



APREE HEALTH WEBSITE PRIVACY NOTICE

Effective Date: January 1, 2025

[apree health](#) (“apree,” “our,” “us,” or “we”) refers to the national healthcare delivery organization consisting of the following companies: i) [Vera Whole Health, Inc.](#), including its affiliates and subsidiaries, as well as the Vera-friendly PCs, (collectively, “Vera”); and ii) [Castlight Health, Inc.](#), including its affiliates and subsidiaries (collectively, “Castlight”).

At apree we respect your privacy and take Internet privacy very seriously. This Website Privacy Notice was written for you, (the “**Website Visitor**”), when visiting [www.apreehealth.com](#), including its subpages and our respective company websites at [www.verawholehealth.com](#) and [www.castlighthealth.com](#) (collectively the “**apree Corporate Websites**” or “**Corporate Websites**”). This Website Privacy Notice is only intended to describe what Personal Information may be collected from you when browsing our Sites for analytical purposes, and should be reviewed alongside our [Website Terms of Service](#).

- This Website Privacy Notice **does not apply** to you if you are a registered member (“**Engaged Member**”) of any of our apree Services, such as the My Vera App and/or the Castlight Platform, accessible via web or digital application. If you are an Engaged Member, please promptly review the [apree health Privacy Policy for Engaged Members](#), if you have not done so.
- For Engaged Members who visit and become patients of a [Vera Whole Health Care Center](#) or otherwise receive treatment or care while using our Services, the [Notice of Privacy Practices](#) applies and describes how a member’s Health Information is collected, used, and disclosed.
- For apree job applicants and/or employees, the [apree Candidate Privacy Notice](#) applies and describes how these individual’s Personal Information is collected, used, and disclosed during the application and recruitment process.

For purposes of this Website Privacy Notice, the term “**Website Visitor**” includes, but is not limited to: (i) individuals browsing any of our Corporate Websites, including eligible My Vera and Castlight members (until registered); (ii) customers and/or business prospects; or (iii) any other Internet user who visits our Corporate Websites.

By visiting any of our Corporate Websites, you are consenting to the collection, use, and disclosure of your personal information as described herein this Website Privacy Notice. **Please read this Website Privacy Notice carefully and do not continue to use our Corporate Websites if you do not agree with how your Personal Information may be collected, used and disclosed.** We reserve the right to modify this Website Privacy Notice as needed to accurately reflect our Personal Information collection, use, and sharing practices, and when required by law. If we make changes to this Website Privacy Notice, a new ‘Effective Date’ will be reflected at the top of this notice.

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Section 1 – Personal Information We Collect and Use

Personal information refers to information that reasonably identifies, relates to, describes, or can be associated with a Website Visitor. When interacting with our Corporate Websites, we may collect and use the following types of Personal Information.

1. **Information Requests.** If you wish to request more information about our product services and offerings, such as subscribing to our marketing emails, you will be required to provide contact information such as your name and email address. This information will only be used by us to communicate with you about our services and products.
2. **Information from Third Parties.** We may receive information about you from third parties. For example, we may supplement the information we collect with outside records, or third parties may provide information in connection with a business relationship. If others give us your information, we will only use that information for the specific reason for which it was provided to us.
3. **Information from Your Contacts.** We may also collect information about your contacts. Your disclosure of such information is completely voluntary. When you provide us with information about your contacts, we will only use this information for the specific reason for which it was provided.
4. **Log Files.** As with of most websites, our Corporate Websites automatically collect and store in log files the Internet Protocol (IP) address of the computer you are using, the name of the domain and host from which you access the Internet, the browser software you use, your device's operating system, the date and time you access the service, and the Internet address of the website from which you directly linked to our Corporate Websites. We may combine this automatically collected log information with other information we collect about you. We use this log file information to analyze trends, monitor service traffic and usage patterns for internal marketing and security purposes, and to help make our Corporate Websites more useful.
5. **Locator information.** We, alongside your internet provider may use locator information as is necessary to enforce any of the terms of this Notice. This information may include your name, email address, physical address, and/or other data that enables us to personally identify you.

Section 2 – Personal Information We Disclose

While we retain the right to disclose the Personal Information we collect from you for our internal business purposes, there may be times when we disclose your Personal Information to third parties for our legitimate business purposes. Unless you have otherwise consented to additional use or disclosure of your Personal Information, we will only disclose such Personal Information to third parties for the following reasons:

1. **Disclosures in Good Faith.** We may disclose your Personal Information when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud or the security of our systems, or respond to a government request, subpoena or similar legal process,



including if we are involved in a merger, acquisition, or sale of all or a portion of its assets. We may notify you by a prominent notice on our Corporate Websites of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information.

- 2. Third-Party Vendors.** We may provide your Personal Information to companies that provide services to help us with our business activities, such as our marketing initiatives. These companies are only authorized to use your Personal Information as necessary to provide such services to us.
- 3. Third-Party Websites.** If you use our Corporate Websites to link to another organization's website, you may decide to disclose Personal Information on that website. For example, you might provide your contact information to obtain information from another organization. Please be aware that in contacting that website, or in providing information on that website, that third party website may obtain Personal Information about you, and this Website Privacy Notice will not apply when you leave our Corporate Websites.

Section 3 – How To Opt-In or Opt-Out of Specific Uses of Personal Information

You have the right to correct, update, amend or otherwise opt-out of the way we collect, use and disclose your Personal Information when visiting our Corporate Websites by contacting us by email at privacy@apreehealth.com, phone at (888) 722-0483, or by clicking unsubscribe at the bottom of an email or replying STOP or LEAVE to any text you may receive from us. We will store your adjusted communication preferences in our internal Do Not Contact List. If you later decide to opt-in to a certain communications, we will adjust your preferences for only that communication method.

Section 4 – Security and Retention Of Information

The security of your Personal Information is important to us. We implement the appropriate technical, physical, and administrative security measures to secure all information collected and stored by our Corporate Websites, as certified by our HITRUST Certification and SOC 2 compliance audit. Our data centers are both physically and electronically secured and all communications between you and our servers are encrypted. Internal access to your Personal Information is also encrypted, and limited to the business needs of those with role-based access, only when necessary.

We will retain your Personal Information as long as we have a legitimate business purpose to use your information such as, but not limited to, operating our Corporate Websites, complying with legal obligations, resolving disputes, or enforcing our agreements. When there is no longer such a purpose, we will destroy your information, or if this is not possible, then we will securely store your Personal Information and isolate it from any further processing until destruction is possible. We will also destroy certain Personal Information we collect about you upon your request and as described in [Section 3](#).

While we actively follow industry accepted standards to protect the Personal Information submitted to us, both during transmission and once we receive it, no security system is perfect, and methods of transmission over the Internet and electronic storage are never 100% secure. Therefore, we cannot guarantee absolute security, however, we rely on our implemented security measures and our users to protect privacy and security. For more information on apree security practices, please refer to our [Security Whitepaper](#).



Section 5 - Tracking Technologies

Our Corporate Websites may use tracking technologies such as cookies, pixels, web beacons, tags, scripts and other storage technologies to collect or receive information about you. These technologies help us save your preferences and understand how you navigate through our Corporate Websites so that we may improve your experience and measure the effectiveness of our digital advertising campaigns. For example, we may use a conversion pixel on our Corporate Websites to track your interactions after you click on an ad for our services from a third-party website. In certain circumstances, you may be able to control the use of specific tracking technologies at the individual browser level in a variety of ways including through a pop up control on our Corporate Websites. If you reject all or certain tracking technologies, you may be limited in your ability to use all or certain functionalities of our Corporate Websites.

We use the following types of tracking technologies on our Corporate Websites:

1. **First Party Cookies:** Our Corporate Websites use first party cookies that allow us to use data analytics so we can measure and improve the performance of our site and provide more relevant content to you, as described in our [Cookie Policy](#). You may manage how these cookies are used in your browser settings.
2. **Clickstream Data.** Our Corporate Websites record clickstream data. Clickstream data is a record of your online activity, including every click, page navigation, and interaction with our Corporate Websites. We collect data types such as your Internet domain name, device type, IP address, browser type and version, operating system and platform, the average time spent on our Corporate Websites, web pages viewed, content searched for, access times and other relevant statistics, and assign unique identifiers to the device or other credentials you use to access our Corporate Websites for the same purposes.
3. **Advertising and Social Media Pixels.** Our Corporate Websites and our emails may contain small electronic files known as web beacons, clear gifs, single-pixel gifs, pixel tags ("**Pixels**") that permit us, for example, to count Website Visitors who have visited those pages or opened an email and for other related Site statistics (e.g., recording the popularity of certain Corporate Website content and verifying system and server integrity). We use this technology to: i) limit the number of times you see an ad; ii) measure the effectiveness of our ad campaigns; iii) retarget Website Visitors to our Corporate Websites; and/or iv) understand Visitor behavior after they view our ads. This technology is usually placed on behalf of an advertising network (e.g., LinkedIn, Facebook, or Google) with the site operator's permission.
4. **Do Not Track ("DNT") Browser Signals.** Website Visitors may initiate a "DNT" browser setting that allows you to inform our Corporate Websites that you do not want to be tracked for advertising or analytics purposes. Please note, that although we intend to honor the privacy requests of all Website Visitors, currently our Corporate Websites do not process or respond to DNT signals transmitted from some Internet browsers (e.g. Internet Explorer, Mozilla Firefox, and Safari), as uniform standards for "DNT" signals have not been adopted by all web browsers.
5. **Location Information.** You may be able to adjust the settings of your device so that information about your physical location is not sent to us or third-parties by disabling location services within the device settings or denying certain websites or mobile applications permission to access location information by changing the relevant preferences and permissions in your mobile device or browser settings. Please note that your location may be derived from your WiFi, Bluetooth, and other device settings. Please see your device settings for more information.



6. **Google Analytics.** We use the web analytics service Google Analytics from Google LLC (1600 Amphitheater Parkway, Mountain View, CA 94043, USA) on our Corporate Websites. This data processing serves the purpose of analyzing the use of our Corporate Websites for analytics purposes. For this purpose, Google will use the information obtained on our behalf as the operator of our Corporate Websites to evaluate your use of our Corporate Websites, to compile reports on Site activity and to provide us with other services related to Site activity and internet usage. The following information, among others, can be collected: Country of origin, date and time of the page view, click path, information about the browser you are using and the device you are using, pages visited, and referrer URL (website from which you accessed our Corporate Websites). The IP address of your browser transmitted by Google Analytics is not linked to any other Google data. Google Analytics uses technologies such as cookies, web storage in the browser and tracking pixels, which enable an analysis of your use of our Corporate Websites.

Section 6 – Notice to Individuals located in the EEA, the United Kingdom and Switzerland

To the extent you are an individual who is located in the European Economic Area, United Kingdom or Switzerland (collectively, the “EEA”) at the time of data collection when visiting our Corporate Websites, we are providing the following GDPR-related disclosures. As you may have specific rights based on your EEA jurisdiction, please see more details on your rights and how to exercise such rights in Section 7 of the [apree health Privacy Policy for Engaged Members](#).

We are a Data Controller with regard to any Personal Data collected from our Corporate Websites.

1. **Legal Bases for Processing.** We may collect and process your Personal Data for the following reasons: i) For our legitimate interests to offer information on our Services we feel may interest you; ii) To protect our property, rights or safety of our customers or others; iii) If it is necessary to carry out our obligations arising from any contracts entered into between you and us, or to take steps at your request prior to entering into a contract with you; iv) Based on your prior consent. In addition, it may be our legal obligation to use or share your Personal Data with third parties, such as public authorities or law enforcement bodies.
2. **Direct Marketing.** We will only contact individuals located in the EEA by electronic means, such as email or SMS, based on our legitimate interests, as permitted by applicable law, or the individual’s consent. If you do not want us to use your Personal Data in this way, you may click the unsubscribe link in an email you receive from us, reply STOP to an SMS text you receive us or contact us at privacy@apreehealth.com.

Section 7 – State Residency Privacy Rights

You may have specific privacy rights based on your state residency. For more details on how to exercise your rights, please review the [Supplemental State Privacy Policy](#).

Section 8 – Contact Us

If you have questions or complaints regarding our Website Privacy Notice, please contact us at:

apree health

ATTN: Legal Office

1201 Second Ave., Suite 1400

Seattle, WA 98101



Email: legal@apree.health