

# Patient Privacy Policy

Assort Health, Inc.

Date last modified: 06/25/2026

## 1. SCOPE AND PURPOSE

This Individual Privacy Policy (this "Policy") describes how Assort Health, Inc. and our subsidiaries, and affiliated companies ("Assort", "we", "us", or "our") may collect, use, and share information about you that we obtain through our website, other websites and applications that link to this Policy, and the use of our Platform, as described in the next section (collectively, the "Services"). This Policy also applies to any information we collect through your use of or interaction with the Services, including offline or in other contexts in which we make this Policy available to you. This Policy does not apply to third party websites to which we provide links or to any services offered or provided by a third party to you. We do not control and are not responsible for the privacy practices of the websites or services of other entities and we urge you to review any applicable third party privacy policies for yourself.

## 2. WHAT DOES ASSORT DO?

We offer a software-as-a-service technology platform (the "Platform"). The Platform uses sophisticated machine learning algorithms and artificial intelligence capabilities to communicate with a patient and enable workflow automation with a physician or other clinician across voice, text, and internet modalities. We process data you provide on behalf of our healthcare clinician or organization customers. Our data processing is governed by the agreements we have with our customers, which often includes a Business Associate Agreement as applicable and required by the Health Insurance Portability and Accountability Act of 1996 and its implementing regulations ("HIPAA"). Where HIPAA is applicable to us, we only use your data as allowed by HIPAA and our agreement with our customers. Your healthcare clinician or organization will also have its own privacy practices and/or policies that govern how it collects and uses your data. We are not responsible for how your healthcare clinician or organization treats your data, and we recommend you review their privacy policies.

## 3. WHAT PERSONAL INFORMATION DO WE COLLECT?

Personal information is data that can be used to identify you. The types of personal information that we collect will depend upon your type of your interaction with us. Over the last 12 months, we have collected personal information that generally fall into the following categories:

- Identifiers, such as your name, email address, or IP address.
- Information contained in our customer records, or that you provide, such as postal address or telephone number.
- Internet or other electronic network activity information, such as how you interact with our website.

- Health information required to meet our obligations to our customers, such as to schedule an appointment, help with intake, manage a referral, and similar action.
- The healthcare clinician or organization that you interact with.

#### **4. HOW DO WE COLLECT YOUR INFORMATION?**

We may collect information from you in the following ways:

- We automatically collect your phone number and our Platform answers your inbound call.
- We collect information you provide to us through your use of our Services, such as filling forms on our website, sharing information during phone calls with Assort's technology, signing up for or requesting certain services or information, or calling our customer service. This information may include your name, gender, insurance information, address, email address, your telephone number, and your clinician's name.

#### **5. HOW DO WE USE YOUR INFORMATION?**

We use your information:

- To provide, enhance, and improve our Services to our customers.
- To identify and authenticate you.
- To communicate with you. To confirm your scheduled appointments, send you emails, updates, and information relevant to our services.
- To secure our Services and for our own internal legal compliance purposes.
- For other purposes explained at the time of collection, or for other business purposes consistent with the context of the collection of your information. We may create, use, and share deidentified, anonymized, and aggregated data that cannot be used to identify you for any legal purpose.

#### **6. HOW DO WE SHARE YOUR INFORMATION?**

Subject to applicable legal and regulatory requirements as well as our agreements with our customers, we may share your information as follows:

- With service providers and vendors that we use to provide our Services, such as hosting sites, artificial intelligence systems, and analytics. We have agreements with each vendor requiring the vendor to protect your data to the same degree that we need to protect it.
- To provide a service that you have requested from us or from others.
- As required by law or legal process to disclose information, and if required, in response to a lawful request by public authorities.
- Where we believe that it is necessary to avoid liability or violations of the law.
- To protect our rights and fulfill our responsibilities.
- To a buyer or potential buyer (and/or its agents and advisers) in connection with any sale or proposed purchase, merger, or acquisition of our business.
- Per your request or direction.

We may disclose deidentified patient information to third parties only when permissible under our contracts with our customers and in accordance with HIPAA or other applicable law.

We do not sell, rent, or share your phone number or SMS opt-in consent data with third parties for their marketing or promotional purposes. Phone number and SMS consent information are used solely for providing our Services and for communicating with you in accordance with your preferences. SMS consent data will not be shared with third parties except as necessary to provide messaging services (e.g., through our SMS platform provider) or as required by law.

## **7. RETENTION AND PROTECTION OF DATA**

We protect your information using at least industry standard administrative, physical, and technical safeguards. When we collect sensitive information, we encrypt the collection and transmission of that information. However, we cannot guarantee that the information we collect will be 100% secure. We retain information for varying time periods depending on the reason we collect and use the information. We retain information for the minimum amount of time required for our purposes, unless a longer time is required by law or our agreement with a customer. There may be technical or other operational reasons where we are unable to delete or de-identify your information. If this happens, we will comply with applicable legal requirements and take commercially reasonable measures to prevent further use or disclosure of your information.

## **8. STATE CONSUMER PRIVACY RIGHTS**

If you live in a state with its own specific consumer privacy legislation, you may benefit from additional rights. However, in many instances our Services are used by our customers to collect your information for the customer's healthcare services, which means the information we collect is often exempt from a state privacy law. If a state law does apply, then you may have the following rights:

- To confirm if we process your personal information.
- To access your personal information.
- To correct inaccuracies in your personal information.
- To delete your personal information.
- To receive a copy of your personal information.
- To opt out of the sale or sharing of your personal information.
- To opt out of the processing of your personal information for purposes of (i) targeted advertising or (ii) automated decision-making or profiling in furtherance of decisions that produce a legal or similarly significant effect on you.

If you live in a state that requires specific consent prior to processing your sensitive personal information and the law is applicable to how you use our Services, we will obtain the required consent and you may withdraw your consent at any time. If you live in a state where you get enhanced rights, then you may exercise the above rights by:

- Submitting a request to [privacy@assorthealth.com](mailto:privacy@assorthealth.com)

We may ask you to provide us with information to verify your identity before responding to your request. We will consider all requests and provide our response within the time required by applicable law. Some information may be exempt from state specific requests. If we deny your request, you may have the right to appeal the decision. If we deny your request and you have the right to appeal, we will provide you with information regarding the appeals process.

**State Law Privacy Notice**

Below are the categories of information that we may have collected about you in the last twelve (12) months, the purposes for the collection, and the third parties with whom your personal information may have been disclosed, or shared. For more information on these practices, please see Sections III-VI.

<b>Categories of personal information</b>	<b>Purpose for the collection</b>	<b>Third parties who may have received personal information</b>
Identifiers	To provide the Services	Healthcare clinicians and organizations
Information contained in our customer's records	To improve the Services and facilitate retrieval of medical records.	Third Party Partners and Business Associates of health care providers.
Professional or employment information	Business operations	Our related entities
Inferences drawn from other personal information	As required by applicable law	Healthcare clinicians and organizations

Depending upon the state where you live, you may have the following rights with respect to the personal information we process about you:

- To request information about the categories of personal information we have collected about you, the categories of sources from which we collected the personal information, the purposes for collecting or sharing the personal information, the categories of third parties with whom we have shared or sold your personal information, and the specific pieces of personal information we have collected about you.
- To request that we delete personal information that we have collected from you.
- To request that we correct inaccurate personal information that we maintain about you.

If you live in a state where you may be entitled to more privacy rights, you may submit a request to exercise the above rights by:

- Submitting a request to [privacy@assorthealth.com](mailto:privacy@assorthealth.com)

Only you, or someone you legally authorize, may make a consumer request regarding your personal information. You may also make a verifiable consumer request on behalf of your minor child. You may be required to verify your identity before we respond to your request. We may require you to use your email address to verify your identity. We will consider all requests and provide our response within the time required by law. Certain information may be exempt from

your requests. If we deny your request we will provide you with information explaining the appeals process. You may only make a consumer request for access or data portability twice within a 12-month period. We will not discriminate against you for exercising any of your rights.

### **Response Timing and Format**

We intend to respond to a consumer request within forty-five (45) days of receipt. If we require more time we will notify you in writing. Any disclosures we provide will only cover the 12-month period preceding the consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

## **9. MINORS**

We do not knowingly collect personal information from children under the age of 13. If you are under the age of 13, please do not submit any personal information through the Services. We encourage parents and legal guardians to monitor their children's internet usage and help enforce this Policy by instructing their children to not provide personal information through the Services without their permission. We do not knowingly gather personal information (as defined by the U.S. Children's Online Privacy Protection Act, or "COPPA") about children under the age of 13. If you believe we have collected information from a child in a manner not permitted by law, contact us by email at [privacy@assorthealth.com](mailto:privacy@assorthealth.com).

## **10. INTERNATIONAL TRANSFER**

We are based in the U.S. and the information we collect is governed by U.S. law. We do not currently direct our Services outside of the U.S. and do not seek non-U.S. customers. If you are accessing the Services from outside of the U.S., please be aware that information collected through the Services may be transferred to, processed, stored, and used in the U.S. and other jurisdictions. Data protection laws in the U.S. and other jurisdictions may be different from those of your country of residence. Your use of the Services or provision of any information therefore constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of information about you in the U.S. and other jurisdictions as set out in this Policy.

## **11. UPDATES TO THIS PRIVACY POLICY**

We reserve the right to make updates and revisions to this Policy at our discretion and at any time. When we make changes to this Policy, we will post the updated notice on <https://www.assorthealth.com/> and update the effective date. Any changes will be effective as of the "Effective Date" identified above. Your continued use of our Services following the posting of changes constitutes your acceptance of such changes.