

## Privacy Policy

Updated October 22, 2015

Atlantic Orthopaedics (the "Company," "we" or "us", and in all cases including affiliates) respects and is committed to protecting your privacy. To access your account information through our Site, we may need to collect your PII (defined below). This Privacy Policy describes how we collect, use and disclose your PII. Please note that, unless we define a term in this Privacy Policy, all capitalized terms used in this Privacy Policy have the same meanings as in our Terms and Conditions. Therefore, please make sure that you have read and understand our Terms and Conditions.

### Changes to this Privacy Policy

Any information that is collected via our Site is covered by the Privacy Policy. We may amend this Privacy Policy from time to time. If we make any substantial changes in the way we use your PII, we will notify you of those changes by posting on the Site or by sending you an email or other notification, and we will update the "Updated Date" above to indicate when those changes will become effective.

#### Information Collection

Personally identifiable Information ("PII") means any information that may be used to identify an individual, including, but not limited to, a first and last name, email address, a home, postal or other physical address, and phone number.

Account Information. We receive your PII when you receive care or take responsibility for an account. We collect your PII when you register or create an account for the Site or when you submit your PII to us through the Site or over the phone for any other reason.

Cookies and Tracking Technology. A "cookie" is a small data file that certain Sites write to your hard drive when you visit them. A cookie file can contain information such as a user ID that the Site uses to track the pages you've visited, but the only PII a cookie can contain is information you supply yourself. A cookie can't read data off your hard disk or read cookie files created by other Sites. Some parts of the Service use cookies to understand user traffic patterns and to tell us how and when you interact with our Site. Session cookies are deleted when you log off from the Site and close your browser.

If you prefer not to receive cookies while browsing our Site you can set your browser to warn you before accepting cookies and refuse the cookie when your browser alerts you to its presence. You can also refuse all cookies by turning them off in your browser. However, you do need to have cookies turned on to use/navigate through many parts of our Site. If you refuse cookies, you will not be able to access all portions or features of the Site. Note that this Privacy Policy covers only our use of cookies and does not include use of cookies by such third parties.

Information Related to Your Use of the Service. If you have not created an account, when you use our Service, you use our Service, App and Site anonymously. We do

automatically log your IP address (the Internet address of your computer) and other information such as the pages or features of our Site to which you browsed to give us an idea of which part of our Site you visit and how long you spend there (we refer to this information as "Log Data"). But we do not link your IP address to any PII unless you have logged in via your account. We use Log Data to administer the Site and we analyze (and may engage third parties to analyze) Log Data to improve, customize and enhance the Site by expanding their features and functionality and tailoring them to our users' needs and preferences.

Your PII is not shared outside of the Companies without your permission, except as described below.

Information Shared with Our Services Providers. We may engage third-party services providers to work with us to administer and provide the Service. These third-party services providers have access to your PII only for the purpose of performing services on our behalf and are expressly obligated not to disclose or use your PII for any other purpose.

Information Disclosed in Connection with Business Transactions. Information that we collect from our users, including PII, is considered to be a business asset. Thus, if we are acquired by a third party as a result of a transaction such as a merger, acquisition or asset sale or if our assets are acquired by a third party in the event we go out of business or enter bankruptcy, some or all of our assets, including your PII, may be disclosed or transferred to a third party acquirer in connection with the transaction.

Information Disclosed for Our Protection and the Protection of Others. We cooperate with government and law enforcement officials or private parties to enforce and comply with the law. We may disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate: (i) to enforce our Terms of Service, (ii) to respond to claims, legal process (including subpoenas); (iii) to protect our property, rights and safety and the property, rights and safety of a third party, our users, or the public in general; (iv) to stop any activity that we consider illegal, unethical or legally actionable activity; and (v) as required in accordance with HIPAA or related applicable local, state or federal laws.

#### Your Ability to Review Your Account and Information

If you are a registered user with an account, you can review your PII by going to the Patient Portal and signing in using the login page.

#### Data Security

Your account information is password-protected for your privacy and security. The Companies safeguard the security of the information you provide to us with physical, electronic, and managerial procedures. In certain areas of our Site, we use industry-standard SSL-encryption to enhance the security of data transmissions. While we strive to

protect your PII, we cannot ensure the security of the information you transmit to us, and so we urge you to take every precaution to protect your PII when you are on the Internet. We require that you change your passwords every 60 days and recommend that you use a combination of letters and numbers, and make sure you use a secure browser.

#### Responding to Do Not Track Signals

Our Site does not have the capability to respond to "Do Not Track" signals received from various web browsers.

#### Children and Privacy

Our Site do not target and are not intended to attract children under the age of 13. We do not knowingly solicit PII from children under the age of 13 or send them requests for PII. If we learn that we have collected PII of a child under 13 directly from that child we will take steps to delete such information from our files as soon as possible. Notwithstanding the foregoing, we may collect PII about children under 13 that parents or guardians provide to us when establishing an account for their children's records.

#### Third Party Sites

The Site may contain links to other sites that are owned or operated by third parties. We are not responsible for the content, privacy or security practices of any third parties. To protect your information, we encourage you to learn about the privacy policies of those third parties.

#### International Transfer

Your information is stored by the Companies on controlled servers with limited access and may be stored and processed in the United States or any other country where the Companies or agents are located. If you're located outside the United States and choose to provide your PII to us, we may transfer your PII to the United States and process it there. Those who choose to access and use the Service from outside the U.S. do so on their own initiative, at their own risk, and are responsible for compliance with applicable laws.

#### Questions

If you have any questions about this Privacy Policy, please contact us at (844) 570-3775.