



## Privacy Policy and Terms of Use

Please note, Alluma's ongoing collection, purposes for collection or use, sharing, selling, and retention of Personal Information/Sensitive Personal Information are performed in accordance with the disclosures in the table below.

<b>Categories of Personal Information Collected</b>	<b>Categories of Sources</b>	<b>Commercial/Business Purpose for Collection</b>	<b>Is the Personal Information Sold or Shared?</b>	<b>Categories of Third Parties with Whom Alluma Sold or Shared PI</b>
<b>Identifiers</b> Examples: Full name, email address, phone number, account login, IP address	You; service providers; and other tracking technologies on our website	Processing or fulfilling transactions; debugging to identify and repair errors that impair existing intended functionality; providing internal analytic services; providing Customer services; protecting against malicious, deceptive, fraudulent or illegal activity	Yes	Service providers; payment processors; third parties that assume control over all or part of the business in connection with a merger, acquisition, bankruptcy, or similar event; affiliates, professional advisors; law enforcement authorities; those involved in legal proceedings, with consent.
<b>Internet and other network activity</b> Example: Browsing activity	You, Your mobile devices and computers used to access our Site	Marketing, customer, or analytic services; enabling or effecting, directly or indirectly, a commercial transaction	Yes	Vendors such as medical services providers, third-party marketers, cloud providers, and service providers in the online advertising industry.



<p><b>Commercial Activity</b></p> <p>Examples: Information about goods or services purchased, obtained, or considered</p>	<p>You, Your mobile device and computers used to access our site</p>	<p>Processing or fulfilling orders and transactions; marketing, customer or analytic services</p>	<p>Yes</p>	<p>Vendors such as health care providers and systems, health care service providers, data aggregators, third-party marketers, cloud providers, service providers in the online advertising industry and other suppliers to the health care industry.</p>
<p><b>Professional or Employment-related Information</b></p> <p>Examples: Job history, educational history</p>	<p>Applicants; corporate customers; and outside sources, such as credit bureaus. (e.g. National Practitioner Identifiers (NPIs), Drug Enforcement Administration (DEA) Numbers, office locations and addresses collected from our customers, governmental sources and health care claims aggregators</p>	<p>Process and evaluate applications for positions with Alluma; facilitate administrative purposes, such as payments to contractors, marketing, customer or analytic services; provide services for customers' health care operations</p>	<p>Yes</p>	<p>Service providers, such as HR vendors or cloud providers</p>
<p><b>Social Security, Drivers License, State Identification Card, or Passport Number</b></p>	<p>Employment applications, resumes, HR documents, email, phone correspondence, documentation completed throughout the application and employment terms</p>	<p>Performing services on behalf of the business</p>	<p>No</p>	<p>N/A</p>
<p><b>Account Login, in combination with the required security or access code, password, or</b></p>	<p>Alluma HR, Alluma IT Security</p>	<p>Performing services on behalf of the business, ensuring the security and integrity, undertaking activities to verify</p>	<p>No</p>	<p>N/A</p>



<b>credentials allowing access to an account</b>		or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by Alluma, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by Alluma		
<b>Geolocation Data</b>	Alluma IT Security	Performing services on behalf of the business, ensuring the security and integrity, undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by Alluma, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by Alluma	No	N/A
<b>Medical Information or Health Insurance Information</b>	Alluma's employee health insurance plan documentation and associated forms, employee health applications	Performing services on behalf of the Alluma, or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, providing	No	N/A



		storage, or providing similar services. Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business.		
<b>Personal information collected and analyzed concerning a consumer's sex life or sexual orientation</b>	Alluma's employee health insurance plan and associated forms, employee health applications	Performing services on behalf of the Alluma, or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, providing storage, or providing similar services. Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance	No	N/A



		the service or device that is owned, manufactured, manufactured for, or controlled by the business.		
<b>Biometric Information</b> Examples: Image and video recording	Security systems, HR Documentation, IT Security	Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes. Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business.	No	N/A



(i) **Categories of Personal Information Alluma has Disclosed for a Business Purpose in the Last Twelve (12) Months**

The following table summarizes (a) the categories of Personal Information that Alluma collected, (b) the categories of sources from which Personal Information was collected, (c) the business purpose for collection, (d) the categories of third parties with whom Alluma has disclosed Personal Information, (e) the categories of third parties with whom Alluma discloses Personal Information, and (f) the associated retention period for each category of Personal Information over the preceding twelve (12) months. As reflected in this table, we may disclose your personal information to a variety of outside entities.

Please note, Alluma’s ongoing collection, use, disclosure, and retention of Personal Information are performed in accordance with the disclosures in the table below.

Categories of Personal Information Collected	Categories of Sources	Commercial/Business Purpose for Collection	Is the Personal Information Disclosed to third parties?	Categories of Third Parties with Whom Alluma Disclosed PI	Categories of Third Parties with Whom Alluma Discloses PI
<b>Identifiers</b> Examples: Full name, email address, phone number, account login, IP address	You; service providers; and other tracking technologies on our website	Processing or fulfilling transactions; debugging to identify and repair errors that impair existing intended functionality; providing internal analytic services; providing Customer services; protecting against malicious, deceptive, fraudulent or illegal activity	Yes	Service providers; payment processors; third parties that assume control over all or part of the business in connection with a merger, acquisition, bankruptcy, or similar event; affiliates, professional advisors; law enforcement authorities; those involved in legal proceedings, with consent.	Service providers; payment processors; third parties that assume control over all or part of the business in connection with a merger, acquisition, bankruptcy, or similar event; affiliates, professional advisors; law enforcement authorities; those involved in legal proceedings, with consent.



<b>Internet and other network activity</b>  Example: Browsing activity	You, Your mobile devices and computers used to access our Site	Marketing, customer, or analytic services; enabling or effecting, directly or indirectly, a commercial transaction	Yes	Vendors such as third-party marketers, cloud providers, and service providers in the online advertising industry.	Vendors such as medical services providers, third-party marketers, cloud providers, and service providers in the online advertising industry.
<b>Commercial Activity</b>  Examples: Information about goods or services purchased, obtained, or considered	You, Your mobile device and computers used to access our site	Processing or fulfilling orders and transactions; marketing, customer or analytic services	Yes	Vendors such as health care providers and systems, health care service providers, data aggregators, third-party marketers, cloud providers, service providers in the online advertising industry and other suppliers to the health care industry.	Vendors such as health care providers and systems, health care service providers, data aggregators, third-party marketers, cloud providers, service providers in the online advertising industry and other suppliers to the health care industry.
<b>Professional or Employment-related Information</b>  Examples: Job history, educational history	Applicants; corporate customers; and outside sources, such as credit bureaus. (e.g. National Practitioner Identifiers (NPIs), Drug Enforcement Administration (DEA) Numbers, office locations and addresses collected from our customers, governmental sources	Process and evaluate applications for positions with Alluma; facilitate administrative purposes, such as payments to contractors, marketing, customer or analytic services; provide services for customers' health care operations	Yes	Service providers, such as HR vendors or cloud providers. As part of its Services, Personal information including professional and employment related information of practitioners is provided to customers in the health care industry, including	Service providers, such as HR vendors or cloud providers. As part of its Services, Personal information including professional and employment related information of practitioners is provided to customers in the health care industry, including



	and health care claims aggregators			health care providers and systems, data aggregators in the health care industry, pharmaceutical manufacturers and other suppliers to the health care industry.	health care providers and systems, data aggregators in the health care industry, pharmaceutical manufacturers and other suppliers to the health care industry.
<b>Social Security, Drivers License, State Identification Card, or Passport Number</b>	Employment applications, resumes, HR documents, email, phone correspondence, documentation completed throughout the application and employment terms	Performing services on behalf of the business	Yes	Service providers, such as HR vendors or cloud providers	N/A
<b>Account Login, in combination with the required security or access code, password, or credentials allowing access to an account</b>	Alluma HR, Alluma IT Security	Performing services on behalf of the business, ensuring the security and integrity, undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by Alluma, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by Alluma	No	N/A	N/A
<b>Geolocation Data</b>	Alluma IT Security	Performing services on behalf of the business,	No	Service providers such as cloud	N/A

		ensuring the security and integrity, undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by Alluma, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by Alluma		providers, security auditors, or IT consultants	
<b>Medical Information or Health Insurance Information</b>	Alluma's employee health insurance plan documentation and associated forms, employee health applications	Performing services on behalf of the Alluma, or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, providing storage, or providing similar services. Undertaking activities to verify or maintain the quality or	Yes	Service providers such as medical providers, medical services providers, payment processors	Service providers such as medical providers, medical services providers, payment processors



		safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business.			
<b>Personal information collected and analyzed concerning a consumer's sex life or sexual orientation</b>	Alluma's employee health insurance plan and associated forms, employee health applications	Performing services on behalf of the Alluma, or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, providing storage, or providing similar services. Undertaking activities to verify or maintain the quality or safety of a service or device that is owned,	Yes	Service providers such as medical providers, medical services providers, payment processors	Service providers such as medical providers, medical services providers, payment processors

		manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business.			
<b>Biometric Information</b>  Examples: Image and video recording	Security Systems, HR Documentation, IT Security	Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes. Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business.	Yes	Service providers, such as HR vendors or cloud providers	Service providers, such as HR vendors, security auditors, or cloud providers