

DWA Healthcare Communications Group, Inc.

Privacy Policy

Effective February 24, 2020

This Privacy Policy (the “Privacy Policy”) applies to websites (each, a “Website”) operated by or for the following entities (collectively referred to herein as “DWA”, “us,” “we” and “our”):

- Forefront Collaborative, Inc.
- Avant Healthcare Marketing, Inc.
- Avant Healthcare Solutions, Inc.
- AVAIL Services, Inc.
- DWA Healthcare Communications Group, Inc.

This Privacy Policy reflects DWA’s policy regarding the nature, purpose, use, and sharing of any information collected via any Website or product that is owned or managed by DWA.

By accessing the Website, you indicate that you have read, understand and agree to this Privacy Policy, as well as our Terms of Use (the “Terms”) [<https://dwahcg.com/dwaprivacy/dwatermsfuse.pdf>]. You understand that through your use of the Website, you consent to the collection and use of your information as set forth in the Privacy Policy.

PLEASE READ THE FOLLOWING CAREFULLY AS IT CONTAINS IMPORTANT INFORMATION REGARDING YOUR LEGAL RIGHTS, REMEDIES AND OBLIGATIONS.

If you do not agree with the Privacy Policy or Terms, you should exit the Website immediately.

The following subject areas are covered in this document:

- Personal Information
- Automatically Collected Information
- How We Use Collected Information
- Information Security
- Website Security Notice
- Google Analytics
- Cookies
- Interaction With Children
- Accessibility Statement
- Linking Policy and Disclaimer of Endorsement
- GDPR and CCPA

- Access, Correction, Opting Out of Services, and Updating Your Information

Personal Information

DWA may collect information that can identify you, such as your name, address, telephone number, email address, and other similar information ("Personal Information") when it is voluntarily submitted to us.

Remember that email isn't necessarily secure. You should never send sensitive or personal information in an email.

Some of our Websites ask visitors who request specific information to fill out a registration form. For example, healthcare professionals registering online for a program will be asked to provide their contact information. Other information collected through questionnaires, feedback forms, or other means enables us to determine visitors' interests, with the goal of providing better service to our customers.

Automatically Collected Information

We collect and temporarily store certain technical information for use in site management and security purposes. This information includes:

1. The Internet domain from which you access our Websites.
2. The IP address (a unique number for each computer connected to the Internet) from which you access our Websites or services.
3. The type of browser (eg, Chrome, Safari, Firefox, Internet Explorer) used to access our Websites.
4. The operating system (Windows, Mac) used to access our Websites or services.
5. The date and time.
6. The URLs of the pages you visit.
7. Your username, if it was used to log in.
8. The URL of the forwarding site, if you visited a DWA Website from another site.

Except for authorized law enforcement investigations, no attempts are made to identify individual users or their usage habits. Raw data logs are retained in accordance with our internal policies and as required for security and site management purposes only.

How We Use Collected Information

We will use information we collect to:

- Operate and improve the Website and customize it for your needs;
- Provide you with the services and communications that you request;
- Respond to your requests for information and/or complaints;

- Offer you services that may be of interest to you;
- Enforce compliance with this Privacy Policy, the Terms of Use and/or applicable laws and regulations; and
- Compile aggregate (not personally identifiable) data.

Information Security

DWA does not and will not sell your Personal Information for marketing purposes.

We may share Personal Information with agents, contractors or partners of DWA in connection with services that these individuals or entities perform for, or with, DWA. These agents, contractors or partners are restricted from using this data in any way other than to provide services for DWA, or services for the collaboration in which they and DWA are engaged (for example, some of our products are developed through joint agreements with other companies). We may, for example, provide Personal Information to agents, contractors or partners for hosting our databases, for data processing services, or so that they can send you information that you requested, consistent with our internal policies.

Any other information gathered by DWA (ie, non-identifiable information such as IP addresses or other information gathered by our web logs or cookies) may be included in databases owned and maintained by DWA or its agents. DWA retains all rights to these databases and the information contained in them and we will use them as set forth herein.

DWA reserves the right to share Personal Information to respond to duly authorized information requests of governmental authorities or where required by law. In exceptionally rare circumstances where national, state or company security is at issue, DWA reserves the right to share our entire database of visitors and customers with appropriate governmental authorities.

Website Security Notice

For site security purposes, our computer system employs software programs that monitor network traffic to identify unauthorized attempts to upload or change information. Anyone using this system expressly consents to such monitoring and is advised that if such monitoring reveals evidence of possible abuse or criminal activity, such evidence may be provided to appropriate law enforcement officials.

Unauthorized attempts to upload or change information on DWA servers are strictly prohibited and may be punishable by law, including under the Computer Fraud and Abuse Act of 1986.

Google Analytics

To help us analyze how users interact with a Website, we use Google Analytics, which is a Web analytics service provided by Google, Inc. that uses cookies. Google Analytics collects information that helps us analyze how a user interacts with a Website, such as where they came from, how much time they spent on the site or a particular page, what links they clicked, duration of their visit, and their IP address. Google Analytics does not collect any personal information that could be used to identify an individual, such as their name, phone number, address, Social Security number, or credit card information.

By using the Websites, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Google Analytics provides an opt-out option using the Google Analytics Opt-Out Browser Add-On for users who do not want this information to be collected on their behalf. For more information about Google Analytics Opt-Out Browser Add-On, please click on the following link: <https://tools.google.com/dlpage/gaoptout>.

Cookies

A cookie is a small file that a Website transfers to your computer to allow it to remember specific information about your session while you are connected. Your computer will only share the information in the cookie with the Website that provided it, and no other Website can request it. There are two types of cookies, session and persistent. Session cookies last only as long as your Web browser is open. Once you close your browser, the cookie disappears. Persistent cookies store information on your computer for longer periods of time.

DWA Websites may use session cookies for technical purposes such as to enable better navigation through the site, or to allow you to customize your preferences for interacting with the site. A few DWA Websites may also make use of persistent cookies to remember you between visits so, for example, you can save your customized preference settings for future visits. Each DWA Website using persistent cookies identifies itself as doing so.

At no time is your private information, whether stored in persistent cookies or elsewhere, shared with third parties who have no right to that information. If you do not wish to have session or persistent cookies stored on your machine, you can turn them off in your browser. However, this may affect the functioning of some DWA Websites.

Refusing and/or Controlling Cookies. Most of the Website will still be visible to you if you elect not to allow cookies to be placed on your computer; however, as mentioned previously, certain functions, such as becoming a registered user, may not be available. For more information on how to control and delete your browser cookies, please refer to this site <http://www.aboutcookies.org/default.aspx>.

Interaction With Children

The Children's Online Privacy Protection Act (COPPA) governs information gathering online from or about children under the age of 13. Verifiable consent from a child's

parent or guardian is required before collecting, using, or disclosing personal information from a child under the age of 13.

We collect no information about you or your child, other than that collected automatically or via cookies (as detailed in the previous sections regarding those subject areas), when you visit our Website unless you choose to provide such information to us. If a child under 13 years of age inadvertently provides personal information to one of our sites, the information about the child will be deleted immediately upon discovery.

Accessibility Statement

We continually strive to ensure our Websites and products are accessible to individuals with disabilities in accordance with Section 508 of the Rehabilitation Act. If you have any difficulty viewing a page or using a product with adaptive technology, please contact the [Web administrator](#) for this site.

Documents on DWA Websites are presented in many formats. These formats are generally accessible to users using screen reading software. Some files on this Website may be posted as Adobe Acrobat Portable Document Format (PDF) files. Adobe provides their Acrobat Reader software as a free download.

Linking Policy and Disclaimer of Endorsement

DWA links to websites created and maintained by other public and/or private organizations. DWA provides links to these sites as a service to our users. The presence of a link is not a DWA endorsement of the site.

When users follow a link to an outside website, they are leaving DWA and are subject to the privacy and security policies of the owners/sponsors of the outside website(s). DWA is not responsible for the information collection practices of non-DWA sites.

GDPR and CCPA

In an effort to implement best practices regarding data collection and security, DWA seeks to comply with the General Data Protection Regulation law of the European Union (the “GDPR”) and the California Consumer Privacy Act (the “CCPA”). We collect Personal Information and aggregate data for certain business and commercial purposes and share this information with the categories of third parties as described above. DWA does not sell (as such term is defined in the CCPA) the Personal Information we collect (and will not sell it without providing a right to opt out). Please note that we do use third-party cookies for our advertising purposes as further described in the **Cookies** section above.

You may request disclosure of your Personal Information we collect through the Website, and you may request information on how long DWA stores your Personal Information. We will verify your request using the information associated with your account, including email address. Government identification may be required. You can

also designate an authorized agent to exercise these rights on your behalf. DWA will provide the first requested copy of such information for free, but DWA may charge a reasonable fee or refuse to comply with requests that are clearly unfounded, repetitive or excessive.

You may also request that DWA delete all personal data that DWA has about you. DWA will seek to honor such requests within thirty (30) to sixty (60) days.

DWA may also refuse a request for access to or deletion of Your Information when necessary to comply with legal obligations or to establish, exercise or defend legal claims.

You may also opt-out of DWA's collection and use of your Personal Information.

DWA does not discriminate against consumers who exercise rights under the GDPR or CCPA.

Access, Correction, Opting Out of Services, and Updating Your Information

To request access to your Personal Information, deletion of your user account, removal from our contact lists, or to update your Personal Information, please contact DWA using one of the following methods:

Email: privacy@dwahcg.com

Phone: 1.317.208.3600

You may send mail to the following address:

DWA Healthcare Communications Group

Attn: Privacy Officer

630 W. Carmel Drive, Suite 180

Carmel, Indiana 46032

USA

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