply strict safeguards when transferring it outside of the EEA, which may include the following:

- Transferring your personal information to countries approved by the European Commission as having adequate data protection laws, such as Israel;
- Entering into standard contracts that have been approved by the European Commission and which provide an adequate level of high-quality protection, with the recipients of your Personal Information;
- Transferring your Personal Information to organizations that are Privacy Shield Scheme certified, as approved by the European Commission.

By submitting your personal information through the app, you acknowledge, and agree, in jurisdiction where such consent is required, to such transfer, storing and/or processing of personal information.

Minors

The App is intended for Users over the age of sixteen (16). Therefore, HelpAround does not intend and does not knowingly collect directly Personal Information from children under the age of sixteen (16) and does not wish to do so. We reserve the right to request proof of age at any stage so that we can verify that minors under the age of sixteen (16) are not using the App. If we learn that we collected Personal Information from minors under the age of sixteen (16) we will delete that information as quickly as possible. If you have reasons to suspect that HelpAround collected Personal Information from minors under the age of sixteen (16), please notify us at privacy@helparound.co, and we will delete that information as quickly as possible.

Third-Party Service Providers and Third-Party Software

While using the App we may be using third-party service providers, who may collect, store and/or process your information, as detailed in this Privacy Policy.

Note that we collect, hold and/or manage your Personal Information through HelpAround's authorized third parties whom are vendors of certain products or services (such as hosting cloud services) (including, as applicable, their affiliates) solely and limited to providing us with such requested services, and not for any other purposes.

Such vendors may be located in a country that does not have the same data protection laws as your jurisdiction.

Such third parties service providers include without limitation the following categories of service providers:

- **Customer engagement and content management services**, including our service provider Braze, whose Privacy Policy can be found [here](#);
- **Hosting and cloud computing services**, including our service provider Amazon (AWS), whose Privacy Policy can be found [here](#) and our service provider XLHost, whose Privacy Policy can be found [here](#);
- **Support management services**, including our service provider Freshdesk, whose Privacy Policy can be found [here](#);
- **Software development services**, including our service provider Vakoms LLC;
- **Sending SMS links to download the Apps services**, including our service provider Twilio, whose Privacy Policy can be found [here](#).

Please read such third-party service providers' Terms of Use and Privacy Policies to understand their privacy practices.

Links to Third Party Websites
The App may contain certain links referring you to third party sites and services. Most of such linked sites and services provide legal documents, including Terms of Use and Privacy Policy governing the use thereof, we recommend examining these documents carefully.

As further detailed in the Terms of Use, the App consists of two Zones, the public zone, managed and operated by the Company (the "Public Zone") and the therapy zones, which are requested by the Medical Providers (i.e. the Company's customers, such as Hub and Pharmaceutical companies) (the "Therapy Zone(s)"). Each Therapy Zone is subject to the Terms of Use and Privacy Policy of the applicable Medical Provider, while in certain cases personal information collected from your usage and activities within the Therapy Zone may be available also to the applicable Medical Provider that wishes to learn, adapt and respond to your individual health needs and medical circumstances. In order to enter a Therapy Zone, you will be required to approve the Terms of Use and Privacy Policy applicable to the Therapy Zone. It is always advisable to read such terms carefully before approving them and entering the Therapy Zone in order to know what kind of information about you is being collected.

**Security**

We take appropriate measures to maintain the security and integrity of our App and prevent unauthorized access to it or use thereof through generally accepted industry standard technologies and internal procedures.

Your Personal Information is hosted on our servers, a backup copy of such information is stored in an encrypted manner on the Amazon (AWS) servers, both servers provide advanced strict security standards (both physical and logical).

Some of the security measures that we employ include, without limitation: highly secure services design and implementation using state of the art encryption mechanisms and architecture, restriction of access to your Personal Information to individuals who need access to it in order to process it on HelpAround’s behalf and implementation of a secured permission management and auditing system, using industry standard firewall and network access filtering as well as security group mechanisms.

Please note, however, that there are inherent risks in transmission of information over the Internet or other methods of electronic storage and we cannot guarantee that unauthorized access or use will never occur.

HelpAround will comply with applicable law in the event of any breach of the security, confidentiality, or integrity of your Personal Information and will inform you of such breach if required by applicable law.

To the extent that HelpAround implemented the required security measures under applicable law, HelpAround shall not be responsible or liable for unauthorized access, hacking, or other security intrusions or failure to store or the theft, deletion, corruption, destruction, damage, or loss of any data or information included in the personal information.

**Data Retention**

HelpAround will retain the Personal Information for as long as we believe that it is accurate and can be relied upon. Personal Information that is no longer required for the purpose for which it was initially collected will be deleted unless we have a valid justification to retain it that is permitted under applicable law, such as to resolve disputes or comply with our legal obligations.

**Changes to the Privacy Policy**

HelpAround reserves the right to change this Privacy Policy at any time, so please re-visit this page frequently to check for any changes. In case of any material change, we will make reasonable efforts to post a clear notice on the App or we will send you an e-mail regarding such changes to the e-mail address that you have provided us with. Such material changes will take effect seven (7) days after such notice was provided on our App or sent to you via e-mail, whichever is the earlier. Otherwise, all other changes to this Privacy Policy are effective as of the stated “Last Revised” and your continued use of the App on or after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes. In the event that the Terms should be amended to comply with any legal requirements, the amendments may take effect immediately, or as required by the law and without any prior notice.

**Have any Questions?**
If you have any questions (or comments) concerning this Privacy Policy, please send us an email to the following address: privacy@helparound.co and we will make every effort to reply within a reasonable timeframe.

*   *   *   *   *