

## T-SYSTEM PRIVACY STATEMENT

**Effective Date: January 1, 2020**

### Introduction

T-System, Inc. ("T-System", "we," "our," or "us") is committed to the confidentiality of your personal information. The following privacy statement ("Statement") describes the information we collect and how we use it. By accessing our website ([www.tsystem.com](http://www.tsystem.com)) you agree to this privacy statement.

### What Does This Privacy Policy Cover?

This Statement covers our collection and use of information that we collect online through this website ("site") and other online resources, and offline through interactions with you to provide T-System services (collectively, the "Services").

This Statement does not apply to the practices of third parties that T-System does not own or control, or to individuals that T-System does not employ or manage.

If you decide to visit the T-System site, your visit and any possible dispute over privacy is subject to this privacy statement and our Terms of Use, including limitations on damages, arbitration of disputes and application of Texas law.

### How Does T-System Collect Information?

- From healthcare providers and hospital administrators who use our Services.
- Through automated technologies and online browser tools, including the use of cookies

### What Personal Information Does T-System Collect?

T-System collects the following categories of personal information:

- **Contact information** (such as name, email address, mailing address, phone number).
- **Personal identifiers** (such as company name).
- **Geo-location information** (such as city, state, and zip code)
- **Internet or other Electronic Network Activity information** (such as IP address, communications and interactions with our Services, and the numbers and frequency of visitors to our website and use of components of our Services).

### How Does T-System Use the Information?

Our primary goal in collecting information is to provide you with a friendly, customized and efficient experience. We collect information from our customers for the following purposes:

- **Fulfillment and Responding to Requests.** We may use personal information to fulfill requests and perform our responsibilities under our contract with you.

- **Protection and Security.** We may use personal information to protect the security and integrity of our Services, and for the protection of T-System, our users, and others.
- **Responding to your inquiries.** We may use personal information to respond to questions.
- **Administrative Communications.** We may use personal information to send important information regarding our Services, such as changes to our terms, conditions, and policies and/or other administrative information.
- **Marketing Communications.** We may also send offers to certain customers on behalf of other businesses with whom we have a partnership. However, when we do so, we do not give the other business your name and address.
- **Research.** We may use information to provide research, advice and information, including, without limitation, for benchmarking purposes (e.g. we may publish an industry white paper that uses data collected through the use of our service). This data is only used in the aggregate.
- **Online Services.** We collect and use information about how you and other users interact with our online Services in order to compile statistics, analyze trends and administer our Services.
- **Internal Business Purposes.** We may use personal information collected from the categories listed above for our internal business purposes, such as data analysis, developing new offerings, diagnosing any problems with servers, improving our services, identifying usage trends and determining the effectiveness of our promotional campaigns. For example, if you are a registered user of our subscription-based service, we may keep records in your account history of your complaints about other registered users' online behavior, and any reported violation of our service agreement that you or someone on your account may have committed.
- **Legal and Regulatory.** We may use personal information to comply with our legal or regulatory obligations, and to prevent fraud, suspicious or other illegal activities.

### **With Whom Does T-System Share Information?**

We neither rent nor sell your personal information. We may, however, provide insights and analytics to healthcare providers and hospital administrators based on information stored in an aggregate way (i.e., not personalized). We share information only with entities that are controlled or controlled by or under common control of T-System, and as described below:

- **Affiliated Entities.** We may share information to our subsidiaries and corporate affiliates. These companies may use your information consistent with this Statement.
- **Third Party Service Providers.** We may share personal information with third party service providers or agents that we hire to perform tasks on our behalf and assist with running our everyday business. Examples include organization of customer lists, analyzing data and providing marketing assistance. We may also provide your personal information to agents who will use it to verify aggregate usage data that we provide to our partners. In all cases where we share your information with such third party service providers or agents, we explicitly grant them access to personal information only to the extent needed for them to perform their functions, and require them, by written agreement, to acknowledge and adhere to T-System's privacy and customer data handling policies, which include protecting the confidentiality and security of personal information. However,

even with the service providers agreeing to abide by these restrictions, we cannot control how third parties process your personal information.

- **Business Transfers or Assignments.** In the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including without limitation in connection with any bankruptcy or similar proceedings), we may transfer any and all information that we collect from users or offline to a third party.
- **Law Enforcement; Emergencies; Compliance.** We may disclose personal information about you to others as we believe to be appropriate: (i) under applicable law including laws outside your country of residence; (ii) to comply with legal process (iii) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (iv) to enforce our terms and conditions; (v) to protect our operations and property interest; (vi) to protect the rights, privacy, safety or property of T-System, our employees, users of our Services, you, or others; and (vii) to permit us to pursue available remedies or limit the damages that we may sustain. We have no obligation to notify you of such disclosures, except as required by applicable law. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

## Your Rights

You may have certain rights and choices regarding our processing of your personal information. Depending on your jurisdiction, applicable law may entitle you to certain consumer rights, including:

- The right to know the categories and/or specific pieces of personal information collected about you, including whether your personal information is sold or disclosed and the purpose, and with whom your personal information was shared;
- The right to request deletion of personal information;
- The right to access a copy of the personal information we retain about you;
- The right to opt-out of the sale of personal information; and
- The right to non-discrimination based on the exercise of a consumer's privacy rights.

Please note that a portion of the personal information collected and processed by T-System may be out of scope for certain individual rights as it falls under exemptions for information collected under applicable federal laws. For example, protected health information that is collected by a covered entity or business associate governed by the privacy, security, and breach notification rules issued by the United States Department of Health and Human Services, Parts 160 and 164 of Title 45 of the Code of Federal Regulations, established pursuant to the Health Insurance Portability and Accountability Act of 1996 (Public Law 104-191) and the Health Information Technology for Economic and Clinical Health Act (Public Law 111-5) is not subject to aspects of various jurisdictional privacy laws. T-System

## Exercising Your Rights

We respond to all requests to exercise applicable rights under this Statement to the extent we have any personal information. To exercise your applicable rights, including submitting a verifiable request, or for questions about this Statement, please see the “Contact Us” section below.

We reserve the right to verify your identity in connection with any requests regarding personal information to help ensure that we provide the information we maintain to the individuals to whom it pertains and allow only those individuals or their authorized representatives to exercise rights with respect to that information. If you are an authorized agent making a request on behalf of a consumer, we may require and request additional information to verify that you are authorized to make that request.

We reserve the right to deny your request if we cannot verify your identity. Where we deny your request in whole or in part, we will endeavor to inform you of the denial, provide an explanation of our actions, and the reason(s) for the denial.

We will not restrict or deny you access to our Services because of choices and requests you make in connection with your personal information. We will promptly respond to all applicable requests.

### **Security and Protection of Information**

Customer information collected and stored by T-System is maintained in a secure corporate data center and subject to reasonable technical and information safety safeguards that comply with federal law in order to protect information from unauthorized access and use. Only employees who need customer information to perform a specific job (for example, a customer service representative) are granted access to it. We keep our employees kept up to date on our privacy and security practices.

While it is our practice to take reasonable steps to secure each the website and the information collected, the confidentiality of information transmitted over the Internet cannot be guaranteed. We urge you to exercise caution when transmitting personal information over the Internet, especially personal information related to your health.

### **Children and Minors**

Our Services are not directed to individuals under the age of sixteen (16) and we do not and will not sell the personal information of minors under 16 years of age absent affirmative authorization. If you are under age 16, please do not submit any personal information to us. In addition, we do not and will not knowingly collect personal information from children under the age of thirteen (13). We do not knowingly permit children to communicate with us or use our Services. If you are a parent or legal guardian and become aware that your child has provided us with information, or think your child has given us information, please contact us using one of the methods specified below and we will work with you to address this issue.

### **Cookies / Website Usage**

Cookies are alphanumeric identifiers that we transfer to your computer through your web browser. Cookies enable our systems to recognize your browser and tell us how and when pages in our site are visited and by how many people, thus allowing us to enhance and personalize your online browsing experience. T-System employs cookies in order for its server to recognize a return visitor as a unique user.

The "help" portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you are to receive a new cookie, or how to disable cookies altogether. However, cookies are required for some of our web pages and services to function correctly, so we recommend that you leave them turned on. If you do not enable cookies, some parts of the Sites and Services may not work.

The use of cookies by our partners, affiliates, tracking utility company, service providers is not covered by our privacy statement. We do not have access or control over these cookies. Our partners, affiliates, tracking utility company, service providers use session ID cookies to analyze website statistics, performance and monitor traffic to and from its websites.

Additionally, when you use our website, some browsers have Do Not Track ("DNT") features that allow you to tell a website not to track you. T-System honors the AdChoice DNT signals. Please be aware that limiting the ability of website technologies may limit your experience and in some cases our Services may not work.

## **Changes**

T-System may amend this privacy statement at any time. When we do revise this Statement, we will update the "Last Updated" date at the top of this page so that you can tell if it has changed since your last visit. Please note the effective date is the date in which this Statement was last updated. Your continued use of our Services constitutes your acceptance of the terms of the Statement as amended or revised by us from the effective/last updated date.

## **Contact Us**

If you have questions about your personal information or your rights, or to exercise your applicable rights under this Statement, please call us, email us or send a letter using the following contact information:

4020 McEwen Road

Dallas, TX 75244

Attention: Charlotte Nafziger, Chief Compliance and Privacy Officer

Phone number: 1-972-503-8899

Email: [cnafziger@tssystem.com](mailto:cnafziger@tssystem.com)