



Privacy Policy

Root Therapeutics PLLC (“RT”, “we” or “us”) is committed to protecting your privacy. This Privacy Policy (“Policy”) describes how we collect, use, disclose and protect your Personal Information. It applies to all Personal Information processed by us on any of our Services, as well as written, electronic, and oral communications.

This Policy touches on how we collect or use your Protected Health Information (“PHI”) as defined by the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”). For full details regarding your PHI and HIPAA, click [here](#) to view our Notice of Privacy Practices (“Privacy Practices”).

Unless we define a term in this Policy, all capitalized terms used in this Policy have the meaning provided in our Private Practice Patient Agreement (“Patient Agreement”), which you can view [here](#). Please make sure that you have carefully read and understand the Patient Agreement before you use our Services. By using our Services, you accept the Patient Agreement. By interacting with our website or any aspect of our business, you are accepting our privacy practices described in this Policy. If you do not feel comfortable with any part of this Policy or our Patient Agreement, you must not use or access our Services.

We may modify this Policy from time to time. The date of change will be shown next to “Effective Date” at the top of this page. We encourage you to read this Policy periodically to ensure you have up-to-date knowledge of our privacy practices. Whenever material changes to this Policy are made, we will provide you with notice before the modifications are effective by sending a message to the email address associated with your account. By continuing to access or use the Services after changes to this Policy become effective, you agree to be bound by the revised Policy. If any changes are unacceptable to you, you may stop using our Services at any time.

1. **Personal Information We Collect** “Personal Information” is any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly with a particular individual, including, but not limited to, a first and last name, email address, a home, postal or other physical address, and phone number. We collect Personal Information when you use our Services, create an account with us or submit Personal Information to us. The types of Personal Information that we may collect about you are:
 - a. **Information You Provide to Us**. We collect information you give us when you register with us for a RT account, when you use our Services, when you participate in surveys or promotional activities, or when you otherwise choose to submit your information to us.
 - i. When you sign up for a RT account, we may collect your name, address, phone number, title, birth date, gender, credit card information, together



with other information such as occupation, industry, and personal interests.

- ii. When you use our Services, such as logging into your account or speaking with a RT staff, we may collect your name, address, birth date, credit card information, etc., to verify your identity and provide Services to you.
 - iii. From time-to-time, we invite users to volunteer to participate in surveys or promotional activities. When a user participates, we request certain Personal Information such as name and email address. Depending on the nature of the survey or contest, we use this information to follow-up with the participants, or, if applicable, to notify contest winners and award prizes.
- b. Communications from You. When you use our Services (for example on our website), complete electronic forms, or contact us, by online chat, email, phone or text, we may automatically collect and store certain information about you and the activity you engaged in, for example: your name and contact information; information that you voluntarily provide to us; the nature of your communication; the purpose of the interaction, and the action we took in response to your inquiry or request.
- c. Information Related to Your Use of the Services. We may automatically collect information about your use of the Services ("Usage Data"), including information sent by your mobile devices. For example, we may collect:
- i. Device information, such as your hardware model, IP address (the Internet address of your computer), unique device identifiers, and other information such as your browser type and operating system.
 - ii. Website usage information regarding customer traffic patterns and website usage. This may include the web page that you were visiting before accessing our website or mobile application, the pages or features of our website or mobile application you browsed to inform us which part of our website, app and Services you visit and how much time you spend there.
 - iii. information about your preferences to make your use of the website more productive through the use of cookies.
- d. Information Sent by Your Mobile Devices. We collect certain information that your mobile devices send when you use our Services, such as a unique identifier, user settings and the operating system of your device, as well as information about your use of our services on your mobile device.
- e. Location Information. When you use our online Services, we may collect and store information about your general location by converting your IP address into a rough geo-location. We may also access your mobile device's GPS coordinates or course location but only if you have previously agreed that we can collect this information by allowing the sharing of your location information. If you do not



want us to have your location information, you may disable the location sharing feature on your device or browser.

- f. Information From Our Clients and Partners. We may receive your Personal Information from our business clients and partners in connection with one or more business purposes, including making our Services available to you.

2. Cookies and Other Tracking Technologies

- a. Cookies. A "Cookie" is a small data file that certain websites write to your computer or smart device when you visit them. A Cookie can't read data off your hard disk or read Cookie files created by other websites. We use session Cookies that are deleted when you leave our website and close your browser, and persistent Cookies that can remain even after you leave. A Cookie file can contain information such as a user ID that the website uses to track the pages you've visited. The Cookies that are configured by our website do not contain directly identifying information, such as your name or sensitive information, such as your credit card number. We use Cookies to:
 - i. ensure our Services function properly
 - ii. provide a secure browsing experience during your use of our Services
 - iii. collect passive information about your use of our Services
 - iv. measure how you interact with our marketing campaigns
 - v. help us improve our Services
 - vi. remember your preferences for your convenience
- b. Types of Cookies on Our Services. We use the following types of Cookies on our Services:
 - i. **Strictly Necessary Cookies** – These Cookies are essential because they enable you to use our Services. For example, strictly necessary Cookies allow you to access secure areas on our Services. Without these Cookies, Services cannot be provided. These Cookies do not gather information about you for marketing purposes. This category of Cookies is essential for our Services to work and they cannot be disabled.
 - ii. **Functional Cookies** - We use functional Cookies to remember your choices so we can tailor our Services to provide you with enhanced features and personalized content. For example, these Cookies can be used to remember your name and location. We do not use functional Cookies to target you with online marketing. While these Cookies can be disabled, this may result in less functionality during your use of our Services.
 - iii. **Performance or Analytics Cookies** - These Cookies collect passive information about how you use our Services, including webpages you visit and links you click. We use the information collected by such Cookies to improve and optimize our Services. We do not use these Cookies to target you with online marketing. You can disable these Cookies.
 - iv. **Third-Party Cookies** - These are Cookies that are provided by third-party service providers and belong in one of the Cookie categories described



above. These third-party providers process your Personal Information on our behalf pursuant to our instructions and obligations consistent with this Policy.

- c. How to Manage Cookies. Depending on whether you would like to manage a first-party or third-party Cookies, you will need to take the following steps:
 - i. First-Party Cookies - If you prefer not to receive Cookies while browsing our website, you can set your browser to warn you before accepting Cookies and refuse the Cookie when your browser alerts you to its presence. You can also refuse all Cookies by changing the settings in your browser. You do not need to have Cookies turned on to use and navigate through many parts of our website, although if you block or disable the Cookie functions, you may not be able to access all portions or features of the website and the Services. Please follow instructions provided by your browser (usually located within the "Help", "Tools" or "Edit" settings) to disable first-party Cookies. You can find more information about how to change your browser cookie settings [here](#).
 - ii. Third-Party Cookies - Some third-party services providers that we engage (including third-party advertisers) may also place their own Cookies on your device. Note that this Policy covers only our use of Cookies and does not include use of Cookies by such third parties. Modern browsers also allow you to block third-party Cookies, please see section above to learn how to do that.
- d. Web Beacons. Web Beacons, also known as web bugs, pixel tags or clear GIFs, are tiny graphics with a unique identifier that may be included on our website to deliver or communicate with Cookies, in order to track and measure the performance of our website and Services, monitor how many web visitors we have, and to monitor the effectiveness of our advertising. Unlike Cookies, which are stored on the user's device, Web Beacons are typically embedded invisibly on web pages (or in an e-mail).
- e. Analytics Technologies. Users of our Services who have JavaScript enabled are tracked using analytics technologies, including Google Analytics and Mixpanel. Unless the Analytics feature is blocked, it collects the following types of information from the user: type of user agent (web browser) used, software manufacturer and version number; type of operating system; network location and IP address; country, city, state, region, county, or any other geographic data; hostname; bandwidth (internet connection speed); time of visit; pages visited; time spent on each page of the website; referring site statistics; the website (URL) the user came through in order to arrive at our website; search engine query used (example: typing in a phrase into a search engine, and clicking on a link from that search engine). The data collected by the analytics technology is primarily used to optimize the Service experience for our users. We also use this data for our own business purposes, for example, to analyze how many users we have, where visitors come from, and understand how they interact with us.



- f. **Mobile Applications.** Depending on your permissions, we may receive your Personal Information from your internet service and mobile device providers. Users of mobile devices who do not want to receive interest-based advertising may opt-out in several ways. Learn more about your choices for mobile devices by visiting [Your Ad Choices](#). To end all targeting on a mobile device immediately, turn on “Limit Ad Tracking” in the device settings. To limit Ad Tracking on an Apple device, please see [here](#). To limit Ad Tracking on an Android device, please see [here](#).
 - g. **Social Media.** Depending on your permissions, we may receive your Personal Information from your social media accounts. You can edit or remove Personal Information usage permissions by using privacy settings on your social media account. Click below for instructions on how to change or remove third party access on each platform:
 - i. [Twitter](#)
 - ii. [Facebook](#)
 - iii. [LinkedIn](#)
- 3. **How We Use Your Personal Information:** We will only use your Personal Information as described in this Policy or otherwise through your informed consent.
 - a. **To Provide Our Services to You.** We will use your Personal Information to provide information or perform Services that you request. We may use general location information to improve and personalize our Services to you, such as providing location-relevant information and Services to you. If the applicable information is to be provided or Service is to be performed by a third-party, then we will disclose the applicable information to the third-party providing the information or performing the applicable Services. Your Personal Information may be available or provided to third-party service providers who are contractually obligated to protect your Personal Information as disclosed in this Policy. In the preceding twelve (12) months, we have not sold any Personal Information to any third-party.
 - b. **For Operations and Administration of Our Business.** We will use your Personal Information for the purposes of furthering our business, including creating, operating, delivering, maintaining, and improving our content, products, and Services. We may monitor how our users use our Services including, without limitation, time spent using our Services, pages visited and content viewed. Aggregated forms of this data may also be used for research and development purposes in order to offer new features, functionalities, products and services.
 - c. **For Business Analytics Purposes.** We analyze, and may engage third-parties to analyze, your Personal Information and Usage Data to determine the usefulness of our website, mobile app, and other elements of the Services. Analytics help us determine how effective our navigational structure is in helping users reach the information they seek, completing the task they wish to complete, etc., and to tailor features and functionalities to our users’ needs and preferences.



- d. For Marketing Purposes. Marketing lets us grow our community and update you about new products and services. We process your contact information or information about your interactions about our Services to: send you marketing communications and keep you updated about our products and Services; provide you with informational content; and deliver targeted marketing materials to you. We may periodically send you free newsletters and e-mails that directly promote our Services that we believe may be of interest to you. When you receive such promotional communications from us, you will have the opportunity to "opt-out" (either through your account or by following the unsubscribe instructions provided in the e-mail you receive). We do need to send you certain administrative and transactional communications regarding the Services and you will not be able to opt out of those communications – e.g., communications regarding updates to our Terms of Services, this Policy, or information about billing and renewals, among others.
 - e. To Provide Customer Support. We collect information that you provide to us when you contact us, such as with questions, concerns, feedback, disputes or issues, so we can address your needs and support your use and enjoyment of the Services.
 - f. For Account and Network Security Purposes. We care about keeping your Personal Information secure and safe while using our Services. Keeping you safe requires us to process your Personal Information, such as your device information, log-in information, activity information and other relevant information to proactively manage privacy and security risks. We use such information to combat spam, malware, malicious activities or security risks; improve and enforce our security measures; and to monitor and verify your identity so that unauthorized users do not gain access to your information.
 - g. For Legal and Regulatory Compliance Purposes. Our Services are subject to certain laws and regulations which may require us to process your Personal Information. For example, we may process your Personal Information to comply with privacy laws, comply with employment laws, or as necessary to manage risk as required under applicable law.
 - h. To Enforce Compliance with Our Terms and Agreements of Policies. When you access or use our Services, you are bound to this Policy. To ensure you comply with them, we process your Personal Information to actively monitor, investigate, prevent and mitigate any alleged or actual prohibited, illicit or illegal activities on our Services. We also process your Personal Information to investigate, prevent or mitigate violations of our terms, agreements or policies.
4. **Information Sharing and Disclosures:** Your Personal Information is not shared with third-parties without your permission, except as described below.
- a. Information Shared with Our Employees, Services Providers. We may engage employees and third-party services providers to work with us to administer and provide the Services or to promote our Services. These employees and third-party services providers have access to your Personal Information only for



the purpose of performing Services on our behalf and are expressly obligated not to disclose or use your Personal Information for any other purpose.

- b. Information Shared with Our Business Clients. We may share your Personal Information with our business clients for Services provisions and business operations purposes. We are a service provider to our business clients who purchase our Services for their employees and dependents. We may share your Personal Information with our business clients for the purposes of performing Services for these clients in accordance with our contractual obligations, including to make our Services available to you and your dependents.
 - c. Information Disclosed in Connection with Business Transactions. If we are acquired by a third-party as a result of a transaction such as a merger, acquisition or asset sale, or if our assets are acquired by a third-party in the event we go out of business or enter bankruptcy, some or all of our assets, including your Personal Information, may be disclosed or transferred to a third-party acquirer in connection with the transaction. Other than to the extent ordered by a bankruptcy or other court, the use and disclosure of all transferred user information will be subject to this Policy. Any information you submit or that is collected after a transfer, however, will be subject to a new privacy policy adopted by the successor entity.
 - d. Information Disclosed for Our Protection and the Protection of Others. We cooperate with government and law enforcement officials to enforce and comply with the law. We may disclose Personal Information about you to government or law enforcement officials as we, in our sole discretion, believe necessary or appropriate: (i) to enforce our Membership Terms; (ii) to respond to claims and legal process (including subpoenas); (iii) to protect the property, rights and safety of a third party, our users, or the public in general; (iv) to protect our property, rights and safety; (v) to stop any activity that we consider fraudulent, illegal, unethical or legally actionable; and (vi) as required by applicable local, state or federal laws.
5. **Data Security:** We safeguard the security of the information you provide to us with physical, electronic, and administrative procedures. For certain features of our Services we use industry-standard SSL-encryption to enhance the security of data transmissions. Your account information is password-protected for your privacy and security. While we strive to protect your Personal Information, we cannot guarantee the security of the Internet, and cannot ensure the security of the Personal Information that is transmitted through the Internet. Please recognize that protecting your Personal Information is also your responsibility. We urge you to take every precaution to protect your Personal Information when you are on the Internet, or when you communicate with us and with others through the Internet. Change your passwords often, use a combination of letters and numbers, and make sure you use a secure browser. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account might have been compromised), or if you suspect someone else is using your account, please let us know immediately by contacting us at



operations@root-therapeutics.com. If your credit information, username, or password is lost, stolen, or used without permission, please promptly notify us and we will assist you in updating your account details. Some portions of the Services (for example our presence on social media) allow users to submit comments, reviews, ratings and other information that may be displayed on the Services and viewed by others. We recommend that you do not post on or through the Services any information that you do not want to make available to other users or the public generally. You assume all responsibility for any loss of privacy or other harm resulting from information you post publicly.

6. **Responding to Do Not Track Signals:** We do not currently respond to web browser “do not track” signals or other mechanisms that may allow you to opt out of the collection of Personal Information across networks of websites and online services as there is no standard for how online services should respond to such signals. As standards develop, we may develop policies for responding to do-not-track signals that we will describe in this Policy.
7. **Children and Privacy:** We are committed to protecting the privacy of children in connection with the use of our Services. This section explains our online information collection, disclosure, and parental consent practices with respect to information collection from children under the age of thirteen (13) (“Child” or “Children”) in accordance with the U.S. Children’s Online Privacy Protection Act (“COPPA”). For more information about COPPA and general tips about protecting Children’s online privacy, please click [here](#). Our Services include online Services that may be used to facilitate health care for a Child. A parent or guardian can create a RT account on behalf of a dependent Child and attest that they have legal authority to do so. Children under the age of eighteen (18) are not eligible to register directly for an account. If your Child directly uses their RT account, either with or without your permission, we may collect information directly from the Child. If you prefer for your Child to not directly interact with RT online, please do not provide account credentials to your Child. Please note certain state patient privacy laws may permit a Child to directly obtain certain types of health care services independent of their parent or guardian.
 - a. **Registration.** Children cannot directly register for our Services. During the user registration process, the parent or guardian can create a Child’s account by providing certain information about the Child, including name, birth date, address, email and password.
 - b. **Consent.** During account registration for a Child, parents or guardians are asked to review and consent to our COPPA Parental Consent form. If a parent or guardian chooses not to consent to the collection and use of their Child’s information, they may not create an online account for the Child. At any time, a parent and guardian may revoke their consent for us to further collect Personal Information from their Child online by contacting operations@root-therapeutics.com. Once consent is revoked, a Child may not use any Services online. Section 2 of this Policy contains details about the information we collect, which extends to information we collect about children.



The information we collect will be used for the purposes described in Section 3 of this Policy.

- c. **Instant Message Chat.** We will not knowingly communicate with a Child through the instant message chat functionality on our website. If a Child contacts our Services via the instant message functionality and discloses their age, we will discontinue the communication immediately. We may disclose the information in accordance with Section 4. No Personal Information about a Child will be made available to the public or sold. We may share information with our service providers, if necessary, for them to perform business, professional, or technology services for us, always in accordance with all applicable laws including HIPAA. In addition to your right to revoke your consent for the collection of your Child's Personal Information, you may request to review the Personal Information we have collected from your Child as well as request for us to delete Personal Information we have collected from your Child. Please submit your request or any questions to operations@root-therapeutics.com.
8. **Links to Third-Party Sites:** We may contain links to other sites that are owned or operated by third-parties. We are not responsible for the content, privacy or security practices of any third-parties. To protect your Personal Information, we encourage you to learn about the privacy policies of those third-parties.
9. **Our Social Media Usage:** RT has accounts on social media platforms through which we may post information or conduct promotional activities. If you use social media to follow us or interact with us, we may collect Personal Information you choose to share with us. Please understand that your use of the social media services may result in the collection or sharing of Personal Information about you by those social media services. We have no control over, and decline all responsibility for, the use of your personal data by these third-parties. Your use of social media, including your interactions with us on social media, are at your discretion. We encourage you to review the privacy policies and settings on the social media services with which you interact to make sure you understand how your information may be collected, used, and shared by those social media services.
10. **International Transfer:** Your Personal Information is stored on controlled servers with limited access and may be stored and processed in the United States or another country where our service providers are located. We offer our Services to individuals located in the United States, and we do not advertise our Services outside the United States. If you are located outside the United States and choose to provide your Personal Information to us, please note that we may transfer your Personal Information to the United States or another country where our service providers are located, and such countries may not provide the same data protection. Those who choose to access and use the Services from outside the United States do so on their own initiative, at their own risk, with this understanding.
11. **Amendments:** We may amend this Policy from time to time and revise the language of the Policy to reflect such changes. If we make a significant or material change in the way



we use your personal information, the change will be posted thirty (30) days prior to taking effect and registered users will be notified via email.

12. **Contact us:** For any questions or comments regarding this policy or the information collection and dissemination practices of this Site, please email us at operations@root-therapeutics.com.

Medical Privacy Policy

This notice describes how your medical information may be used and disclosed by Root Therapeutics PLLC and its affiliates, and how you can get access to this information. Please review it carefully.

Table of content

How We Use and Share Your Information:

1. Treat you: We can use your health information and share it with other professionals who are treating you or when seeking advice from other medical professionals. In these interactions, your personal identifying information is limited
2. Run our organization: We can use and share your health information to run our practice, improve your care, and contact you when necessary.
3. Bill for your services: We can use and share your health information to bill and get payment from health plans or other entities.
4. Public health and safety issues: We can share your personal information with the following:
 - a. County Health Departments: in the case of a health outbreak or for periodic reporting
 - b. Comply with the law: we are Mandated Reporters
 - i. Child abuse
 - ii. Eldery abuse
 - iii. Sexual abuse
 - iv. Domestic violence
 - v. Sex trafficking
 - c. Workers' compensation, law enforcement, and other government requests
 - d. Respond to lawsuits and legal actions

Your Rights: You have the right to:

1. Get an electronic or paper copy of your medical record
 - a. You can ask to see or get an electronic or paper copy of your medical record and other health information we have about you. Email us at recordsrequest@root-therapeutics.com
 - b. We will provide a copy or a summary of your health information, usually within 30 days of your request. We may charge a reasonable, cost-based fee.
2. Ask us to correct your medical record



- a. We will review your request and respond to changes within 60 days of receiving the request. If for any reason, we decline a request, you will receive an explanation in writing within 60 days of receiving your request.
3. Request confidential communications
 - a. You can ask us to contact you in a specific way (for example, home or office phone) or to send mail to a different address.
4. Ask us to limit what we use or share
 - a. Advise us on how we communicate your condition with family, significant others, and friends.
 - b. If you pay for a service or health care item out-of-pocket in full, you can ask us not to share that information for the purpose of payment or our operations with your health insurer, unless we are required to by law
5. Get a copy of this privacy notice. download [here](#). If you require a paper copy, please contact us.
6. Choose someone to act as your Medical Power of Attorney
 - a. If you have given someone medical power of attorney or if someone is your legal guardian, that person can exercise your rights and make choices about your health information.
7. File a complaint if you feel your rights have been violated. No retaliation against you will occur for filing a complaint. You may use any of the following options:
 - a. Contact us at operations@root-therapeutics.com
 - b. Contact the U.S. Department of Health and Human Services Office for Civil Rights by one of the following:
 - i. Sending a letter to 200 Independence Avenue, S.W., Washington, D.C. 20201
 - ii. Calling 1-877-696-6775
 - iii. Visiting www.hhs.gov/ocr/privacy/hipaa/complaints/