WEBSITE PRIVACY POLICY

Effective May 1, 2019

This Privacy Policy applies to your use of Aledade, Inc.’s (“we,” “our,” “us”) website (“the Website”). We take privacy seriously, and this document is intended to describe the types of information we collect when you use our Website; how we use, share, and protect that information; your options regarding the information we collect; and features of our Website. By using the Website, you consent to our collection and use of your information as described in this Policy. Please note that this Policy does not apply to use of other Aledade products and services, including the use of our application which are governed by separate policies.

1. Information We Collect. When you use the Website, we may collect the following types of information:

   a. Information you provide to us: You may submit information to us through our Website, including by entering information on the “Contact Us” tab, applying for a job we have posted, or registering to watch a webinar hosted on or through our Website. This information may include personally identifiable information (PII) about you, including your name and contact information (e.g., email address, phone number). You may also submit information about your practice, including your practice’s location, website, type, size, and number of Medicare beneficiaries you serve.

      If you apply to an open position in the “Careers” section of the Website, we may collect your name, email address, postal address, telephone number, cover letter, resume, and potentially other information. When you apply for an open position with one of Aledade’s partners, the information you provide may also be shared with that partner. This Privacy Policy does not apply to the use of information by Aledade’s partners.

   b. Web Analytics: We use Google Analytics to evaluate the use of our Website. Google Analytics collects information, such as how often users visit the Website, what pages they visit when they do so, and what other websites they visited prior to visiting our Website. Google Analytics may collect your IP address, data related to the device/browser you are using, and other information about your use of our Website. It may do so using cookies. Google Analytics’ data practices are governed by the Google Analytics Terms of Service and the Google Privacy Policy, as they may be amended from time to time. For more information about Google Analytics, you can visit Google Analytics’ website here.

2. Purposes for Which We Collect Information? We collect information for a variety of purposes, including:
   - To contact you, including with information about services and promotional information that may be of interest to you
   - To respond to your inquiries and questions
   - To consider you for employment (either at Aledade or at one of our partner organizations)
   - To improve our Website and the services we offer
   - To understand what information and services you may be interested in
   - For statistical and business operations and planning purposes
• To give us insights on how you and other users utilize the Website, including to ensure that our service continues to appeal to our users.

3. **How We Share information.** We do not share any of the information we collect from you with third parties for marketing purposes without your consent. However, we may share information, including PII, with the following categories of third parties:

   a. We may provide PII and web analytics to our service providers for the purpose of processing, analyzing, and/or storing such information on our behalf or offering you services you have requested, such as access to webinars and other content through our Website. We use reasonable efforts to limit their use of such information and to use other appropriate confidentiality and security measures.

   b. We may provide information you submit in applying to a job to our partner practices for purposes of responding to and considering your job application.

   (c) If requested or required by other government authorities, such as courts or regulators, we may disclose information we have about our Website users. Similarly, we may share information about you (including PII) as required by law to protect our rights and property, or the rights, property or safety of others.

   (d) The information we collect through and on our Website (including PII) is considered an asset of our company, and if that asset is acquired by a third party, either through sale or bankruptcy, your PII will be transferred to the entity acquiring the asset. By using our Website, you agree that, in the event a transfer such as a merger, acquisition, or sale of assets takes place any such assets (including your PII) may continue to be used by the acquirer or its successors as set forth in this policy.

3. **How We Protect Information.** We are committed to protecting the privacy and confidentiality of your PII. While we implement security measures to help safeguard your data, no security system is impenetrable. We cannot and do not guarantee the security of our servers or databases, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. Please use caution any time you provide information over the Internet.

4. **Your Options Regarding Uses of Information.** One of the elements of PII that you may provide is your email address. You may stop receiving emails from us by selecting the “unsubscribe” link included in all such emails.

6. **Children under 13.** Our Website is not intended for users under the age of 13, and we do not knowingly collect PII from children under 13. If we learn that we have collected PII of a child under 13, we will take steps to delete such information from our files as soon as possible.

7. **Do-Not-Track Requests.** Some web browsers may transmit “do-not-track” signals to the websites with which the user communicates. We currently do not take action in response to these signals.
8. **Web Site Data Collection.** We do not knowingly allow other parties to collect personally identifiable information about your online activities over time and across third-party web sites when you use our Website.

9. **Third-Party Links.** Our Website contains links to websites operated by third parties over which we have no control. Should you click on a link to a third-party website, the Privacy Policy of that website will apply instead of our Privacy Policy. We are not responsible for the content or security of third-party websites.

10. **For California Users.** In addition to the rights set forth in this Privacy Policy, under California Civil Code section 1798.83, California residents may request information regarding the types of PII we share with third parties for direct marketing purposes, and the identities of the third parties with whom we have shared such information during the immediately preceding calendar year. As noted above, we do not provide personal information to third parties for their direct marketing purposes.

11. **International Users.** This Website is hosted in the United States and is intended for access and use by individuals located in the United States only. By using our Website, you consent to the transfer of your personal information to the United States as described in this Privacy Policy. Please do not use the Website if you do not agree to the transfer and processing of your personal information in the United States or if it is illegal to do so in your home country.

12. **Changes to this Privacy Policy.** We reserve the right to amend, alter, or otherwise change this Privacy Policy at our sole and absolute discretion. If we make material changes to the Privacy Policy, we will post notice on the Website. Further use of the Website following any such notification constitutes your agreement to follow and to be bound by the amended Privacy Policy.

13. **Questions.** If you have any additional questions or concerns about this Privacy Policy, please contact us at legal@aledade.com.