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Privacy and Security Policy

PUSH Wellness Solutions LLC (“PUSH Wellness” or “we”) is committed to maintaining the confidentiality, integrity and security of the personal information about our users. This Privacy and Security Policy explains how we protect personal information provided through our websites www.PUSHforWellness.com and my.PUSHforWellness.com (collectively, the “Site”) and how we use that information in connection with our service offered through the Site (the “Service”). “Personal information” for purposes of this Privacy and Security Policy means information that identifies you as an individual, such as your name, address, phone number, fax number or email address. PUSH Wellness adheres to privacy and security standards to guard against identity theft and provide security for your personal information. We regularly re-evaluate our privacy and security policies and adapt them in response to new challenges.

Your Privacy is not for sale

We do not and will not sell or rent your personal information to anyone, for any reason, at any time. Except as otherwise expressly provided in this Privacy and Security Policy, PUSH Wellness uses and discloses your personal information only as follows:

- to provide the Service to you;
- to analyze site usage and improve the Service;
- to deliver to you any administrative notices, alerts and communications relevant to your use of the Service;
- to fulfill your requests for certain products and services;
- for market research, project planning, troubleshooting problems, detecting and protecting against error, fraud or other criminal activity;
- to third-party contractors that provide services to PUSH Wellness and are bound by these same privacy restrictions;
- to enforce PUSH Wellness’s Terms of Use located on the PUSH Wellness website (the “Terms of Use”); and
- as otherwise set forth in this Privacy and Security Policy.

We limit the collection and use of personal information

Certain areas and features of the Site are available to you without registration or the need to provide to us any personal information. However, other features of the Site or the Service may require registration or activation, which involves provision to PUSH Wellness of your name, address, social security number, an email address, a password, and other personal information (collectively the “Registration/Activation Information”).

From time to time we may request other personal information to provide you with other benefits of the Service. In all such instances, your personal information will be used only for the stated purpose and as otherwise permitted by this Privacy and Security Policy. PUSH Wellness may disclose anonymous or aggregate personal information only in a non-personally-identifiable manner to:



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- Advertisers and other third parties for their marketing and promotional purposes, such as the number of users who clicked on a particular PUSH Wellness Resource;
- Organizations approved by PUSH Wellness that conduct research; and
- Users of the Service for purposes of comparison of their personal health situation relative to the broader community.

Such information does not identify you individually. Access to your Registration/Activation Information, Account Information and any other personal information you provide is restricted and used in accordance with specific internal procedures and safeguards governing access, in order to operate, develop or improve the Service. Our employees with access to personal information have been selected in accordance with our security policies and practices and are bound by confidentiality obligations. They may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations. We may also use third party vendors or service providers to help us provide the Service to you, such as sending e-mail messages on our behalf or hosting and operating a particular feature or functionality of the Service. Our contracts with these third parties outline the appropriate use and handling of your information and prohibit them from using any of your personal information for purposes unrelated to the product or service they're providing. We require such third parties to maintain the confidentiality of the information we provide to them.

Online session information and use is only used to improve your experience

When you visit the Site, we may collect technical and navigational information, such as computer browser type, Internet protocol address, pages visited, and average time spent on the Site. This information may be used, for example, to alert you to software compatibility issues, or it may be analyzed to improve our Web design and functionality.

“Cookies” are alphanumeric identifiers in the form of text files that are inserted and stored by your Web browser on your computer’s hard drive. PUSH Wellness may set and access cookies on your computer to track and store information about your browsing preferences. For example, PUSH Wellness may assign a cookie to you, to limit the amount of times you see a particular PUSH Wellness Resource or to help better determine which PUSH Wellness Resources to make available to you. Please note that most Internet browsers will allow you to stop cookies from being stored on your computer and to delete cookies stored on your computer. If you choose to eliminate cookies, the full functionality of the Service may be impaired for you.

We encode our cookies so that only we can interpret the information stored in them.

Web beacons are images embedded in a Web page or email for the purpose of measuring and analyzing site usage and activity. PUSH Wellness, or third party service providers acting on our behalf, may use Web beacons to help us analyze Site usage and improve the Service.

We may use third party service providers to help us analyze certain online activities. For example, these service providers may help us measure the performance of our online campaigns or analyze visitor activity on the Site. We may permit these service providers to use cookies and other technologies to perform these services for PUSH Wellness. We do not share any personal information about our customers with these third party service providers, and



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these service providers do not collect such information on our behalf. Our third party service providers are required to comply fully with this Privacy and Security Policy.

Third parties offering other products or services will not be given your personal information without your permission

There are a number of separate products and services offered by third parties advertised by us on our Site and through the Service that may be complementary to your use of the Site, such as fitness centers, weight loss programs, and health coaches (collectively, "PUSH Wellness Resources"). If you choose to use these separate products or services, disclose information to the providers, or grant them permission to collect information about you, then their use of your information is governed by their privacy policies. PUSH Wellness is not responsible for their privacy practices. If you click on a link to a third party site, PUSH Wellness encourages you to check the privacy policy of that site.

PUSH Wellness may present links in a format that enables us to keep track of whether these links have been followed and whether any action has been taken on a third party Web site. We use this information to improve the quality of PUSH Wellness Resources and customized content on the Service.

Contests, Giveaways and Surveys

From time to time, PUSH Wellness may offer you the opportunity to participate in contests, giveaways and other promotions. Any information submitted in connection with such activities will be treated in accordance with this Privacy and Security Policy, except as specifically set forth in the rules for those contests, giveaways or promotions. From time to time, PUSH Wellness may also ask you to participate in surveys designed to help PUSH Wellness improve the Site. Any personal information provided to PUSH Wellness in connection with any survey will be used only in relation to that survey and as elsewhere set forth in this Privacy and Security Policy.

Disclosure of your information to protect our rights, if required by law, or in connection with a merger or sale

Notwithstanding the foregoing, PUSH Wellness reserves the right (and you authorize PUSH Wellness) to share or disclose your personal information when PUSH Wellness determines, in its sole discretion, that the disclosure of such information is necessary or appropriate:

- To enforce our rights against you or in connection with a breach by you of this Privacy and Security Policy or the Terms of Use;
- To prevent prohibited or illegal activities; or
- When required by any applicable law, regulation, subpoena or other legal process.

In addition, PUSH Wellness may transfer your personal information in connection with a merger with a third party or a sale or transfer of all or a portion of the business or assets of PUSH Wellness to a third party acquirer.



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Email communications from us

We provide our registered customers with regular summaries of their wellness and incentive status, along with email alerts. We also allow users to subscribe to email newsletters and from time to time may transmit emails promoting PUSH Wellness or third-party goods or services. Site subscribers have the ability to opt out of receiving our promotional emails and to terminate their newsletter subscriptions by following the instructions in the emails. "Opt out" options also include a choice to end transmission of service-related emails, such as email alerts.

Data security

We use a combination of firewall barriers, encryption techniques and authentication procedures, among others, to maintain the security of your online session and to protect Site accounts and systems from unauthorized access. When you register for the Service, PUSH Wellness requires a password from you for your privacy and security. PUSH Wellness transmits information such as your Registration/Activation Information for the Site or Account Information securely. Our servers are in a secure facility. Access requires multiple levels of authentication. Security personnel monitor the system 7 days a week, 24 hours a day. Our databases are protected from general employee access both physically and logically. We encrypt your Service password so that your password cannot be recovered, even by us. All backup drives and tapes also are encrypted. We enforce physical access controls to our buildings.

No employee may put any sensitive content on any unsecure machine (i.e., nothing can be taken from the database and put on an unsecure laptop).

However, it is important to understand that these precautions apply only to our Site and systems. We exercise no control over how your information is stored, maintained or displayed by third parties or on third-party sites.

Our service enables secure communications with encryption

From the time you submit your Login ID and password, these communications between your computer and the Site are encrypted. This enables client and server applications to communicate in a way that is designed to prevent eavesdropping, tampering and message forgery.

You are responsible for maintaining the confidentiality of your Login ID and Password

We recommend that you change your password periodically. You are responsible for maintaining the security of your Login ID and Password. You may not provide these credentials to any third party. If you believe that they have been stolen or been made known to others, you must contact us immediately at security@PUSHforWellness.com, but in any event you should change your password immediately via the Service. We are not responsible if someone else accesses your account through Registration/Activation Information they have obtained from you or through a violation of this Privacy and Security Policy or the Terms of Use.

If you have a security related concern, please contact us at security@PUSHforWellness.com. We will work with you to provide a rapid response to your concerns.



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Your California privacy rights

California Civil Code Section 1798.83 (also known as the "Shine The Light" law) permits users who are California residents to request and obtain from us once a year, free of charge, information about the personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request by email to: info@PUSHforWellness.com.

Protecting children's privacy

We do not target this Site or the Service to any child under the age of 13 and, in compliance with the Children's Online Privacy Protection Act (COPPA), any personal information we may receive from any user that we believe to be under the age of 13 will be promptly purged from our database. No personal information from any such user will be collected, stored or disclosed.

Acceptance of privacy policy

Your use of the Site and the Service, including any dispute concerning privacy, is subject to this Privacy and Security Policy and the Terms of Use. **BY USING THE SITE OR THE SERVICE, YOU ACCEPT THE PRACTICES SET OUT IN THIS PRIVACY AND SECURITY POLICY AND THE TERMS OF USE.**

Changes to our Privacy and Security Policy

We update this Privacy and Security Policy periodically. The date last revised appears at the top of the Policy. Changes take effect immediately upon posting. Your continued use of any portion of the Site or the Service following posting of an updated version of this Privacy and Security Policy will constitute your acceptance of the updated version.

Contact us if you have any questions or concerns

If you have questions, comments, concerns or feedback regarding this Privacy and Security Policy or any other privacy or security concern, send an e-mail to security@PUSHforWellness.com.