

## FLASHCARE PRIVACY POLICY

This Privacy Policy shall be an electronic contract between the User (hereinafter referred to as “You” with all its grammatical variations) and LEONYN SOLUTIONS PRIVATE LIMITED (Hereinafter referred to as the “Application”, “FlashCare”, “we”, “our”, or “us” with all its grammatical variations). This Privacy Policy governs the practices of FLASHCARE™ concerning information we obtain by and through your use of the FlashCare™ mobile application (the “Application”) and the services provided through the Application (the “Services”). FlashCare™ is committed to respect your privacy and recognize your need for appropriate protection and management of personally identifiable information (“PII”) and Protected health information (“PHI”) you share with us. The purpose of this Privacy Policy is to explain the types of information FlashCare™ obtains about users of our Application and/or Services, how the information is obtained, how it is used, how it is disclosed, how you can get access to this information, and the choices you have regarding our use of, and your ability to review and correct, the information. By using the Application and/or Services, you are accepting and consenting to the use of your information as described in this policy. We will not accept any Personally Identifiable Information or Protected Health Information from you prior to providing you with this Privacy Policy. If you don’t agree and concur with this Privacy Policy, please don’t use the application. You are hereby advised to review this Policy carefully.

This Privacy Policy applies only to FlashCare™’s Application and Services and becomes effective as soon as you use the Application. Any medical services rendered by any independent Physician are subject to that particular Physician’s or associated Medical Practice’s own privacy standards or policies.

### Information That You Give Us.

When you register on the Application, we collect personal information that can identify you (“Personally Identifiable Information” or “PII”) such as your full name, email address, mailing address, telephone number and other government issued ID info. We also may collect PHI or protected health information (“Protected Health Information” or “PHI”) from you when you make any request for service on the application. The submission of PII shall also be a prerequisite for creating a profile, commenting on articles, completing surveys or posting any content on the Application.

The information that we collect varies, depending upon how you use our Services. When you enroll, you will be required to provide us with health-related information that a Physician will need to determine whether he/she is willing to provide medical services to you. That information will be associated with your profile. Any PHI that you provide through the Application which briefly describes your symptoms (or those of any minor for whom you request Services) will be sent to an independent Medical Practice and Physician, if available, to be used for treatment and processing your payment for the Visit, and other health care operations.

FlashCare™ will not use any PHI for any other purpose without your written authorization, or unless otherwise permitted or required by law. You may revoke, such authorization at any time, by submitting a written revocation letter to us, except to the extent that such revocation shall not affect the actions of FlashCare™ which has already taken place before such revocation and under the reliance of prior authorization. FlashCare™ will not have any independent access to any independent Medical Practice’s detailed health record, if any, created as a result of a Visit.

WE DO NOT KNOWINGLY ENROLL OR COLLECT INFORMATION DIRECTLY FROM USERS UNDER THE AGE OF EIGHTEEN. HOWEVER FLASHCARE™ SHALL NOT BE RESPONSIBLE FOR ANY COLLECTION OF PII OR PHI THROUGH THE APPLICATION IN ANY CASE WHERE THE USER CONSCIOUSLY MISREPRESENTS TO BE OVER 18 YEARS OF AGE OR MISTAKENLY SUBMITS THE PII OR PHI UNDER THE IMPRESSION THAT SUCH REQUIREMENT OF 18 YEARS OF AGE IS NOT APPLICABLE TO THE USER.

Please keep in mind that certain features on the Application give you an opportunity to interact with others and us. These may include forums, message boards, chats, creating community profiles, rating, tagging and commenting on articles. When you use these features you should be aware that any information you submit, including your name, location, health issues, and email address, may be publicly available to others. We do not protect your privacy and are not responsible for your disclosure of any information through these interactive features, including, but not limited to information that you might post related to a minor.

Also, whenever you voluntarily disclose anyone’s personal information on publicly viewable web pages, that information can be collected and used by others. For example, if you post your email address, you may receive unsolicited messages. We cannot control who reads your posting or what other users may do with the information that you voluntarily post, so we encourage you to exercise discretion and caution with respect to information you choose to disclose through these interactive features. When an individual chooses to post information that will be publicly disclosed, he or she is responsible for all legal consequences. We are not responsible under any data protection laws for information that you voluntarily post on a site that can be accessed by others.

If you believe that FlashCare™ has violated your privacy rights, you should contact us at the mailing address or e-mail address provided below. If you believe that an independent Medical Practice or Physician has violated your privacy rights regarding PHI, you should contact the Medical Practice directly. You may also file a complaint with the appropriate judicial forum or government authority for such illegal invasion of your privacy by a Medical Practice or Physician.

## Other Information We Collect.

**Protected Health Information.** In the process of connecting you with an independent Medical Practice, to provide you with their medical services, the Application may collect PII and PHI from you and transmit it electronically to the Medical Practice or Physician. We will use administrative, physical, and technical safeguards to protect the security and privacy of information held in the Application. Our infrastructure is kept in a secured cloud server, which is protected from unauthorized access. Only authorized personnel can access the data. Currently we are not backing up our data servers and there may be a loss of data. We regularly upgrade our system software to include the latest security features. Our servers are protected by a firewall system, which is designed to keep unwanted traffic or access out of our computer network. We also use security methods to determine the identity of each registered user, so that appropriate rights and restrictions can be enforced for that user. Reliable verification of user identity is called "authentication." All communication between our Web Server, your browser and our mobile apps is encrypted with SSL (Secure Sockets Layer) to guard against network eavesdroppers. Your authentication is through SMS verification and this will help prevent unauthorized access to the system by anyone other than you.

Neither FlashCare™ nor any other party, not working directly with the independent Medical Practice shall be authorized to access PHI kept by the independent Medical Practice. FlashCare™ will transmit any PHI describing your symptoms (or that of any minor for whom you are requesting Services) to any independent Medical Practice in a secured electronic transaction. If you wish to communicate with an independent Medical Practice or Physician directly by email or other electronic means, you may request that those communications be sent through a system that protects your confidentiality, and based on such request the confidentiality of your PII and PHI shall be protected/secured. However, such requests shall be subject to applicable law, and if the applicable law provides otherwise, your electronic communications may not be secure.

**Cookies.** Our Application may use cookies and other technologies to collect information. Cookies are small bits of information that our websites place on the hard drive of your computer. We may use cookies to facilitate your login processes; allow you to personalize and store your settings; collect usage information; determine our total audience size and traffic; and help us improve our sites by measuring which areas are of greatest interest to users.

**Tracking and/or Analytics Services.** We may use mobile application tracking and/or analytics services. These services may record unique mobile gestures such as tap, double-tap, zoom, pinch, scroll, swipe and tilt but do not collect personally identifiable information that you do not voluntarily enter in the Application. These services do not track your browsing habits across mobile applications which do not use the same services. We are using the information collected by these services to understand user behavior and optimize site performance.

**Non-Personally Identifiable Information.** We also collect Non-Personally Identifiable Information that is not health information or medical information in the form of statistics and information regarding the Application user's statistics and metrics obtained from third party devices. We may also request the following optional information as part of your profile so that you can fully enjoy the features and functions of our Services: your weight, height, and gender

**Mobile Device Information.** Your use of the Application may also include collection of information from your mobile device. For example, the Application may request your permission to collect location data and/or may request access to multimedia (photos or videos) stored on your mobile device. Location data is not required for participation in activities through the Application, and you have the option of declining collection of geo-location data. If you do not wish for your location data to be shared with FlashCare™, please respond accordingly when prompted on your mobile device, or visit your mobile device settings. Multimedia will only be collected from your device if you affirmatively select it to upload to the application (i.e. you choose an image or video to store within the Application). Multimedia will not be shared with other Application users (with the exception of your profile photo, which will appear in your user profile). Additionally, the permissions at the time of download shall be governed by Applications Marketplaces like Google play store, or Apple App Store, or such other Applications marketplace, and FlashCare™ shall not incur any liability in relation to your user agreement with such applications marketplaces.

## How We Use Your Information.

Subject to this FlashCare™ Privacy Policy, the Terms of Service, and applicable terms and conditions of third-party applications, all data transmitted through the Application is owned by FlashCare™; provided, however, that PHI that you provide for the purpose of scheduling a Visit with an independent Medical Practice will be solely owned by the Medical Practice. To the extent FlashCare™ is precluded from owning data transmitted through the Application, you grant FlashCare™ a perpetual, worldwide, royalty-free license to use such data (with the exception of PHI) to the extent necessary to enable use of the Application and Services. Generally, we may use information in the following ways:

- For the purposes for which you specifically provided it including, without limitation, to enable us to process and fulfill your Membership, provide the Services or other requests.
- To communicate with an independent Medical Practice and Physician.
- To send you information about your relationship or transactions with us.
- To notify you about our products, services, and special offers, except that FlashCare™ will not use PHI for marketing purposes without your prior written consent for yourself or your minor child.
- To otherwise contact you with information that we believe will be of interest to you.

- To enhance or develop features, products and services.
- To allow us to personalize the content that you and others see on the Application.
- To provide advertisers and other third parties with aggregate information about Application users and Application usage patterns.
- To allow other select companies to send you promotional materials about their products and services, provided that no personally identifiable PHI will be used for this purpose without your prior written consent.

We use Non-Personally Identifiable Information for purposes such as measuring the number of users of various features of the Application, making the Application more useful to users and delivering targeted advertising and non-advertising content. We may also use Non-Personally Identifiable Information (for example, statistics regarding use and metrics) for research purposes, for marketing and promotional purposes, and to develop new learning tools and solutions and we may share such information with third parties, including researchers and/or advertisers, on an aggregate and anonymous basis. We use IP addresses to analyze trends, administer the Application, track a visitor's movement, and gather demographic information for aggregate, non-personally identifiable use.

You acknowledge that unless you request in writing, FlashCare™, in its sole discretion, has the right but shall not have the obligation to store any information, whether Personally Identifiable Information or otherwise, perpetually or temporarily. If you wish for any information about you to be removed from our database, please contact us through the contact information provided below in the "How to Contact Us" section of this Privacy Policy. We will not use your health related information for any purpose other than to provide you with the Services and/or customer support services you request from us, subject to other provisions of this Privacy Policy.

### Sharing Your Information.

Except as otherwise described in this Privacy Policy, or if we inform you otherwise at the time of data collection and receive your consent where required, we will not sell, trade, or share your information with third parties.

We may share your information as follows:

**Medical Practices and Physicians:** We will share your information with the independent Medical Practice and Physician who respond to your request. The Physician may contact you via telephone prior to departing to your location, to ensure that they are equipped to handle your medical case and that you are available at the location of the Visit. The Physician's treatment of your information is subject to the Physician and Medical Practice's own policies and procedures. Any PHI that we collect from you will be kept private and secure, as required by law, and in accordance with this Privacy Policy.

**With Affiliates:** We may share your PII with affiliated companies and businesses, provided that your PHI will not be shared for any marketing purposes without your prior written consent, in accordance with applicable law.

**With Service Providers:** We may use other companies to perform services including, without limitation, facilitating some aspects of our Application such as processing credit card transactions sending emails, and fulfilling purchase requests. These other companies may be supplied with or have access to your PII solely for the purpose of providing these services to you on our behalf. Such service providers shall be bound by appropriate confidentiality and security obligations, which may include, as applicable, business associate contract obligations.

**With Business Partners:** When you make purchases or engage in promotions offered through our Application, we may share PII, but not your PHI with the businesses with which we partner to offer you those products, services, and promotions. When you accept a particular business partner's offer, you authorize us to provide your information to that business partner.

**With other Service Providers:** We occasionally will share, on an anonymous basis, information and data on Application users with third party providers who provide targeted services, such as advertising or data analysis on our behalf. This sharing of information does NOT include any PII or PHI.

### Special Circumstances:

We also may disclose your PII :

- In response to a subpoena summons, or similar investigative demand, a court order, or other request from a law enforcement or government agency where required by applicable law.
- When disclosure is required or allowed by law in connection with efforts to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of our company, our users, our employees, or others; to comply with applicable law or cooperate with law enforcement; or to enforce our Application's terms and conditions or other agreements or policies.

- In connection with a corporate transaction, such as the sale of all or a portion of our business, a divestiture, merger, consolidation, or asset sale, or in the event of bankruptcy, as required or allowed by law.

### **How to Access or Update Your Information.**

You have the ability to review and update your personal information, including PHI that FlashCare™ is managing for you through your Application account by visiting the account section on the Application. You can also review and update your personal information or PHI by contacting us at the email address provided below in the “How to contact us” section of this Privacy Policy.

**How We Protect Your Information:**We use commercially reasonable administrative, technical, and physical measures to safeguard your PII and PHI in our possession against loss, theft and unauthorized use, disclosure or modification. We follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it. No method of transmission over mobile applications is 100% secure, however. Therefore, while we strive to make all reasonable efforts to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. In the unlikely event of a data breach, you will be notified as soon as reasonably possible, in accordance with applicable law. Furthermore, we are not responsible for any breach of security or for any actions of any third parties that receive the information, including without limitation any breach of security or for any actions of a Medical Practice or Physician.

**Changes To Our privacy Policy:** From time to time we may revise this Privacy Policy. If we make revisions that change the way we collect or use your PII or PHI, those changes will be posted in this Privacy Policy and the effective date will be noted at the end of the Privacy Policy. Therefore, you should review it periodically so that you are up to date on our most current policies and practices. If we make material changes to our practices regarding use of your PII or PHI, your PII or PHI will continue to be governed by the Privacy Policy under which it was subject prior to those changes, unless you have been provided notice of, and you have not objected to, the changes.

**Children's Online Privacy:**We support and comply with the best practices of Children’s Online Privacy Protection and we do not knowingly collect information from children under the age of 18, nor do we share such information with third parties. Children under the age of 18 may not use the Application. If you seek Pediatric Services for a minor, you will be responsible for providing information related to the minor and for paying for Services requested for the minor.

**Links To Third Party Sites:**Our Application may contain links to websites or applications operated and maintained by third parties, over which we have no control. Privacy policies for these third-party sites and applications may be different from our Privacy Policy. You access these third-party sites and applications at your own risk. You should always read the privacy policy of a linked site or applications before disclosing any personal information on such site and/or through such applications. FlashCare™ is not responsible for information you submit to third-parties.

**How To Contact Us:**If you have any questions, comments or concerns about our Privacy Policy, you may contact us at [info@flashcare.in](mailto:info@flashcare.in) or by writing a letter to:  
9-1-1A, Beside Manasa Theatre  
Upstairs, Kavali, Andhra Pradesh-524201  
India  
Email: [info@flashcare.in](mailto:info@flashcare.in)

**Effective Date:**This Privacy Policy is effective as of Jan 09, 2018.