



PRIVACY POLICY

Protecting your privacy and the privacy of your child’s health information is incredibly important to us. As a signatory to the Student Privacy Pledge, Healthmaster® Holdings LLC (referred to as “Healthmaster”, “we”, “our” or “us” in this Privacy Policy) we will NEVER: (1) collect, maintain, use or share student personal information beyond that needed for authorized school purposes; (2) sell your child’s personal health information; or (3) use or disclose any information collected in our program for behavioral targeting of advertisements to parents or students.

The rest of our Privacy Policy is written in easy to understand language and we urge you to take the time to read how Healthmaster protects and secures your child’s health information. In this Privacy Policy, as a user of our service as either: (i) the parent, legal guardian or legal representative of a student whose health records are recorded and stored in your child’s school district’s HealthOffice® Anywhere database (Database) or (ii) the student whose health records are recorded and stored in the Database **and who is also over 18 years of age**, will be

referred to as “you” or “your”. When we refer to a “parent” in this Privacy Policy, we also mean a legal guardian, legal representative and/or the student over 18 years of age whose health records are recorded and stored in the Database.

What is HealthOffice® Anywhere?

HealthOffice® Anywhere (HealthOffice) is a Web-based electronic student health records application developed and provided by Healthmaster to school districts under a web services agreement to be used by district-authorized, school-based health care providers and administrator’s in documenting, tracking, analyzing and reporting of school health services and other information related to students in the school district. All student information is contained in the school district’s Database. Instead of using pen and paper, HealthOffice helps make the process easier, more accurate and easily accessible to authorized individuals. Health services may include emergency or medication visits to the school nurse, immunizations and screenings given to your child and behavioral health visits to a school psychologist to name a few.

What is HealthOffice Portal?

The HealthOffice Portal (Portal) is a secure, school-district specific web site hosted by Healthmaster on its servers located in a secure, third-party data center. The Portal allows authorized school health officials and you to communicate with one another, distribute and collect forms and permits you to view certain parts of your child’s or children’s health records on-line in a manner that is secure, private and complies with federal law. Our smart-phone/tablet application (App), available for free download from the App Store^{®1} or Google Play^{™2}, is an encrypted and secure way to access the Portal when you are not near a computer.

¹ The App Store is a service mark of Apple, Inc.

² Google Play is a trademark of Google, Inc.

How is Student Data Entered into the Database?

Healthmaster does not *collect or obtain* any student data. Rather, all data is either transmitted into the Database electronically or entered into the Database via HealthOffice by people who have been authorized to do so by a school district.

Once your school district (sometimes also referred to as a Local Educational Agency or LEA) agrees to use Healthmaster's services, including HealthOffice, Healthmaster becomes authorized by the Family Educational Rights and Privacy Act (FERPA), a federal statute, to *receive and securely handle* personally identifiable information contained in student records. The HealthOffice Database receives student information electronically from the school district's student information system (for example, your child's name, date of birth, school grade and the like), from health information entered into the program by school-based or your child's personal health providers (for example to document a visit to the nurse or an immunization) and from you (for example to authorize a procedure or inform the school of an allergy). If your school district uses Healthmaster to bill Medicaid or private insurance companies for health services, we also receive information from your state's health database or from those health insurers.

You cannot directly enter, change or delete any data into your student's health record in HealthOffice. Data transmitted to the school district through the Portal must be reviewed by an appropriate, authorized school district employee who then may input the data into HealthOffice and change your child's health record in the Database.

Who Owns the Student Health Data in the Database?

The data within the Database is property of, and under the control of, the school district. Healthmaster does not own any of the student information or health data or the school district created data within the

Database. The collection, input, use, retention, disposal and disclosure of any and all student information is controlled solely by the school district. Healthmaster will not delete, change, modify or disclose any information in the Database without specific written instruction from the school district.

You have the right under state and federal law to correct erroneous information that may have been put into the Database. You must contact the school district to correct your student's health record, if needed.

Does Healthmaster Collect any Other Information?

User Collected Data: HealthOffice automatically tracks and stores data about anyone who logs into the application to ensure that s/he is an authorized user, to track the time/day/date of each session and to ensure that all inputs and changes to a student's health record are properly recorded. Each person authorized by the school district to use HealthOffice has a unique user identification and password.

Parent Collected Data: When you register for the Portal or App and create an account, you will be prompted to provide several student identifiers, the email address you previously shared with the school district, and a new password.

Session Collected Data: We automatically collect certain types of usage information when you view the Portal and use the App. We use cookies — a small text file containing a string of alphanumeric characters — to record current session information, and to remember you for subsequent sessions. You are required to log back into your account after a certain period of time has elapsed to protect you against others accidentally accessing your account contents. We also log information about your usage of the Portal and App (e.g., the pages you view, the links you click and other actions you take). This information may include analytics tools to help us measure traffic and usage trends.

How does Healthmaster use the Information Collected?

Healthmaster does not permit any advertising in HealthOffice, the Portal or the App. Therefore, none of the information collected by Healthmaster or contained in the Database is used to target advertising to parents or students.

Use of Student Data: Healthmaster exercises limited access to student information, as determined by the school district, and only then for the purposes of providing support to school district users of HealthOffice. HEALTHMASTER DOES NOT SELL, PROFIT FROM OR DISCLOSE STUDENT INFORMATION TO THIRD PARTIES; NOT INDIVIDUAL, AGGREGATED, DE-IDENTIFIED, OR OTHERWISE STATISTICALLY MANIPULATED DATA. EVER. We have too much respect for the privacy rights of your student(s) and family.

The Health Insurance Portability and Accountability Act (HIPAA) is a federal law that establishes standards to protect the privacy of health information sent to health care providers and payers. If the school district is using the billing module in HealthOffice for your child, the school district is required to have your consent in order to transmit your student's personal health information to the federal government, state government or insurance companies (as appropriate) to obtain reimbursement to the school for health services provided to your child. Healthmaster fully complies with HIPAA and sends HIPAA-Compliant claiming information electronically as it has been received from the school district. Our employees do not read or review any particular claims information unless absolutely necessary for product support.

Use of Parent and Session Data: We use or may use data collected through cookies, device storage, log files and device identifiers to: (a) remember information so that You will not have to re-enter it during subsequent visits; (b) provide and monitor the effectiveness of HealthOffice, the Portal and/or App (c) monitor aggregate metrics such as total number of visitors, traffic and usage to improve our services; (d) diagnose or fix technology problems; and (e) help users efficiently

access information after signing in. Healthmaster does not track its users over time and across third-party websites to provide targeted advertising. The Portal does not therefore respond to Do Not Track (DNT) signals.

How does Healthmaster Securely Store Student Information?

We take pride in our security measures. All of the student information in HealthOffice, the Database and its related services are stored in the United States in an off-site, third-party data center in Michigan on servers and equipment used only by Healthmaster. The data center's compliance with commercially reasonable, industry-standard measures to protect the confidentiality, security and integrity of the data are independently audited and verified annually. The data center has multiple backup and power systems to allow for anytime access. The data center performs frequent diagnostics, operating system updates, security-monitoring and threat assessments.

All data is stored in a fashion that electronically obfuscates the data and maintains a barrier between the identifiable data and its health data counterpart. Login data and all transmission of data to and from the Portal and App are encrypted through SSL encryption. All security related data is encrypted to provide maximum user security and to meet all electronic signature requirements. Within our infrastructure, data from each school district is laid out in infrastructure silos as to keep all the data separated. HealthOffice can only be accessed by strict compliance with a school district's password and login policies and each user session is logged to ensure the integrity of the data entry.

Healthmaster has strict policies about data handling within our organization with emphasis on security. Only a limited number of Healthmaster employees are granted the right to inspect and review student educational and health records. These employees must agree, in writing, to maintain the confidentiality of the information contained in those records.

Unfortunately, no security measures are infallible. Although we do our best to protect your personal information, we cannot completely guarantee its security. Healthmaster is not responsible for the circumvention of any privacy settings or security measure or for the failure of users or parents to protect their login information. In the unlikely event of a data security incident that has or might compromise the privacy of your child's or your data and that we are aware of, we will notify the school district and you as soon as possible.

How Secure are the Portal and App?

The school district will provide you with a link to access the Portal so you can go directly to the Portal Website and self-register. The App has a similar self-registration feature. After entering in data about your student, some personal information including the email on file with the school district and accepting the Terms of Use, you will be prompted to change your password. You must then validate your email as another security check. Your password and your actions to protect your security, including the security features and software on your computer and/or smart phone, prevents others from accessing your student's personal health information.

How you protect your login and password information is critically important for the privacy and security of your child's health information while using the Portal and App. The security of your child's health data is only as strong as the weakest security link. We therefore suggest the following:

Choose your passwords carefully: Always create a password that's easy for you to remember but difficult for someone else to figure out. **Don't** use your name, address, phone number, initials, Social Security number, license plate or birthday. **Don't** use names of your friends, family, or pets, company names, common numerical sequences or the word password.

Do use a mix of special characters, numbers, and uppercase and lowercase letters. **Do** use a short phrase you can easily remember with **spaces** between the words. Also, remember to change your password frequently and never give your password to anyone.

Log out and close your browser: Leaving your Web browser open and computer unattended gives an opportunity for someone that has access to your computer to view private information. When you finish your online session, close your browser to erase any information it may have temporarily stored on your computer.

Install antivirus software and spyware protection: Viruses are dangerous. Many viruses are sent as email attachments. They can slip into your system without your knowledge the moment you open the email. Some viruses can capture the contents of your system, including your passwords. Installing up-to-date antivirus software and running it will help thwart these and other unwanted programs.

Spyware is a program or technology that aids in gathering information about a person or organization, often without their knowledge. The best way to identify whether or not spyware is installed on your computer is to run and regularly update anti-spyware programs. Similar to antivirus software, anti-spyware software identifies and helps you remove spyware.

The Portal and App are secure – but we cannot protect you or your privacy from unauthorized people who have obtained your username and password or if your smart phone is lost or stolen. We are not liable to you or responsible for unauthorized use of your username and password. Contact your school district immediately if you believe your password has been compromised and they will close access to your account until you have changed your password.

How will Healthmaster use Email Addresses for the Portal and App?

Except in limited circumstances, Healthmaster will not contact you using your email address. All questions regarding the Portal or the App should be directed to the school district.

The Portal and App are designed to notify you via email or text message that there is a message for you in the Portal. You can then view the message securely in the Portal on your computer or the App on your smart phone. You will chose to receive an email, text message or both during registration. The school district will not send *confidential information* to your email address; you will only be notified that you that a secure message is waiting for you in the Portal.

This is important. **FOR SECURITY REASONS, ONLY SEND STUDENT INFORMATION THROUGH THE PORTAL OR APP. DO NOT SEND THE SCHOOL DISTRICT OR ANYONE ELSE YOUR CHILD’S HEALTH INFORMATION OR ANY FORM THROUGH YOUR REGULAR EMAIL.**

Does Healthmaster Comply with COPPA?

Protecting the privacy of young children is especially important to us. HealthOffice complies with all applicable state and federal laws regulating student and health privacy. The federal Children's Online Privacy Protection Act (COPPA) is also designed to prevent the collection and use of information from children under age 13.

HealthOffice is intended for use solely by school districts and direct service providers to your children. The Portal and App are designed to be used by parents to provide your child’s health information to the school district, answer questions, review portions of your student’s health record and sign necessary forms.

Healthmaster does not permit anyone under age 13 from using HealthOffice Anywhere, the Portal and App and does not knowingly collect any information from anyone under age 13. If we come to find out that we have received information from a person under age 13, we

will immediately contact the school district to investigate and purge the information from HealthOffice Anywhere files.

In order to use the Portal and App, you must attest that *all* of the following must be true: (i) you must be at least 18 years old and have not been removed from using the service under our Terms of Use; (ii) you are the student whose information is being provided or the student's parent, guardian or other lawful representative; (iii) you have agreed to be bound by the Terms of Use; and (iv) your use complies with all state and federal laws and regulations.

Can Healthmaster Share Data With Others?

As we stated above, the data within the school district's Database is property of, and under the control of, the school district. At the school district's written request and as provided for in our written agreements, Healthmaster will provide the school district or third parties that the school district designates (for example, state health or education departments for required reporting) with the data and reports that it requests in a manner consistent with state law and school district internal policies of which we are aware.

Healthmaster can also share or transfer student health information: (i) if required by law or in response to legal process (for example, in response to a court order or subpoena); (ii) if we believe that it is necessary to investigate, prevent or to take action against illegal activities, suspected fraud, violations of Healthmaster terms of use or situations involving potential threats to the physical safety of any person, or (iii) if Healthmaster is sold to another company, provided that the acquiring company adopts this or a similar Privacy Policy.

Is There Additional Information for California Residents?

Under California Civil Code Section 1798.83, also known as Shine the Light you are entitled to request and receive, free of charge, a report of where your child's personal information was shared for direct marketing

purposes. This is an easy disclosure for Healthmaster. We have not nor will we share student health information with other companies for their direct marketing use.

We also fully comply with California Code Section 22584 and 22585 of the California Business and Professions Code, also known as the Student Online Personal Information Protection Act, or SOPIPA. Healthmaster does not sell student information, does not target students or parents for marketing or advertising purposes and does not use student information to create a “profile” of any student for any non-school purpose.

Do Users Outside the United States have Different Privacy Protections?

HealthOffice Anywhere is currently only sold in the United States and the Portal and App are intended solely for users located within the United States. If you choose to use the service from other regions of the world with laws and regulations governing data collection and use that may differ from those of the United States, please note that you are transferring personally identifiable student information to the United States for processing and storage. By using the Portal and App, you acknowledge and consent to application of federal and state laws of the United States to such use, transfer and storage of personally identifiable student information.

Can Healthmaster change this Privacy Policy?

Yes. We reserve the right to update this Privacy Policy but we will give you 30 days prior notice by posting the proposed Privacy Policy on the Parent Portal Website (and highlighting the changes) before the changes will become effective. No changes will be retroactive. If we update the Privacy Policy, the notice will explain the changes to be made as well as our reasons.

IF YOU DO NOT AGREE TO THE CHANGES, CONTACT THE SCHOOL DISTRICT USING THE PORTAL OR BY EMAIL AND

THE SCHOOL DISTRICT WILL WORK WITH YOU TO DELETE
YOUR ACCOUNT.

Dated: July 8, 2016