



## Privacy Policy and Terms of Use

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>	You, Your mobile devices and computers used to access our Site	Marketing, customer, or analytic services; enabling or effecting, directly or	Yes	Vendors such as third-party marketers, cloud providers, and service	Vendors such as medical services providers, third-party marketers, cloud



Example: Browsing activity		indirectly, a commercial transaction		providers in the online advertising industry.	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 and health care claims aggregators	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 health care providers and systems, data aggregators in the health care industry, pharmaceutical manufacturers and	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 health care providers and systems, data aggregators in the health care industry, pharmaceutical manufacturers and



				other suppliers to the health care industry.	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, ensuring the security and integrity, undertaking activities to verify or maintain the quality or safety of a service or device that is owned,	No	Service providers such as cloud providers, security auditors, or IT consultants	N/A



		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>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 safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or	Yes	Service providers such as medical providers, medical services providers, payment processors	Service providers such as medical providers, medical services providers, payment processors



		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 the 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.			
<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