



# Privacy Policy

*Last Updated March 8th, 2023*

This Privacy Policy describes the information Across Matrix, Inc. (“Matrix,” “we,” “us,” “our”) collects and how we use and/or disclose that information; it also discloses options regarding certain uses of this information. Matrix enables individuals to collect, view, maintain, and/or share health and other information via our website and other technologies located at [www.acrossmatrix.com](http://www.acrossmatrix.com) (together, the “Service(s)”). We are committed to protecting your (“user of the Services,” “you,” “your”) information and right to privacy.

## Information Collected

### Health Information and Other Reported Information

Matrix is a technology platform that allows you to input information, upload information, and allows the transfer of information from medical records through the “right of access” under the Health Insurance Portability and Accountability Act (“HIPAA”) and/or the laws applicable to where you are located.

You may choose to provide Matrix any or all of the following information:

- (i) general information
- (ii) personal health and/or medical information
- (iii) information you have from third parties including caregivers, clinicians, and researchers; and/or
- (iv) data from devices, sensors, or diagnostic equipment

We collect information about you using one or more of the following processes:

- (i) allowing you to input data into surveys/forms and other tools within your Matrix account
- (ii) allowing you to upload information directly into your Matrix account
- (iii) having you connect Matrix to online portal(s) hosted by your hospital(s), clinician(s), and/or insurance(s) in order to obtain information that can be accessed to populate your Matrix account
- (iv) allowing you to provide us information or explicitly allowing us to collect information on your behalf

We are not responsible or liable for the accuracy of the information you provide and/or that is provided to us by third parties. Additionally, we are not responsible for any third party’s policies or practices.



## **Account Information**

Matrix collects account information about you in order to create an account and use our services. Account information includes, as applicable or permitted under law, items such as name, e-mail address, telephone number, address, and birth date.

From time to time, Matrix will send emails or text messages that communicate information about your account or other Matrix services. When you open these emails, text messages, or click on links, we may collect and retain information about your interaction with the email, text message, or link. You will have the option of opting out of email or text message communications, except where required by law, necessary to prevent or mitigate a security or fraud risk, or in order to continue to provide you with the Service.

When you ask us to delete your account, in accordance with applicable law, your account information along with health information and any other applicable information will be deleted and further access to your account and our Services removed.

## **Use of Information**

When you use the Matrix website we may automatically collect technical and navigational information about your interaction with our Services such as your computer browser type, Internet Protocol address, pages visited, language of device, precise location, device type, browser type, unique device type and/or identifiers, and/or average time spent on our website.

We may collect usage information using cookies and/or web beacons or other similar tracking technologies. You may reset your web browser to refuse certain tracking methods such as cookies or you may choose to receive a notification of when a cookie is being sent. Please note that if you choose to modify the way we collect information in any way, certain features of our website or Services may not work properly and/or may not be available.

We may use the information we collect in any or all of the following ways:

- (i) To improve our experience with our site
- (ii) To tailor features, content, and Services from us to you
- (iii) To better understand user interaction with our Services

We may collect any other information you include in communications with us.

Matrix may use your information to create and manage your Matrix account and may also use your information for one or more of the following purposes:

- (i) To keep you updated about selected Services. You can opt out of these communications at any time through your account
- (ii) To help us create, develop, operate, deliver, and improve our products and Services
- (iii) To help maintain anti-fraud, account security, and network security



- (iv) To send important notices regarding Matrix products including changes to our terms, conditions, and policies
- (v) To locate, authenticate, and match your health information

Matrix may access information about your use of our website or Services in order to create aggregate usage data for both internal use and in some cases public dissemination. This statistical information will not contain any specific personal information about you or any other Matrix users.

We may use information that has been anonymized or aggregated, without limitation. We may also use information to comply with any applicable legal obligations, to enforce any applicable terms of service, and to protect or defend the Services, our rights, the rights of our users, or others.

### **Text Messages**

You may opt-in to receive text messages from Matrix as part of our Services. Text message frequency will vary. You agree that by providing your mobile phone number and opting in to receive text messages, you expressly consent to receiving automated text messages from us to the mobile phone number you provide. Consent to receiving text messages is not required in order to be a Matrix user. Message and data rates may apply, and you should check rates with your mobile carrier. We nor your mobile carrier are liable for delayed or undelivered messages. We are located in the United States, and international rates may apply depending on your location. We share your mobile phone number with service providers with whom we contract in order to send you automated text messages, but we will not share your mobile phone number with third parties for their own marketing purposes.

Contact us at [info@acrossmatrix.com](mailto:info@acrossmatrix.com) if you have any questions about our text message Services.

### **Disclosure of Information to Third Parties**

Matrix may share personal information about you, including account information, for any or all of the following purposes:

- (i) To comply with valid legal processes including subpoenas, court orders or search warrants, and as otherwise authorized by law.
- (ii) To provide information to professional advisors such as auditors, law firms, and accounting firms
- (iii) To protect against fraudulent, malicious, abusive, unauthorized, or unlawful use of or subscription to our products and Services and to protect users from the same
- (iv) To enforce any applicable terms of service
- (v) To share certain information with third parties upon your request
- (vi) To perform Services or functions that enable Matrix to function with service providers and/or third-party contractors who need your information
- (vii) For the purposes of providing the Services, with your consent or where required by applicable law, with our affiliates or within our corporate group



- (viii) To provide information to your patient advocacy group and/or foundation
- (ix) In other instances with your consent

When you make a decision to share your data outside of Matrix, the data practices under this Privacy Policy will no longer apply to the information held by that outside entity. We recommend that you review and determine if you are comfortable with that individual or entity's privacy policy prior to sharing your data outside of Matrix.

In any circumstance where your consent is sought prior to Matrix sharing personal information about you, you will be able to withdraw that consent at any time. Such withdrawal of consent will apply into the future indefinitely within a reasonable amount of time after Matrix has received the withdrawal or at such other time as required by applicable law.

## **Geographic Specific Provisions**

Australia, California, Canada, European Union, India, New Zealand, Singapore, and many other locations around the world have additional or different notifications, disclosures, and other applicable privacy rights and/or policies not covered specifically within this privacy policy. Matrix is committed to global participation in its Services. Please contact us at [privacy@acrossmatrix.com](mailto:privacy@acrossmatrix.com) for specific questions, notices, compliance information, or other information related to your rights within your specific geographic region.

## **Child Safety**

We do not knowingly or intentionally collect information from minors. If you are under 18, you may use our Services only with your parent or guardian's consent.

## **Integrity and Retention of Information**

You should keep your account information and self-reported information accurate, complete, and up-to-date. Information in your Matrix account, sourced directly from a third-party such as clinician(s), insurance provider(s), or other health data source(s) cannot be changed by you or Matrix; however, you can request the data be changed at the source of supply and then re-uploaded. Additionally, you can self-report information to clarify third-party data.

Matrix will retain personal information about you as long as necessary to fulfill the purposes outlined in this Privacy Policy. Your Matrix account will remain populated with personal information about you until you decide to close your account.



## **Changes to This Policy**

We reserve the right to make changes to this Privacy Policy, in which case we will update the “Last Updated” date at the top of this Privacy Policy. We will give you advance notice of any material changes so you can decide if you want to maintain your account with Matrix. The updated Privacy Policy will be effective as of the time of posting or at such later date as may be specified in the updated Privacy Policy.

## **Contact Us**

Questions, concerns, or suggestions related to our Privacy Policy can be emailed to our Legal department at [privacy@acrossmatrix.com](mailto:privacy@acrossmatrix.com), or you can contact us by phone at 1-770-316-5569, or you can write a letter to:

Matrix  
Attn: Privacy  
306 B Rome Street  
Carrollton, Georgia 30117

IT Governance Europe Limited has been appointed by us to act as our EU representative. If you wish to exercise your rights under the EU General Data Protection Regulation (EU GDPR) or have any queries in relation to your rights or general privacy matters, please email our Representative at [eurep@itgovernance.eu](mailto:eurep@itgovernance.eu). Please ensure to include our company name, Across Matrix, in any correspondence you send to our Representative.