

Notice of Privacy Practices

This notice describes how we collect and store information about you, and how we might disclose it.

Statement of HIPAA compliance

As a Business Associate (BA) of HIPAA compliant Covered Entities, we are aware of our obligation to implement effective security and privacy policies that comply with these regulatory standards. To review the measures we have taken to ensure compliance, please see our Compliance and Security Overview.

Statement of 42 CFR part 2 Compliance:

WEconnect is prepared to work with any entity requiring compliance with 42 CFR part 2. Our operating processes and security parameters are designed to protect individual data to the highest reasonable standard.

WEconnect requires explicit authorization and consent to share data within an individual's support network. Support persons are added to this network by the client themselves. We do not share data on behalf of any client without explicit authorization to do so.

All data are input and reported by the account holder, with the exception of GPS location, which is activated and reported by consent only. Auto check-in features can also be disabled by the account holder.

Our application icon is discreet, and does not indicate by design, branding, or other external feature an affiliation with substance abuse treatment, addiction, or recovery.

Our HIPAA compliance training includes a review of 42 CFR 2, and all employees are educated on the importance and necessity of respect for persons and privacy.

Our application requires an individual login to view scheduled appointments, contacts, or any other data that might be considered sensitive, or identifying the individual as a current or former individual in long term recovery.

We don't disclose information with any contacts on behalf of our clients without consent, they choose what is shared and with whom. In the event that a treatment center requests access to the data dashboard, we require an acknowledgement that describes the data shared and the applications before the data dashboard can be viewed.

All disclosures to law enforcement are delimited by the requirements set forth in 45 CFR 2, and our policy regarding these disclosures is available for review.

Introduction to Privacy at Pala•linq Social Purpose Corporation

We at Pala•linq Social Purpose Corporation know the value of trust and transparency, and we understand the need for responsible and secure protection of the information you choose to share with us. Your security is important to us, and we take your privacy seriously. Please read the following to learn more about our policies and practices for keeping your data secure.

The Pala•linq Social Purpose Corporation website and all other products and Services, including mobile applications, owned, controlled or offered by Pala•linq Social Purpose Corporation, and all content offered as part thereof, are collectively referred to herein as the “Services.” Subscribers, account holders, customers, and others who download, access, use, and/or subscribe to the Services (“you”) agree to the following privacy policy (the “Privacy Policy”).

By using or accessing our Services in any manner, you are acknowledging that you accept and are opting in to the practices and policies outlined in the Privacy Policy and Terms. By accessing the Services, you represent that you are over 13 years of age, and you hereby are giving full consent that Pala•linq Social Purpose Corporation will collect, use, and share your information as described below.

As noted in the Terms of Service, Pala•linq Social Purpose Corporation does not knowingly collect or solicit Personal Information from anyone under the age of 13. If you are under 13, please do not attempt to register for the Services or send any Personal Information about yourself to us. If we learn that we have collected Personal Information from an individual under age 13, we will delete that information as quickly as possible. If you believe that a child under 13 may have provided us Personal Information, please contact us at legal@weconnectrecovery.com.

PALA•LINQ PRIVACY POLICY

Pala•linq Social Purpose Corporation Privacy Policy Overview

Pala•linq Social Purpose Corporation gathers information from customers for multiple reasons. We use Personal Information internally in connection with our Services, as a means of identifying you as a subscriber, to create an account and profile, to contact you, to help you fulfill rehabilitation requirements, to provide and improve the Services, and to learn more about how you use the Services. We may share some de-identified Information with third parties, who might help us learn how to provide better support to you. Pala•linq Social Purpose Corporation will not access your camera, your contacts,

your location, or any other device content without your permission. Pala•linq Social Purpose Corporation will never contact others or post to social networks on your behalf without your permission. The following sections explain what information we collect and how we use it.

THE INFORMATION PALA•LINQ COLLECTS

The Information Pala-linq Social Purpose Corporation Collects

Pala-linq Social Purpose Corporation collects both Personal Information and Anonymous information through the standard operation of the Services. This information is used to identify you as a Pala•linq Social Purpose Corporation subscriber, track your preferences and settings, and to improve and personalize your experience. Certain information is required for the effective operation of the Services. These types of information are defined in the subparts below and used as described in the corresponding sections.

You may request access to all your personally identifiable information that we collect online and maintain in our database, by emailing us at privacy@weconnectrecovery.com.

Some information is collected automatically when you access our Services. Some information we will ask you for, and some information you may provide voluntarily. We will not ask you for information for which there is no relevant purpose, and we will not share your information with unauthorized third parties. The following section will explain what types of information we collect, and why we collect it.

- **Information you give us.**
 - In order to use our services, you must sign up for an account. We will ask you for some personal information when you are activating this account, such as your name, your phone number, and your email address. We will also ask you for personal information such as your sobriety date. We use this information to help tailor our services to your needs, and we do not share this information with anyone outside of your approved support network. To add contacts within the Services, we ask for a contact's phone number. We do not share your contacts with anyone.

- **Information we get from your use of our services**
 - We collect information about the services that you use and how you use them. For example, when you visit our website or log in, we may collect

browser data, your IP address, or device specific information, such as the model of your device, your operating system, or your IP address.

- We also may use cookies when you visit our website on your computer or mobile device. Cookies may uniquely identify your browser or device, and give us insight into how you use our services. We use this information to improve the way we design our services.
 - We also collect information that verifies your adherence to your treatment plan, such as your location (discussed below) and your connection routines. When you schedule a call or text with a connection through the app, WEconnect will simply verify that the interaction took place. WEconnect will not record, transmit, copy, review, retain or access any content (text messages, voice recordings, etc.) of these transactions. We respect your confidentiality and your right to privacy.
- **Location information and GPS tracking**
 - The WEconnect by Pala-linq app uses GPS and location data to allow you to check-in to your activities and support routines. When you check-in to an activity, we record your location using the location services on your device, and the length of your stay. This helps you to stay accountable, and may be required for your support program. This function can be turned off in the settings menu of the application. Please be aware that disabling the GPS tracking may impede the function of the services, and may prevent you from complying with certain terms of your treatment program.
 - **Information we get from your care providers or treatment centers**
 - We do not solicit information about you from any third party. In the event that someone, such as your treatment facility, provides us with information about you, this information is considered private and confidential, and will not be shared with unauthorized third parties.

The Information Pala-linq Social Purpose Corporation Shares

- **Aggregate Data:** Aggregate data are data that are *no longer personally identifiable*. Pala-linq may share these aggregate statistics with our associates to determine the ways in which our services are used, and how we can improve.
- **Personally Identifying information:** Pala-linq Social Purpose Corporation will share your personal information ONLY with those entities you have authorized to view it.

Coordinating with your Treatment Center:

When you activate your account with us through your treatment center, you are provided with a treatment center code, which connects you to your treatment center and allows your recovery support professionals to keep current with your progress and your adherence to your routine. This will not happen without your consent. If you are using WEconnect as part of your recovery routine, you will be asked to sign a separate authorization explicitly allowing this connection. If you are not using WEconnect in connection with a specific treatment center, your progress will not be shared with any third party without your knowledge or consent.

The Information Pala-linq Social Purpose Corporation Retains:

Once you have ended your Pala-linq Social Purpose Corporation subscription, your identifying information will be removed from our database of active subscribers. Data that have been collected about you that have been anonymized cannot be removed from aggregate banks, but THESE DATA CANNOT BE USED TO IDENTIFY YOU. De-identified data such as usage history, location data, and other information stored in your account may continue to be used internally for quality improvement research to enhance efficacy, accuracy, development of features and customer experience. Data that are requisitely retained will be retained securely only for the duration of the requirement.

Text Messaging and WEconnect:

The WEconnect service allows you to send text messages to your contacts by using your phone's text messaging application. Text messages are not stored by WEconnect. Text messages you send or receive through the WEconnect services are stored within your phone's text message application and are not subject to the same protections as data stored within the app. Standard text messaging rates will apply.

Your Account Security

We make every effort to ensure that your data are retained confidentially and securely. We require an account to access our services. Each username is connected to a unique password which allows you to log in to your account. DO NOT SHARE YOUR PASSWORD AND USERNAME WITH ANYONE. You should never allow anyone to access our Services under your username, or share your account with another individual. You are responsible for the uses of the Service associated with your username. We reserve the right to revoke or deactivate your username and password at any time. If you have security concerns, questions, or need to reset your password, contact us at privacy@weconnectrecovery.com.

Pala-linq Social Purpose Corporation places a premium on protecting your information, but you should remain aware that any information you share online may be accessed by others. Pala-linq Social Purpose Corporation is not responsible for the actions of those who obtain your content in this manner. Pala-linq Social Purpose Corporation cannot guarantee your safety and security and you should be aware that submitting any information and using the Services is done at your own risk. **DO NOT INCLUDE INFORMATION IN YOUR PUBLIC PROFILE THAT YOU WOULD PREFER TO KEEP PRIVATE.** Pala-linq Social Purpose Corporation is not responsible for the voluntary disclosure of personal information or personally identifying information on any public forum.

Information stored or transferred electronically is never completely secure, so while we, at Pala-linq Social Purpose Corporation, do our best to protect you and your privacy, please be aware that absolute security cannot be guaranteed by Pala-linq Social Purpose Corporation.

Pala-linq Social Purpose Corporation Subscription

All payments for subscriptions and accounts are processed by Stripe, Inc., which ensures safe transactions using Secure Sockets Layer (SSL). Stripe, Inc. provides Pala-linq Social Purpose Corporation with the details of each purchase. These details include name and email address (this information is retained by Pala-linq Social Purpose Corporation for future contact and support), but do not include specifics such as credit card or routing numbers.

Downloads of the Pala-linq Social Purpose Corporation applications are processed by Google Inc., Apple Inc. and TestFlight. Pala-linq Social Purpose Corporation's privacy policies and practices are not extensible to these entities. Please refer to Google's [privacy policy](#) for questions about downloading Android Apps, and Apple's [Privacy Policy](#) for questions about iTunes and TestFlight. These entities do not share any personal data with Pala-linq Social Purpose Corporation.

Safety, Security, and Compliance with Law.

We may disclose any information, including personal information, we deem necessary to comply with any applicable law, regulation, legal process or governmental request, to enforce our rights, or to protect the safety and security of our Applications or other subscribers. For more information, please see our Disclosure to Law Enforcement Policy.

Jurisdiction

This agreement will be governed solely by the internal laws of the State of Washington, without reference to any principles of conflicts of law. The parties consent to the personal and exclusive jurisdiction of the federal and state courts in King County, Washington.

Complaints

If you believe that our policies or practices have been inconsistent with the Privacy law, you may submit complaints to the HHS or to privacy@weconnectrecovery.com.

Severability

This agreement will be enforced to the fullest extent permitted by applicable law. If for any reason any provision of this agreement is held to be invalid or unenforceable to any extent, then (a) the provision will be interpreted, construed, or reformed to the extent reasonably required to render the provision valid, enforceable, and consistent with the original intent underlying such provision; (b) the provision will remain in effect to the extent that it is not invalid or unenforceable; and (c) the invalidity or unenforceability of the provision will not affect any other portion of this agreement.

Notification of Changes

Pala-linq Social Purpose Corporation reserves the right to change and update this Privacy Policy. We do our best to reflect the most current standards in order to demonstrate the utmost respect for our subscribers. We will do our best to keep you informed as we evolve, but please check this page for changes from time-to-time to make sure you are aware of our latest privacy practices.