# Vendormate Site Privacy Policy

This site is operated by Global Healthcare Exchange, LLC and its subsidiaries, including Vendormate, Incorporated (collectively, "GHX," "us," or "we"). GHX is committed to respecting the privacy and security of your personal information. This Privacy Policy describes the information collected on this site and how it is used and protected. This Privacy Policy applies only to this site. Please review the privacy policy of any other GHX site you may visit, including other applications offered by GHX and its subsidiaries and the GHX marketing website.

By using this site, or by providing your information to us or to our service providers, you consent to the collection, use, and disclosure of your information in accordance with this Privacy Policy, the <u>Terms of Use</u> for this site, and any written agreement(s) executed and in effect between you and any GHX entity in connection with any of our products or services (collectively, the "Service Agreement").

# Your rights with regard to your personal information may depend on where you live. California residents should carefully review the section below titled "Privacy Notice for California Residents."

## **Collection and Use of Information**

The information we receive and how we use it depends on what you do when visiting our site. The site and related services require registration for access. As part of registration and related services, we ask you to provide us certain information about you. You may provide us and our service providers personal information using this site in a number of ways, for example by entering that information into data fields on the site or linked service provider sites, uploading documents to the site, emailing us at the email addresses provided on the site, initiating support cases from the site, or completing a survey. If you register with us, we may also obtain information about you from our service providers. Personal information includes data that specifically identifies you, such as your name, email address, mailing address, and telephone number. Depending on the credentialing requirements of the healthcare systems with which you do business, it may also include information such as vaccination records, whether or not you have passed background checks, and whether you have been sanctioned under or excluded or debarred from government programs. If you make a purchase related to the site using a credit card, our service providers will collect and use the credit card number and related information to complete the transaction or for verification purposes. To protect your privacy, you should not upload to the site personal details that are not required for the service or by healthcare systems' credentialing requirements, such as criminal background details.

GHX and its service providers also collect certain data that is specific to you but that does not directly identify you as an individual person. This information tells us about how people use the site so that we can analyze its effectiveness and provide you with a better web experience. We collect and use this information through a variety of technologies, including "cookies" and techniques used to track who is reading a web page or email, when, and from what computer, as discussed below.

#### Cookies

This site uses several types of cookies to help its operation. A cookie is a small piece of information sent from a web server to a browser to be stored and read back later by the application. Some cookies are set to expire when you end your session on the site. Others last for longer periods unless you reject or disable them. The site uses browser cookies and may use flash cookies (also called local shared objects), which differ in that flash cookies can store more data, store different data, and store data in a different place on your browser. The types of cookies used on the site are described below.

#### Site Performance Cookies

Site performance cookies collect information about how users navigate the site. These cookies collect only aggregated, anonymized information, and do not collect information that individually identifies users. This information is used to help the site's performance.

#### **Functionality Cookies**

Functionality cookies remember choices you have made to customize your view of parts of site pages (*e.g.*, languages, text sizes, fonts, etc.).

The site may use local shared objects, or flash cookies, to personalize your visit by storing your preferences.

#### Options and Disabling Cookies

You may disable many cookies using your browser settings. Each browser is a little different, so look at your browser's Help menu to learn the correct way to modify your cookie settings. You can manage flash cookies using the local settings manager native to your operating system or, for earlier flash player versions, using the online settings manager for the flash player. Please note, however, that disabling or deleting cookies may prevent the site from functioning.

#### Web Beacons and Site Analytics

Web beacons, also known as web bugs or pixel tags, are tiny graphic images that are unobtrusively placed on a site or in an email. The site may use web beacons together with cookies to help analyze your use of the site. When the code for a web beacon points to the site to retrieve the image, it simultaneously passes information to the site's servers about your use of the site, including the pages you view, the links you click, and other actions taken in connection with the site. Web beacons can also collect certain standard information that your browser sends to every site you visit, such as your Internet Protocol ("IP") address, browser type and language, access times, referring site addresses, and previously-set cookie values.

#### Google Analytics

This site uses Google Analytics to help us analyze use of the site, but not to show you advertisements during or after your use of the site. Google Analytics uses IP addresses to provide and protect the security of its services and to provide site owners like GHX a sense of the countries where visitors may be located. Google Analytics also uses some cookies placed by the site to analyze site use without collecting personally identifiable information. The site does not use advertising cookies.

You can opt out of having your data sent to Google Analytics by downloading and installing the Google Analytics opt-out browser add-on at <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a> on the Google Analytics site.

#### Location-Enabled Technology

Some electronic devices include location-enabled technology. If you use these devices to access the site, you may be sending the site information about your location. GHX does not use or keep this information, except to provide the services. Your device may allow you to disable this technology, although doing so may affect the functionality of some services. You should log off the site when leaving a location at which you are using location-enabled technology.

GHX and its service providers may use your personal information to provide our products and services and to contact you in response to inquiries you submit. GHX and its service providers retain and use your information for as long as needed to provide services, respond to communications, comply with legal obligations, resolve disputes, and enforce our agreements. We and our service providers may save personal contact information you provide in order to contact you in the future about our products and services. This contact may be in the form of telephone calls, emails, or mailings. You may opt out of these future contacts as described in "Review, Modify, or Delete Your Information" below. GHX reserves certain rights with respect to information provided through this site, and requires certain representations about such information, as described in the Terms of Use posted on this site.

## **Sharing and Transferring Your Information**

GHX makes materials and features of this site available only to users who provide their contact information.

To carry out the services provided through our site, we may share your personal information with healthcare providers and their service providers using our credentialing and contract management services. We may also share your personal information with your employer to carry out the services and for marketing GHX services to your employer.

GHX and its service providers may transfer personal information between them for business purposes. For example, our service providers may handle background checks, training, data management, email distribution, technical support, marketing, market research, or information analysis. We and our service providers furnish each other the information needed to perform these and other services, and we work with our service providers to respect and protect your information. We may also provide your information among the GHX affiliates and subsidiaries. The entities with which we share information may be located in the United States or other countries.

GHX does not sell your personal information to any third party. We may sell or transfer non-individualized information to third parties, including summary or aggregated anonymous information about all or sub-groups of users of the site, for purposes such as reporting or marketing.

In the event that GHX or some of our assets are sold or transferred or used as security, or to the extent we engage in business negotiations with our business partners, the information collected on this site may be transferred or shared with third parties as part of that transaction or negotiation. We may also provide information or provide access to information to any of our affiliated businesses or to our business partners.

On rare occasions, we may disclose specific information without your consent and without notice to you as required to comply with laws and regulations, or to comply with court orders, subpoenas, or lawful discovery requests. Information collected from you may also be used or disclosed to authorities or service providers to prevent, detect, investigate, or respond to security breaches or fraudulent or illegal activity.

# **Protecting Your Information**

GHX has implemented reasonable physical, technical, and organizational safeguards to help protect your personal information from unauthorized access, acquisition, or disclosure, alteration, or destruction. Although we strive to keep your personal information secure, no safeguards can be guaranteed to be completely secure, so you should exercise caution when transferring personal and other sensitive information over the Internet. Please advise us immediately at the address listed below of any incident involving loss, unauthorized access, or unauthorized disclosure of personal information that is in our custody or control.

## Links to Other Sites

The site may contain links to other sites, content, or resources, including links to other sites operated by GHX or other entities. Please note that when you click on one of these links, you will leave this site and will be subject to the policies and privacy practices of the other site, which may differ significantly and be subject to different laws. You should review the policies of other sites you visit. GHX is not responsible for the content, technology, security, or practices of linked sites operated by others, or for your use of linked sites.

## Children's Privacy

The site is not aimed at or intended for children. We do not knowingly collect information from children under the age of sixteen through this site. If we obtain actual knowledge that we have inadvertently collected personal information relating to a child under the age of sixteen, we will delete that information from our records.

#### **International Transfers**

This site is hosted and maintained in the United States. If you are visiting this site from a country other than the United States, you should understand that your data submitted through or generated by your use of this site will be transferred to and processed under the laws of the United States, which may not have the same data protection laws as the country in which you are located. This will necessarily result in the transfer of information across international boundaries. By visiting this site and communicating electronically with us, you consent to the transfer and processing of your data as set out in this Privacy Policy in the United States subject to the laws of the United States. If you do not consent to having your information used in according with this Privacy Policy, you should not provide your personal information and should disable all cookies and other technologies as described above under "Collection and Use of Information."

## Review, Modify, or Delete Your Information

We want to communicate with you only if you want to hear from us. If you prefer not to receive information from us or would like to update or change your personal information, please or preferences, please follow the instructions below review, modify, or delete your personal information.

You may change or delete your profile information on the site, other than your email address and your company's federal tax identification number, at any time by logging in with your user id and password. Our services use your email address and your company's federal tax identification number to help uniquely identify you, so those may not be changed.

To unsubscribe from receiving periodic emails from us, please follow the instructions for unsubscribing that may be found in emails we send you.

If you request that your registration information be deleted or if you unsubscribe from communications, we may maintain information about your transactions or service inquiries for future service and recordkeeping purposes. In some circumstances, a change in or withdrawal of consent may severely limit our ability to provide you information, products, or services. In some circumstances we may not agree with your request to change your personal information and will instead append an alternative text to the record in question.

If you wish to otherwise view or correct the information GHX has collected about you through this site, or if you wish to be removed from our contact lists, please contact us using the information at the end of this Privacy Policy. In the event that we cannot provide you with access to your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

# Updates to this Privacy Policy

GHX may update this Privacy Policy and our site at any time without prior notice to reflect material changes in how we collect, use, share, or store your information, to satisfy legal requirements, or for other business purposes. You should review this Privacy Policy when you visit the site to understand our current practices. The date below shows when this Privacy Policy was last updated.

We encourage you to refer to this Privacy Policy on an ongoing basis so that you understand our current practices. You consent to any changes we make to this Privacy Policy if you continue to use the site after receiving a notice of the change or upon our posting of the new Privacy Policy on this site.

## Interpretation of this Privacy Policy

Any interpretation associated with this Privacy Policy will be made by GHX's Legal Department. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word "including" is used, it means "including without limitation." In the event of any conflict between any Service Agreement and this Privacy Policy, the terms of the Service Agreement take precedence.

This Privacy Policy does not create or confer upon any individual any rights, or impose upon GHX any rights or obligations outside of, or in addition to, any rights or obligations imposed by applicable country, state, and other privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Policy and applicable privacy laws, this Privacy Policy shall be interpreted, in that case, to give effect to, and comply with, such privacy laws.

## **Privacy Notice for California Residents**

This section supplements the information provided elsewhere in this Privacy Policy and includes information applicable only to "personal information" of California "consumers" as those terms are defined in the California Consumer Privacy Act, as amended by the California Privacy Rights Act and their implementing regulations ("CCPA"). Taken together, the information in this Privacy Policy serves as general notices and instructions for purposes of the CCPA.

The effects of the laws and regulations described below on any particular individual may vary according to the circumstances. This section is provided for general informational purposes only and is not intended as legal advice.

#### Categories of California Personal Information Collected

In the past 12 months, GHX has collected, used, and disclosed personal information in connection with this website in the CCPA categories listed in the table below. Please refer to the section titled "Collection and Use of Information" for more detail.

CCPA Category	Examples
Identifiers	Name, alias or username, postal address, unique personal identifier, online identifier, Internet Protocol ("IP") address, or email address
California Customer Records Statute Categories	Name, email, state of residency/work, business address, IP address
Commercial Information	Products or services used
Internet or similar website activity	Information about an individual's interaction with this site
Audio, video, or similar information	Audio recordings of support calls
Sensitive data	Government identifiers, health information, physical location*
Employment information	Employer, job title, completion or passage of background screenings
Inferences drawn from other personal information	Profile reflecting a person's preferences, behavior, etc.

\* Please see "Location-Enabled Technology" above.

## **Categories of Sources**

GHX collects personal information in connection with this site from the following sources, as described in more detail in this Privacy Policy:

- Directly from you (e.g., information you submit on this site);
- Indirectly from you or your devices (e.g., from your interaction with this site); and
- From other sources (e.g., your employer, hospitals, our service providers, government lists, etc.).

## Business Purposes of Uses and Disclosures

GHX has in the past 12 months used and disclosed, and continues to use and disclose, personal information for the following business purposes described more fully in this Privacy Policy.

- Delivering, providing information about, analyzing, and helping develop GHX products and services and events;
- Responding to inquiries and requests;
- Providing, supporting, personalizing, analyzing, and developing this site;
- Advertising and marketing;
- Helping maintain the safety, security, and integrity of this site, and investigating and helping prosecute wrongdoing;
- Responding to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- To evaluate or conduct a sale or transfer of assets; and
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

GHX has not knowingly "sold" or "shared" any personal information collected through this site within the meaning of CCPA during the last 12 months, and does not intend to do so in the future.

## Categories of Third Parties Receiving Information

As described more fully above in the section of this Privacy Policy titled "Sharing and Transferring Your Information," GHX may disclose personal information to the following categories of third parties:

- GHX affiliates;
- Service providers;
- Advertising partners;
- Businesses involved in a sale or transfer of assets; and
- Law enforcement and government authorities.

#### California Consumer Rights

CCPA provides California residents certain rights with respect to their data, including:

- Information about the categories of information and of sources of information collected; the purposes for which it is collected, used, and disclosed; and the categories of third parties with which it is shared (as discussed above).
- Access to specific information about and portability of their personal information collected.
- Correction of inaccurate personal information.
- Right to opt out of sales or sharing of personal information, if any.
- Limitation of use or disclosure of sensitive personal information, if any.
- Deletion of personal information.
- Freedom from discrimination in connection with their exercise of CCPA rights.

## Exercising Personal Data Rights

You may request exercise of your CCPA rights using the information below under "Contact Us." Only you, or someone legally authorized to act on your behalf, may make requests related to your personal information. You may also make request on behalf of your minor child. You may only submit requests for access or data portability twice within a 12-month period.

Any request related to personal information under CCPA must provide sufficient information to:

- Reasonably verify you are the data subject or an authorized representative.
- Allow us to properly understand, evaluate, and respond to your request.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and connect the personal information we have collected to you. We may request that you submit information to verify your identity or authority using a form or account login we specify. If we are unable to verify your rights or if it appears your personal information is subject to a legal exemption or exception, we may respond to that effect. We will only use personal information provided in a request to verify your identity to make the request.

#### Do Not Sell or Share Requests

Because GHX does not and does not intend to sell any personal information collected through this website or to share it for advertising tracking purposes, we do not currently provide a "Do Not Sell or Share My Personal Information" button or option on this website. However, GHX will treat personal information we collect from you as subject to a do not sell or share request. There is not yet a consensus as to whether third party cookies and tracking devices associated with our site and mobile apps may constitute a "sale" or "sharing" of your personal information as defined by the CCPA. You can exercise control over browserbased cookies by adjusting the settings on your browser.

#### Do Not Track Requests

Because there is no current industry standard on responding to web browser "do not track" signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personally identifiable information about online activities over time, GHX does not respond to them at this time.

Further, we do not understand them to operate in that manner or to indicate a do not sell expression by you, so we currently do not recognize these as a do not sell request. We understand that various parties are developing do not sell signals, and we may recognize certain such signals if we conclude such a program is appropriate.

## California "Shine the Light" Law

California residents who use this website may request from us once a year, free of charge, information about the personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us at the address provided below.

# **Contact Us**

If you have questions or comments about this Privacy Policy or this site, please contact us using the information below.

Email: compliance@ghx.com

Global Healthcare Exchange Attn: Compliance 1315 West Century Drive, Suite 100 Louisville, Colorado 80027 USA Phone: 1.720.887.7000

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