

IROQUOIS HEALTHCARE ASSOCIATION

PRIVACY POLICY

November 4, 2024

This Privacy Policy describes how Iroquois Healthcare Alliance and its subsidiaries and/or affiliates ("Iroquois healthcare Association," "Company," "we," or "us") collects, uses and shares information in connection with Iroquois Healthcare Alliance services, systems, websites, and apps that refer or link to this Privacy Policy (collectively, the "Services").

By using our Services, you agree to our Terms and Conditions and consent to our collection, use and disclosure practices, and other activities as described in this Privacy Policy. This Privacy Policy is not a contract and does not create any legal rights or obligations.

1. Information Collection

Information You Provide to Us

We collect information you provide directly to us. For example, we collect information when you use our Services, such as when you submit an application to us for participation in our programs, request online or other support, apply for a job or otherwise communicate with us through the Services.

The types of information we may collect include Personal Information. "Personal Information" is information that could reasonably be linked with a particular consumer or household, such as your first and last name, e-mail address, zip code, billing address, phone number, social media account information, and demographic information. "Personal Information" also may include sensitive information, such as your social security number, to allow us to serve your needs (for example, to assist you through one or more of our programs or to process an employment application).

You may choose to voluntarily submit certain other information to us through the Services, including Personal Information, but you are solely responsible for the information that you submit to us.

Information We Collect Automatically

We and our service providers automatically collect certain information from and about you when you access or use our Services. This information may include, without limitation, demographic information; IP address; browser/device/hardware type; operating system characteristics; information about your use of our Services; and data regarding network connected hardware (e.g., computer or mobile device), such as unique device identifiers, type, model, version, MAC address, device or session ID, error related data status, capability, confirmation, functionality, performance data, and connection type. This information may also include clickstream data, which is information about the page-by-page paths you take as you browse through the Services.

This information is gathered by certain tools and methods such as:

- **Log Information:** We and our service providers collect information about your use of our Services, such as the type of browser you use, access times, pages viewed, your IP address and the referring link through which you accessed our Services.
- **Information Collected by Cookies and Other Tracking Technologies:** We and our service providers may use cookies, web beacons (also known as "tracking pixels"), embedded scripts, location-identifying technologies, in-app tracking methods, and other tracking technologies to collect information about you when you interact with our Services or e-mails, including information about your browsing behavior. We and our service providers may combine this information with other information about you and use it for various purposes, such as improving our Services and your online experience, understanding which areas and features of our Services are popular, counting visits, understanding campaign effectiveness, tailoring communications with you, determining whether an e-mail has been opened and/or links within the e-mail have been clicked, and for other internal business purposes.
 - **Cookies:** Cookies are data files that are placed on a computer when it is used to visit a website. These cookies may be used for many purposes, including, without limitation, tracking user preferences or web pages visited while using our Services. Some web browsers are set to accept cookies by default. If you prefer, you can usually set your browser to remove or reject certain cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Services
 - **Web Beacons:** We and our service providers may include small graphic images called web beacons, also known as "Internet tags" or "clear gifs," in our web pages and e-mail messages. We and our service providers may use web beacons or similar technologies for a number of purposes, including, without limitation, to count the number of visitors to our Service, to monitor how users navigate the Services, and to count how many e-mails that we sent were actually opened or how many particular articles or links were actually viewed.
 - **Embedded Scripts:** An embedded script is programming code that is designed to collect information about your interactions with the Services. It is temporarily downloaded onto your computer from our web server or a third party with whom we work, is designed to be active only while you are connected to the Service, and deleted or deactivated thereafter.
 - **Location-identifying Technologies:** We and our service providers may use GPS (global positioning systems) software and other location-based technologies to locate you so we may verify your location, and deliver relevant content to you based on your location. We may collect precise location information from your device.
 - **In-App Tracking Methods:** There are a variety of tracking technologies that may be included in mobile applications, and these are not browser-based like cookies and cannot be controlled by browser settings. Some use device identifiers, or other identifiers such as "Ad IDs" to associate app user activity to a particular app.

If you do not want to allow the use of any non-essential Cookies, or only want to allow the use of certain Cookies, you can use your browser settings to withdraw your consent to our use of Cookies at any time

and delete Cookies that have already been set. To find out more about Cookies, please visit: www.allaboutcookies.org, which contains further information about behavioral advertising and online privacy.

Information We Collect From Other Sources

We may also obtain information about you (such as information about your participation on one or more of our programs or employment history) from other sources and combine that with information we collect about you. If we receive Personal Information from a third-party source and/or if we combine the information we receive from these third-party sources with your Personal Information, our goal will be to treat that information as Personal Information. We are not responsible for the accuracy of the information provided by you or third parties or how such third parties collect, use and share such information.

We may obtain information from other sources and append it to our existing user information to better understand users' interests and to provide more relevant content, including job listings.

We may append information about you that is publicly available or information that is aggregated and/or depersonalized including by partners. This information may include, for example, your employment and education history. We may use a third-party vendor with whom we share your information to assist with this.

2. Use of Information

We may use information about you for various purposes. Primary purposes for use of information include to:

- Facilitate, personalize, and improve your experience with our Services, including your online or app experience;
- Process your use of our Services, including verifying that your e-mail address(es) are active and valid;
- Manage your profile(s) and online account(s), including accounts through which you create and submit any program or employment applications;
- Respond to your comments, questions and requests and provide customer service;
- Send you technical notices, updates, security alerts and support and administrative messages;
- Contact you regarding your use of our Service and, in our discretion, changes to our policies;
- Evaluate and process your application for our programs and employment; and
- Prevent fraudulent transactions and monitor against threats.

In addition, there may be secondary purposes for use of information, such as to:

- Create a usage profile of your preferences and provide job descriptions or content that match your profile and interests;

- Communicate with you about our services, programs, offers, and events (including those offered by third parties) and provide news and information we think will be of interest to you (for information about how to manage these communications, please see the Your Choices section below);
- Monitor and analyze trends, usage and activities;
- Link or combine with information we get from others to help understand your needs and provide you with better service;
- Improve our Services and other of our websites, applications, marketing efforts, products and services;
- Conduct research and analysis, including focus groups and surveys, on our Service and on our other websites, applications, and services;
- Retarget across other sites (as described in the Advertising & Analytics Services and Online Tracking section below);
- Carry out any other purpose disclosed elsewhere in this Privacy Policy or at the time you provide your Personal Information; and
- Any other purpose, with your consent or as permitted or required by applicable law.

Whether a use is primary or secondary may change over time. Some of the information we collect for primary purposes may be used for secondary purposes.

3. Sharing of Information

Our agents, vendors, consultants, and service providers have access to Personal Information to carry out work on our behalf.

We may also share information about you for various purposes. Primary purposes for sharing of information include:

- With federal or state governments as legally permitted or required under the laws relating to you participation in our Services, or your employment or prospective employment with us;
- To the maximum extent permitted by applicable law, in response to (i) subpoenas or other legal process or if in our good faith opinion such disclosure is required or permitted by law; and/or (ii) at the request of governmental authorities conducting an investigation;
- To defend the Terms & Conditions or other policies applicable to our Services;
- If we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property, life, health, security and safety of us or any third party;
- To the maximum extent permitted by applicable law, we may also use IP addresses, mobile device identifiers or any other information we collect to identify users, and may do so in cooperation with copyright owners, Internet service providers, wireless service providers or law

enforcement agencies in our discretion. Such disclosures may be carried out without notice to you;

- With our agents, vendors, and service providers for purposes of providing you with Services. For example, we may share your information with our service providers to help facilitate the processing of your applications for our programs.
- With our and our agents, vendors, and service providers to verify your address in order to ensure we maintain the accuracy of our database;
- With our affiliates for internal business purposes; and
- In connection with, or during negotiations of, any proposed or actual merger, purchase, sale (including a liquidation, realization, foreclosure or repossession), lease, amalgamation or any other type of acquisition of all or any portion of our assets, financing, disposal, conveyance or transfer of all or a portion of our business to another company.

In addition, there may be secondary purposes for sharing of information, such as:

- With third parties who conduct analytics or data appending (such as the process described above) in order for us to offer you more relevant services;
- For a purpose disclosed elsewhere in this Privacy Policy, or at the time you provide your Personal Information. For example, if you participate in one of our programs, we may share your Personal Information with our program partners in a way that supports our operation of one or more of our programs.

We do not and will not sell your Personal Information.

4. Advertising & Analytics Services and Online Tracking

We may engage third parties to place advertisements on our behalf in locations throughout the Internet and to provide analytics about the use of our Services. In addition, we may participate in online advertising networks and exchanges that display relevant advertisements to our Services visitors based on their interests as reflected in their browsing of the Service and certain third-party sites participating in the same networks and exchanges. These entities may use cookies, web beacons, pixels, embedded scripts, and other technologies to collect information about your use of the Service, such as your IP address, web browser, pages viewed, time spent on pages, links clicked and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on the Services and other websites and better understand your online activity.

This means that some information about your browsing of the Service and certain third party sites may be shared with these companies for the purpose of delivering ads to you on the Services and certain third party sites, and we may receive from some of these companies information about third party sites that you have visited. This information is used for marketing purposes and the practice is sometimes termed "retargeting" to indicate that information from one retailer is used to suggest to you relevant products offered by another retailer.

These and other third parties may also collect Personal Information about your online activities over time and across different websites when you use our Service.

We may also work with third parties to provide ads to you as part of a customized campaign on other websites or platforms.

This Privacy Policy does not cover any use of information that such third parties themselves may have collected from you (e.g., type of browser, operating system, domain name, day and time of visit, page(s) visited) or the methods used by the third-parties to collect that information (e.g., cookies, web beacons and clear gifs).

5. Third Party Websites

The Services contain hyperlinks to other websites or locations that we do not control and are operated and controlled by third parties ("Third Party Websites"). We make no representations regarding the policies or business practices of such Third Party Websites and encourage you to familiarize yourself with their privacy policies before providing them with your Personal Information. Our Privacy Policy does not apply to these Third Party Websites. You should read the privacy policy of each Third Party Website as these Third Party Websites may use their own cookies, web beacons and other technology to independently collect information about you. In addition, these Third Party Websites may solicit Personal Information from you.

6. Your Choices

Profile and Apps

You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information. The Services may allow you to access, review, correct, update, and remove or make inaccessible Personal Information you have provided through the Services or otherwise, and you may provide updates and changes by logging into your account with us, or contacting us as detailed in this policy.

With respect to our mobile and other applications that you use, you can prospectively stop all collection of information by the application by uninstalling the application. Also, you may at any time restrict our access to your location data by adjusting the permissions in your mobile device.

Promotional Communications

You can opt out of receiving promotional e-mail communications from us at any time by following the instructions provided in those communications or e-mail us as detailed in this policy.

Please note that even if you opt out of receiving promotional emails or other communications, we and our agents, vendors, and service providers may continue to send you non-promotional e-mails and other types of communications, as permitted by law, such as those about our ongoing business relations. For example, we and our agents, vendors, and service providers may send e-mails and other communications that contain service-related announcements that affect your participation on one of our programs, requests for feedback on our services and/or your specific experiences with our Services, information about your job application or responses to your comments and feedback submitted to us and our agents, vendors, and service providers.

Our mobile applications may send you notifications that may include alerts, sounds, and icon badges. These push notifications or in-app messages may include both operational messages and promotional messages regarding services, programs and offers that may be of interest to you. Push notifications can be configured in settings on your mobile device. As with e-mails, even if you opt out of receiving promotional communications, we may continue to send you non-promotional push notifications, such as those about your use of the applications or our ongoing business relations.

7. Children

Our Services are not intended for and are not targeted to children under the age of thirteen (13). If you are a child under the age of thirteen (13), you are not permitted to use the Services and should not send any information about yourself to us through the Services.

8. Data Security

It is our goal to take reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Although our objective is to use reasonable efforts to help protect your information, transmission via the Internet is not completely secure and we cannot guarantee the security of your information collected through our Services. Further, you are responsible for protecting your password.

9. Our Data Retention

We retain personal data for as long as necessary to provide the Services, comply with our legal obligations, resolve disputes, enforce our agreements, and other legitimate and lawful business purposes. Because these needs can vary for different data types in the context of different services, actual retention periods can vary significantly based on criteria such as user expectations or consent, the sensitivity of the data, the availability of automated controls that enable users to delete data, and our legal or contractual obligations. To dispose of personal data, we may anonymize it, delete it or take other appropriate steps. Data may persist in copies made for backup and business continuity purposes for additional time

10. California Privacy Rights

If you are a California resident and the processing of Personal Information about you is subject to the California Consumer Privacy Act (“CCPA”), then you have certain rights with respect to that information.

In general, the CCPA broadly protects Personal Information that businesses collect from California consumers. However, the Personal Information we process about you may be subject to certain exemptions under applicable law.

If the CCPA does apply, you have the following rights:

Notice at Collection

At or before the time of collection, you have a right to receive notice of our practices, including the categories of Personal Information and sensitive Personal Information to be collected, the purposes for which such information is collected or used, whether such information is sold or shared, and how long such information is retained. You can find those details in this Privacy Policy.

Sharing and Sales of Personal Information

We do not sell or share your personal information (as “sell” is defined in the CCPA), though we do disclose personal information to our affiliates, service providers and other vendors as described above. We also do not have actual knowledge that we have sold personal information of minors under age 16. In the last 12 months, when you access our online services, we let advertising and analytics providers collect things like IP addresses, cookie IDs, advertising IDs, and other unique identifiers, which may be collected along with device and usage data, and information about your interactions with our online services and content.

Right to Know

You have a right to request that we disclose to you the Personal Information we have collected about you. You also have a right to request additional information about our collection, use, disclosure, or sale of such Personal Information. Note that we have provided much of this information in this privacy statement.

Rights to Request Correction or Deletion

You also have rights to request that we correct inaccurate Personal Information and that we delete Personal Information under certain circumstances, subject to a number of exceptions.

Right to Limit Use and Disclosure of Sensitive Personal Information

You have a right to limit our use of sensitive Personal Information for any purposes other than to provide the Services you request or as otherwise permitted by law. Note that we do not use sensitive Personal Information for any such additional purposes.

Right to non-discrimination

You have a right to not be discriminated against for exercising these rights set out in the CCPA.

Shine the Light Law

Under California’s “Shine the Light” law, California residents who have provided Personal Information to a business with which they have established a business relationship may request information about whether the business has disclosed Personal Information to any third parties for the third parties' direct marketing purposes. We do not disclose any information to third parties for their own direct marketing purposes.

Authorized Agents

You may designate, in writing or through a power of attorney, an authorized agent to make requests on your behalf to exercise your rights under the CCPA. Before accepting such a request from an agent, we will require the agent to provide proof you have authorized it to act on your behalf, and we may need you to verify your identity directly with us.

11. Changes to This Privacy Policy

We reserve the right to change this Privacy Policy and our practices from time to time consistent with applicable privacy laws and principles. If we make changes to this Privacy Policy, we will notify you by

revising the date at the top of this Privacy Policy, and in some cases, we may choose to provide you with additional notice (such as adding a statement to the homepages of our Services or sending you an e-mail notification).

12. Contact Us

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your information described here, your choices and rights regarding such use, please do not hesitate to contact us at:

- Email: communications@iroquois.org
- Postal Address: 15 Executive Park Drive, Clifton Park, NY 12065
- Policy last updated: November 2024