

## Qsource Privacy Policy

*Last Modified: April 12, 2019*

### **Introduction**

This Privacy Policy describes Qsource’s (“Qsource,” “we,” “us” or “our”) use and sharing of (1) personally identifiable information (“PII”) that users (“users” or “you”) voluntarily provide to Qsource when they use or register with Qsource’s website (the “Site”) and (2) certain information about you (described in more detail below) that is automatically collected when you access the Site. This Privacy Policy does not apply to: (i) information collected by Qsource offline or through any other means, including any website operated by a third party (including our affiliates and subsidiaries); or (ii) any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Site.

### **Consent**

**PLEASE READ THIS POLICY CAREFULLY TO UNDERSTAND OUR POLICIES AND PRACTICES REGARDING YOUR INFORMATION AND HOW WE WILL TREAT IT. IF YOU DO NOT AGREE WITH OUR POLICIES AND PRACTICES, DO NOT ACCESS, VIEW OR USE ANY PART OF THE SITE. BY USING, ACCESSING, VISITING, OR REGISTERING WITH THE SITE, OR BY SUBMITTING YOUR INFORMATION THROUGH IT, YOU CONSENT TO THIS PRIVACY POLICY AND TO QSOURCE’S COLLECTION AND SHARING OF YOUR PII AND OTHER CERTAIN INFORMATION IN ACCORDANCE WITH THE TERMS OF THIS PRIVACY POLICY.**

### **Protecting Children**

We are committed to protecting the privacy of children. This Site and the Service are not intended or designed to attract children under the age of 18. We do not collect PII from any person who we know is a child under the age of 18. If you are under the age of 18, do not use or provide any information on the Site or provide any information about yourself to us, including your name, telephone number, email address or any screen name or user name you may use. If we learn we have collected or received PII from a child under the age of 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under the age of 18, please contact us using the contact information provided below.

### **Changes to this Privacy Policy**

We reserve the right, in our sole discretion, to modify this Privacy Policy at any time. We will provide notice by, at a minimum, updating this posting. Any changes to this Privacy Policy will be in effect as of the “Last Modified” date referenced in this Privacy Policy. You are expected to, and you acknowledge and agree that it is your responsibility to, carefully review this Privacy Policy prior to using the Site and from time to time so you are aware of any changes.

However, if we make material changes to this Privacy Policy, we will notify you of such changes either through the email address you have provided us, other method of written notice, or by means of a prominent notice on the Site before the change becomes effective. Your continued use of the Site after the “Last Modified” date will constitute your acceptance of and agreement to such changes and to Qsource’s collection and sharing of your PII according to the terms of the then current Privacy Policy. If you do not agree with this Privacy Policy and our practices, do not access, view or use any part of the Site.

## **Information We Collect**

We collect information you share through the Site. We may collect PII you provide, such as your name, email address, mailing address, telephone number, or other identifiers.

We may use Google Analytics or other similar technologies (the “Analytics Technologies”) to collect and process certain information about you and your use of the Site. The information collected by the Analytics Technologies is statistical data and does not include PII, and we do not maintain it or associate it with PII we collect in other ways or receive from third parties. **You may learn more about how Google uses the information it collects by visiting the following site “How Google uses data when you use our partners’ sites or apps” (located at <https://www.google.com/policies/privacy/partners/>). Google’s ability to use and share information collected by Google Analytics about your visits to the Site is restricted by the Google Privacy Policy (located at <https://www.google.com/policies/privacy/>).**

Our web server and/or the Analytics Technologies may collect and store the following information about you: the originating name of the domain from which you access the Internet; the date and time you access the Site; the pages of the Site you visit or the services you access on the Site; the Internet address of the website from which you linked directly to the Site; the type of device, device ID, operating system and web browser you use to access the Site; the search engine and key words used that brought you to one of our sites; and the location of the device used to access the Site. This information is collected automatically. We solely use it to improve the Site by tracking the number of “hits” or visits to the Site, the most popular times of day and sections visited, and the range of devices and browsers most commonly used to view the Site. Qsource does not sell or transmit any of this information to other parties or organizations.

We may use “cookies,” which are small files stored on your computer’s hard drive that are used to store and track personal information. Cookies are used to remind us of who you are in order to deliver you better service. You can set your browser to notify you when you receive a cookie, giving you the chance to decide whether or not to accept it. By not accepting cookies, some Site pages may not display properly or you may not be permitted to access certain information.

Qsource may also collect Internet protocol addresses (the Internet address of a computer) to track a user’s session while the user remains anonymous. We analyze this data for certain trends in statistics, such as which parts of our Site users are visiting and how long they spend there.

When you send email or other communications to Qsource, we may retain those communications in order to process your inquiries, respond to your requests and improve our services. We may use your email address to communicate with you about our services. We may use your email

address to send periodic emails if you decide to opt-in to our mailing list. If at any time you would like to unsubscribe from receiving future emails, you may unsubscribe at the bottom of each email.

You also may provide information to be published or displayed (hereinafter, “posted”) on public areas of the Site, or transmitted to other users of the Site or third parties (collectively, “User Contributions”). Your User Contributions are posted on and transmitted to others at your own risk. Although we limit access to certain pages, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Site with whom your User Contributions may be shared. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

**YOU MAY NOT POST ON THE SITE ANY INDIVIDUALLY IDENTIFIABLE HEALTH INFORMATION (AS DEFINED UNDER HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA) REGULATIONS AT 45 C.F.R. § 160.103).**

### **Do Not Track Policy**

We may also use these automatic data collection technologies to collect PII about your online activities over time and across third-party websites or other online services (“Behavioral Tracking”). “Do Not Track” is a standard that is currently under development. As it is not yet finalized, we adhere to the standards set out in this privacy policy and we do not currently respond to “Do Not Track” signals on our Site or on third-party websites or online services where we may collect information.

Some content or applications on the Site are served by third-parties, including content providers and application providers. These third parties may use cookies alone or in conjunction with other tracking technologies to collect information about you when you use our Site. The information they collect may be associated with your PII or they may collect information, including PII, about your online activities over time and across different websites and other online services. They may use this information to provide you with targeted content. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about targeted content, you should contact the responsible party directly.

### **How We Use Your Information**

We may use the information that we collect about you or that you provide to us, including any PII:

- To present the Site and its contents to you.
- To provide you with information or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.

- To notify you about changes to the Site or any services we offer or provide through it.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

By using the Site, you are consenting to such use of your information.

### **What Information is Shared and With Whom**

We do not rent or sell your PII to outside marketers. Qsource may share your information with its affiliates, subsidiaries or divisions and with their respective officers, directors, employees, accountants, attorneys and agents. In certain circumstances, we may share your information with third-party service providers that need access to your information to provide operational or other support services on our behalf. All such third-party service providers are required to maintain the confidentiality of your information and are prohibited from using your PII except for the purposes for which we disclose it to them or as required by law.

Qsource may share information about the use and engagement of the Site with some of its customers, such as the Centers for Medicare & Medicaid Services (CMS) and some state governments. Qsource does not provide PII in these reports, which are generally used for verifying the level and type of use of the Site.

We also may provide information to regulatory authorities and law enforcement officials in accordance with applicable law or when we otherwise believe in good faith that the law requires it. There may be instances when we may access or disclose your information in order to protect or defend the legal rights or property of Qsource and its affiliated companies or their employees and agents, to protect the safety and security of users, and to protect against fraud. We may also access or disclose your information to comply with a court order or other legal process, enforce our Terms of Use, or respond to claims that any posting or other content violates the rights of third-parties. Qsource may sell, transfer or otherwise share some or all of its assets in connection with a merger, reorganization or sale of assets, or in the event of bankruptcy. In such an event, personal information may be one of the assets transferred.

### **Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the PII you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Cookies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of the Site may then be inaccessible or not function properly.
- **Disclosure of Your Information for Third-Party Advertising.** Qsource does not share your PII with unaffiliated third parties for promotional purposes.

- **Google Analytics Opt-out Option.** If you do not want your information collected with Google Analytics, you can install the Google Analytics opt-out browser add-on. To opt-out of Google Analytics, visit the Google Analytics opt-out page (located at <https://tools.google.com/dlpage/gaoptout>) and install the add-on for your browser. For more details, visit the “Google Analytics opt-out browser add-on” page (located at <https://support.google.com/analytics/answer/181881?hl=en>).
- **Email Opt-out Option.** If you do not want to receive email communications from Qsource, you can unsubscribe by clicking the “Unsubscribe” link in the email’s footer.

## **California Rights**

If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your PII by Qsource to a third party for the third party’s direct marketing purposes. To make such a request, please contact us using the contact information provided below. Please note, however, that Qsource does not disclose PII to third parties for their direct marketing purposes.

## **Third Party Websites**

This privacy policy is applicable only to the Site and does not apply to any third party websites or to other companies or persons. The Site may contain links to, and media and other content from, other sites. In addition, such third-party media and content may also contain external links. Because of the dynamic media capabilities of the Site, it may not be clear to you which links are embedded in the Site and which are embedded in third-party media and/or content. Qsource cannot and does not guarantee the privacy policies and practices of any third party. Qsource does not control, operate, or endorse any information, products, or services of any third-party websites that may be reached through links from the Site. The use of any personal information provided by you to, or automatically collected from, a third party will be governed by that party’s privacy policy. If you are unsure whether a web site is controlled, affiliated, or managed by Qsource, you should review the privacy policy at each linked web site to determine how that site treats your PII.

## **Security**

We take reasonable precautions to protect the security of the PII that you share with us. Unfortunately, however, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your PII, we cannot guarantee or warrant the security of any information you transmit to or from our Site, and you do so at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

The safety and security of your information also depends on you. Where we have given you (or you have chosen) a password for access to certain parts of the Site, you are responsible for keeping this password confidential. Do not to share your password with anyone.

## **Access and Update Your Information**

If you have any questions about PII that may be retained by Qsource, you may contact us using the contact information provided below. Upon your request, Qsource will provide to you the PII under its control, if any, as well as information about the ways in which that information is being used and disclosed. Qsource only collects PII for the purposes of providing you with the information or services that you request from us and the support of those services. Qsource will use commercially reasonable efforts to ensure that PII we may be using or disclosing is accurate and complete. If you demonstrate that your information is inaccurate or incomplete, the information will be amended as appropriate. We will use commercially reasonable efforts to respond to any request and update your PII, if necessary.

### **Storage; Removal of Information**

We may store all the above-mentioned information indefinitely, and may archive such information elsewhere. Upon your request, we will make commercially reasonable efforts to remove all your PII from our records; however, it may be impossible to remove your account without some residual information being retained. If you would like to request that we remove your PII from our records, please contact us using the contact information provided below.

### **Governing Law**

This Privacy Policy and any disputes related thereto shall be governed by and construed in accordance with the laws of the State of Tennessee without giving effect to any choice or conflict of law provision or rule (whether of the State of Tennessee or any other jurisdiction).

### **Contact information**

To ask questions or comment about this Privacy Policy and Qsource's privacy practices, contact us at: [compliance@qsource.org](mailto:compliance@qsource.org).

Please note, if your communication is sensitive, you may want to send it by postal mail instead.

### **Postal Address:**

Qsource  
Attn: Compliance Officer  
3340 Players Club Parkway, Suite 300  
Memphis, TN 38125  
Phone: 901.273.2682  
Email: [compliance@qsource.org](mailto:compliance@qsource.org)  
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