

Onward Health Inc Privacy Policy

Effective: January 1, 2024

Introduction

Onward Health Inc (“Onward”) is committed to protecting the privacy and security of your information. This privacy policy (“Policy”) describes how we collect, use, and disclose information that you submit to us or that we collect through any Onward website or mobile application (collectively, “Sites”). Various specific sections discuss how we handle data pertaining to different state laws.

By accessing our Sites, you agree to the terms of this Policy, including the collection, use, and disclosure of your information, as described in this Policy.

Additionally, Onward’s Sites have links to external internet pages, including social media platforms, job application platforms, and other websites. Onward does not make any guarantee, warranty or representation regarding the accuracy of the information contained on the websites. Onward has no control over the privacy or security practices of external websites. It is important that you read and understand the policies of all websites with respect to these practices.

This Privacy Policy is in addition to, and does not replace, Onward’s HIPAA Notice of Privacy Practices, which explains how we use and disclose our patients’ protected health information (“PHI”) and your rights to access and amend your PHI under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”). In the event of a conflict between the terms of this Privacy Policy and the Notice of Privacy Practices with respect to PHI, the Notice of Privacy Practices will control to the extent of a conflict.

Information We Collect

Information You Provide Us Directly

Onward may collect certain information from you, such as your name, address, phone number, email address, or other demographic information when you request additional information, search and apply for a job with Onward, fill out a contact form, submit feedback to Onward, attend a Onward event, or otherwise engage with us. We may retain any messages you send us through the Sites pursuant to our retention policies. We use this information to operate, maintain, and provide you a superior website user experience as well as provide you information about Onward.

If you apply for employment at Onward, you may provide information about yourself as well as information regarding your education, employment history, demographic/equal employment

opportunity data, educational history, degrees, certifications, credentials, references, locations, and other information included in your resume and in the application for employment that you submit.

Information We May Receive From Third Parties

We also may collect information regarding how you interact with our Sites and other websites, such as Onward pages and content on social media platforms. For example, if you “like” a photo on one of our social media sites, we may collect information related to that interaction. In some cases, we may receive information about you from third parties. Onward may receive information about you that you directly provided to a third party. For instance, Onward may use a third party to manage event registrations. The third party would provide Onward registrants’ data to facilitate the event.

Analytics Information

Onward may use website analytics to provide you the best possible experience with our web platforms, Sites and offerings. For example, when we send you emails, we may use technologies to determine whether the email has been opened and whether the links contained in it have been clicked on. We may combine this data with other information collected to measure your interest in Onward, improve our offerings to audiences, or our marketing campaigns, as well as tailor our interactions with you.

Some of our Sites may use website analytics vendors to better understand usage of our Sites or for offerings to audiences or general marketing campaigns. These tools collect information sent by your browser or mobile device, including the pages you visit and other information that assists us in improving our Sites and offerings.

Cookies

Onward may place internet "cookies" on the computer or other devices used by visitors to our Sites. Cookies are small text files that contain small amounts of information and are downloaded to your device. Cookies help us and/or the third parties who provide such cookies obtain information about your use of our Sites and assist us in our offerings. Onward uses two types of cookies: "session" cookies and "persistent" cookies. Onward uses Meta Pixel and GA4 for cookies.

A session cookie is temporary and expires after you end a session and close a Web browser. We may use session cookies to help customize visitors' experiences on our Sites, maintain a signed-on status while exploring the Sites, and track which Web pages visitors view on our Sites. On the other hand, persistent cookies remain on your hard drive and have an expiration date which remains for a set period of time.

We use cookies to help us tailor our Sites to our users and in our offerings or for marketing. Some features of our Sites may not work as intended if you decline to allow cookies or deactivate cookies.

For instructions on how to remove existing cookies from your hard drive and/or block cookies from all websites, go to your browser's Web site for detailed instructions.

In addition, further information regarding cookies may be available from your internet service provider, operating system, or browser provider. Please review how to delete and remove existing cookies and block future cookies from your device, as well as making your opt-in or opt-out election with regard to future use of certain cookies by Onward.

Log File Information

Log file information is sent automatically to Onward by your browser each time you visit our Sites. This is not dependent on the presence or use of cookies and is unaffected by your opt-in or opt-out election concerning cookies. These logs may contain information such as the Internet domain from which you access our Sites; the date and time you visited our Sites; the areas of our Sites that you viewed; your computer's IP address that is automatically assigned when you log onto the Internet; the type of browser and operating system you use; and the address of the Web site you came from, if any.

Onward uses log file information to help us design our Sites; identify popular features; resolve user, hardware and software problems; and make the Sites more useful to patients and other visitors.

Location Data

Onward may utilize a feature that, when you access the Sites by or through a mobile device or through your browser, accesses, collects, monitors and/or remotely stores "location data," and may include GPS coordinates (longitude and latitude) or similar information regarding the location of your device. This data may be used to convey information about how you browse and use the Sites, as well as provide you personalized information based on that location data (such as the closest Onward location to you). You may opt-in or opt-out of sharing location data from your computer via your internet browser and/or computer location services settings.

Web Beacon

A web beacon is a small image file on a web page that may be used to collect certain information from your device. This information may include IP address, time of access, browser, and identification of cookies. Onward, or its vendors, may utilize web beacons to track visitor statistics and manage cookies.

In some of our email communications, we may track recipient actions with the email. This may include opening the email or clicking a link included in the email. This is used to monitor user engagement with our communications.

Use and Disclosure of Information

We may use your information:

- To contact you (for example, sending you a newsletter or other informational materials, offers, announcements, or surveys);
- To manage business relationships, employment lifecycle, or other employee-data purposes;
- To communicate with you about our services, products, and Sites, including to follow up on requests or questions that you may submit;
- To send you emails or text messages. (if you do not wish to receive these communications, you may opt out using the “unsubscribe” link in the email or replying “STOP” for text message);
- To provide marketing and advertising communications;
- To track and analyze use of our Sites;
- To prevent, detect, and investigate misuse, fraud, and illegal activities;
- To enhance and maintain our Sites, services, and products;
- To complete a transaction;
- To administer surveys or contests, as applicable;
- For any lawful, legitimate business purpose; and
- As otherwise necessary to perform the services Onward provides.

We may disclose your information:

- With our service providers who perform certain services or functions on our behalf (for example, we may share your information with a hosting service provider who hosts one of our Sites that you have visited, or with a benefits administrator for employment benefit purposes);
- In the event of a change in ownership or control, such as a sale or merger (in the event of a sale or merger, we would request the new entity adhere to this Policy, however, we may not have control over the new entity's privacy practices); in accordance with your consent or direction, as permitted by law;
- As required to comply with applicable laws and legal process, including law enforcement requests;
- To investigate and defend our and others' rights and property (including intellectual property rights); and
- To protect the personal safety of us and others.

If you use our Sites from outside the United States, you consent to the transfer of your information to the United States, and the use and disclosure of your information as permitted under United States laws.

We may combine information collected through different Sites or portions of Sites. In the event we combine personal information collected through our Sites with your personal health information, we will use and disclose such combined information as described in our Notice of Privacy Practice which relates to our collection, use, and disclosure of medical protected health and confidential information.

Security Measures

Protecting your confidential information is a top priority for Onward. In addition to applying confidentiality policies that govern access and use of information by Onward employees, we have implemented physical, administrative, and technical security features and methods designed to safeguard your data in our information systems, including the use of, as appropriate, encryption, firewalls, monitoring, access controls, and other controls where appropriate. While we take reasonable steps to protect your information, we cannot guarantee the security of all systems against any potential incident. If we learn of a breach of your information, then we will notify you in accordance with applicable law.

Protecting Your Username and Password

It is highly important that you keep any of your usernames and passwords for Onward Sites completely confidential. Anyone with access to your username and password will be able to assume your online identity and view your information. It is your responsibility to prevent disclosure of your usernames and passwords and to change your usernames and passwords if you feel that their security has been compromised.

Please note that no one from Onward will ever ask you for your passwords.

Information and Notice to California Residents

This section provides additional information for California residents whose information is subject to the California Consumer Privacy Act (“CCPA”) and California Privacy Rights Act (“CPRA”). For the purposes of this section, the term “Personal Information” does not include PHI or other patient information that is maintained by us in compliance with HIPAA or the California Confidentiality of Medical Information Act.

Use and Disclosure of Personal Information

Generally, in the past 12 months, we have collected the categories of Personal Information detailed in the “Information We Collect” section above from the sources described in the “Information We Collect” section above. We have used and disclosed Personal Information for the purposes described, respectively, in the “Use and Disclosure of Information” section above. We do not collect or process Sensitive Personal Information to infer characteristics about you.

Although we have not “sold”

personal information for money in the past 12 months, we engage in standard business interactions with third parties that might be considered a “sale” or “sharing” of Personal Information as those concepts are defined by CCPA and/or CPRA. Specifically, we allow third parties to control the collection of Personal Information through cookies and other tracking technologies. These third parties use the data to allow us to understand how the Sites are used, to understand your preferences and interests, and to customize advertisements to those interests and preferences on our behalf. For more information on our use of cookies and similar tracking technologies, please review the “Cookies and Other Tracking Technologies” section above. We do not knowingly sell or disclose personal information of minors under the age of

Rights Concerning Your Personal Information

California law(s) CCPA and CPRA (“California Law” collectively) provide eligible California residents with certain rights regarding their Personal Information. If you are an eligible California resident, you may follow the directions below to exercise your rights.

- **Right to Know.** You have the right to request to know (1) the specific pieces of Personal Information we have collected about you in the last 12 months; (2) the categories of Personal Information we have collected about you in the last 12 months; (3) the types of sources from which such Personal Information was collected; (4) the categories of your Personal Information that we sold or disclosed in the last 12 months; (5) the categories of third parties to whom your Personal Information was sold or disclosed in the last 12 months; and (6) the purposes for collecting and selling your Personal Information.
- **Right to Delete.** You have the right to request that we delete the Personal Information that we have collected from or about you. To make a request to delete under the applicable California Law, please contact us using the information in the “Contact Us” section below. We may deny your request under certain circumstances, such as if we need to comply with our legal obligations or complete a transaction for which your Personal Information was collected. If we deny your request to delete, we will let you know the reason for the denial.
- **Right to Correct.** You have the right to request that we correct inaccurate Personal Information that we maintain about you.
- **Right to Opt Out of Sales or Sharing.** You have the right to opt out of the sale or sharing of your Personal Information or targeted advertising.
- **Non-Discrimination.** If you choose to exercise any of these rights, we will not discriminate against you in any way. If you exercise certain rights, please understand that you may be unable to use or access certain features of the Sites or our Services.

California residents may exercise their respective rights by emailing privacy@onwardrides.com

California “Shine the Light” Law

California residents may also request information from us once per calendar year about certain personal information shared with third parties for their own direct marketing purposes, including the categories of information and the names and addresses of those businesses with which we have shared such information. To request this information, please contact us by email at privacy@onwardrides.com

Information and Notice to Colorado Residents

This section provides additional information for Colorado residents. The Colorado Privacy Act (“CPA”) provides eligible Colorado residents with certain rights regarding their Personal Information and Sensitive Personal Information. For the purposes of this section, the terms “Personal Information” and “Sensitive Personal Information” do not include PHI or other patient information that is maintained by us in compliance with HIPAA.

Use and Disclosure of Personal Information

Generally, in the past 12 months we have collected the categories of Personal Information detailed in the “What Personal Information We Collect” section above from the sources described in the “How We Collect Your Personal Information” section above. We have used and disclosed Personal Information for the purposes described, respectively, in the “How We Use Your Personal Information” and “How We Disclose Your Personal Information” sections above. We do not collect or process Sensitive Personal Information to infer characteristics about you. We do not sell personal data as defined by the CPA.

We allow third parties to control the collection of Personal Information through cookies and other tracking technologies. These third parties use the data to allow us to understand how the Sites are used, to understand your preferences and interests, and to customize advertisements to those interests and preferences. By interacting with our Sites, you consent to the use of information that is collected or submitted as described in this Policy. For more information on our use of cookies and similar tracking technologies, please review the “Cookies and Other Tracking Technologies” section above. We do not knowingly sell or disclose personal information of minors under the age of 13.

Rights Concerning Your Personal Information

If you are an eligible Colorado resident, you may follow the directions below to exercise your rights.

- **Right to Know.** You have the right to request to know (1) the specific pieces of Personal Information we have collected about you in the last 12 months; (2) the categories of Personal Information we have collected about you in the last 12 months; (3) the types of sources from which such Personal Information was collected; (4) the categories of your Personal Information that we sold or disclosed in the last 12 months; (5) the categories of third parties to whom your Personal Information was sold or disclosed in the last 12 months; and (6) the purposes for collecting and selling your Personal Information.
- **Right to Delete.** You have the right to request that we delete the Personal Information that we have collected from or about you. To make a request to delete, please contact us by email at privacy@onwardrides.com. We may deny your request under certain circumstances, such as if we need to comply with our legal obligations or complete a transaction for which your Personal Information was collected. If we deny your request to delete, we will let you know the reason for the denial.
- **Right to Correct.** You have the right to request that we correct inaccurate Personal Information that we maintain about you.
- **Right to Opt Out of Sales, Profiling or Targeted Ads.** You have the right to opt out of the sale or sharing of your Personal Information or targeted advertising.
- **Right to Appeal.** You have the right to appeal our action within 60 days and Onward will respond within accordance with CPA requirements.
- **Non-Discrimination.** If you choose to exercise any of these rights, we will not discriminate against you in any way. If you exercise certain rights, please understand that you may be unable to use or access certain features of the Sites or our Services.

Colorado residents may exercise their respective rights by emailing privacy@onwardrides.com

Information and Notice to Connecticut Residents

This section provides additional information for Connecticut residents. The Connecticut Data Privacy Act (“CTDPA”) provides eligible Connecticut residents with certain rights regarding their Personal Information and Sensitive Personal Information. For the purposes of this section, the terms “Personal Information” and “Sensitive Personal Information” do not include PHI or other patient information that is maintained by us in compliance with HIPAA.

Use and Disclosure of Personal Information

Generally, in the past 12 months we have collected the categories of Personal Information detailed in the “What Personal Information We Collect” section above from the sources described in the “How We Collect Your Personal Information” section above. We have used and

disclosed Personal Information for the purposes described, respectively, in the “How We Use Your Personal Information” and “How We Disclose Your Personal Information” sections above. We do not collect or process Sensitive Personal Information to infer characteristics about you. We do not sell Personal Information or Sensitive Personal Information as defined by the CTDPA.

We allow third parties to control the collection of Personal Information through cookies and other tracking technologies. These third parties use the data to allow us to understand how the Sites are used, to understand your preferences and interests, and to customize advertisements to those interests and preferences. By interacting with our Sites, you consent to the use of information that is collected or submitted as described in this Policy. For more information on our use of cookies and similar tracking technologies, please review the “Cookies and Other Tracking Technologies” section above. We do not knowingly sell or disclose personal information of minors under the age of 13.

Rights Concerning Your Personal Information

If you are an eligible Connecticut resident, you may follow the directions below to exercise your rights.

- **Right to Know.** You have the right to request to know (1) the specific pieces of Personal Information we have collected about you in the last 12 months; (2) the categories of Personal Information we have collected about you in the last 12 months; (3) the types of sources from which such Personal Information was collected; (4) the categories of your Personal Information that we sold or disclosed in the last 12 months; (5) the categories of third parties to whom your Personal Information was sold or disclosed in the last 12 months; and (6) the purposes for collecting and selling your Personal Information.
- **Right to Delete.** You have the right to request that we delete the Personal Information that we have collected from or about you. To make a request to delete, please contact us using the information in the “Contact Us” section below. We may deny your request under certain circumstances, such as if we need to comply with our legal obligations or complete a transaction for which your Personal Information was collected. If we deny your request to delete, we will let you know the reason for the denial.
- **Right to Correct.** You have the right to request that we correct inaccurate Personal Information that we maintain about you.
- **Right to Opt Out of Sales, Profiling or Targeted Ads.** You have the right to opt out of the sale or sharing of your Personal Information or targeted advertising.
- **Right to appeal.** You have the right to appeal our action within 60 days and Onward will respond within accordance with CTDPA requirements.

- Non-Discrimination. If you choose to exercise any of these rights, we will not discriminate against you in any way. If you exercise certain rights, please understand that you may be unable to use or access certain features of the Sites or our Services.

Connecticut residents may exercise their respective rights by emailing privacy@onwardrides.com

Notice to Nevada Residents

If you are a Nevada resident, you have the right to opt out of the sale of certain Personal Information, including your name and mailing address, to third parties. Roya does not sell your personal information. If that were to change in the future, we will provide Nevada residents with a method to opt-out of those transactions.

Notice to Virginia Residents

This section provides additional information for Virginia residents. The Virginia Consumer Data Protection Act (“VCDPA”) provides eligible Virginia residents with certain rights regarding their Personal Information and Sensitive Personal Information. For the purposes of this section, the terms “Personal Information” and “Sensitive Personal Information” do not include PHI or other patient information that is maintained by us in compliance with HIPAA.

Use and Disclosure of Personal Information

Generally, in the past 12 months we have collected the categories of Personal Information detailed in the “What Personal Information We Collect” section above from the sources described in the “How We Collect Your Personal Information” section above. We have used and disclosed Personal Information for the purposes described, respectively, in the “How We Use Your Personal Information” and “How We Disclose Your Personal Information” sections above. We do not collect or process Sensitive Personal Information to infer characteristics about you.

Specifically, we allow third parties to control the collection of Personal Information through cookies and other tracking technologies. These third parties use the data to allow us to understand how the Sites are used, to understand your preferences and interests, and to customize advertisements to those interests and preferences. By interacting with our Sites, you consent to the use of information that is collected or submitted as described in this Policy. For more information on our use of cookies and similar tracking technologies, please review the “Cookies and Other Tracking Technologies” section above. We do not knowingly sell or disclose personal information of minors under the age of 16.

Rights Concerning Your Personal Information

If you are an eligible Virginia resident, you may follow the directions below to exercise your rights.

- **Right to Know.** You have the right to request to know (1) the specific pieces of Personal Information we have collected about you in the last 12 months; (2) the categories of Personal Information we have collected about you in the last 12 months; (3) the types of sources from which such Personal Information was collected; (4) the categories of your Personal Information that we sold or disclosed in the last 12 months; (5) the categories of third parties to whom your Personal Information was sold or disclosed in the last 12 months; and (6) the purposes for collecting and selling your Personal Information.

- **Right to Delete.** You have the right to request that we delete the Personal Information that we have collected from or about you. To make a request to delete, please contact us using the information in the

“Contact Us” section below. We may deny your request under certain circumstances, such as if we need to comply with our legal obligations or complete a transaction for which your Personal Information was collected. If we deny your request to delete, we will let you know the reason for the denial.

- **Right to Correct.** You have the right to request that we correct inaccurate Personal Information that we maintain about you.

- **Right to Correct.** You have the right to correct your Personal Information.

- **Right to Opt Out of Sales, Profiling or Targeted Ads.** You have the right to opt out of the sale or sharing of your Personal Information or targeted advertising.

- **Right to Appeal.** You have the right to appeal our action within 60 days and Onward will respond within accordance with VCDPA requirements.

- **Non-Discrimination.** If you choose to exercise any of these rights, we will not discriminate against you in any way. If you exercise certain rights, please understand that you may be unable to use or access certain features of the Sites or our Services.

Virginia residents may exercise their respective rights by reaching us at privacy@onwardrides.com

Consumers may elect to designate an authorized agent to make their request. For more information on authorized agents under the CCPA, please visit the California Attorney General’s website.

We will honor any legal right you may have to access such information, but fees, if permitted by law, may apply.

Health Information

If you have questions about your rights related to your health information, please visit our Notice of Patient Privacy Practices.

Retention of Your Personal Information

We retain your Personal Information only as long as necessary for the purpose for which it was collected. Onward may retain your data until the set retention period for the data expires. In some instances, such as to comply with a legal or tax obligation, Onward may be required to maintain your Personal Information longer.

Revisions to this Privacy and Security Policy

As state and federal laws change, and as we add new features to our Sites, Onward may periodically revise this Policy. We will post changes to this policy on our Sites. Your continued use of our Sites following the posting of changes will mean you accept those changes.

Questions, Concerns and Contact Information

For questions about our privacy practices, please contact us a [tprivacy@onwardrides.com](mailto:privacy@onwardrides.com) or by calling (800) 700-4797.