



eCare Vault Inc. Privacy Notice

This document was last updated on July 27, 2023.

eCare Vault, Inc. (“**eCare Vault**,” “**we**,” “**us**,” or “**our**”) respects your privacy, and we are committed to protecting your rights. eCare Vault provides a combination of modular technology solutions and expert advisory services to support public sector entities and their constituents. eCare Vault may work with such entities in one of three ways, or all: (1) by supporting employees with workplace well-being and skills and career progression, (2) by supporting clients and families with collaboration tools for empowerment, transition, skills training and self-sufficiency (collectively, the “**Program**”), and/or (3) by supporting students’ well-being with collaboration tools and supports. The Program is sponsored by the entity with which you are associated (the “**Sponsor**”), either as an employee, client or family member.

The Program provides a personalized digital platform for managing your Program participation that you can access through our website or mobile application. In addition, you may collaborate with certain individuals associated with your Sponsor and provide or obtain certain services from others associated with your Sponsor. The digital and non-digital components of the Program are collectively referred to as the “**Service**” or “**Services**.” This notice describes the types of information we may collect from our about you when you participate in our Program or otherwise use our Services, whether as a registered member or an unregistered visitor, and our practices for collecting, using, maintaining and disclosing that information.

In certain instances, your enrollment and Program participation will be managed by other individuals (such as your case manager if you are receiving social services from your Sponsor).

Definitions

For the purposes of this Privacy Notice, the following terms are defined:

Authorized User: A person with access to the Service who provides, accesses and discloses information about a Service Recipient. An Authorized User may or may not be the Service Recipient. In situations in which the Authorized User is not the Service Recipient, the Service Recipient’s Personal Information will be associated with the Authorized User’s Sponsor for the purpose of storing and sharing information with a Care Team and other Authorized Users.

Service Recipient: A person associated with a Sponsor whose Personal Information is collected, held or processed by us.

Care Team (Team): a collection of Authorized Users that have been specifically invited to receive and share Program-related information about themselves, other Authorized Users and/or designated Service Recipients.

Personal Data: any information, including personal and material circumstances, that allows a person to become identifiable. The Personal Data we collect includes, but is not limited to:

- Your contact information, including your first name and last name, home address, personal



and organizational email addresses, and your phone number;

- Your email address;
- Your gender, date of birth and age if you are the Service Recipient;
- Your social security number if you are the Service Recipient
- Your employee identification number;
- Information about your participation and performance in the Program;
- Information that is shared with your Care Team if you are the Service Recipient;
- Information you voluntarily share about yourself during any interactions with individuals on your Care Team;
- If you are an Authorized User who is not the Service Recipient, your relation to the Service Recipient (i.e. case manager); and
- Additional information you may provide as you submit requests.

Information We Collect and How We Use Such Information

Registration and Use of the Service

We collect Personal Data about you to provide you with our Program and Services. When registering with eCare Vault, we will ask you to provide us Personal Data including, but not limited to your name, address, e-mail address, phone number, name of Service Recipient(s) (if other than yourself), dates of birth, gender, and relation to Service Recipient(s) (e.g. parent/guardian, etc.), profession, organization name, organization address and other related information that eCare Vault may ask of you from time to time, and you may submit additional information and comments throughout your use of the Service.

We may also collect Personal Data from you outside of our Program and Services. When you subscribe to our blog or newsletter, we collect your email address. When you contact us through our website, we collect your first and last name, email address, and phone number.

Information Collected from Third Parties

We may receive information about you from various sources to support our Program and Services:

- *Your Sponsor.* Your Sponsor may provide us with Personal Data to identify you as an individual who is able to join the Program.
- *Other Providers or Partners associated with by Your Sponsor.* In some cases, your Program Sponsor may offer benefits through other providers that integrate with our Program. At the direction of your Program Sponsor, we may exchange data with these other providers to provide our services to you.
- *Your Healthcare Provider.* With your prior approval, we may receive information from your



healthcare provider and any clinics or organized care facilities with which your provider is associated.

- *Your Friends and Family.* With your prior approval, we may receive information from your friends or family members who are part of your care team.

Cookies and Other Technologies

Our member application does not use “cookies” or any other software tracking technology. Our website use “cookies” and “web beacons.” “Cookies” are small text files that we place in visitors' computer browsers to store their preferences. Whenever you use our website, eCare Vault also receives and records information on our server logs from your browser, including your IP address, eCare Vault's cookie information, and the pages you request, and may relate it to the Personal Data you provide on the website.

“Web beacons” are small pieces of code placed on a web page to monitor the behavior and collect data about the visitors viewing a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page. We may use web beacons on our website from time to time for this purpose.

How We Use Your Information

eCare Vault collects and uses Personal Data you provide to:

1. administer your account and provide customer service;
2. create your account;
3. provide you with access to the Service and accompanying tools, including care coordination and other services that may involve sharing your Personal Data with others who are part of your Care Team;
4. share your Personal Data with Authorized Users that you have identified to participate in the Service;
5. communicate with you, and your Authorized Users as applicable;
6. reply to your request for information or comments;
7. provide information about eCare Vault's related products and services to you and your Authorized Users as applicable; and
8. add you as a subscriber to our blog or newsletter, unless you choose to unsubscribe.

Third Party Login and Authentication. The Service allows you to log in using your social media account, such as Google, Microsoft or LinkedIn (“Social Media Account”) for initial registration and authentication. By associating the Service with your Social Media Account, you are granting permission for eCare Vault to use your Social Media Account provider for registration and authentication services using your Social Media Account information. At no point during registration or authentication, or during your use of the eCare Vault Service while logged in with your Social Media Account, will eCare Vault share any data about you or the use of the



Service with your Social Media Account provider.

Analytics. When you use the Service, we may collect de-identified information relating to your browser or device type, the time and date you use the Service, operating system, identification of website page views, use of particular Service features, geographic location and other statistical information relating to your use of the Service but which does not identify you. In addition, we may de-identify Personal Data that you have shared as part of the Service. This collection and review of de-identified information is referred to in this Privacy Notice as “Analytics.” We may use Analytics a) to develop, improve, extend and test the Service (and underlying technology platforms); b) to market and promote eCare Vault and the Service; and c) distribute Analytics to interested third parties.

How We Protect Your Information

We take appropriate technical and organizational safeguards to protect Personal Data from theft, other loss, misuse, and any unauthorized access, copying, collection, use, disclosure, alteration, forgery, destruction or technical errors. We follow generally accepted standards to protect the Personal Data submitted to us, both during transmission and once we receive it. eCare Vault follows best-practice standards to protect your Personal Data including, but not limited to secure server software (SSL/TLS), firewalls, and encryption during transmission and at rest to protect your Personal Data from unauthorized access, disclosure, alteration, or destruction. All Personal Data is transmitted, stored, and processed in a secure environment. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security.

Information Sharing and Disclosure

Care Team and Authorized Users. The Personal Data of Authorized Users and Service Recipients will be disclosed to all Authorized Users on a Service Recipient’s Team. Once an Authorized User obtains Personal Data of another Authorized User or Service Recipient, the Authorized User may further disclose that information to new Authorized Users within the Care Team. Authorized Users are required by our Terms of Service to not disclose a Service Recipient’s data outside of the Care Team without the prior consent of the Service Recipient or as otherwise authorized by law.

Program Sponsor. In addition to the information shared with your Care Team and Authorized Users, we may share anonymized and aggregated data with your Sponsor, and they will not be able to use such data to directly identify you. Your Sponsor may use the anonymized information in its discretion, including to evaluate the overall Program and to provide additional benefits and services.

In specific circumstances and for limited purposes, such as to ensure proper Program administration, we may share reports containing identifiable information with your Sponsor. In these circumstances, we limit Personal Data to the least amount necessary to support the specific, necessary purpose.

Third Party Service Providers. We may disclose your Personal Data and non-Personal data to third party vendors who help us operate the Service, including in the areas of website and



database hosting and maintenance, telecommunications, information security, fraud detection and prevention, and identity verification. These third parties are contractually obligated to maintain the confidentiality of your Personal Data consistent with the terms of this Policy and to comply with applicable data protection laws. eCare Vault does not rent, sell, or share your Personal Data with third parties for their direct marketing purposes.

Legal Authorities. If we determine we are obligated to do so, we will disclose your information in response to a valid legal process, for example, in response to a court order, a subpoena or other legal request for information, and/or to comply with its applicable legal and regulatory reporting requirements. We may also disclose your information in response to a law enforcement agency's request, or where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Use, or to verify or enforce compliance with the policies governing our products and with applicable laws, or as otherwise required or permitted by law or consistent with legal requirements.

Reorganization or Acquisition. In the event we are acquired by a third party or undergo a reorganization or liquidation pursuant to a bankruptcy proceeding, any Personal Data we hold about you may be transferred to the reorganized entity or third party in accordance with applicable laws. In any such event, the new entity will continue to use your Personal Data in accordance with and within the limits of this Privacy Notice to ensure continuation of service to you.

For Users Outside of the United States: International or Cross-Border Transfer of Your Personal Data and Your Express Agreement

Given that the Internet operates in a global environment and that transfer of your data is necessary to process your registration, to enable you to the Service, to provide updates, and to respond to your inquiries, using the Internet to collect and process Personal Data necessarily involves the transmission of data on an international, or cross-border, basis. By signing up for or using the Service, subscribing to our blogs or newsletters, and/or by communicating with us by email, you acknowledge and expressly, explicitly, voluntarily and unambiguously consent to our processing of your Personal Data including international transfer of Personal Data. The Personal Data of users who are located outside the U.S. will be transferred outside of each eligible country to the United States, or to a location in the cloud, where the servers containing our data are located and where Personal Data will be processed and stored. The U.S. has not been recognized as providing an adequate level of protection according to the data protection requirements of certain other countries and territories (including countries and territories in which users may be located such as the European Union (EU)), but we will take all steps reasonably necessary to ensure that users' Personal Data is treated securely in respect of such transfer and as described in this Privacy Notice.

It is also possible that U.S. authorities may access data that is transferred to the U.S. We will undertake best efforts to support affected data subjects to exercise their rights vis-à-vis U.S. authorities, to the extent required by applicable law.

By accepting the Privacy Notice or otherwise registering for or using the Service,



subscribing to our newsletter or blog, or by sending us an email, you expressly agree to such processing, including transfer to the U.S and disclosure of your Personal Data to our third-party vendors for the purposes described in this Privacy Notice.

Links to Other Platforms; Transactions with Third Parties

The Service may contain links to other sites that are not owned or controlled by eCare Vault. Please be aware that we are not responsible for the privacy practices of these other Sites. We encourage you to review the privacy policies and statements of such other sites to understand their information practices. Our Privacy Notice applies only to information collected by the Service.

You may be able to access the Service and/or communicate with the Service from, and you may be able to link or communicate from the Service to: applications, devices, distribution platforms and websites owned and operated by, Clinicians and/or by Apple, Google, Microsoft or other third-party distribution platform operators ("*Channel Partners*"). These other applications, devices, platforms and websites belong to third parties and are not operated or controlled by eCare Vault. We are not responsible for and will not be party to any transactions between you and a third-party provider of products, information or services. eCare Vault does not monitor such transactions to ensure the confidentiality of your Personal Data. Additional or different terms and conditions (including without limitation, privacy and security practices) apply when you access and use third-party applications, devices, platforms and websites, which are not the responsibility of eCare Vault. Any communications made or obligations you incur in your dealings with these third parties linked to eCare Vault's Service are solely your responsibility.

Children and Minors

Our Service is not intended for children under 13 years of age. We do not knowingly collect personal information from children under 13. If you are under 13, do not use our Program or provide any information to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at **help@ecarevault.com**

Accessing and Changing Your Information

You may access, review, and request changes, corrections, updates or deletion of your Personal Data, request information about our collection, use and disclosure of such information, and request information on our policies and practices relating to the disclosure of information to our service providers, by contacting us at **help@ecarevault.com**. We will respond to these requests in accordance with applicable law. You can help us maintain the accuracy of your information by notifying us of any changes to your information by emailing us at **help@ecarevault.com**.



FERPA: Student/Pupil Information

FERPA and California AB 1584.

Regarding FERPA and California AB 1584 (Buchanan) Privacy of Pupil Records: 3rd-Party Digital Storage & Education Software (Education Code section 49073.1), eCare Vault will abide to the following:

Student records obtained by eCare Vault from an educational institution continue to be the property of and under the control of the educational institution. The educational institution retains full ownership rights to the personal information and education records it provides to eCare Vault.

eCare Vault users may retain possession and control of their own generated content by contacting us directly at customer-support@ecarevault.com.

eCare Vault will not use any information in a student record for any purpose other than those required or specifically permitted by the eCare Vault Terms of Service and Privacy Policy.

Parents, legal guardians, or eligible students may review personally identifiable information in the student's records and correct erroneous information by contacting their educational institution. Additionally, eCare Vault users may access, correct, update, or delete personal information in their profile by signing into eCare Vault, accessing their eCare Vault account, and making the appropriate changes.

eCare Vault is committed to maintaining the security and confidentiality of student records. Towards this end, we take the following actions: (a) we limit employee access to student data to only those employees with a need to such access to fulfill their job responsibilities; (b) we conduct background checks on our employees that may have access to student data; (c) we conduct regular employee privacy and data security training and education; and (e) we protect personal information with technical, contractual, administrative, and physical security safeguards in order to protect against unauthorized access, release or use.

In the event of an unauthorized disclosure of a student's records, eCare Vault will (1) promptly notify Users unless specifically directed not to provide such notification by law enforcement officials. Notification shall identify: (i) the date and nature of the unauthorized use or disclosure; (ii) the Private Data used or disclosed; (iii) general description of what occurred including who made the unauthorized use or received the unauthorized disclosure; (iv) what eCare Vault has done or shall do to mitigate any effect of the unauthorized use or disclosure; (v) what corrective action eCare Vault has taken or shall take to prevent future similar unauthorized use or disclosure; and (vi) who at eCare Vault the User can contact. eCare Vault will keep the User fully informed until the incident is resolved.

eCare Vault will delete or de-identify personal information when it is no longer needed, upon expiration or termination of our agreement with an educational institution with any deletion or de-



identification to be completed according to the terms of our agreement with the educational institution, or at the direction or request of the educational institution.

eCare Vault agrees to work with educational institution to ensure compliance with FERPA and the Parties will ensure compliance by providing parents, legal guardians or eligible students with the ability to inspect and review student records and to correct any inaccuracies therein as described in statement (4) above.

eCare Vault prohibits using personally identifiable information in student records to engage in targeted advertising.

Health Information

In the event that any an Authorized User provides, accesses and discloses information while using the Service that constitutes protected health information ("PHI") under the U.S. Health Insurance Portability and Accountability Act ("HIPAA"), we agree to work with such Authorized User in order to fully comply with the applicable requirements of HIPAA.

Your GPDR Data Rights

If you are an individual subject to the European Union General Data Protection Regulation (GDPR) or similar laws in the United Kingdom or Switzerland, you have the following rights in relation to your Personal Data:

Right to Access and Data Portability. If you ask us, we will confirm whether we are processing your Personal Data and, if so, provide you with a copy of that Personal Data (along with certain other details).

Right to Rectification. If your Personal Data is inaccurate or incomplete, you are entitled to have it rectified or completed. If we have shared your Personal Data with others, we will tell them about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.

Right to Erasure. You may ask us to delete or remove your Personal Data and we will do so in some circumstances, such as where we no longer need it (we may not delete your data when other interests outweigh your right to deletion). If we have shared your data with others, we will tell them about the erasure where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.

Right to Restrict Processing. You may ask us to restrict or 'block' the processing of your Personal Data in certain circumstances, such as where you contest the accuracy of that Personal Data or object to us processing it. We will tell you before we lift any restriction on processing. If we have shared your Personal Data with others, we will tell them about the restriction where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.



Right to Object. You may ask us at any time to stop processing your Personal Data, and we will do so if we are relying on a legitimate interest to process your Personal Data and unless we demonstrate compelling legitimate grounds for the processing.

Right to Withdraw Consent. If we rely on your consent to process your Personal Data, you have the right to withdraw that consent at any time. This will not affect the lawfulness of processing based on your prior consent.

Right to Lodge a Complaint. If you have a concern about our privacy practices, including the way we have handled your Personal Data, please contact us at help@ecarevault.com. You have the right to report your concern to the data protection authority that is authorized to hear those concerns.

Your California Privacy Rights; California Do Not Track

If you are a California resident, you may request information regarding the disclosure of your Personal Data by eCare Vault or its subsidiaries to a third party for the third party's direct marketing purposes. Since we do not make such disclosures, we are exempt from these reporting requirements.

Your browser may offer you a "Do Not Track" option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities, over time and across different websites. We do not honor "Do Not Track" signals.

Updates to this Privacy Notice

This Privacy Notice may be updated from time to time, so please check back periodically to check the most recent modification date to ensure that you are aware of any changes. Your continued use of the Service or eCare Vault's related products or services after any such changes signifies your express, explicit, voluntary and unambiguous consent to any such changes. If you do not agree to such changes, you should immediately stop using the Service and delete your Personal Data. If we make any significant changes regarding the use or disclosure of Personal Data, you will be notified and required to review and accept the updated Privacy Notice the next time you log in to the Service. Further use of the Service following any such change constitutes your agreement to follow and be bound by the amended Privacy Notice. We encourage you from time to time to review our Privacy Notice. If you do not agree with any changes or the current privacy policy, you may terminate your account by contacting help@ecarevault.com. By continuing to use the service, you acknowledge and accept and agree to the current version of the Privacy Notice.

Contact Us About Any Questions, Complaints or Notices Relating to this Privacy Notice

eCare Vault is committed to resolving questions or concerns about your privacy and our Processing of your Personal Data. If you have questions, suggestions, wish to correct your account information or if you believe your privacy rights have been violated or you disagree



with any action eCare Vault has taken with regard to your Personal Data, you may contact us with any question or file a complaint by contacting the Privacy Officer shown below.

Contact Us:

Customer Support – Privacy Officer
eCare Vault, Inc.
855 Boylston Street, Suite 1000
Boston, MA 02116
Email: help@ecarevault.com

Terms of Service Please also visit our Terms of Service establishing the use, disclaimers, and limitations of liability governing the use of our website and Service [here](#).