

Steward Health Privacy Policy

EFFECTIVE DATE: June 8 2018

Introduction

Steward Health Group B.V. (“**we**”, “**us**”, “**our**”) commits to ensuring strong privacy practices for the online services we provide to our users (“**you**”, “**your**”).

This Privacy Policy (“**Privacy Policy**”) defines the privacy practices of Steward Health Group B.V. This policy applies only to the website located at www.steward.com, hereafter referred to as the “**Service**”. This Privacy Policy describes how Steward Health Group B.V. collects, discloses, stores, transfers, and uses information that could individually identify our users through their own personal data (“**Personal Data**”).

This Privacy Policy does not extend to include practices of third parties. Steward Health Group B.V. is not responsible on how third parties act, behave, nor what privacy policies they might use.

This policy applies (i) to new users who use or access the Service on or after the Effective Date and (ii) on the Effective Date to users who use or access the Service before the Effective Date. If you have any questions or comments about our privacy policy, you can reach us in one of the following ways:

- Email – support@steward.com
- Mail – Steward Health Group B.V., Keizersgracht 391, 1016 EJ Amsterdam, The Netherlands.

What data we collect and how we use it

Kind of Personal Data We Collect

Steward Health Group B.V. collects Personal Data about you when you provide it directly to us, when third parties such as our business partners (e.g. companies with whom we integrate our Service), service providers (such as our advertising service providers) provide us with Personal Data about you, or when Personal Data about you is automatically collected in connection with your use of our Service. We collect the following Personal Data from you in connection with the Service:

* Information about your computer including your IP address, geographical location, browser type and version, and operating system; * Information about your visits to and use of this website including the referral source, length of visit, page views, and website navigation paths; *

Information, such as your name, email address, and phone number that you enter in order to receive notifications; * Information contained in any communications that you send to us by email or through our website, including its communication content and metadata; * Any other personal information that you send to us. Please note that before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

How We Use Your Personal Data

Steward Health Group B.V. uses Personal Data to: (i) provide, administer, and improve our Service; (ii) better understand your needs and interests; (iii) fulfill requests you make; (iv) personalize your experience; (v) provide Service announcements; (vi) provide you with information and new offers; (vii) protect, investigate, and deter against fraudulent, harmful, unauthorized, or illegal activity and (viii) comply with legal obligations. For example, Steward Health Group B.V. can use your Personal Data to:

- Administer our website and business;
- Personalise our website for you;
- Send you non-marketing commercial communications;
- Send you email notifications that you have specifically requested;
- Send you our email newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter);
- Send you marketing communications relating to our business or the businesses of carefully-selected third parties which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications);
- Provide third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information);
- Deal with inquiries and complaints made by or about you relating to our website;
- Keep our website secure and prevent fraud; and
- Verify compliance with the terms and conditions governing the use of our website (including monitoring private messages sent through our website private messaging service)

Mechanisms We Use To Collect Personal Data

Steward Health Group B.V. collects Personal Data when a user (i) interacts with the services; (ii) communicates with us; and (iii) responds to communication or interaction with us. Some of the methods and tools we use to collect Personal Data are:

- **Unique Identifiers:** We use unique identifiers such as cookies or e-mail addresses to track individual usage behavior on our Services, such as the length of time spent on a particular page and the pages viewed during a certain period.
- **Cookies, Web Beacons, and Other Tracking Tools:** We and our third-party service providers collect information about you, your device, and your use of the Service through

cookies, Web Beacons (“Web Beacons”), and other tracking tools and technological methods (collectively, “Tracking Tools”). Tracking Tools collect information such as computer or device operating system type, IP address, browser type, browser language, device hardware type, the website or page visited or used, the parts of the Service accessed, the length of time spent on a page or using a feature, and access times for a page or feature. These Tracking Tools help us learn more about our users and understand how they use the Service.

- **Cookies:** Our website uses cookies. A cookie is a small file with an identifier. This file is sent by web servers to your browser and stored on your device locally. Cookies are sent from your browser back to the web server each time the browser requests a page from the web server. Cookies may be either “persistent” cookies or “session” cookies. A persistent cookie is stored by a web browser and remains valid until its expiration date is reached unless it is explicitly deleted by the user. A session cookie, on the other hand, expires at the end of the user session, usually when the web browser is closed. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies. Our Service only uses permanent cookies.
- **Web Beacons:** Web Beacons help us better manage content on our Service by informing us what content is effective. Web Beacons are embedded in, or otherwise associated with, certain emails or other means of communications that you receive from us or our partners. Web Beacons help us track your responses and interests and deliver relevant content and services to you. For example, they may let us know when you take action based on the emails that we send.
- **Social Media Widgets:** Some parts of our Service may include social media features, such as the Facebook “like” button, and widgets, such as the “share this” button. These social media features are either hosted by a third party or hosted directly on our Service. When you use these tools, the party that provides the tool, the third party that operates the social media services, and/or we may receive Personal Data about you. By using these tools, you acknowledge that some information, including Personal Data, from your social media services, will be transmitted to us, and that information is, therefore, is covered by this Privacy Policy, and some information, including Personal Data, may be shared with the third-party services, and that information is therefore governed by their privacy policies.
- **Third-Party Sources:** We may use third-party services, such as open search tools and social networks, to obtain information about you (such as your name or company) and to enrich your personal information by obtaining publicly available information about you, such as your job title, employment history, and contact information.

WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

We share Personal Data with vendors, third-party service providers, and agents who work on our behalf and provide us with services related to the Service. These parties include:

- Third parties who act for us or provide services for us, such as billing and credit card payment processing, maintenance, sales, marketing, administration, support, data enrichment, hosting, and database management services
- Outside professional advisors (such as lawyers and accountants) for purposes related to the operation of our business such as auditing, compliance, and corporate governance Steward Health Group B.V. Affiliates, including persons or entities that acquire some or all of Steward Health Group B.V. assets
- Co-sponsors and presenters of webinars and events that you attend We also share Personal Data with third-party service providers and agents when necessary to complete a transaction initiated or authorized by you or provide you with a product or service you have requested. In addition to those set forth above, these parties also include:
- Other users (when you use a “share link” to post information publicly, share or comment on content, or as otherwise necessary to effect a transaction initiated or authorized by you through the Service)
- Social media services (if you interact with them through your use of the Service)
- Third-party business partners who you access through the Service
- Other parties authorized by you We also share Personal Data when we believe it is necessary to:
- Comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies
- Protect us, our business or our users, or third parties, for example, to enforce our terms of service, prevent spam or other unwanted communications and investigate or protect against fraud
- Maintain the security of our products and services Finally, we also share information with third parties when you have given us consent to do so.

TRANSFERS OF PERSONAL DATA

The Service is hosted and operated in countries within the European Union (EU), with development, support, and maintenance operations happening in countries outside the EU. By using the Service, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to Steward Health Group B.V. in the EU. Your further authorize Steward Health Group B.V. to transfer, store, host, and process your information within and outside the EU.

EU PERSONAL DATA

If you are located in the EU, United Kingdom, Lichtenstein, Norway, or Iceland, you may have additional rights under the EU General Data Protection Regulation (the “GDPR”) related to your Personal Data, as further described below. Steward Health Group B.V. will be the controller of your Personal Data processed in connection with the Service.

BUSINESS TRANSFERS

Steward Health Group B.V. may sell, transfer, or otherwise share some or all of its business or assets, including your Personal Data, in connection with a business deal (or the evaluation of a potential business deal) such as a merger, consolidation, acquisition, reorganization, or sale of assets or in the event of bankruptcy. You acknowledge that such transfers may occur and that any acquirer or successor of Steward Health Group B.V. or its assets may continue to use your Personal Data as set forth in this Privacy Policy. You will be notified via email and/or a prominent notice on our Website or Service of any change in ownership or resulting change in uses of your Personal Data, as well as any choices you may have regarding your Personal Data.

YOUR PRIVACY CHOICES

Opting Out of Tracking Tools

You can opt-out of certain web tracking activities using a series of procedures.

- **Web Browser Controls:** You can prevent the use of certain Tracking Tools, such as cookies, on a device-by-device basis using the controls in your web browser. These controls can be found in the Tools > Internet Options (or similar) menu for your browser, or as otherwise directed by your browser's support feature. Through your web browser, you may be able to:
 - Delete existing Tracking Tools
 - Disable future Tracking Tools
 - Set your browser to provide you with a warning each time a cookie or certain other Tracking Tools are being set
- **Do Not Track:** Your browser may offer you a "Do Not Track" option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain online activities. The Service does not support Do Not Track requests at this time, which means that we collect information about your online activity both while you are using the Service and after you leave our Service. You further have the ability to opt-out of the following:
- **Emails:** We give you the ability to opt-out of marketing-related emails by providing a link within our email communications. By selecting this link, you will be removed from our email list and not receive further marketing or non-marketing materials.
- **Information Shared with Third Parties:** Except as set forth in this Privacy Policy, you will be notified when your Personal Data may be shared with third parties and will be able to prevent the sharing of this information. To the extent permitted or required by applicable law, you can opt-out of having your information shared with a third party that is not our agent, by contacting us at support@steward.com.

Security

We believe the security of your information is a serious issue and we are committed to protecting the information we receive from you. We use commercially reasonable security measures to protect against the loss, misuse, and alteration of your information under our control based on the type of Personal Data and applicable processing activity, such as data encryption in transit, data encryption at rest (for customers that elect to purchase our “private cloud” solution), pseudo-anonymisation, and enforcement of least privilege and need-to-know principles. To the extent the Service requires you to provide any Financial Account Information, such as when you purchase subscriptions to the Service, that information will be collected and processed by third-party PCI-compliant service providers. We do not store Financial Account Information transmitted through the Service, provided that we do store (or our payment processor on our behalf will store) just the last four digits of your credit card number, if you provide this to us, to comply with credit card processing requirements of authorisations, charges and chargebacks.

Data Retention

We retain Personal Data about you for as long as you have an open account with us or as otherwise necessary to provide you with the Service, and thereafter as set forth in our Service agreement with you (typically 30 days after the termination of the Service, or sooner upon request (except as required by law)). In some cases, we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule, or regulation. Upon disposal, we will destroy or render unreadable any such Personal Data. Afterwards, we retain some information in a depersonalised or aggregated form but not in a way that would identify you personally. This Privacy Policy applies only to the Service. It does not apply to products, services, or sites that are provided by or operated by third parties, even if such products, services or sites are linked or redirected to or from the Service (“Third-Party Sites”), regardless of whether or not such link or redirection is authorised by Steward Health Group B.V. Third-Party Sites may have their own policies regarding privacy, or no policy at all. The fact that we link to a Third-Party Site is not an endorsement, authorisation, or representation that we are affiliated with that third party. Steward Health Group B.V. is not responsible for Third-Party Sites, and you use them at your own risk. We encourage you to read the privacy policies and terms of the Third-Party Sites that you visit or use.

Your Personal Data Rights

Accessing, Correcting, and Deleting Your Personal Data and Other Data Subject Rights

You have certain rights with respect to your Personal Data. However, we may limit or reject your requests in certain cases, such as if it is impractical or if it is not required by law. In some cases, we may also need you to provide us with additional information, which may include Personal Data, to verify your identity and the nature of your request. We will take reasonable steps to respond to all requests within 30 days.

- **Access:** You can request more information about the Personal Data we hold about you and request a copy of such Personal Data.
- **Rectification:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data.
- **Erasure:** You can request that we erase some or all of your Personal Data from our systems.
- **Portability:** You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible. For the following, please email us at support@steward.com:
- **Withdrawal of Consent:** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilise some or all of our Service.
- **Objection:** You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes, such as marketing purposes.
- **Restriction of Processing:** You can ask us to restrict further processing of your Personal Data. You also have the right to lodge a complaint about Steward Health Group's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State.

Amendments

We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you understand any changes to this policy. We may notify you of changes to this policy by email or through the private messaging system on our website. New amendments will supersede this version of the Privacy Policy.

Children

Our Service is not intended for children under the age of 13 (16 in the EU), and therefore, Steward Health Group B.V. does not knowingly acquire or receive Personal Data from children under the age of 13 (16 in the EU). If we later learn that any user of our Service is under the age of 13 (16 in the EU), we will take appropriate steps to remove that user's information from our account database and will restrict that individual from future access to the Service.