

KeystoneACO.org Privacy Policy

Maintaining your trust is important to us. We take your privacy seriously, and we have created this privacy policy (this “**Privacy Policy**”) to disclose our information gathering, distribution, storage, and destruction practices for the personally identifiable information (“**PII**”) we collect on KeystoneACO.org and its related websites (collectively, the “**Site**”). In addition to this Privacy Policy, you should review the Site’s Terms of Use.

This Privacy Policy only addresses the use and disclosure of information we collect from you as a result of your use of the Site. You should be aware that when you are on the Site, you can be directed to other websites that are beyond our control, and we are not responsible for the privacy practices of third parties or the content of such linked websites. You should read the posted privacy policy of any website you access.

PLEASE NOTE! Keystone Accountable Care Organization, LLC’s (“**KACO**”) Notice of Privacy Practices is a separate document that governs how protected health information about you may be used and disclosed by KACO. In addition, any of the independent medical providers that are members of or otherwise affiliated with KACO will have their own separate notice of privacy practices. Please refer to those notices to understand how your protected health information may be used by those providers. This Privacy Policy does not address KACO’s use of your protected health information.

Our Site Security

The Site has security measures in place to reasonably protect against the loss, misuse, and alteration of the information under our control. Firewalls are in place to prevent unauthorized access to our systems. A firewall controls traffic between the Internet and our internal network and protects your information stored within our systems from outsiders. Systems are monitored for suspicious activity to prevent any breaches in security. Any data provided by you sits behind this firewall.

PLEASE NOTE THAT, BY ITS VERY NATURE, A WEBSITE CANNOT BE ABSOLUTELY PROTECTED AGAINST INTENTIONAL OR MALICIOUS INTRUSION ATTEMPTS. FURTHERMORE, KACO DOES NOT CONTROL THE DEVICES OR COMPUTERS OR THE INTERNET OVER WHICH YOU MAY CHOOSE TO SEND CONFIDENTIAL PII AND CANNOT, THEREFORE, PREVENT SUCH INTERCEPTIONS OF COMPROMISES TO YOUR INFORMATION WHILE IN TRANSIT TO KACO. BEYOND OUR REASONABLE CARE TO SAFEGUARD YOUR INFORMATION WHILE IN TRANSIT, KACO CANNOT AND DOES NOT GUARANTEE THE ABSOLUTE SECURITY OF ELECTRONIC COMMUNICATIONS OR TRANSMISSIONS SINCE ANY TRANSMISSION MADE OVER THE INTERNET BY ANY ORGANIZATION OR ANY INDIVIDUAL RUNS THE RISK OF INTERCEPTION.

Types of Information We Collect

We collect non-PII of the sort that web browsers and servers typically make available, such as the browser type, language preference, and the date of time of each user request. We do not collect PII unless you choose to provide it. You are generally not required to submit any PII to use the Site.

In addition, we may gather technical information such as:

- **Your computer's IP (Internet Protocol) address or browser type:** Our Web server automatically collects the IP address of the computers that access the Site. An IP address is a number that is assigned to your computer when you access the Internet. It is not truly personally identifiable information because many different individuals can access the Internet via the same computer. To help diagnose problems with our servers, collect site usage statistics, and administer our web site, traffic between KACO and the Internet at times will be recorded for analysis (technical and physical). Our Privacy Policy would apply to this recorded information.
- **Pixel tracking:** A tracking pixel is a piece of code embedded on a web page of a website that collects information about a user's engagement on that page. Tracking pixels may include a command to create cookies that can follow a user across different websites, including non-KACO sites.
- **Cookies:** A cookie is a small text file that can be stored on a user's browser (on any type of device). KACO utilizes cookies in conjunction with certain applications (for example with our web security application) to allow you to easily move through secured pages once you have logged on. At times we may use cookies to know that you have accessed an online course or to administer certain surveys, for example, to allow a user to reply to a survey only once. Our cookie contains a unique random identifier that enables anonymous tracking activity from a browser.
- **Aggregated Statistics:** We may collect statistics about the behavior of users on the Site. For instance, we may monitor the most popular forums on the Site. We may display this information publicly or provide it to others.

How We Use the Information We Collect

We may collect and use information in the following way:

- To optimize your web experience
- To improve customer service
- To conduct surveys, research, and analysis
- To promote events
- To establish and manage your accounts
- To operate, evaluate, and improve KACO's operations

The above list is not comprehensive and may change without notice.

How Your Information Is Shared

If you participate on the Site by writing posts or responses, or importing a blog or other content, you should be aware that any information you choose to disclose using these services can be read, collected, and used by other users of the Site. We are not responsible for the information you choose to submit to the Site and any forums therein. Your contributions may be searchable on the Site and some content on the Site may be public and searchable on the Internet.

Please note: Information you have shared with others or that others have copied may also remain visible after you have closed your account or deleted the information from your own profile. In addition, you may

not be able to access, correct, or eliminate any information about you that other Site users copied or exported out of the Site, because this information may not be in KACO's control.

Third Party Information Sharing

As a routine part of some business processes, we may share some information from the Site with third parties. We may disclose information to such affiliated third parties that perform services for us in the processing of the Site and/or the services made available thereon. While these vendors are contractually obligated to keep your information secure and private, we cannot guarantee the effectiveness of third party privacy policies and safety measures.

- **Service providers.** We may engage trusted third-party companies and individuals to facilitate or provide services on our behalf or to perform Site-related services and analysis. Such engagement will be only to the extent necessary and we require that such third parties will comply with the principles of this Privacy Policy.
- **Legal orders.** We may disclose user data if required by any applicable law or government agency to comply with a legal order. We may also disclose or use user data in order to defend or enforce our legal rights and in accordance to any applicable law.
- **Corporate transfers.** We may disclose, share or transfer user data in connection with a merger, acquisition, reorganization, change in control, or sale of our assets.

How Long Do We Keep Your Information? (Data Retention)

We may retain collected user data for an indefinite period of time. We have reasonable security measures in place to help protect PII that we collect and retain. However, no system can be completely secure, and we make no guarantees as to the safety or security of any information transmitted through our services.

Changes to this Privacy Policy

We reserve the right to change, modify, add or remove portions of this Privacy Policy at any time and without prior notice. Please check the Site regularly for updates to this Privacy Policy.