

RxWare's Privacy Policy

Last Revised: June 4, 2023

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

In summary, when using the App, we may collect some personal data, all in order to provide you with the services. If you used one of our Medical Provider Partners, we may share personal data with them. We also allow you to interact with other users, where in such cases personal data will be shared with such users.

We use third party software, SDK and services to run the App; they have access to some of your personal data under a confidentiality obligation.

We use industry standard practices to ensure that your data is kept secure, and we allow you to exercise your personal data rights granted under the GDPR even if you live outside the EU.

As a US Company, we are Privacy Shield compliant. You may exercise your legal rights under this framework.

RxWare was formerly HelpAround, and was rebranded during 2022.

And now for the full legal text.

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2. About this Privacy Policy

This Privacy Policy applies when you use our App and services and describes our practices with respect to data collected from you and other data subjects. This Privacy Policy explains our online information practices and the choices you can make about the way your personal data is collected and used in connection with our App.

Additionally, we maintain [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.

3. Who are we

RxWare Inc. is a company incorporated under the laws of Delaware, USA, with offices at 8718 Hartsdale Ave Bethesda, MD 20817, United States. Individuals wishing to contact us about data protection issues may do so by emailing us at privacy@RxWare.io.

Your acknowledgment of this Policy

This Privacy Policy ("**Privacy Policy**") details how your personal data collected via the App is used and processed by us.

Are you required to provide us with any personal data?

You are not required by law to provide us with any personal data. Our processing of your personal data shall be solely according to your specific request and consent. In order to access or use the app or to create an Account, you are required to provide your consent for our processing, as detailed in this privacy policy. If you do not agree to any term provided herein, please cease any access or use of the app.

Which personal data do we collect about you?

We collect two types of personal data :

Non-personally identifiable Data. The first type is non-personally-identifiable data and statistical information. Non-personally identifiable data that is being gathered consists of technical information and behavioral information that does not pertain to a specific individual ("**Non-Personal Data**").

Technical Data that might be de-anonymized. 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, your mobile operator service provider, etc is collected and retained according to this policy. additional information that may include your click-stream on the App, your activities on the App including time spent on various screens of the App and additional information of a similar nature. While it is not specifically personally identifiable, it may be reverse-engineered to be identifiable and therefore is considered personal data.

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

Personal Data that is provided by you voluntarily:

Communications with RxWare: Personal data you provide to us as part of any communications with us, 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 data is collected from the details you provide us 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 data may be requested in the future. You may, at your sole discretion, provide us with any of the following additional personal data: year of birth, gender, location and a profile photo.

User Generated Content: Personal Data 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**").

Data provided in the medical and insurance related forms: Personal Data 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 Data collected via technology:

Approximate Location: 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.

Device Location: In case 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.

4. How do we collect personal data about our Users?

There are two main methods we use to collect personal data:

We collect personal data through your entry, connection, access 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 personal data 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 personal data that you provide us voluntarily. For example, we collect Personal Data that you provide via the Contact Form on our App. We will inform you prior to collecting your Personal Data if it is requested on a voluntary basis and the consequences of not providing voluntary Personal Data.

We collect personal data we receive from our Medical Provider partners whose services you use. 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.

5. What are the purposes of the collection and processing of data?

Non-personal data is processed in order to:

- Provide you with the services;
- 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, and prevent fraud;
- Improve, develop, upgrade the App and our services;
- Ensure that content on the App is presented in an optimal way for you and for your device (e.g. tablet, mobile phone);

Personal Data 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 interact between members of communities within the App;
- Contact you by email or via the App with proposals and tailored information regarding new products, offers, services, features, enhancements, upgrade opportunities, etc.; you may always request to opt-out from these types of messages.
- Allow Medical Provider partners the services you requested from them, if applicable, and upon your request
- 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 us. 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 sign 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 upon your request;
- 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 our developments of our 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@RxWare.io
- 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 us, 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

Your Personal Data Rights

Right of Access and Rectification

You have the right to know what personal data we collect about you and to ensure that such data is accurate and relevant for the purposes for which we collected it. You can receive a copy of your personal data, and to rectify such personal data if it is not accurate, complete, or updated. However, we may first ask you to provide us with certain credentials to permit us to identify you before rectifying, deleting, or reviewing.

6. Right to Delete Personal Data or Restrict Processing

You have the right to delete your personal data or restrict its processing by ourselves and third parties. We may postpone or deny your request if your personal data is in current use for the purposes for which it was collected or for other legitimate purposes such as compliance with legal obligations.

Right to Withdraw Consent.

You have the right to withdraw your consent to the processing of your personal data. Exercising this right will not affect the lawfulness of processing your personal data based on your consent before its withdrawal. Please note that in most cases, withdrawal of your consent would most likely cause us to delete your personal data rather than cease processing.

Right of Data Portability.

Where technically feasible, you have the right to ask to transfer your personal data in accordance with your right to data portability. In order to apply for this, please contact us at privacy@RxWare.io.

The Right to Lodge a Complaint

You also have the right to lodge a complaint with a data protection supervisory authority regarding the processing of your personal data.

Your California Privacy Rights and Do Not Track Notices

We do not convey your personal data to third parties for direct marketing purposes. However, if we did, then the California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding its disclosure of personal data to third parties for their direct marketing purposes.

To make such a request, please send an email to privacy@RxWare.io, and we will let you know that none of your personal data was shared. We are only required to respond to one request per customer each calendar year.

We respond to “Do Not Track” signals.

Exercising Your Rights

We acknowledge you have the right to access and change the Personal Data we collect and process. **If you wish to access or to correct, amend, or delete Personal Data, please send us an email to: privacy@RxWare.io** 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 Data and other information as possible, you may modify certain parts of your information by yourself in the App.

Sharing Personal Data with Third Parties

We respect your privacy and will not disclose, share, rent, or sell your Personal Data to any third party. The only sharing of your Personal Data is made upon your specific, explicit, request. If you used one of our Medical Provider Partners to register, then we share such data with them. However, this does not release us from our liability towards you and we are fully liable for this onward transfer.

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

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

Service Providers: we share Personal Data 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 Data 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.

We use the following third parties to process Personal Data on our behalf.

AppsFlyer is used to improve the services;

Crashlytics is used to improve the service and monitor bugs;

Mailgun is used to contact you and send you messages;

Redash is used to provide with insights on usage;

Tableau is used for data visualization;

Twilio is used to send you notifications;

Each of these service providers have entered into a data processing agreement with us, ensuring that they will respect your personal rights and freedoms, and not use your personal data for any purpose apart from according to this Privacy Policy.

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 data might be shared with such Medical Provider.

In addition, we may share Personal Data in the following cases: (a) to satisfy any applicable legitimate and binding 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 ourselves, 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 rights, property, or personal safety, of ourselves, our Users or the general public; (e) when we are undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of our assets (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.

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

7. Location of Your Data

The personal data collected from you, 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 us and our suppliers, service providers or partners' staff operating outside your country.

We are committed to protecting your Personal Data and will take appropriate steps to ensure that your Personal Data 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 our data transfer protection measures.

We will ensure the confidentiality, integrity and availability of your Personal Data by Transferring your personal data only to (i) countries approved by the European Commission as having adequate data protection laws, such as Israel; (ii) entities that executed 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 Data; and (iii) Transferring your Personal Data to organizations that are Privacy Shield Scheme certified, as approved by the European Commission.

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

8. Minors

The App is intended for Users over the age of sixteen (16). Therefore, we do not intend and do not knowingly collect directly Personal Data from children under the age of sixteen (16) and do 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 Data from minors under the age of sixteen (16) we will delete that data as quickly as possible. If you have reasons to suspect that RxWare collected Personal Data from minors under the age of sixteen (16), please notify us at privacy@RxWare.io, and we will delete that personal data as quickly as possible.

Some of our customers require that the service be provided only to users of eighteen (18) years of age. In such case, this section shall be replaced and read as follows:

The App is intended for Users over the age of eighteen (18). We do not collect any personal data relating to minors. If you have reasons to suspect that RxWare collected Personal Data from minors, please notify us at privacy@RxWare.io, and we will delete that personal data as quickly as possible.

Cookies

We may use cookies to authenticate your identity. A cookie is a small text file stored on your browser which may be used to identify you across services. We use first party cookies, meaning only our own cookies, that allow us to retain your details when you sign up and during the verification process. You may delete these cookies at any time, which may require you to re-authenticate. We do not share these cookies with anyone else.

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 personal data, as detailed in this Privacy Policy.

Note that we collect, hold and/or manage your Personal Data through our 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.

Third Party Portions and Links

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 data 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 data about you is being collected.

9. 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 Data 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 Data to individuals who need access to it in order to process it on our 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.

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

To the extent that we implemented the required security measures under applicable law, we 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 data.

Data Retention

We will retain the Personal Data for as long as we believe that it is accurate and can be relied upon. Personal Data 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.

Complaints and Arbitration.

If you feel or believe that your personal data rights were harmed in any way or form, you may contact our data protection officer at privacy@RxWare.io and lodge a complaint. Such complaints shall include how and why you believe your personal data rights were harmed, and the required evidence. Our data protection officer will respond to most complaints within 14 days, and shall offer the required remedies.

In accordance to the Privacy Shield Principles, we will resolve all complaints according to the Privacy Shield and applicable regulations. We also agree to resolve all complaints and deal with disputes with the local data protection authorities.

This section does not limit your right to lodge a complaint with your respective data protection authority or to enter into a binding arbitration with us according to the Privacy Shield.

In order to invoke binding arbitration, you are required to raise the claimed violation directly with us and afford us an opportunity to resolve the issue within the timeframe; (2) make use of the independent recourse mechanism under the Privacy Shield Principles, which is at no cost to you; and (3) raise the issue through your Data Protection Authority to the Department of Commerce and afford the Department of Commerce an opportunity to use best efforts to resolve the issue within the timeframes set forth in the Letter from the International Trade Administration of the Department of Commerce, at no cost to you.

In compliance with the Privacy Shield Principles, RxWare commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact RxWare by emailing privacy@RxWare.io

RxWare has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning data transferred from the EU.

10. Updates to the Privacy Policy

We reserve the right to amend this Privacy Policy at any time. In case of any 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 changes will take effect thirty (30) days after such notice was provided on our App or sent to you via e-mail, or your explicit consent to such changes, whichever is the earlier.

Privacy Shield

We comply with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal data transferred from the European Union to the United States. We have certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

The Federal Trade Commission has jurisdiction over our compliance with the Privacy Shield.

Have any Questions?

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