

# WEBSITE PRIVACY POLICY

Current as of: June \_\_, 2019

This Privacy Policy (“Privacy Policy”) describes Quip NYC, Inc., (referred to as “Quip”, “we” or “us”) practices regarding the collection, use and disclosure of information that you provide to us when you visit [www.quipcare.com](http://www.quipcare.com) (the “Site”). This Privacy Policy is incorporated into, and is part of, our Terms of Use [quipcare.com/terms](http://quipcare.com/terms), which governs your access to and/or use of the Site.

This Privacy Policy describes the types of information we gather from people visiting our Site and/or using our services from individual users (“you” or “users”) interacting with our Site and services. By accessing our Site, you agree to be bound by this Privacy Policy. If you do not agree to the terms of this Privacy policy, please do not use the Site. Each time you use the Site, the current version of this Privacy Policy will apply. Accordingly, you should check the date of this Privacy Policy (which appears at the top) and review any changes since you last reviewed the Privacy Policy.

## **Type of Information that We Collect**

In order to provide you with a discount dental plan, Quip may collect, create and maintain personal, dental and health information about you (“Personal Information”), which may include:

- Information about your dental health;
- Information about dental care services you have received or may receive in the future; ;
- Geographic information (such as where you live); and
- Unique numbers that may identify you (such as your address, your phone number, or your driver’s license).

If you choose to share information publicly through our Site, please understand that we cannot control the actions of third parties who could collect this information.

Quip may also collect “Anonymous Information.” Anonymous Information means information that is not associated with or linked to you or Personal Information and does not permit your identification. Quip collects and uses Personal Information and Anonymous Information as described in this Privacy Policy and as required or permitted by law.

## **How Information is Collected**

When you communicate with Quip via the Site, Quip collects your Personal Information only if you provide it voluntarily and unless otherwise permitted by law, only uses your Personal Information with your permission. Quip may also obtain Personal Information from its business partners, including Quip’s dental network, when necessary to provide services to you or such business partners.

***For example, Quip may use and disclose your Personal Information:***

- Obtain payment for your dental services;
- Manage your benefits under a discount dental plan and other services, which may include such things as giving you appointment reminders and telling you about treatment alternatives or other health-related benefits;
- Ensure that we follow the rules of regulatory agencies regarding the quality of services we provide;
- Comply with all legal requirements, subpoenas, and court orders;
- Engage in certain pre-approved research activities;
- Assist in our own payment process and the payment activities of other health care providers; and
- Meet special situations as described in this Privacy Policy such as public health and safety.

**Anonymous Information**

Log Files

The Site gathers certain Anonymous Information automatically (as do many websites) and stores it in web server log files. This information includes internet protocol address, browser type, internet service provider (ISP), site entry/exit pages, operating system, date/time stamp, and clickstream data. Quip uses this information to improve the Site, analyze trends, administer the Site, track users' movements around the Site, and gather aggregate, Anonymous information about Site users as a whole.

Cookies

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. Cookies can help Quip to understand how Site visitors click to the Site and what pages they view during their visit. Similar to many websites, the Site uses a standard technology called a "session cookie" to enable the Site to recognize you during a visit. The session cookie is stored in temporary memory on your computer and is not retained after you close your browser. You can set your web browser software to disable cookies. To do so, please refer to the help section of your specific browser for more information on how to manage or disable cookies. If you disable cookies, you may still view the Site, but some areas of the Site may not work properly.

**Collection of Information by Third Parties**

Some links on our Site may redirect you to third party websites and services that we do not operate. The privacy practices of these websites and services will be governed by their own policies. We make no representation or warranty as to the privacy policies of any third parties,

including the providers of third party applications. If you are submitting to any such third party through our Site, you should review and understand that party's policies, including its privacy policy, before providing any information to the third party.

We may also participate in interest-based advertising using similar technology. This means that you may see advertising on our Site tailored to how you browse or shop, or you may see advertising for Quip and its products on other websites based on your browsing behavior across websites. Some websites where we may advertise belong to ad networks that use your web browsing history to choose which ads to display on their network websites; these ads may include advertising for Quip. Other websites where you see our ads, such as Facebook, may use interest preferences that you have chosen on those sites, as well as registration and other information about you, to choose which ads to display to you. Some internet browsers, websites such as Facebook and mobile devices offer opt-outs for interest-based advertising. Please refer to the website that you are visiting, your browser and/or your device settings for additional information

You can opt-out of receiving interest-based ads from third parties who are members of the Network Advertising Initiative (NAI) or who follow the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising by visiting the opt-out pages on the NAI website (<http://www.networkadvertising.org/choices/>) and DAA website (<http://www.aboutads.info/choices/>).

## **Opt-Out**

If we send you promotional communications, you may opt-out of receiving them by following the instructions included in each communication.

## **Children and Privacy**

We do not knowingly collect Personal Information from children in connection with our Site or services. If we become aware that an individual under the age of 13 has provided Personal information through our Site, we will immediately remove that Personal Information from our files.

## **How Do We Protect Your Information**

We take the security of your Personal Information very seriously. We use reasonable administrative, physical, and technical safeguards to secure the Personal Information you share with us. Despite these safeguards and our additional efforts to secure your information, we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third-parties will not be able to defeat our security and improperly collect, access, steal, or modify your Personal Information.

Any email or other communication purporting to be from one of our websites asking you to provide sensitive information via email, should be treated as unauthorized and suspicious and should be reported to us immediately by emailing [privacy@quipcare.com](mailto:privacy@quipcare.com).

### **How We May Use and Share your Personal Information with Others**

The following categories describe different ways that we may use and disclose your Personal Information. For each category of uses or disclosures, we will explain what we mean and try to give some examples. Not every possible use or disclosure within each category will be listed.

***For Treatment by a Network Dentist.*** We may use or disclose Personal Information about you to facilitate treatment by our network dentists. For example, if one of our participating dentists is treating you, we may disclose to this dentist Personal information that may be relevant to the care that he or she is providing or payment for that care.

***For Payment.*** We may use and disclose Personal Information about you for our own payment purposes such as to collect monthly payments for your discount dental plan.

***For Our Operations.*** We may use your Personal Information to support our business activities, which can include quality assessment and improvement activities or the resolution of any complaints or grievances you may have.

***Appointment Reminders.*** We may use and share your Personal Information to remind you of appointments you have made to receive dental care or to encourage you to make such appointments.

***Treatment Alternatives and Other Health-Related Benefits and Services.*** We may use your Personal Information to contact you about the management of your dental care and to discuss related dental products and services that may be of interest to you.

***Marketing Activities.*** We may use or share your Personal Information for marketing purposes such as to provide you with an inexpensive promotional gift related to your dental care. We will never sell your Personal Information to third parties without your written permission to do so.

***Individuals Involved in Your Dental Care or Payment for Your Dental Care.*** Unless you say no, we may disclose your Personal Information to family members, relatives, or close personal friends who are helping to care for you or helping you to manage your dental care. If a person has the authority under the law to make health and dental care decisions for you, we will treat that person the same way we would treat you with respect to your Personal Information.

***Research.*** We may use or disclose your Personal Information for research purposes, such as studies comparing the benefits of alternative treatments received by our members. All research projects conducted through Quip must be approved through a special review process to protect plan member safety, welfare and confidentiality and unless otherwise permitted by law, your consent will be required.

***As Required By Law.*** We will share your Personal Information when federal, state, or local law requires us to do so.

***De-identified Information and Limited Data Sets:*** We may use and disclose health information that has been “de-identified” by removing information that may identify you. We may use this de-identified information as permitted by law.

## **Special Situations**

***Legal Proceedings, Lawsuits, and Other Legal Actions.*** We may share your Personal Information with courts, attorneys and court employees when we get a court order, subpoena, discovery request, warrant, summons or other lawful instructions from those courts or public bodies, and in the course of certain other lawful, judicial or administrative proceedings, or to defend ourselves against a lawsuit brought against us.

***Law Enforcement.*** We may disclose your Personal Information if asked to do so by law enforcement, and as authorized or required by law.

## **Will We Change This Privacy Policy?**

Each time you use our Site the current version of the Policy will apply. When you use our Site, you should check the date of this Policy (which appears at the top of the Policy) and review any changes since the last version. Our business may change and this Policy is subject to change from time to time. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you. We will not materially change our policies and practices to make them less protective of your privacy without the consent of affected customers.

## **How Do You contact Us?**

To contact us with your questions or comments regarding this Policy or the information collection and dissemination practices of this website, please email us at [privacy@quipcare.com](mailto:privacy@quipcare.com).

## **Governing Law**

This Policy is governed by the laws of the State of New York, U.S.A. without giving effect to any principles of conflict of law.