

ORRUM ANALYTICS PLATFORM PRIVACY POLICY

Last Modified: [DATE]

Thank you for your interest in the Comprehensive Clinical Analytics dba Orrum Clinical Analytics (“Orrum”) Analytics Platform (the “Platform”). The Orrum Platform, accessible at <https://analytics.orrum.com>, is subject to this Privacy Policy, as well as our Terms of Use located at [LINK TO WEBSITE TOUs]. Collection and use of individually identifiable personal information (“personal information”) through the Platform is subject to this Privacy Policy. In the event of any conflict between the Website Privacy Policy located at [LINK TO WEBSITE PRIVACY POLICY] and this Policy, this Policy will control with respect to personal information collected and used through the Platform.

ABOUT THIS POLICY

The purpose of this Privacy Policy is to tell you how Orrum collects, uses, shares, and protects your personal information collected through the Platform. Orrum collects, uses, shares, and protects your personal information in accordance with the privacy principles set out below.

In some instances, an additional privacy policy may apply, and if it does, it will be made available on the application you are accessing. We will update this Privacy Policy from time to time, and update the Last Modified Date accordingly. If you use the Platform, you are agreeing to the Privacy Policy. Do not use the Platform if you do not agree with this Privacy Policy, and any other privacy policies that apply to the application you are using.

This Privacy Policy does not apply to information that has had identifiers removed or other actions taken so that an individual is no longer identified in the data (“De-identified Data”). For example, identifiers such as name, IP address, date of birth, or other data elements may be removed from certain data sets. Orrum may use de-identified data for any purposes permitted by applicable law, such as for Orrum operations, for research, or for the development of new services or products. Orrum may also share de-identified information with third parties, including researchers and companies that provide services to Orrum.

PRIVACY PRINCIPLES

Location Based Approach to Privacy Practices

Orrum processes personal information when it believes it has a legal basis to do so. Orrum determines the legal basis for use and processing of data based on the location of Orrum’s operations related to the Platform.

Our operations are based in, and are directed at individuals located in, the United States of America. If you are located outside of the United States, be aware that information we collect will be transferred to, and processed, stored and used in the United States. The data protection laws in the United States may not be as protective as those of the country in which you are located, and your personal information may be subject to access requests from governments, courts, law enforcement, or other third parties in the United States according to laws of the United States.

Certain laws protect categories of individuals, like minors or residents of certain states, or types of information, like health information, and we comply with those laws where they are deemed to apply.

For example:

- Orrum may collect and process data for purposes of fulfilling a contract or providing a service you have requested, for purposes of operating the Orrum Platform, or as permitted by law.
- Orrum is not subject to the Children’s Online Privacy Protection Act (“COPPA”) and does not intend to collect online personal information subject to COPPA from minors under the age of 13 without parental consent. If you believe that we have collected information from such a minor without parental consent, please contact us so that we may address it.
- If we no longer have a legal basis to use the information, such as if you revoke consent required by law for us to process your information and we grant the revocation, we will stop using your information, unless the information has been integrated into a database, it has been de-identified and is no longer identifiable as relating to you; if removal would adversely affect the integrity or accuracy of data used by Orrum, or we are required to maintain or use it for legal reasons or otherwise cannot honor the request. For example, under some circumstances, you may unsubscribe from certain marketing communications, and once we have processed the request, we will stop using your contact information to send marketing information to you.

Fairness and Transparency

We seek to support fairness and transparency in the management of individually identifiable information. This means that:

- Orrum receives information from its customers in order to calculate and display relevant analytics insights. Orrum may also receive information about the employees of its customers in order to authenticate their access to the Platform. This Privacy Policy seeks to inform you about our collection, use and disclosure of the information.
- You can ask us to delete personal information Orrum collected about you. Not all information is subject to this right. For example, if Orrum is required by law to retain information, or if deletion of information would adversely affect the reliability or integrity of data used by Orrum, it may not be possible to delete the information.
- You can ask to opt out of the sale of personal information.
- You have the right to exercise your privacy rights under the law. Orrum will not take an action against you because you exercised your privacy rights.

Limited Purposes

This Privacy Policy, or a disclosure at the time data is collected, provides information about how Orrum may use data. Orrum uses information that it collects to provide services, authenticate users into the Orrum Platform, for other compatible purposes, and to fulfill its mission, including analyzing and presenting health analytics data.

- If you provide your email address so that you can receive e-mails about a particular activity, we may send information about other topics that we believe are compatible with your request.

- If you submit information into a form on the Platform, the form may specify the intended uses of the information. Orrum may use the information for related and permissible purposes, as described in this Privacy Policy.
- We will use personal information to provide you with information, goods, or services or process transactions that you have requested or agreed to receive. For example:
 - We will use your personal information to process your registration with the Platform, where we may need to verify that your information is active and valid.
 - We will use personal information to manage and administer the Platform, such as managing user accounts.
- We may use your information to create new service offerings, to personalize your experience on any of the Platform, or to suggest specific content to you that may be most relevant to you.
- We may use your information to contact you about your use of the Platform, including changes to the Platform or the Platform's Privacy Policy. Users can determine if there have been changes in the Privacy Policy by checking its "last modified" date.
- We have the right to use information to prevent unauthorized, improper or illegal activities on the Platform.
- We will use information for internal business purposes.
- If you provide us your phone number, we may use it to communicate with you via phone call or text message, if that is consistent with the purposes for which you provided the phone number.

Data Minimization

Orrum seeks to only collect the information that is reasonably related to our permitted uses of your information. This includes the performance of services, product improvement, operation of the Orrum Platform and other operations, and as permitted by applicable laws and regulations. This may include sensitive personal information. Orrum may collect information directly from you, automatically collect it from your computer or other devices, or receive the information from our third party service providers. For example:

- Orrum directly and with the assistance of third party service providers (see below regarding cookies) uses tracking technologies that automatically track users of the Platform and observes user activity so Orrum can identify general user trends and improve the Platform based on those trends.
- Orrum may use information previously provided, as well as information submitted by you or your company, to verify the accuracy of your account, including that your account is active and valid.

Accuracy

Orrum seeks to maintain accurate information. If you advise us of an error affecting your personal data, we will evaluate the update and, if appropriate, correct the information unless we determine that the information is accurate and does not require updating, or updating the information is infeasible or inappropriate (for example, if removal of data would corrupt a database), or if the request for changes to information would result in data inaccuracies. We may also retain and not change information if permitted or required by applicable law, or if necessary to fulfill the purposes for which data was collected. You must ensure that information is accurate at the time you provide information to Orrum.

Integrity and Confidentiality

Orrum uses reasonable and appropriate safeguards to retain your information for the amount of time we need to use it and keep your information safe and secure as appropriate for the type of information. We seek to protect information from inappropriate use or disclosure to external parties, as well as parties internal to Orrum. For example:

- Orrum implements policies and procedures as well as training to help prevent Orrum workforce members from accessing personal information unless they need such information in order to do their jobs.
- Orrum maintains certain physical and electronic safeguards against improper uses and disclosures of any sensitive or regulated personal information.
- When Orrum works with a third party, like a data analytics company that requires Orrum to disclose information to the third party, Orrum endeavors to enter into agreements with the data analytics company requiring it to safeguard the information. Third parties performing services for Orrum are only allowed to use identifiable information for the purposes permitted by Orrum and applicable law.
- Please carefully consider the information you access and share through the Platform, because no electronic transmission of data, and no electronic storage of information, can be guaranteed to be 100% secure.

Account Management

Accounts will be monitored for inactivity and will be suspended after 90 days of detected inactivity. To have an account removed, please contact us at the email address below.

WHAT INFORMATION DO WE COLLECT?

Information You or Your company Disclose to Orrum

Orrum collects personal information that you or your company voluntarily provide to Orrum when you or your company express an interest in obtaining information about Orrum or Orrum products and services, when you participate in activities on the Platform or otherwise when you contact Orrum.

The personal information that Orrum collects depends on the context of your interactions with Orrum and the Platform, the choices you make and the products and features you use. The personal information Orrum collects may include the following:

- **Personal Information Provided by You or Your Company.** Orrum collects information of the identities of its users, which may include names; email addresses; phone number, and other similar information of users of the Platform in order to maintain accounts tied to individuals who use the Platform.
- **Aggregate Information.** If you adopt Orrum's services to visualize analytics data, we also receive information related to the performance of certain healthcare providers (i.e., monthly glucose performance numbers).
- **General Operation or Procedure Data.** Orrum may collect and surface for viewing general operation data, such as operation date, surgeon name, procedure type, and operating room time.

All personal information that you provide to Orrum must be true, complete and accurate, and you must notify Orrum of any changes to such personal information.

Information Collection and Tracking Technologies

The technologies we use for automatic information collection may include:

- **Cookies (or mobile cookies).** A cookie is a small file placed on your device. It may be possible to refuse to accept mobile cookies by activating the appropriate setting on your device. However, if you select this setting, you may be unable to access certain parts of our Platform. Unless you have adjusted your settings so that it will refuse cookies, the Platform will issue cookies when you use the Platform.
- **Flash Cookies.** Certain features of the Platform may use local stored objects (Flash cookies) to collect and store information about your preferences and navigation to, from, and on the Platform. Flash cookies are not managed by the same browser settings as are used for mobile cookies.
- **Web Beacons.** The Platform may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages and for other related app statistics (for example, recording the popularity of certain content and verifying system and server integrity).

Third-Party Information Collection

When you use the Platform or its content, certain third party tools or software may be incorporated within the Platform and may use automatic information collection technologies to collect information about you or your device. These third parties may include:

- Microsoft Corporation's Power BI Platform
- Origami Risk

These third parties may use tracking technologies to collect information about you when you use this Platform. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites, apps, and other online services websites. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used or interact with the Platform. These third parties may also have their own privacy policies that govern how they use any data collected.

ADDITIONAL DETAILS REGARDING HOW WE USE YOUR INFORMATION

Consent to Text Messaging, Phone Calls, and E-mails

By providing a phone number and/or email address to Orrum through a contact form or elsewhere on the Platform, you authorize Orrum and all of its independent contractors, agents and/or affiliates to contact you, including using autodialed calls, texts, robot calls, and artificial voices or prerecorded voices, at the telephone numbers you provided with regard to information about services, billing, collections and other account activities, and for advertisement and telemarketing

purposes. You are not required to provide this consent and this consent is not a condition to purchasing any property, goods, or services.

You understand that it is not possible to guarantee that any transfer of information over text messaging or e-mail is 100% secure. As a result, Orrum cannot guarantee the absolute security of your information when it is sent via a text message or e-mail. By asking Orrum to transmit information to you through text messaging or e-mail, you accept the risk that the transmission is not secure, and that your information may be exposed to a third party.

DISCLAIMER

WHILE ORRUM ATTEMPTS TO KEEP THE PLATFORM UPDATED, WE DO NOT GUARANTEE OR WARRANT THE ACCURACY, RELIABILITY, OR TIMELINESS OF ANY INFORMATION PUBLISHED ON THE PLATFORM OR ANY WEBSITE THAT LINKS TO OR IS LINKED FROM THE ORRUM PLATFORM. NEITHER ORRUM NOR ANY SUBSIDIARY OR AFFILIATE, NOR ANY EMPLOYEE, OWNER, DIRECTOR, TRUSTEE, EMPLOYEE, OR CONTRACTOR SHALL BE HELD LIABLE FOR ANY LOSSES CAUSED BY RELIANCE ON THE ACCURACY, RELIABILITY OR TIMELINESS OF SUCH INFORMATION. IF YOU RELY ON ANY INFORMATION OBTAINED USING THIS PLATFORM YOU DO SO AT YOUR OWN RISK. WHILE WE EXERT REASONABLE EFFORTS TO MAINTAIN THE PRIVACY AND SECURITY OF ALL INFORMATION THAT IS ACCESSIBLE, OR ACCESSED, THROUGH THE PLATFORM, YOU ACKNOWLEDGE THAT ELECTRONIC INFORMATION IS SUSCEPTIBLE TO UNAUTHORIZED ACCESS, AND THAT SUCH INFORMATION MAY BE USED, DISCLOSED, MODIFIED OR CORRUPTED WITHOUT AUTHORIZATION OR UNINTENTIONALLY.

CHANGES TO THIS PRIVACY POLICY

We have the discretion to update this Privacy Policy at any time. When we do, we will revise the “last modified” date at the top of this page. We encourage you to frequently check this page for any changes to stay informed about how we collect and use your information. You acknowledge and agree that it is your responsibility to review this Privacy Policy periodically and become aware of modifications.

CONTACT INFORMATION

If you have any questions about this Privacy Policy, the Platform, or your information, you may contact us by any of the following methods:

<u>E-mail:</u>	privacy@orrum.com
<u>Phone:</u>	734-853-1110
<u>Mail:</u>	Privacy 45207 Helm Street Plymouth, MI 48170
<u>Website:</u>	www.orrum.com