

## **MyOwnMed User Privacy Policy**

The following Privacy Policy (the “Policy”) describes how My Own Med, Inc. (“MyOwnMed”) handles your personal information, including related study information, collected from or about you when you use any part of the MyOwnMed ecosystem, including our mobile applications and websites (collectively, the “Platform”). This Policy is a part of and incorporated into the Terms of Use Agreement (“Terms of Use”) applicable to the Platform and any terms capitalized herein but not defined shall have the meanings assigned to such terms in the Terms of Use. By visiting or using the Platform, including by enabling the use of emails or text messages from MyOwnMed, you agree to accept the practices described in this Policy. If you do not agree with or are not willing to comply with any portion of this Policy, do not access or otherwise use the Platform.

This Policy applies only to information collected through the Platform. Any information about you collected outside the Platform in connection with the research study (the “Research Study”) will not be governed by this Policy and instead will be treated solely in accordance with the informed consent form you signed before beginning your participation in the Research Study (the “Informed Consent”).

### **A. YOUR HEALTH INFORMATION**

1. In order to use any portion of the Platform, you will need to create a MyOwnMed Account (“Account”). Your Research Site (as defined below) will provide us with an ID number, your phone number, and your email address to allow us to set up your Account and will provide you with a username and password to finish creating an Account. Creating an Account provides you with some control over who can access your Personal Information (as defined below).
2. We are providing you access to the Platform on behalf of the investigator and research site at which you are participating in the Research Study (collectively, “Research Site”). Personal Information we collect from you through the Platform on behalf of your Research Site (as well as Personal Information we collect directly from your Research Site) may be protected by applicable privacy laws in your country of residence. Our collection use and disclosure of such Personal Information will be done in accordance with your Informed Consent and those privacy laws. In the event of any inconsistency between this Policy and the Informed Consent or such privacy laws, the Informed Consent or such privacy laws, as applicable, shall govern.

### **B. THE INFORMATION WE COLLECT**

When you create an Account or use the Platform, we may collect certain personally identifiable information about you (“Personal Information”) in various ways. For example, when your Research Site creates an Account on your behalf or when you register for our services, we will collect certain registration information like participant ID, along with your email address, phone number and other Personal Information about you. When you use the Platform, we collect the information that you provide through the Platform. In connection with the Research Study, we will collect self-reported information (“Self-Reported”). Self-Reported responses will be considered Personal Information unless they are no longer associated with your identifying information. IF YOU DO NOT WISH TO SHARE YOUR PERSONAL INFORMATION WITH US, PLEASE DO NOT REGISTER FOR OR OTHERWISE USE THE PLATFORM.

1. MyOwnMed will record information about your use of the Platform (such as number of logins and time and date of your submission of Survey Responses). This information is stored in association with your Account for the duration of the study and will be aggregated with other data.

2. MyOwnMed will also collect and use certain technical data and usage information, including but not limited to technical information about your computer or device, your computer's or device's operating system, and peripherals.

### **C. HOW WE USE THE INFORMATION WE COLLECT**

1. To Provide You with Information. If you create an Account on the Platform, we may use Personal Information we collect through the Platform or directly from your Research Site to provide you with reminders and other information related to your participating in the Research Study. We may also use your Personal Information to send you communications, including a welcome e-mail; messages to verify your username and password; information relating to the Platform; and communications related to your participation in the Research Study.

2. Using Anonymous and Aggregate Information. We may anonymize your Personal Information to create "Anonymous Information." Anonymous Information is no longer Personal Information because it does not identify or permit the identification of any individual and is not otherwise attributed or attributable to any one person. We may then aggregate your Anonymous Information with the Anonymous Information of other users to create "Aggregate Information." This Aggregate Information is also anonymous. We may use Aggregate Information to publish trend statistics, medical studies, reports, lessons learned and white papers. For example, we might publish trend data to demonstrate improved overall health of ecosystem users. None of this Aggregate Information can be used to personally identify an individual. Research Site may also use Anonymous Information and Aggregate Information in presentations and publications related to the Research Study, as further described in the Informed Consent.

3. Creating Coded Information. In connection with the Research Study, we will create "Coded Information" by replacing the identifying information associated with your Survey Responses with a participant ID number. Coded Information will be treated separately from Anonymous or Aggregate Information, as described further below.

4. Other Uses. We may use your Personal Information to detect, prevent, and respond to fraud, intellectual property infringement, violations of our Terms of Use, violations of law, or other misuses of the Platform. To the extent permitted by applicable law, we may use information (including information that does not identify you) to conduct research and measurement activities and to perform other administrative functions relating to the Platform.

5. Customer support. We may use or request Personal Information from you when you contact our customer support to answer your questions, to investigate and troubleshoot problems.

### **D. SHARING YOUR INFORMATION**

1. Other than as described in this Policy, we do not sell or provide your Personal Information to unaffiliated third parties.

As described in the Informed Consent, we will disclose your Coded Information to your Research Site as a part of your Research Site's participation in the Research Study and for storage and processing during and after the Research Study. The Research study may also share your Coded Information with other investigators, staff, institutions and companies as described in the Informed Consent. Please refer to the Informed Consent for further information on the treatment of your Coded Information.

In addition, we may disclose the Personal Information that we collect: (a) to our service providers who work on our behalf and have agreed to adhere to the rules set forth in this Policy; or (b) otherwise in accordance with your Informed Consent and applicable law. We may buy or be bought by other businesses or entities. In such event, we may transfer or assign the information we have collected as part of such merger, acquisition, sale or other change of control. In such transactions, your information, including all Personal Information, may be included in the transferred business assets. Also, in the unlikely event of our bankruptcy, insolvency, reorganization, receivership or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how your information is treated, transferred or used and your Personal Information may be included in the transferred assets; however, we will take all appropriate actions to prevent your Personal Information from being disclosed to a third party in such an event.

2. We may share Anonymous Information and Aggregate Information with third parties only as permitted to do so by your Informed Consent.

3. In certain situations, MyOwnMed may be required to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, upon receipt of a valid judicial instruction.

4. In cases of onward transfers of data, received pursuant to the EU-U.S. Privacy Shield, MyOwnMed is potentially liable.

## **E. SECURITY**

We strive to maintain administrative, technical, and physical safeguards designed to safeguard the information we collect through the Platform and directly from your Research Site. However, no information system can be 100% secure, so we cannot guarantee the absolute security of your information. Moreover, we are not responsible for the security of information you transmit to the Platform over networks that we do not control, including the Internet and wireless networks.

- MyOwnMed uses industry standard security measures to encrypt sensitive information both at rest and in transit.
- MyOwnMed ensures processing, production, and research environment are separate and access is restricted and limited to essential personnel. Information is de-identified/pseudonymized.
- MyOwnMed maintains a formal incident management program designed to ensure the secure, business continuity and continuous delivery of its services.
- MyOwnMed maintains a formal data breach procedure designed to be consistent with our privacy and security policies.
- MyOwnMed uses the state-of-the-art intrusion detection and prevention measures to stop any potential attacks.

## **F. YOUR PRIVACY CHOICES**

1. If your contact information changes, if you no longer wish to receive information or communications from MyOwnMed, or if you wish to modify settings relating to how or with whom your Account is shared, please email us at [clientsupport@myownmed.com](mailto:clientsupport@myownmed.com).
2. You may access, update or change your Personal Information within the Account Settings. Should you want your entire Account deleted, please email us at [clientsupport@myownmed.com](mailto:clientsupport@myownmed.com) to facilitate that request. Please note that deleting your account or any of your Personal Information will not delete any of your information, including Coded Information, that has already been provided to your Research Site. Your Research Site will retain and use any such information as set forth in the Informed Consent. Please further note that if you delete your account and would like to continue participating in the Research Study, you will need to choose another way to provide data to the Research Sites, such as by phone call.
3. You have the right to opt out of your information being used for any purpose by emailing us at [optout@myownmed.com](mailto:optout@myownmed.com). If you wish to stop any email notification / email communication, you can click the “unsubscribe” button at the bottom of any email communications, as applicable.
4. Unless you make a request for us to delete your account or delete certain personal information, we will store your personal information as long as your account is open or unless a longer retention period is required or permitted by law.

## **G. CHILDREN’S PRIVACY**

The Platform is not intended to, nor do we knowingly collect information from, children under the age of 13. A parent or guardian assumes full responsibility for ensuring that the information that he/she provides to MyOwnMed about his or her child is kept secure and that the information submitted is accurate. If you become aware that your child or any child under your care has provided us with information without your consent, please contact our Privacy Officer.

## **H. CHANGES TO THIS POLICY**

We reserve the right to update this Policy from time to time by posting a new Policy on this page. If we make any changes to this Policy, we will change the date below in Section J. You are advised to consult this Policy regularly for any changes, and your continued use of the Platform after such changes have been made constitutes acceptance of those changes. If we make any revisions that materially change the ways in which we use or share the information previously collected from you through the Platform, we will give you the opportunity to consent to such changes before applying them to that information.

## **I. PRIVACY SHIELD FRAMEWORK(S)**

MyOwnMed complies with the EU-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. MyOwnMed has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

If you are unhappy with how we deal with your complaint, or the outcome, you may invoke binding arbitration or refer your complaint to a data panel.

With respect to Personal Information received or transferred pursuant to the Privacy Shield Frameworks, MyOwnMed is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission.

We are the “processor” with respect to your Personal information on behalf of the “controller”. We will perform data processing within the bounds of the mandate given by the controller.

## **J. COMPLIANTS**

If you believe that we have infringed your rights, we encourage you to contact us so that we can try to address your concerns or dispute informally. Our contact information is:

Attn: Privacy Officer  
My Own Med, Inc.,  
6701 Democracy Boulevard, Suite 300  
Bethesda, MD 20817  
[privacy@myownmed.com](mailto:privacy@myownmed.com)

If you do not receive timely acknowledgement of your complaint, or if your complaint is not satisfactorily addressed, you can also submit your complaint to Privacy Trust, an independent third party. Visit <https://www.privacytrust.com/drs/myownmed> to file a complaint.

Finally, as a last resort and in limited situations, EU and EEA individual with remaining privacy complaints may use the binding arbitration mechanism before the Privacy Shield Panel.

## **K. CONTACT INFORMATION**

This Policy was last updated on March 25, 2020

The Office of the Privacy and Data Protection Officer can be reached using the contact information below.

Attn: Privacy and Data Protection Officer  
My Own Med, Inc.  
6701 Democracy Blvd, Suite 300  
Bethesda, MD 20817  
[privacy@myownmed.com](mailto:privacy@myownmed.com)