

CuraFi Privacy Policy

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This Privacy Policy is designed to help you understand how Cura Financial, Inc. (“**CuraFi**,” “**we**,” “**us**,” or “**our**”) collects, uses, and shares your information, and to help you understand and exercise your privacy rights.

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1. SCOPE AND UPDATES TO THIS PRIVACY POLICY

This Privacy Policy applies to information processed by us, including on our chrome extensions and applications (“Apps”) operated by Cura Financial, Inc. (“**CuraFi**”).

An Important Note: This Privacy Policy does not apply to any of the information that our customers may collect and process using CuraFi’s products (“**Customer Data**”). Our customers’ respective privacy policies govern their collection and use of Customer Data. Our processing of Customer Data is governed by the contracts that we have in place with our customers, not this Privacy Policy. Any questions or requests relating to Customer Data should be directed to our customer.

Changes to our Privacy Policy. We may revise this Privacy Policy from time to time in our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use our Apps after the new Privacy Policy takes effect.

2. INFORMATION WE COLLECT

The categories of information we collect depend on how you interact with us, our Apps, and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Apps, and information from other sources such as third-party services and organizations, as described below.

A. Information You Provide to Us Directly We may collect information that you provide to us.

- **Your Communications with Us.** We may collect information, such as your first and last name, email address, role, when you request information about CuraFi or our Apps, register for our newsletter, request support, or otherwise communicate with us.

Surveys. We may contact you to participate in surveys. If you decide to participate, we may collect information from you in connection with the survey.

- **Interactive Features.** We may collect information that you submit or make available through our interactive features (e.g., messaging and chat features, commenting functionalities, forums, blogs, and social media pages). Any information you provide using the public sharing features of the Services (referred to herein as “User Content”) will be considered “public,” unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein.

- **Interaction and Usage Data**

We collect data on how you interact with our application and use its features. This includes information such as the times you access the app, the features you use, the frequency and duration of your interactions, navigation paths within the app, and any preferences or settings you choose while using the app. This interaction and usage data helps us to understand user behavior, improve app functionality, enhance user experience, and optimize our services accordingly. Collecting this data is essential for us to deliver personalized and efficient solutions to our users. As with all personal information we handle, this data is processed in strict adherence to applicable privacy laws and regulations.

- **Protected Health Information (PHI) and Personally Identifiable Information (PII)**

In addition to the information mentioned above, we specifically collect patient data (PHI & PII) necessary for the functioning of our applications. This includes, but is not limited to, health-related information that is essential to enable features and functionalities within our apps. We handle all such data in compliance with the Health Insurance Portability and Accountability Act (HIPAA) and other applicable regulations, ensuring the highest standards of privacy and data security are maintained. **All patient identifiable information is stored securely according to HIPAA requirements. This information will not be aggregated with other data unless it is fully de-identified, ensuring no possibility of re-identification in compliance with HIPAA standards.** This data helps us to tailor our applications to meet your needs effectively and to enhance your user experience by enabling specific features that are relevant to your personal healthcare management.

B. Information Collected Automatically

We may collect information automatically when you use our Apps.

- **Automatic Collection of Information.** We may collect certain information automatically when you use our Apps, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Apps, such as pages that you visit before, during and after using our Apps, items that you search for via the Apps, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Apps.
- **Cookie Policy (and Other Technologies).** We, as well as third parties that provide content, information, or other functionality on our Apps, may use cookies, pixel tags, and other technologies (“**Technologies**”) to automatically collect information through your use of our Apps.
 - o **Cookies.** Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.
 - o **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in our Apps that collects information about engagement on our Apps. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular link. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Our uses of these Technologies may fall into the following general categories:

- **Operationally Necessary.** This includes Technologies that allow you access to our Apps, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity, improve security, or allow you to make use of our functionality;
- **Performance-Related.** We may use Technologies to assess the performance of our Apps, including as part of our analytic practices to help us understand how individuals use our Apps (*see Analytics below*);
- **Functionality-Related.** We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Apps. This may include identifying you when you sign into our Apps or keeping track of your specified preferences, interests, or past items viewed;

See [“Your Privacy Choices and Rights”](#) below to understand your choices regarding these Technologies.

- **Analytics.** We may use Technologies and other third-party tools to process analytics information on our Apps. These Technologies allow us to better understand how our digital Apps are used and to continually improve and ize our Apps.
- **Google Analytics.** For more information about how Google uses your data (including for its own purposes, e.g. for profiling or linking it to other data), please visit

[Google Analytics' Privacy Policy](#). To learn more about how to opt-out of Google Analytics' use of your information, please click [here](#).

3. Compliance with Healthcare Regulations

Cura Financial, Inc. ("CuraFi") is committed to protecting the privacy and security of personal information, particularly health-related information, in compliance with the Health Insurance Portability and Accountability Act (HIPAA) and all other applicable federal and state healthcare regulations. We adhere to the following principles to ensure compliance:

- **HIPAA Compliance:** All personal health information (PHI) collected, used, and disclosed by CuraFi is handled in accordance with the requirements set forth by HIPAA. We implement stringent administrative, physical, and technical safeguards to ensure the confidentiality, integrity, and security of PHI.
- **Data Protection Measures:** We utilize advanced security measures to protect the storage and transfer of your personal information, ensuring compliance with HIPAA and other relevant data protection regulations.
- **Employee Training:** All our employees are trained on HIPAA requirements and the importance of protecting personal and health information. This training is conducted regularly to ensure that all staff members are aware of their responsibilities.
- **Data Use Agreement (DUA):** Where applicable, we enter into Data Use Agreements with our partners and third-party service providers to ensure that any PHI shared is handled in compliance with HIPAA and other relevant laws.
- **Regular Audits:** CuraFi conducts regular audits to monitor compliance with HIPAA and to identify and remediate any potential vulnerabilities in our data handling processes.
- **Reporting:** We maintain protocols for identifying, reporting, and addressing any data breaches or non-compliance issues in line with regulatory requirements.

By implementing these measures, CuraFi ensures that all personal information, especially health-related data, is managed in compliance with the highest standards set by healthcare regulators.

4. [HOW WE USE YOUR INFORMATION](#)

We use your information for a variety of business purposes, including to provide our Apps, for administrative purposes, and to market our products and Apps, as described below.

A. Provide Our Apps

We use your information to fulfill our contract with you and provide you with our Apps, such as:

- Managing your information and accounts;
- Providing access to certain areas, functionalities, and features of our Apps;
- Answering requests for customer or technical support;
- Communicating with you about your account, activities on our Apps, and policy changes;
- Processing applications if you apply for a job we post on our Apps; and
- Allowing you to register for events.

B. Administrative Purposes

We use your information for various administrative purposes, such as:

Pursuing our legitimate interests such as direct marketing, research, and development (including marketing research), network and information security, and fraud prevention;

- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Apps;
- Improving, upgrading, or enhancing our Apps;
- Developing new products and services;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities, including requests to exercise your rights under this Privacy Policy;
- Debugging to identify and repair errors with our Apps;
- Auditing relating to interactions, transactions, and other compliance activities;
- Sharing information with third parties as needed to provide the services;
- Enforcing our agreements and policies; and
- Carrying out activities that are required to comply with our legal obligations.

C. Enhance App Functionality and Operational Efficiency

We utilize the data collected, including Protected Health Information (PHI) and Personally Identifiable Information (PII), to enable specific features and functionalities within our app. This usage is crucial for:

- Enabling workflows tailored to the specific needs of healthcare providers;
- Enhancing the operational and clinical efficiency of our customers by streamlining processes and reducing administrative burdens;
- Improving decision-making processes through enhanced data accessibility and visibility;
- Supporting clinical tasks with data-driven insights, thereby enhancing patient care and outcomes.

This strategic utilization of data not only supports the functionality of our app but also contributes to significant improvements in healthcare delivery by our customers.

D. With Your Consent

We may use information for other purposes that are clearly disclosed to you at the time you provide information or with your consent.

E. Other Purposes

We also use your information for other purposes as requested by you or as permitted by applicable law.

- **De-identified and Aggregated Information.** We may use information to create deidentified and/or aggregated information, such as demographic information, information about how you use the Apps, information about the device from which you access our Apps, or other analyses we create. De-identified and/or aggregated

information is not information, and we may use, disclose, and retain such information as permitted by applicable laws including, but not limited to, for research, analysis, analytics, and any other legally permissible purposes.

F. Use of De-identified and Aggregated Patient Data

At Cura Financial, Inc. (“CuraFi”), we are committed to maintaining the privacy and security of all personal information entrusted to us. As part of our efforts to enhance our services and provide more effective solutions, we utilize de-identified and aggregated patient information.

- **Process of De-identification:** We strictly adhere to the guidelines set by the Health Insurance Portability and Accountability Act (HIPAA) to remove any personally identifiable information (PII) from patient data. This process ensures that the information cannot be traced back to any individual.
- **Creation of Aggregated Data:** Once de-identified, the data may be combined with other sets of de-identified data to create aggregated insights. These insights help us understand broader patterns and trends without compromising individual privacy.
- **Purpose and Use:** The de-identified and aggregated information is used for research, analysis, and analytics purposes. It allows us to improve the functionality of our applications, enhance the operational and clinical efficiency of our services, and develop new features that benefit our users and clients. This information is also invaluable for healthcare research and the development of new healthcare solutions.
- **Legal Compliance:** All processing of de-identified and aggregated information is conducted in compliance with applicable laws and regulations, ensuring that we continue to uphold the highest standards of data privacy and security.

This dedicated approach not only supports our commitment to innovation and improvement but also aligns with our responsibility to protect patient information and use it responsibly.

5. [HOW WE DISCLOSE YOUR INFORMATION](#)

We disclose your information to third parties for a variety of business purposes, including to provide our Apps, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

A. Disclosures to Provide our Apps

The categories of third parties with whom we may share your information are described below.

- **Service Providers.** We may share your information with our third-party service providers and vendors that assist us with the provision of our Apps. This includes service providers and vendors that provide us with IT support, hosting, payment processing, customer service, and related services.
- **Business Partners.** We may share your information with business partners to provide you with a product or service you have requested. We may also share your information with business partners with whom we jointly offer products or services.
- **APIs/SDKs.** We may use third-party Application Program Interfaces (“**APIs**”) and Software Development Kits (“**SDKs**”) as part of the functionality of our Services. For more

information about our use of APIs and SDKs, please contact us as set forth in [“Contact Us”](#) below.

B. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others’ rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

6. YOUR PRIVACY CHOICES AND RIGHTS

Your Privacy Choices. The privacy choices you may have about your information are determined by applicable law and are described below.

- **Email Communications.** If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Apps you have requested. We may also send you certain non-promotional communications regarding us and our Apps, and you will not be able to opt out of those communications (e.g., communications regarding our Apps or updates to our Terms or this Privacy Policy).
- **Text Messages.** You may opt out of receiving text messages from us by following the instructions in the text message you have received from us or by otherwise contacting us.
- **“Do Not Track.”** Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- **Cookies.** You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, our Apps may not work properly. Please note that cookie based opt-outs are not effective on mobile applications.

Please note you must separately opt out in each browser and on each device.

Your Privacy Rights. In accordance with applicable law, you may have the right to:

- **Access to and Portability of Your Information,** including: (i) obtaining access to or a copy of your information; and (ii) receiving an electronic copy of information that you have provided to us, or asking us to send that information to another company in a structured, commonly used, and machine-readable format (also known as the “right of data portability”);

- **Request Correction** of your information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your information;
- **Request Deletion** of your information;
- **Request Restriction of or Object to** our processing of your information;
- **Withdraw your Consent** to our processing of your information. Please note that your withdrawal will only take effect for future processing and will not affect the lawfulness of processing before the withdrawal.

If you would like to exercise any of these rights, please contact us as set forth in "[Contact Us](#)" below. We will process such requests in accordance with applicable laws.

7. Storage and Transfer of Information

Storage within the United States: All information collected by Cura Financial, Inc. ("CuraFi") is stored securely within the United States. Our data handling and storage practices are designed to comply with the Health Insurance Portability and Accountability Act (HIPAA) and other relevant federal and state regulations to ensure the highest level of protection for your personal and health-related information.

No International Transfers: To further ensure compliance with HIPAA and to maintain the integrity and security of your information, CuraFi does not transfer personal data outside of the United States. This policy supports our commitment to protect your privacy and meet regulatory requirements effectively.

By limiting our data storage and processing activities to the United States and strictly adhering to HIPAA, we provide a robust framework for privacy protection and compliance with applicable laws.

8. [RETENTION OF INFORMATION](#)

We store the information we collect as described in this Privacy Policy for as long as you use our Apps, or as necessary to fulfill the purpose(s) for which it was collected, provide our Apps, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

To determine the appropriate retention period for information, we may consider applicable legal requirements, the amount, nature, and sensitivity of the information, certain risk factors, the purposes for which we process your information, and whether we can achieve those purposes through other means.

9. [CONTACT US](#)

CuraFi is the controller of the information we process under this Privacy Policy.

If you have any questions about our privacy practices or this Privacy Policy, or to exercise your rights as detailed in this Privacy Policy, please contact us at:

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