



## **With Me When Privacy Policy**

Welcome to Accanto Health's, with brands The Emily Program and Veritas Collaborative, With Me When. We take your privacy seriously and want to ensure you are familiar with how we manage, use and protect your information. This Privacy Policy explains how Accanto Health's With Me When ("**With Me When**," "**we**," "**our**," or "**us**") collects, uses, and discloses information obtained through your use of its mobile and web-based apps and all related products and services (collectively, the "**Services**").

This Privacy Policy forms a part of the **Terms of Use**, which are binding terms between With Me When and all visitors of With Me When, including clients, parents/legal guardians, providers, and other individuals not affiliated with Accanto Health ("**Users**" or "**you**"). In providing the Services, we collect and obtain information about Users to, among other things, provide access to a mobile and web-based platform for eating disorder education and management. Your use of the Services is subject to this Privacy Policy as well as our Terms of Use.

This Privacy Policy provides the following information:

- A. What this Privacy Policy Covers
- B. Information With Me When Collects
- C. How With Me When Uses Your Information
- D. How With Me When Discloses Your Information
- E. Required Age to Use the Application and the Services
- F. Security and Confidentiality
- G. How We May Change this Privacy Policy
- H. Contact Information

**Please review this Privacy Policy and Terms of Use thoroughly and carefully. If you do not agree to this Privacy Policy, you may not access or use this Service.**

- A. What this Privacy Policy Covers:** This Privacy Policy covers how we use and disclose Personal Information or Protected Health Information that we gather from Users beginning at the time you first access the Services and on an ongoing basis as you continue using the Services. With Me When is dedicated to maintaining the privacy and integrity of the personal information and protected health information that we receive from Users or as a part of your use of the Services.

Under the federal law entitled the Health Insurance Portability and Accountability Act ("HIPAA"), "protected health information", which includes any information that can reasonably be used to identify an individual and that relates to the individuals physical or mental health condition, provision of care, or payment of such care, is safeguarded. HIPAA limits how we may use and disclose protected health information. We are also required to, among other things, apply reasonable and appropriate measures to safeguard the confidentiality, integrity, and availability of this information. Please be aware that this Privacy Policy is distinct from Accanto Health's or another provider's Notice of Privacy Practices, which describes in detail how Accanto Health or that provider uses and discloses protected health information. If a User would like to review Accanto Health's or their provider's Notice of Privacy Practices, the User should request a copy directly from the respective entity.

- B. Information With Me When Collects:** With Me When collects various Personal Information from you and certain devices that you may use, as further described below. This includes information gathered through applications, registrations, consent forms and your use of the Services. Collection starts from the time that you initially access our Services.

***Information Users Provide:***

With Me When collects any information that Users provide through the app or when you otherwise use the Services.

**Contact and Demographic Information** such as your name, email address, phone number, physical address, telephone number, medical record number, and date of birth.

**Health Information** such as information concerning a User's upcoming appointments or their dietitian prescribed meal plan and treatment goals.

**User Submissions** as further described in our Terms of Use; including but not limited to: a food log where Users can enter their meals and snacks for the day and/or take a picture of the meal or snack, add feelings about the meal or snack, as well as hunger/fullness before and after the meal; a daily and weekly goals section where Users can indicate and comment on how they are progressing with their goals, and a behaviors section

**Communications and Other Interactions** such as information we collect with our customer-support team or through other communications with us, including through feedback surveys and when you submit your name and email address to use so we can contact you.

***Information We Collect When Users Use Our Services:***

**Personal Information Collected Automatically.** In addition to any information that Users provide to us through the Services, With Me When and our third-party service providers may use a variety of technologies that store or collect certain information from you automatically (or passively) when you interact with With Me When and/or use any aspect of the Services ("Usage Information"). This Usage Information may be stored or access using technologies downloaded to your device whenever you visit or interact with the Services. Examples of Usage Information include: your IP address, cookies, web beacons, other unique device identifiers assigned to your device that allow our computers to recognize you, details of your device's characteristics and functionality (e.g. browser, operating system, mobile network information), the areas within With Me When that you visit and your activities there, your device's location, and certain other data regarding your device. You may be able to change browser settings to block and delete cookies when you access the Services through a web browser; however, if you elect to block or delete cookies, the Services may not function properly. To the extent we associate Usage Information with your Personal Information that we collect directly from you, we will treat it as Personal Information.

**Information from your Browser or Device.** We automatically receive and record Usage Information from your browser on our server logs whenever you interact with the Service. We may use this Usage Information to provide you with customer service and support. Our Services also collect Usage Information to determine how often visitors use parts of the Service so that we can improve our Services. We may provide this de-identified, aggregate data to our partners or third-party vendors to identify how Users use the Services, but we only use this data in an aggregate form as a statistical measure to monitor how the Services function and not in a manner that would permit us to identify you personally.

**C. How With Me When Uses Your Information:** Information that we gather through With Me When enables us to:

- Administer your Account;
- Provide you with the Services;
- Obtain your feedback on our Services;
- Understand who is using our Services and how the Services are performing;
- Otherwise analyze user behavior and activity;
- Improve our Services;
- Conduct research activities;
- Manage the security of the Services; and
- Fulfill any requirements imposed on us by applicable laws and regulations.

**D. How With Me When Discloses Your Information:** Except as otherwise described in this Privacy Policy, we will not disclose information that we collect about you on the Services to third parties without your written consent. In addition, to the extent permitted by applicable law, we may de-identify your information and process it in an anonymous and/or aggregated form such as through reports on user demographics, service performance and traffic patterns.

With Me When will not rent, sell or share information about Users with other people or non-affiliated companies for their direct marketing purposes, unless we have your written permission. With Me When may share information we receive with service providers retained in connection with the provision of the Services. For example, we may provide your collected information to our database hosting provider.

If you are a User and your account is linked to Accanto Health, employees of Accanto Health, whether administrative or clinical (“**Staff Person**”), may see information, including protected health information, about you. For example, a staff person may be able to view the contents of your meal and snack plans, diary cards, clinical outcome scores, consent forms and other information obtained within the Services. When you are linked to Accanto Health, staff persons may obtain the information about you through the Services and store it in their own systems. Staff persons may use this information for diagnosis, treatment, and payment related purposes.

If you are a User and a link between you and Accanto Health is discontinued, staff persons may continue to access for record and treatment related purposes the information posted by you prior to your termination of services. However, after the link between you and Accanto Health is terminated, staff persons will not obtain new and/or updated information about you unless you reconnect the link.

With Me When may access, preserve, and disclose your information if we believe doing so is required or appropriate to comply with applicable law, respond to requests from governmental authorities, such

as a court order or subpoena, respond to your requests, or protect yours', ours' or other's rights or safety.

- E. Required Age to Use the Application and the Services:** You must be 18 years of age or older to register or use the Site and the Services. If you are between the ages of 13 and 18, you may only access the Services under the supervision and approval of a parent/legal guardian who has agreed to the Terms of Use. If you are the parent or legal guardian of a child between the ages of 13 and 18, you may use the Services on behalf of such child. If you are under the age of 13, you may not use the Services.

By using the Services on behalf of a child between the ages of 13 and 18, you represent and warrant that you are the parent or legal guardian of such child and that all references to these Terms of Use to "you" shall refer to the child or for such individual for whom you have legal authorization to enter into these Terms of Use for, and you in your capacity as the parent or legal guardian of such child or individual. If you do not qualify under these terms, you may not use the Services.

We do not knowingly collect, maintain or use personal information from children under 13 years of age, and no part of the Services are directed to children under the age of 13. If you learn that your child has provided us with information, you may alert Accanto Health by contacting us at 800-364-5977 (The Emily Program) or 855-875-5812 (Veritas Collaborative). If we learn that we have collected any information from children under 13, we will promptly take steps to delete such information and terminate the child's account.

- F. Security and Confidentiality:** With Me When takes steps in effort to treat your information securely and confidentially and in accordance with this Privacy Policy and the Terms of Use. Unfortunately, we cannot guarantee that the internet and mobile networks over which our Services are delivered are 100% secure, and we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for unintentional disclosure.
- I. Changes to This Privacy Policy:** By using With Me When and its Services, Users agree to the current Privacy Policy and our Terms of Use, into which the Privacy Policy is incorporated. We reserve the right, in our sole discretion, to modify this Privacy Policy at any time. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used or disclosed. If we make changes in the way we use Personal Information, we will notify you by posting an announcement on the App and/or sending you an email. By continuing to access or use the Services after we have posted a modification or have provided you with notice of a modification, you are indicating that you agree to be bound by the modified Privacy Policy. If you do not agree with the Privacy Policy, please discontinue use of the Services.
- J. Contact Information:** If you have any questions or concerns regarding privacy on With Me When or if you want to make a request to access or correct your Personal Information, please contact Accanto Health's Privacy Officer at:

***By mail:***

Accanto Health  
Attn: Privacy Officer  
2265 Como Ave.  
St. Paul, MN 55108

***By phone:***

888-364-5977

We will make every effort to respond to your questions, concerns, or requests within a reasonable time.