

Digital Privacy Policy

Effective Date: January 2025

Welcome!

You have arrived at a digital service location (i.e., website or application) that is owned and operated by Village Practice Management Company, LLC ("VillageMD" or "We"). VillageMD is composed of various entities that provide healthcare and related services to individuals throughout the United States of America. The following entities make up the VillageMD family:

- Village Medical Primary Care Clinics*
- Village Medical at Walgreens
- Village Medical at Home
- Village Medical Pharmacy
- Village Medical Physical Therapy

This Privacy Policy governs your use of any digital service location that posts a link to this Privacy Policy, and also applies to your use of interactive features, widgets, plug-ins, applications, content, downloads and other services (collectively the "Service") that VillageMD owns and controls and makes available through an online service OR where VillageMD posts a link to this Privacy Policy, regardless of how you access or use the Service, whether via personal computers, mobile devices or other electronic media. If you are providing individually identifiable information for the purpose of obtaining medical care through the Services (such information is also referred to as "Protected Health Information" or "PHI"), our use of your information is governed by our Health Insurance Portability and Accountability Act Notice of Privacy Practices (the "HIPAA Notice"), available here: <https://www.villagemedical.com/hubfs/Documents/Compliance/VM-D%20NPP%20-%2016-2025.pdf>.

The HIPAA Notice describes how we can use and share your PHI and also describes your rights with respect to your PHI. This Privacy Policy governs our use of information that is not PHI. If there is ever any conflict

between this Privacy Policy and the HIPAA Notice with respect to PHI, the HIPAA Notice will apply.

PLEASE READ THE STATEMENT REGARDING COOKIES AND SIMILAR TECHNOLOGIES BELOW CAREFULLY BEFORE USING OR OBTAINING ANY MATERIALS, INFORMATION, OR PRODUCTS THROUGH THE SERVICES. BY ACCESSING THE SERVICES, YOU AGREE TO ACCEPT, WITHOUT LIMITATION OR QUALIFICATION, THE COOKIE AND SIMILAR TECHNOLOGIES STATEMENT BELOW.

We reserve the right to change, update or correct the Cookie and Similar Technologies Statement, or any information contained in the Services, at any time without advance notice by posting an amended statement to the Services. Your continued use of the Services means that you accept and agree to the revised Cookie and Similar Technologies Statement. If you do not accept this Cookie and Similar Technologies Statement (as amended from time to time), please exit the Services immediately.

To the extent we provide you notice on our Service of different or additional privacy policies or practices (e.g., at the point of our collection), those additional terms shall govern such data collection and use. By using our Service, you consent to our Privacy Policy and our collection, use and sharing of your information and data, and other activities as described below.

How Do We Collect Personal Information

From you. We may collect personal information and other information that you provide when you use our Services.

From devices you use when you interact with us online. This includes information collected through our Services and automatically from devices you use to connect to our Services. For more information about this, please see our "Cookies and Similar Technologies" section below.

From third parties. This includes personal information we collect from websites that enable social sharing, social media sites, and websites from our service providers, vendors, our affiliates, or other individuals and businesses.

The Types of Personal Information We Collect

Depending on how you interact with us and your use of our Services, we may collect the following information:

Contact Information, such as your name, home address, work address, email address, telephone number, or other similar identifiers.

Health Information, such as health data that may be collected based on your self-report of your health data, or data from a remote patient monitoring device(s) (an "RPM Device") you connected to the Service. Some examples of health data that you may self-report or is received directly from an RPM Device includes, but is not limited to, respiratory rates, blood pressure, height, and weight.

Biographic and Demographic Information, such as date of birth, age, gender, and photo.

Account Information, such as a username and password, profile details you choose to provide, and feedback and reviews you may leave about our Services.

Activity Information, such as information we collect when you access and interact with our Services, including browser or device model and settings, operating system, and unique identifiers, clickstream data, cookies and localStorage, browsing history, search history, web-based location, IP address, browser information, and any other Internet usage information our Services may automatically record when you visit. For more information about cookies and similar technologies, please refer to the "Cookies and Similar Technologies" section below.

Inferences, such as inferences drawn from any of the personal information identified.

Other Personal Information you provide, such as the content provided either in your job application or in your communications with us, including interactions with us online, in-person, or on the phone.

Sensitive Personal Information, such as driver's license number, other government-issued identification number, biometric information, and

geolocation data (including your precise geolocation) collected with your consent for the purpose of locating a clinic near you.

Professional Information, such as information about your job function and role, title, professional affiliations, employer, and employment history and any other information that may be obtained from third-party background checks and feedback.

How We Use the Information Collected

Any personally identifiable information you give us will be used only as permitted by law, including to provide the product, service, or information you have requested or to support the program(s) for which you registered. If you use and continue to use the features on a Service, you agree to our collection of information as described above.

We may use your information for the following reasons, depending on your relationship with us:

- To provide you the Services requested.
- To communicate with you, such as when we respond to your inquiries and send you communications, including information about our Services, or promotions offered, such as sweepstakes, contests, special events, and other events. This may also include when we send you administrative e-mail notifications, such as security or support and maintenance advisories.
- To market and provide to you our Services.
- To serve you targeted advertising or content.
- To provide, market, and develop our Services, including to maintain our websites, troubleshoot, provide customer and technical support, conduct data analysis, and conduct test and research.
- To maintain the safety, security, and integrity of our Services, for example, by authenticating users and providing account security and fraud detection. We may also use your information to monitor, detect, and prevent fraud and improper or illegal activity.
- To debug our systems, to secure our online services, including our network and websites, and to debug our online services.
- To send you news and/or marketing communications (by email, phone, or text) subject to your marketing preferences and choices,

including information about us or third-party offerings we think may be of interest to you.

- To conduct market research and develop quality assurance, including to study, develop, and improve our Services. This may include measuring and analyzing audience traffic, including tracking user interests, trends, and patterns. We may also aggregate, anonymize, and/or de-identify personal information we collect and use it for any purpose, including development for our Services and improvement activities.
- To comply with legal requirements and/or to investigate or address claims or disputes relating to your use of the Services. This would include the use of your information to comply with our legal and regulatory obligations, to defend ourselves in litigation and investigations, and to prosecute litigations.
- To conduct internal business purposes, including for data analysis, audits, and enhancing our Services. We may also use inferences drawn from personal information to create a profile reflecting your preferences, so we can tailor our Services to you.
- To collect analytics in order to understand how our Services are used and to improve them over time.

How We Disclose Personal Information

We may disclose some or all of the personal information collected from or about you with any of the following entities and for any of the following purposes:

- ***Advertising Partners.*** We may provide personal information to third parties, such as advertising partners or other marketing partners who provide services to us.
- ***Service Providers.*** We may provide personal information to vendors, payment processors, contractors, business and service partners who provide services to us, including analysis firms and others.
- ***Government, regulatory, or law enforcement agencies.*** We reserve the right to disclose your information to respond to valid information requests from government authorities and judicial requests, to investigate potential fraud, or where otherwise required by law. We may disclose your personal information where we believe the disclosure is necessary or appropriate to comply with regulatory or legal requirements, or to protect the

safety, rights, or property of ourselves and others and to exercise, establish, or defend our legal rights.

- ***In connection with a merger, acquisition, or business transfer.*** For example, if we sell all or a part of our company, are part of a merger, consolidation, restructuring, bankruptcy, and/or sale of assets or other corporate change, your information may be transferred as part of that transaction.
- ***At your direction.*** We may disclose your personal information at your direction or with your consent.
- ***Affiliates, Subsidiaries, and Divisions.*** We may disclose your personal information to our affiliates, subsidiaries, and other related divisions, in order to provide our Services.
- ***Collaborators.*** We may disclose personal information with collaborators with whom we jointly develop or promote our Services, including special offers, sponsorships and co-branded opportunities, and promotions, including health and wellness sponsors.
- ***Aggregate Data.*** We may disclose your personal information in an aggregated or non-identifying form or otherwise in a form that cannot reasonably be used to identify you.

To the fullest extent permitted by applicable law, we may also disclose your information if we believe in good faith that doing so is necessary or appropriate to (1) protect or defend the rights, safety or property of VillageMD or third parties (including through the enforcement of this Privacy Policy, and other applicable agreements and policies); or (2) comply with legal and regulatory obligations (e.g., pursuant to law enforcement inquiries, subpoenas or court orders). To the fullest extent permitted by applicable law, we have complete discretion, and without notice to you, to elect whether or not to make such disclosures, and to contest or not contest requests for such disclosures.

Sweepstakes, Contests, and Promotions

We may offer sweepstakes, contests, and other promotions (for any, a "Promotion") through the Service that may require registration. By participating in a Promotion, you are agreeing to official rules that govern that Promotion, which may contain specific requirements of you, including allowing the sponsor of the Promotion to use your name, voice and/or likeness in advertising or marketing associated with the

Promotion. If you choose to enter a Promotion, personal information may be disclosed to third parties or the public in connection with the administration of such Promotion, including in connection with winner selection, prize fulfillment and as required by law or permitted by the Promotion's official rules, such as on a winners list.

Data Retention

Information that you voluntarily provided will be maintained as long as VillageMD deems appropriate to fulfill the purpose for which you provided the information, until you request us to remove it, or for as long as permitted or required under applicable law.

Third-party Analytics Providers and Ad Servers

When you use our Services, our third-party advertising partners, social media providers, and analytics providers may collect personal information about your online activity on our Services and on third party websites.

These providers may set web tracking tools (e.g., cookies and web beacons, as discussed further below) to collect information regarding your online activity. In addition, our advertising partners may use this information to deliver our advertisements to you. If you would like more information about this practice, please visit <https://youradchoices.com/>. For more information about advertising industry opt outs, please visit the Digital Advertising Alliance's opt-out page (currently available at <http://www.aboutads.info/choices/>) or the Network Advertising Initiative's opt-out page (currently available at <http://www.networkadvertising.org/choices/>) on each of your devices and browsers and, for mobile devices, you can use the AppChoices app at <https://youradchoices.com/appchoices>. In addition, to opt out in mobile apps, you may use your device's setting to opt out of ads personalization or similar settings. Please note that you may continue to receive generic ads that are not based on your preferences.

Cookies and Similar Technologies

We and our partners use various tools to collect data when you visit our sites and apps, including cookies, pixels, localStorage, and other similar technologies. Some of these technologies store data in the browser or on

your device. Other technologies may use network-related or other information to recognize your device (e.g., IP address). Our Services use these technologies, for example, when you first request a web page and data is then stored on your computer or other device so the website or mobile application can access personal information when you make subsequent requests for pages from that Service. These technologies may also be used to collect and store information about your usage of the Services, such as pages you have visited, other content you viewed, and search history. Additionally, we may use these technologies to collect analytics and measure the use of our Services.

We and our partners may also use these technologies to gather personal information about how you view and use our Services and content and to connect your activity with other data we store about you. The use of these technologies helps us serve you better by understanding what you are interested in, tracking trends, measuring the effectiveness of ads, saving your preferences, and storing information you may want to retrieve on a regular basis. We also allow specific, approved partners to collect data from your browser or device for advertising and measurement purposes.

Your web browser can be set to allow you to control these technologies, such as whether you will accept cookies, reject cookies, or to notify you each time a cookie is sent to your browser. If your browser is set to reject cookies, websites that are cookie-enabled will not recognize you when you return to the website, and some website functionality may be lost. The "Help" section of your browser may tell you how to prevent your browser from accepting these technologies, such as cookies. To find out more about cookies, visit www.aboutcookies.org. Depending on the make and model of your phone, you may be able to use device settings to opt out of the use of certain device IDs for targeted advertising. For more information about Google Analytics, please review the site "How Google uses data when you use our partners' sites or apps," located at www.google.com/policies/privacy/partners/. To opt out of Google Analytics specifically, please go to <https://tools.google.com/dlpage/gaoptout>.

Social Media Cookies. These cookies are used when you visit any public VillageMD page. A social networking website such as Facebook, Twitter or LinkedIn can record that you have visited this page, and could use this

information to serve you relevant ads that are in compliance with platform advertising policies.

Pixel Tags. We may use pixel tags (also referred to as clear GIFs, web beacons or web bugs) on the Service to track the actions of users on website. Pixel tags are tiny graphic images with a unique identifier, similar in function to cookies, that are used to track online browsing activity of web users. Pixel tags also allow us to send email messages in a format users can read, and they tell us whether emails have been opened, for example, to ensure that we are sending messages that are of interest to our users. We may use this information to reduce or eliminate messages sent to a user.

“Do Not Track” Signals. Some internet browsers may be configured to send “Do Not Track” signals to the online services you visit. We currently do not respond to “Do Not Track” signals. To find out more about “Do Not Track,” please visit www.allaboutdnt.com.

Additional Information for Consumers of Colorado, Connecticut, New Jersey, Texas, and other U.S. states with similar privacy laws.

This Section provides information for consumers in Colorado, Connecticut, New Jersey, Texas, and other U.S. states with similar privacy laws (“Relevant Laws”). Under these Relevant Laws, “Personal Data” and/or “Personal Information” generally means information that identifies, relates to, or describes a particular consumer in the Relevant States.

We do not “sell” Personal Information for monetary consideration. However, we do engage in targeted advertising, which helps to serve you with VillageMD ads when you are not on our site.

In addition, we may process each category of Personal Information in order to protect VillageMD and others’ rights, and/or to complete a merger, bankruptcy, sale of assets, or other corporate transaction, which are not included in the definition of “sale” under Relevant Laws.

Categories of Personal Information Collected, Disclosed, or Processed for Targeted Advertising:

Category of Personal Information Collected/ Processed	Purposes for Processing	Categories of Parties to Whom Personal Information Is Disclosed	Categories of Third Parties Who Process Personal Information for Targeted Advertising
<p>Identifiers, such as name, IP address, email address, and online and device identifiers</p>	<p>To provide Services, To allow service providers to assist us in providing the Services, To contact you</p>	<p>Service providers and vendors who provide services on our behalf, professional services organizations, affiliates, and other partners that support our operational business purposes</p>	<p>Ad tech partners, advertisers</p>
<p>Personal information, such as contact information</p>	<p>To provide Services, To allow service providers to assist us in providing the Services, To share with our affiliates, To contact you</p>	<p>Service providers, professional services organizations, and other partners that support our operational business purposes, affiliates</p>	<p>N/A</p>
<p>Characteristics of protected classifications under federal and other similar state privacy laws, such as age or gender</p>	<p>To provide Services, To allow service providers to assist us in providing the Services, To share with our affiliates, To deliver relevant advertisements</p>	<p>Service providers and vendors who provide services on our behalf, professional services organizations, affiliates, and other partners that support our operational business purposes</p>	<p>N/A</p>

Category of Personal Information Collected/ Processed	Purposes for Processing	Categories of Parties to Whom Personal Information Is Disclosed	Categories of Third Parties Who Process Personal Information for Targeted Advertising
<p>Internet or other electronic network activity information, such as browsing history and interactions with our websites or apps</p>	<p>To provide Services, To allow service providers to assist us in providing the Services, To share with our affiliates, To deliver relevant advertisements</p>	<p>Service providers and vendors who provide services on our behalf, professional services organizations, affiliates, and other partners that support our operational business purposes</p>	<p>Ad tech partners; advertisers</p>
<p>Professional or employment-related information, such as work history and prior employer</p>	<p>To provide Services, To allow service providers to assist us in providing the Services, To share with our affiliates</p>	<p>Service providers and vendors who provide services on our behalf, professional services organizations, affiliates, and other partners that support our operational business purposes</p>	<p>N/A</p>
<p>Inferences drawn from any of the Personal Information listed above to create a profile or summary about, for example, an individual's preferences and characteristics</p>	<p>To provide Services, To allow service providers to assist us in providing the Services, To share with our affiliates, To deliver relevant advertisements</p>	<p>Service providers and vendors who provide services on our behalf, professional services organizations, affiliates, and other partners that support our operational business purposes</p>	<p>Ad tech partners; advertisers</p>
<p>Sensitive Personal Information, such as social security number, government-issued identification number, and account log-in credentials</p>	<p>To provide Services, To allow service providers to assist us in providing the Services, To share with our affiliates</p>	<p>Service providers, professional service organizations, affiliates, and other partners that support our operational business purposes</p>	<p>N/A</p>

Sensitive Personal Information. We do not process “sensitive” Personal Information for purposes other than as permitted by law (such as to provide you with the Services you requested or to prevent, detect, and respond to security incidents).

Consumer Rights

For non-patient information, you may have the right to access and/or find out what information we have about you, to correct such information, and to delete such information. We may not be able to accommodate your request if we believe it would violate any legal requirement, if we have a legal basis or obligation to maintain it, or if it would cause the information to be incorrect. Depending on your state of residence, you may also have the right to request an appeal if we decline to take action in response to your request. To exercise your rights described in this section, please email us at compliance@villagemd.com. Note that you have the right to be free from unlawful discrimination for exercising your rights under the Relevant Laws.

You can opt out of targeted advertising by clicking on the “Manage Preferences” link within the Cookie Consent Banner, and actively select the option to “opt out of data collection or sharing. This will involve either clicking a toggle switch or checkbox to disable the desired tracking features. We also honor alternative opt-out signals, such as the Global Privacy Control.

If you are a patient, you can access or correct certain patient-related information that we maintain about you through our [Patient Portal](#). In our mobile app, you can request to deactivate your account. However, we are still required to maintain your patient-related information under HIPAA and other federal and state laws.

Authorized Agent

You may have the right to submit a request through an authorized agent. If you are an authorized agent acting on behalf of a consumer, you must be able to demonstrate that you have the requisite authorization to act on behalf of the consumer.

Information Security

We use commercially reasonable administrative, technical, personnel, and physical measures designed to safeguard information in its possession against loss, theft, unauthorized use, disclosure, or modification. However, the confidentiality of information transmitted over the Internet cannot be guaranteed. We urge you to exercise caution when transmitting personal information over the internet. WE CANNOT GUARANTEE THAT UNAUTHORIZED THIRD PARTIES WILL NOT GAIN ACCESS TO YOUR INFORMATION; THEREFORE, WHEN SUBMITTING PERSONAL INFORMATION TO US, YOU DO SO AT YOUR OWN RISK.

Sites We Link To

If you choose to use any of the links we provide to providers, sponsors, and other third-party resources, you will be leaving our Service and going to a new website. While we take care in choosing the content and links on our website, we accept no liability whatsoever for third-party sites. Protection of your privacy at those other sites will be governed by the privacy policy at that site. We've taken special care selecting the companies that are accessible through our website to try to ensure they respect your privacy as we do, but please take the time to read the privacy policies at their sites.

What Should Parents Know about Children?

We understand the importance of protecting children's privacy in the interactive world. We do not use the Service to knowingly collect personal information from children under the age of eighteen (18) without parental consent.

In the event that we become aware that we have collected personal information from any child, we will dispose of that information in accordance with the Children's Online Privacy Protection Act and other applicable laws and regulations. If you are a parent or guardian and you believe your child under the age of 18 has provided us with information without your consent, please contact us at compliance@villagemd.com. It may take up to thirty (30) days to ensure that such information is no longer collected and that such information is deleted from our files.

Changes to this Policy

The effective date of this Privacy Policy and any revised Privacy Policy may be found at the top of this page. If we make any changes to this Privacy Policy, we will let you know the effective date of the changes and you can contact our Webmaster if you would like to know more about what is new.

Any changes will be effective only after the effective date of the change and will not affect any dispute arising prior to the effective date of the change.

If you have any questions or comments or receive any unwanted e-mail from this Service, please contact our Webmaster via e-mail at contact@villagemedical.com.

Disclaimer

ELECTRONIC COMMUNICATIONS PRIVACY ACT NOTICE (18 U.S.C. 2701-2711): OWNER MAKES NO GUARANTY OF CONFIDENTIALITY OR PRIVACY OF ANY COMMUNICATION OR INFORMATION TRANSMITTED ON THE WEBSITE OR ANY OTHER WEBSITE LINKED TO THE WEBSITE. VILLAGEMD WILL NOT BE LIABLE FOR THE PRIVACY OF INFORMATION, E-MAIL ADDRESSES, REGISTRATION AND IDENTIFICATION INFORMATION, DISK SPACE, COMMUNICATIONS, CONFIDENTIAL INFORMATION OR TRADE SECRET INFORMATION, OR ANY OTHER CONTENT TRANSMITTED OVER NETWORKS ACCESSED BY THE WEBSITE, OR OTHERWISE CONNECTED WITH YOUR USE OF THE WEBSITE.

**For more information about our Village Medical Primary Care Clinic locations, please visit <https://www.villagemedical.com/locations>.*

Contact Us

For further information on Privacy matters contact our Privacy Officer at compliance@villagemd.com.