

## Privacy

Healthroads ("Healthroads.com") is an Internet-based personal health improvement program. It is designed to provide individuals with an evidence-based educational resource for fitness planning and health related lifestyle improvement. Healthroads.com is made available through Healthroads, Inc., a subsidiary of American Specialty Health Incorporated ("ASH"). Healthroads.com values its users and respects their privacy. We collect personal information in an effort to improve the user experience and to communicate information about our products and services. Healthroads.com is committed to using personal information responsibly.

For the purposes of this Privacy Statement the terms "We" and "Our" refer to Healthroads.com, and the terms "User" or "You" mean an authorized user of the Healthroads.com.

Healthroads.com will not release, sell, rent, or trade your personal information to any third party without your permission, except when we believe in good faith that the law requires it, or to protect our own rights and properties, or as outlined in this Privacy Statement. Healthroads.com considers personal information to include, but not be limited to, name, e-mail address, mailing address, phone number, user I.D. and passwords, credit card information, and personal health information.

Healthroads.com may use and/or provide your personal information to your plan sponsor, health plan, or other entities that have contracted with your plan sponsor or health plan, for the administration of your wellness program or to provide you with other health-related services available through your plan sponsor and/or your health plan. In certain limited situations, Healthroads.com may be required to provide your employer with personal information to perform billing, eligibility, and other administrative functions. In these situations, Healthroads.com requires recipients of the information to ensure that there are safeguards in place so that personal information is only used for the purposes noted. If information is disclosed to plan sponsors who are employers, then such information is required to be used for benefit administration purposes only. To learn more about how Healthroads.com protects personal health information and personally identifiable information, please refer to this Privacy Statement. By accessing and using the services on Healthroads.com, you acknowledge that Healthroads.com may provide this information as noted above.

You should read and familiarize yourself with this Privacy Statement and with our Terms & Conditions. When you use our site, you agree to abide by these Terms & Conditions. For any questions about this Privacy Statement, please contact us directly. Healthroads.com will respond to any questions within 10 business days from the date of receipt. Contact Healthroads.com directly through any means noted at the end of this Privacy Statement. If information practices change, Healthroads.com will post the revised policy on Healthroads.com or will notify users through direct communication.

## What kind of personal information does Healthroads.com collect?

During the initial registration process, Healthroads.com collects information from you such as name, gender, date of birth, phone number, email address, and mailing address. You may choose not to provide this information, but you will not be able to access or use Healthroads.com if you choose not to provide the information. Once registered, you may enter health-related information such as weight, body measurements, and health habits into your account using certain Web site features, such as Health Survey and Health Trackers. You are not required to enter personal information into these areas. However, if you chose not to provide the personal information, you will be able to access these functions, but you will not be able to track your progress.

Any personal information you enter into Healthroads.com, including but not limited to, registration information, product purchase information, as well as any information you enter into the interactive tools on Healthroads.com (interactive tools include, but are not limited to, personal health assessment, e-coaching courses, exercise planners, meal planners, health trackers, and Actiped) may be disclosed to your plan sponsor, health plan, or other entities that have contracted with your plan sponsor or health plan, to aid in the administration of your benefit plan or wellness program including auditing or medical management purposes. Please also be advised that any information regarding coaching appointments, coaching records, inquiries and incentives may too be disclosed if applicable to your plan sponsor, health plan, or other entities that have contracted with your plan sponsor or health plan, to aid in the administration of your benefit plan or wellness program for the purposes noted above and elsewhere in this Privacy Statement.

Healthroads.com may also collect demographic information from users, such as age, gender, and areas of interest, as well as information regarding the "IP address" that is used to identify your computer on the Internet and information obtained by tracking the "clickstreams" from your usage of our Web site. We use this information to improve our site, by measuring interest, traffic, and usage patterns. We may share this information with third parties, in a non-personal, aggregate form only. If your membership is sponsored by your employer, or other entity, we may share information with that party in aggregate form only. For example, we may report to your employer the participation information about its members using Healthroads.com services, or the frequency of their collective use.

We will also use this personal information to contact you if necessary or, if you choose to receive e-mail from us or our partners, to send you newsletters, and to inform you about special offers or events that might interest you. We will not knowingly sell, rent, or trade the personal information we collect, or that you have entered into Healthyroads.com. However, we may learn of the third parties who provide products or services that we believe may be of interest to you. If you have agreed to receive e-mail from us, we may notify you on such third parties behalf. You always have the option to change your mind about receiving emails from Healthyroads.com. Simply follow the unsubscribe directions in the footer of our newsletters and promotional emails.

You may change or delete your personal information at any time by logging on to the site and reviewing your account information. Submit and save any updates to your information. If you chose to provide personal information within a particular feature, such as the Health Survey or Health Trackers, you can change or delete that information by visiting those features and submitting the appropriate changes.

Personal Health Information (PHI) and Personally Identifiable Information (PII) cannot be removed from the system and will be retained for a minimum of 7 years in accordance with the record retention policy. User accounts, however, may be disabled upon written request, using the contact information at the end of this privacy statement.

## **Pebble Purchases on Healthyroads.com**

If you make purchases via Healthyroads.com to support the use of a Pebble device, you may need to provide us with more detailed personal information so that we can complete your order. If you chose to pay by credit card through the site, you must provide us with a valid credit card number and expiration date, the name on the credit card, the card verification number, the corresponding billing address and the shipping address, if different (as well as other shipping addresses if you are sending any items as gifts). We may provide the shipping information to one or more of our agents (for example, a fulfillment service). These agents have committed to abide by our Privacy Statement and have agreed not to share or release your personal information.

When registered members make a purchase on the Web site, we will store some information, such as billing and shipping addresses, to speed up subsequent transactions. We strongly recommend that you never share your password with anyone. Thereafter, we will never ask for your account information and password by e-mail. If you receive such a request, it may be from an individual or group falsely claiming to be an established legitimate enterprise in an attempt to acquire private information.

## **How does Healthyroads.com protect the privacy of minors?**

Healthyroads.com is concerned about the safety of children when they use the Internet. As such, Healthyroads.com does not permit children under the age of 18 to register for an account on Healthyroads.com.

## **Protecting Yourself**

Healthyroads.com will protect your privacy as described in this Privacy Statement, however, you should keep in mind that if you voluntarily disclose personal information online, especially confidential health information, it is possible that despite our efforts, information may be accessible by others. You can help guard against this by not giving anyone else access to your personal computer, such as or family member. And never give out your user I.D. or password to your Healthyroads.com account.

## **What are cookies? How does Healthyroads.com use cookies on its site?**

A cookie is a small data file that Web sites often store on a computer's hard drive when their sites are visited. A cookie may contain information (such as a unique user ID), that is used to track the pages of the sites visited.

Healthyroads.com uses cookies to enhance your experience while navigating our Web site by storing and tracking your preferences.

Your browser is probably set to accept cookies. However, if you would prefer not to receive cookies, you can change your browser settings to refuse them. If you choose to have your browser refuse cookies, it is possible that some areas of our Web site will not function properly when you view them, and you may have to enter personal information every time you use the Web site.

## **How does Healthyroads.com ensure information is secure?**

In order to maintain the confidentiality of personal information, Healthyroads.com enforces strict company-wide policies regarding privacy, security, and confidentiality.

ASH has an organizational commitment to protecting privacy and security. All employees who work on Healthyroads.com are aware of security policies and practices through employee orientation and annual refresher training. Personal information is secured in an isolated database with tightly restricted access. Employees authorized to view this information are authenticated prior to gaining such access.

ASH reviews Web security on an ongoing basis. In addition to daily security administration and response activities, the ASH environment undergoes an overall security review on an annual basis.

Healthyroads.com uses Secure Sockets Layer (SSL) technology to protect the security of online order information. Users will see an unbroken key or a closed lock (depending on the browser used) in the lower left-hand corner of the browser window when SSL is active and the server is secure. The URL line of the browser will also contain "https"; instead of "http". Some versions of browsers and some firewalls don't permit communication through secure servers. In that case, users will not have the ability to connect to the server and therefore won't have the ability to place an order through an unsecure connection. Orders can be made over the phone by calling 1-877-330-2746 if access to the secure server cannot be accomplished.

## **How to contact Healthyroads.com for questions?**

Questions may be submitted online using Healthyroads.com's Contact Us page. Healthyroads.com is available through Healthyroads, Inc.; which is a subsidiary of American Specialty Health Incorporated ("ASH"), a privately held corporation. All Healthyroads.com site operations are conducted and maintained by staff affiliated with ASH. ASH is a Delaware corporation domiciled in California, with the corporate office located at 10221 Wateridge Circle San Diego, CA 92121.

U.S. Mail: Healthyroads.com Customer Service  
P.O. Box 509040

San Diego, CA 92150-9040  
Phone: 1-877-330-2746  
E-mail: [service@healthyroads.com](mailto:service@healthyroads.com)

## **Changes to Our Privacy Policy**

ASH reserves the right to make changes to this Privacy Statement at any time by posting its new policy on the Web site. Modifications shall be effective when they are posted on this Web site. Such posting shall constitute notice to you. Your continued use of the Web site following the posting of any such modifications on this Web site will mean you accept and agree to be bound by such modifications.

Any changes to this Privacy Statement that affect the use of your personally identifiable information will not be applied to you until your continued use of this Web site following the posting of any such modifications of this Privacy Statement to the Web site, or until you have otherwise consented to the modifications.

We encourage you to check the Web site regularly to see if we have made any modifications to this Privacy Statement.