

Washington Consumer Health Data Privacy Policy

Washington State’s My Health My Data Act (the “Act”) went into effect March 31, 2024. If you are a resident of Washington state, or if we collect your health data in Washington state, the terms of this privacy policy (the “Consumer Health Data Privacy Policy”) apply to you and supplement our general [Privacy Policy](#).

To the extent that Onlife Health (“Onlife,” “we,” or “us”) collects health data that is ***non-exempt*** from Washington’s My Health My Data Act, this Consumer Health Data Privacy Policy explains the health data we collect, the purpose for which we collect the data, and how the data will be used.

1. Consumer Health Data We Collect.

“Consumer Health Data” is defined as any personal information that is linked or reasonably linkable to a consumer and that identifies the consumer's past, present, or future physical or mental health status. “Consumer Health Data” includes, but is not limited to, information related to:

- Individual health conditions, treatment, diseases, or diagnosis;
- Social, psychological, behavioral, and medical interventions;
- Health-related surgeries or procedures;
- Use or purchase of prescribed medication;
- Bodily functions, vital signs, symptoms, or measurements;
- Diagnoses or diagnostic testing, treatment, or medication;
- Gender-affirming care information;
- Reproductive or sexual health information;
- Biometric data;
- Genetic data;
- Precise location information that could reasonably indicate a consumer's attempt to acquire or receive health services or supplies; and
- Data that identifies a consumer seeking health care services.

It is important to note that Onlife collects and creates Protected Health Information (“PHI”) as part of its services as a Business Associate regulated by the federal Health Insurance Portability and Accountability Act of 1996 (“HIPAA”). Any health data we collect which constitutes PHI is exempt from both the Act and the terms of this Consumer Health Data Privacy Policy. Most, if not all, health data we collect constitutes PHI. Other information exempt from the Act and, thus, this Consumer Health Data Privacy Policy, includes information that originates from, and is intermingled to be indistinguishable with, PHI. **After a review of our data collection practices, we are of the opinion that we collect little to no “Consumer Health Data” subject to the Act.**

However, to the extent applicable, this Consumer Health Data Privacy Policy governs any Consumer Health Data which is not exempt from the Act.

2. Purposes for Collection of Consumer Health Data

To the extent we collect Consumer Health Data, such collection is for the purposes described in the [How We Use Your Personal Information](#) section of the Privacy Policy. Primarily, any collection and use of Consumer Health Data would be reasonably necessary to provide you with the products you have requested or authorized. This may include: delivering and operating the Platform, products, services, and their features; personalization of certain product and services; ensuring the secure and reliable operation of the Platform, products, and services (including the systems that support them); troubleshooting and improving the Platform, products, and services; and other essential business operations that support the provision of the products and services (such as analyzing our performance, carrying out our obligations, and contacting you in response to a request).

We may also use Consumer Health Data for other purposes for which we give you choices and/or obtain your consent as required by law – for example, for advertising or marketing purposes. See the How to Exercise Your Rights section below for more details on the controls and choices you may have.

3. Sources of Consumer Health Data

As described further in the [Personal Information We Collect About You and How We Collect It](#) section of our Privacy Policy, we collect personal information (which may include Consumer Health Data) directly from you, from your interactions with our products and services, from third parties, and from publicly available sources.

4. How We Share Consumer Health Data

We may share each of the categories of Consumer Health Data described above for the purposes described in the [Disclosure of Personal Information](#) section of the Privacy Policy. In particular, we may share personal information, including any Consumer Health Data, with your consent or as reasonably necessary to complete any transaction or provide any product or service you have requested or authorized, as described above.

5. Third Parties With Which We Share Consumer Health Data

As necessary for the purposes described above, we may share any Consumer Health Data with the following categories of third parties:

- **Service providers.** Vendors or agents (“processors”) working on our behalf may access Consumer Health Data for the purposes described above. For example, companies we’ve engaged to support or assist in protecting and securing our systems and services may need access to data to provide those functions.
- **Business partners.** We may share Consumer Health Data with our health plan and employer customers, as well as other companies, for example, where you use a service that is cobranded and jointly operated with another company, or where you use our services to interact with another company.
- **Parties to a corporate transaction.** We may disclose Consumer Health Data as part of a corporate transaction or proceeding such as a merger, financing, acquisition, bankruptcy, dissolution, or a transfer, divestiture, or sale of all or a portion of our business or assets.

- **Affiliates.** We enable access to data across our subsidiaries, affiliates, and related companies, for example, where we share common data systems or where access helps us to provide our services and operate our business.
- **Government agencies.** We may disclose data to law enforcement or other government agencies when we believe doing so is necessary to comply with applicable law or respond to valid legal process.
- **Other third parties.** In certain circumstances, it may be necessary to provide data to other third parties, for example, to comply with the law or to protect our rights or those of our customers.
- **Other users and individuals.** If you use our services to interact with other users of the service or other recipients of communications, we will share data, including Consumer Health Data, as directed by you and your interactions.
- **The public.** You may select options available through our services to publicly display and disclose certain information, such as your profile, demographic data, content and files, or geolocation data, which may include Consumer Health Data.

6. Exercising Your Rights Under the Act

The Act provides certain rights with respect to Consumer Health Data, including rights to access, delete, or withdraw consent relating to such data, subject to certain exceptions. You can request to exercise such rights by either:

- Calling us at 877.709.0201;
- Emailing us at support@onlifehealth.com; or
- Writing to us at 113 Seaboard Ln, Suite C-200, Franklin, TN 37067

If your request to exercise a right under the Act is denied, you may appeal that decision by contacting our support@onlifehealth.com. If your appeal is unsuccessful, you can raise a concern or lodge a complaint with the Washington State Attorney General at www.atg.wa.gov/file-complaint.