Privacy Policy

Welcome to ZealCare.

This Privacy Policy describes how ZealCare, Inc. and its subsidiaries ("ZealCare", "us", "our", or "we") collect, use, disclose, and protect your Personal Information. Please carefully read this Privacy Policy as it contains important information about how we process your personal information.

WHAT DOES THIS PRIVACY POLICY COVER?

This Privacy Policy applies to your access to and use of the following services, which we refer to collectively as the "Services":

- the website that ZealCare operates (including www.ZealCare.com) (the "Site");
- ZealCare's mobile applications (the "Apps");
- ZealCare's digitally based health care programs (the "ZealCare Programs"); and
- All related services and features that ZealCare provides.

By accessing or using the Services, you consent to this Privacy Policy and to our collection, maintenance, use, disclosure, and processing of Personal Information, as described in this Privacy Policy. This Privacy Policy forms part of the Terms of Use and together constitute a binding agreement between you and ZealCare. If you are enrolling in a ZealCare Program, our Notice of Privacy Practices and ZealCare Consent & Enrollment Package separately govern our use and disclosure of your Protected Health Information and your related consents, and control over this Privacy Policy with respect to PHI.

Personal Information – In General

In this Privacy Policy, we use the term "Personal Information" to refer to information we gather that could be used to identify or contact you and any information we gather concerning your use or potential use of the Services. Examples of Personal Information include your first and last name, email address or other contact information.

Protected Health Information

In this Privacy Policy, we use the terms "Protected Health Information" or "PHI" to refer to the subset of Personal Information that we create, receive, transmit, or maintain as part of your application for or participation in a ZealCare Program where that information relates to (a) your past, present, or future physical or mental health or condition; (b) the provision of healthcare to you; or (c) your past, present, or future payment for that healthcare. ZealCare is a HIPAA covered entity with respect to the Services we provide as a participant in the Centers for Medicare & Medicaid Services (CMS) Advancing Chronic Care with Effective, Scalable Solutions (ACCESS) Model. Federal and state law afford you certain rights with respect to any access to, use of, or disclosure of your PHI. Our uses and disclosures of your PHI, and your rights with respect to that information, are governed by our Notice of Privacy Practices, which controls over this Privacy Policy with respect to PHI. This Privacy Policy addresses our handling of Personal Information generally, including information that is not PHI (such as information you provide before becoming a patient, or technical/usage information collected through our Site and Apps).

WHAT PERSONAL INFORMATION DO WE COLLECT?

We collect various Personal Information from you and certain devices that you may use, as further described below. This includes information collected through clinical screeners, applications, registrations, and your use of the Services. We also collect Personal Information in connection with your inquiries. Collection starts from the time that you initially access our Services.

Information that we collect enables us:

- To administer your account.
- To provide you with the Services.
- To effectively communicate with you and others regarding our services.
- To respond to your inquiries.
- To obtain your feedback on our Services.
- To understand who is using our Services and how the Services are performing.

- To debug, identify and repair errors, or effectuate similar functional enhancements in connection with our Services.
- To analyze user behavior and activity.
- To enhance and personalize your experience using our Services.
- To conduct research activities.
- To manage the security of the Services.
- To evaluate or participate in an actual or potential merger, change in organizational structure, or other sale or transfer of some or all our assets, including as part of bankruptcy, liquidation, or similar proceedings.
- For legal and safety purposes, such as maintaining the safety, security, and integrity of our websites, other technology assets and our organization; preserving and enforcing our legal rights, policies, and terms of use; protecting our property, our consumers, our employees and others; and complying with applicable law, other legal obligations, and/or industry standards.
- For such other purposes as you may consent to or authorize.

Personal Information that You Provide to Us

When you use or access our Services, we may collect or receive the Personal Information that you enter on our Site or through one of our Apps or information that you share with us by email or phone, and any other information that you provide to us through the Services. Personal Information that you provide may include:

- Contact information, such as your full name, phone number, email address, and mailing address.
- Demographical information, including but not limited to age and gender.
- Username and password.
- Health information, such as weight, pre-existing medical conditions, blood glucose and blood pressure readings, information concerning your exercise, sleep, and other activities.
- Financial information, such as credit card and/or other payment information (where applicable for participants who pay for their own participation in the Services), and any other information or data that you provide when using our Services.

Information Collected Automatically

In addition to any information that you provide to us through the Services, we may collect or receive information about your or your device automatically when you visit our Sites or use our Apps ("Usage Information"). This Usage Information may be stored or accessed using technologies downloaded to your device whenever you visit or interact with the Sites or Apps, such as IP addresses and MAC addresses, other unique device identifiers assigned to your device that allow our computers to recognize you, details of your device's characteristics and functionality (e.g., browser, operating system, mobile network information), the areas within the Site, the Apps, or other aspects of the Services that you visit and your activities there, your device's location, and certain other data regarding your device. To the extent we associate Usage Information with your Personal Information that we collect directly from you, we will treat it as Personal Information.

Information from Your Browser or Device

We automatically receive and record Usage Information from your browser on our server logs whenever you interact with the Site, the Apps, or other aspects of the Services. We may use this Usage Information to provide you with customer service and support. We also may use this Usage Information to recognize you when you arrive at the Site from an external link, such as a link appearing on a third-party site or in an email generated by us. We discuss this type of technology in more detail under "Tracking Technologies" below.

Our Services also collect Usage Information to determine how often visitors use parts of the Site, the Apps, or other aspects of the Services so that we can improve our Services and strive to ensure that the Services appeal to as many users and customers as possible. Our Services collect this data in a manner similar to how TV ratings may indicate the number of people that watched a particular show. We may provide this de-identified, aggregate data to our partners and/or customers to identify how our users use our Services, but we only use this data in aggregate form as a statistical measure to monitor how the Services function and not in a manner that would permit us to identify you personally.

You may set your browser to refuse or disable these data collection methods but doing so may change your experience with the Site, the Apps, or other aspects of the Services, diminish certain aspects of the Services' functionality, or render certain features inoperable. For example, the Site may not recognize or respond to your browser with "do not track" technologies employed.

Tracking Technologies

We may use various tracking methods or technologies ("Tracking Technologies") to store or collect your Usage Information, including information about your visits to or interactions with our Site, the Apps, and other aspects of the Services. We use Tracking Technologies for a variety of purposes we believe to be necessary or helpful in improving or assessing the performance of the Services (for example, as part of our analytic practices) or in offering you enhanced functionality (for example, to identify you when you sign in, to keep track of your specific preferences, or to help ensure that the security of your account has not been compromised).

Tracking Technologies may include the following technologies and methods as well as any subsequent technologies and methods later developed to perform similar functions:

- *Cookies.* Cookies are alphanumeric identifiers that we transfer to your device through your browser to enable our systems to recognize your browser and to tell us how and when you visit pages in our Site or other aspects of the Services. We use cookies to enhance visitors' experiences by understanding how they engage with and navigate our Site and the Services. Regular cookies may be disabled or removed generally by adjusting certain settings available as part of most browsers. In some (but not all) cases, these tools can block those cookies in the future. Each browser that you use would need to be set separately, and different browsers offer different functionality and options in this regard. In addition, these tools may not be effective for certain types of cookies (e.g., Adobe Flash or HTML5 cookies). Your ability to limit cookies when you revisit our Site or Services is subject to your browser settings and limitations. Please note that, if you disable or remove cookies

on your device, some parts of our Site or other aspects of our Services may not function properly.

- *Embedded Scripts*. An embedded script is programming code designed to collect information about your interactions with the Site, the Apps, and other aspects of our Services, such as a link that you may click on. Embedded scripts are temporarily downloaded onto your device. Embedded scripts remain active only while you are connected to the Services and are then deactivated or deleted.

- *Web Beacons*. The Services may also include small graphic images or other web programming code called "web beacons" (also known as "1×1 GIFs" or "clear GIFs"). Any electronic image or other web programming code inserted into a page or email can act as a web beacon, and web beacons may be invisible to you. Web beacons and similar technologies may be used for a number of purposes, including to count visitors to the Services, to count how many sent emails were opened, to count how many articles or links were viewed, or to monitor how users navigate the Services.

The Site may include links to websites, applications, information, and services provided by third parties. These third parties may use Tracking Technologies with our Services. We do not control those Tracking Technologies, and we are not responsible for them. We are also not responsible for the privacy policies or practices of those third parties. This Privacy Policy refers only to the use of cookies and other Tracking Technologies by ZealCare and does not cover the use of any Tracking Technologies by advertisers or any other third parties. We encourage you to review the applicable privacy policies of such third parties if you elect to follow the links provided.

WITH WHOM DO WE SHARE YOUR INFORMATION?

We may disclose your personal information:

This section describes our disclosure practices for Personal Information generally. Disclosures of your PHI — including sharing with CMS, your participating physician

practice, and other parties as part of your participation in the CMS ACCESS Model — are described in our Notice of Privacy Practices, which controls for PHI-specific disclosures.

- To our affiliates or business partners.
- To our contractors, service providers, and other third parties we use to support our organization and the Services.
- To government agencies or others as necessary to comply with any court order, law, or legal process, including to respond to any government or regulatory request, and consistent with other purposes authorized by law.
- To other organizations, such as a buyer or other successor-in-interest, in the event of an actual or potential merger, divestiture, restructuring, reorganization, dissolution, or other sale, exchange, or transfer of some or all of our assets, including as part of bankruptcy, liquidation, or similar proceeding.
- We also will disclose information for any purpose or to any organization that you authorize or permit, such as when we request your consent to share information and you agree.

Any disclosure of the personal information that we collected about you would be for one or more of the following purposes:

- To effectively communicate with you and others.
- To respond to your requests.
- To deliver information or marketing, such as promotional materials or surveys.
- To debug, identify and repair errors, or effectuate similar functional enhancements in connection with this Website or other services being provided or offered to you by us.
- To protect the legal rights, property, safety, and security of us and others.
- To comply with applicable law, other legal requirements, and industry standards.
- To investigate or prevent unlawful activities or misuse of the Website.
- To enforce our policies, terms of use, contracts, or other legal rights.
- To protect against malicious, deceptive, fraudulent, or illegal activity, and participating in any prosecution or enforcement of laws or agreements meant to prevent or punish such activity.
- To fulfill a business or legal obligation consistent with our operations, such as property management.
- For any other purpose you authorize.

ZealCare will never sell or rent your personal information.

For SMS programs, we do not share SMS opt-in data or consent with any third parties, including affiliate partners, except as required to provide the messaging services (e.g., our SMS delivery provider). SMS consent information is never sold, rented, or shared for marketing purposes.

WHAT ARE YOUR CHOICES?

You may choose not to provide the personal data we request. However, not providing information requested may restrict your ability to use certain features of our Services. For example, you may be able to restrict the collection of personal data or functionality through your device's operating system or by disabling cookies but doing so may prevent you from using the functionality of the Site and Apps. Some Internet browsers have a "do-not-track" feature that let you tell websites that you do not want to have your online activities tracked. Currently, the Site does not respond to browser "do-not-track" signals. We may allow third parties to use the site to collect personal data about your online activities over time and across different websites, applications, and other online products or services. For information about interest-based advertising, and to opt out of this type of advertising by third parties that participate in self-regulatory programs, please visit the Network Advertising Initiative (NAI) and/or the Digital Advertising Alliance (DAA) Self-Regulatory Program for Online Behavioral Advertising. Please note that any opt-out choice you exercise through these programs will apply to interest-based advertising by the third parties you select but will still allow the collect of data for other purposes, including research, analytics, and internal operations. You may continue to receive advertising, but that advertising may be less relevant to your interests.

HOW DO WE PROTECT CHILDREN'S PERSONAL INFORMATION?

The Services are not directed to children, and we do not knowingly collect Personal Information from children. We do not knowingly allow or solicit anyone under the age of 18 to participate independently in any of the Services. If a parent or guardian becomes aware that a child has provided us with Personal Information, please contact us. If we

become aware that a user of the Services under the age of 18 has provided us with Personal Information without verifiable parental consent, we will delete such Personal Information from our files.

HOW CAN WE CHANGE THIS PRIVACY POLICY?

We may update this Privacy Policy from time to time without notice and for any reason at our discretion. When we do so, we will update the Effective Date of the most recent version of this Privacy Policy on our Sites and in the Apps, and any changes to this Privacy Policy will become effective when posted. You are responsible for checking this Privacy Policy periodically for changes. By continuing to use or access the Services after any changes come into effect, you consenting to the processing of your Personal Information as indicated in the updated Privacy Policy.

HOW CAN YOU CONTACT US WITH QUESTIONS OR CONCERNS?

If you have any questions or concerns regarding this Privacy Policy or ZealCare's privacy practices, please email privacy@zealcare.com or write to us at the following address:

ZealCare, Inc.
ATTN: Privacy Officer
P.O. Box 13169
Research Triangle Park, NC 27709

We will make every effort to respond to your questions, concerns, and requests within a reasonable time.

Effective Date: July 1, 2026