

Privacy Declaration (Customer Facing Privacy Policy)

Original Issue Date: September 2022
Current Version Date: September 2022
Current Version No.: Version 1.00

Approval Authority: Chief Information Officer
Responsible Authority: Information Technology Department
Policy Main Contact: Chief Information Officer

Policy Statement/Reason For Policy

This policy provides a customer facing privacy policy.

This Policy Applies To

This policy applies to customer facing applications and systems.

Policy

Commitment To Privacy

SpendMend LLC ("SpendMend") values your patronage and is firmly committed to protecting your privacy. This Privacy Policy ("Policy") describes the information collection, use, protection, and sharing practices of SpendMend websites, mobile applications, electronic communications, social media pages, and properties. This Policy sets forth the principles that govern our treatment of personal data. We expect all employees and those with whom we share personal data to adhere to this Policy. This Policy applies to all personal data in any format or medium, relating to all customers, prospective customers, employees, suppliers, and others who do business with SpendMend.

If you have any questions or concerns about this Policy, please contact us using the methods in the "Contact Us" section.

Information We Collect and How It Is Used

Device and Browser Information

What information? When you use the Internet, your computer may transmit certain information to the servers that host the websites you visit. The information may include: (i) your computer's operating system, (ii) your web browser, (iii) your IP address, (iv) the duration of your use; (v) the pages viewed; (vi) search words; and (vii) dates and times that our site is accessed. We also use "cookies" to help us recognize you and serve you better. A "cookie" is a small text file that a website can place on your computer to store your preferences. Cookies are not personally identifiable by themselves, but they can be linked to personal data you provide to us.

How is this used? This information is used to enhance the user experience and marketing purposes. We currently use "cookies", including Google Analytics, on our website to detect your web browser's multimedia capabilities and to provide a unique identifier to your computer so that we can generate statistics regarding general customer website usage. Cookies may also be used to help accelerate your future activities or to improve your user experience by

remembering information from your computer that was not voluntarily provided by you (e.g. during registration) but does not include data that will identify you personally. Most web browsers allow some control of cookies through your browser settings. You can opt out of cookies and advertising related to the same by visiting the Network Advertising Initiative opt-out page: <http://www.networkadvertising.org/choices>. According to its own policy, Google does not collect any personal data using Google Analytics. Nevertheless, if you do not want to use the remarketing feature from Google, you can disable it by changing the appropriate settings at <http://www.google.com/settings/ads>.

You have many choices to manage cookies on your computer. Most browsers allow you to block or delete cookies from your system, and you can set most browsers to prevent cookies from being placed on your devices. If you do this, however, you may have to manually adjust preferences every time you visit our website(s), and it may not be possible to use the full functionality of the website(s). To learn more about your ability to manage cookies, please consult the privacy features in your browser.

Online Surveys

What information? Occasionally, we may also ask you to fill out an online customer survey to obtain your suggestions or feedback.

How is this used? This is used to enhance the guest experience. Providing this information is solely at your discretion.

Contact and Other Personal Information

What information? When a healthcare provider engages with SpendMend services, these providers might provide us with (and/or we may collect) contact and other Personal Information such as your name, date of birth, postal address, e-mail address, and telephone number. Also provided for the services may be medical device types and associated information such as serial numbers, coded billing information for financial audits, and associated cost amounts.

How is this used? The usage of this information is to provide the SpendMend service set to the healthcare providers in tracking medical device warranties and audited financial transactions.

Video Surveillance

What information? Any individuals visiting SpendMend facilities are subject to video surveillance on closed circuit camera system.

How is this used? Video surveillance cameras are used to protect us, our visitors, and our employees. We monitor our surveillance cameras and may share surveillance footage with law enforcement and/or regulatory authorities.

Wi-Fi and Location Information

What information? When you use Wi-Fi services that we make available at SpendMend for our visitors, we might collect information about the websites you visit, the type of device and browser you are using, your device identification number, your precise physical location, bandwidth used, session time, etc.

How is this used? This information is used to enhance the visitor experience and ensure service availability.

Social Media Information

What information? When you use integrated social media features on SpendMend, or other social media websites or mobile applications, or when interacting with SpendMend on social media platforms, we may obtain information such as your name and e-mail address, and videos, recordings, and images of you.

How is this used? This information may be used to enhance the customer experience, for marketing purposes, or to fully respond to your inquiry, request, or communication.

Other Information

What information? We may obtain information about you from third parties, including entities that direct you to, are located at, or are accessible via, SpendMend business partners, family members, and friends.

How is this used? This is used for marketing purposes and enhance the customers experience at SpendMend.

Employment Application Information

What information? If you apply for a job with us, we might ask for certain information about you including, for example, your work and education history, and your profile/résumé.

How is this used? This is used during the hiring assessment process.

How We May Use Your Information

Your privacy is important to us. We collect and use information we believe is necessary to our business, and to provide you with the products, services, and experiences you expect when you interact with us. When we collect and use your information, we take your privacy and security very seriously.

We collect personal data to deliver superior quality of service. We may use the information you provide to us for the purpose you provided it to us (e.g., in the hiring process), which is stated when information is collected. We may also use your information in other ways for our business purposes and to provide you with the products, services, and experiences you request and expect from us, including but not limited to the following purposes:

- fully respond to your inquiries, requests, or communications.
- to provide you and third parties with products and services.
- to develop new products and services.
- to improve and personalize the customer experience.
- to audit, research and conduct analysis in order to maintain and improve our services and protect customers.
- for marketing, market research and analysis, customer satisfaction and quality assurance surveys.
- to ensure third parties protect your information.
- to consider your job application.
- to comply with applicable laws and regulations.
- for safety and security, including working with third parties to help protect your information.
- to ensure the technical functioning and security of our network.
- to protect the rights or property of the SpendMend, its employees, and its customers.

How We Share Information

We may share information about you to third parties as indicated below:

Affiliates: We may share your personal data with our other properties, subsidiaries, and third parties if we need to. If we share your information, we will share only the information that is necessary, and we will take reasonable steps to make sure that third parties take prudent steps to protect your information.

Agents: We use others to help us provide some of our products and services (e.g., maintenance, IT support, analysis, audit, payments, marketing, development, and security). Unless we tell you differently or as described elsewhere in this Policy, our agents are expected not to have the right to use your information beyond what is needed to assist us.

Legal Requests: We may be required to respond to legal requests for your information, including from law enforcement authorities, regulatory agencies, third party subpoenas, or other government officials.

Compliance with Legal Obligations: We may have to disclose certain information to auditors, government authorities, or other authorized individuals in order to comply with laws that apply to us or other legal obligations such as contractual requirements.

Your Choices Regarding Your Information

For all personal data that we have about you, you have the following rights and/or choices that we will strive to accommodate where your requests meet legal and regulatory requirements and do not risk making other data less secure or changing other data:

Opt Out, Object, Withdraw Consent: You can always choose not to disclose certain information to us. Where we rely on your consent to process your personal data, you have the right to withdraw or decline consent at any time. If you have provided us with your email address and you would like to stop receiving marketing emails from us, click on the unsubscribe link at the bottom of any of our email communications. If you do not wish to receive marketing communications from us via direct mail, or if you want to request that we do not share your contact information with our marketing partners, please contact us using the methods in the Contact Us section and include your name, address, and any other specific contact information that you wish to restrict. Please do not email any sensitive information such as social security number or date of birth.

Access, Correct, Update, Restrict Processing, Erase: You may have the right to access, correct, and update your information. You also may request that we restrict processing of your information or erase it. To ensure that all of your personal data is correct and up to date, or to ask that we restrict processing or erase your information, please contact us using the methods in the Contact Us section below.

Data Portability: If you would like to request that we provide a copy of your information to you, please contact us using the methods in the Contact Us section below.

Responding to Requests: Each request to access, correct, restrict processing, erase, or provide a copy of data will be evaluated to determine whether the requested change meets legal regulatory requirements and does not risk making our other data less secure or changing our other data. These requests will involve an identification process to ensure the legitimacy of the individual making the request.

Our Commitment To Data Security

SpendMend strives to take every reasonable precaution to keep your personal information secure. We have put in place appropriate physical, electronic, and managerial procedures to safeguard the information we collect including encryption of information in transit, technological safeguards such as firewalls for protection and monitoring, advanced endpoint security, and processes for handling of information.

While we cannot guarantee that loss, misuse, or alteration of information will never occur, we strive to prevent it. Please keep in mind that no method of storage or transmission over the Internet is completely secure, so your use of our products and services and provision of information to us is at your own risk.

External Links

The SpendMend website(s) may provide links to other websites. We do not endorse the materials disseminated at other websites. We are not responsible for the content, validity, privacy policies or reliability of any website linked to the SpendMend website(s).

Changes To This Policy

We reserve the right to modify or change this policy at any time, simply by posting such changes on the SpendMend website(s). Any such change, update, or modification will be effective immediately upon posting. If a change is made the last modified date at the bottom of this policy will be updated to reflect the change. Visitors to this website are advised to check back periodically for any changes.

Contact

For questions regarding this Privacy Policy or to submit any of the requests mentioned above relating to your personal data, contact us using any of the following options:

Mail:

SpendMend Data Privacy Officer
2680 Horizon Drive SE
Grand Rapids, MI 49546

Email:

privacy@SpendMend.com

The request will be reviewed and processed, and a response can be expected within a reasonable timeframe.

Distribution

N/A

Definitions

N/A

Procedures

N/A

Frequently Asked Questions

N/A

Related HITRUST Domains/Controls

HITRUST Domain & Control No.	HITRUST UID
19.11	19379.13fHIPAAOrganizational.4

History

Date	Approved By	Version	Comments
September 26, 2022	Jeremy Toth	1.00	Reviewed and approved.