

Privacy Policy

NOTE: FOR ALL LOGIN OR SUPPORT QUESTIONS, PLEASE

CONTACT: support@healthcaresource.com.

This is the privacy policy (“Privacy Policy”) for the healthcaresource.com Website with a front page at the www.healthcaresource.com domain and the HealthcareSource Recruitment Marketing Website with a front page at the healthcarentalentsource.com domain name, along with all related blogs and social media sites and affiliated Webpages including, without limitation, URLs assigned to specific users in connection with their usage of our Position Manager, Performance Manager, NetLearning, HealthcareSource Recruitment Marketing, Assessment and Lean Human Capital services (collectively, the “Site”). The Site is published, maintained and made available by HealthcareSource HR, Inc. and its subsidiaries and affiliates (collectively referred to in this Privacy Policy as “HealthcareSource” or “we,” “us,” “our” or other similar pronouns).

This Privacy Policy sets forth our policies regarding the collection, use and disclosure of certain personal information relating to your use of the Site and use of the products and services offered on or through the Site (the “Services”). HealthcareSource takes very seriously the private nature of your personal information. Please read this Privacy Policy carefully; by visiting the Site, and/or using the Services, you (or the entity you represent) (“you” or “your” or other similar pronouns) agree to the terms of this Privacy Policy as they may be amended from time to time without notice to you. As we update and expand our services, this Privacy Policy may change. This Privacy Policy is incorporated into, and is part of, the HealthcareSource Website Terms and Conditions, which governs your use of the Site in general.

This Privacy Policy does not apply to HealthcareSource service providers or other personnel. Such relationships are governed by separate agreements entered into between us and such providers.

This Privacy Policy does not apply to third party Websites that may be accessible through the Site. Please be aware that we have no control over such Websites. We encourage you to read the privacy policies of those third parties to learn how they may collect and use information about you.

I. YOU MAY OPT IN OR OPT OUT OF OUR SHARING OF YOUR PERSONAL INFORMATION WITH THIRD PARTIES FOR THEIR MARKETING PURPOSES BY

FOLLOWING THE DIRECTIONS IN THE “RIGHT TO OPT IN AND OPT OUT” SECTION BELOW.

Purpose

In connection with your use of the Site and/or Services, we may ask you for Personal Information and we may collect certain information from you and your computer each time you visit us. “Personal Information” includes, for example, your name; title; home and/or business address; e-mail address; home and/or business telephone, wireless and/or fax number; credit card and other payment information; demographic information; payment history; Social Security number; employment history; compensation history; workplace performance reviews; assessment questionnaire responses; and/or other information that may identify you as an individual or allow online or offline contact with you as an individual. This Privacy Policy explains, in general, what Personal Information and other information is collected on the Site, how the information is used, and with whom we may share such information.

Opt In and Opt Out Rights

You have the right to “opt in” and “opt out” of certain of our uses of your Personal Information. For example, you may elect to, or elect not to: (1) receive correspondence from us (either on our behalf or on behalf of a third party), or (2) have your Personal Information shared with other entities for purposes described herein. You may make this election by sending an e-mail to solutions@healthcaresource.com with the subject line “Privacy Policy—PI Opt Out.” In your e-mail, state whether: (i) you would like to opt out of receiving promotional correspondence from HealthcareSource in general, or just via e-mail or postal mail, (ii) you would only like to opt out of certain of HealthcareSource mailings, e-newsletters, e-mail alerts or other correspondence, and if so which ones, and/or (iii) you would like to elect for us not to share your Personal Information with third parties.

Regardless of whether you opt-out of receiving correspondence from us, we may still contact you in connection with your relationship, activities, transactions and communications with us. Requests to have us stop sharing your Personal Information will apply as of the date we review your request, and we will not be responsible for any communications that you may receive from entities that received your Personal Information prior to the date we reviewed such request.

II. COLLECTION OF INFORMATION.

User-Provided Information

- We collect Personal Information from users via the Site, for example, through such users' activities, transactions and completion of online forms on the Site. Such information is collected:
- When you register as a customer on the Site (we create an account for you on the Site, with a username, a password and an account profile containing your contact information and other Personal Information that you have provided to us);
- When you update your account profile on the Site;
- When you submit any feedback, comments or questions to us, or you contact us by e-mail or through any other means;
- When you submit information and materials for Services to be performed;
- When you complete transactions or surveys on the Site;
- When you use the interactive features of the Site, for example, to access, review, clean or manage your account;
- When you use our blog or other social media sites or portals to communicate with us and/or our personnel; or
- When you in any other way submit Personal Information to us via the Site.

You may be able to send information about our products and services to your business associates, clients, friends or family members through the Site. In some of these cases you may provide the e-mail address of any such person or entity to us. Such information will be treated in accordance with this Privacy Policy and applicable law.

IP Address and Clickstream Data

Our server may collect data about your server's Internet address when you visit us. This information, known as an Internet Protocol address, or IP Address, is a number that is automatically assigned to your computer by your Internet service provider whenever you're on the Internet. When you request pages from our Site, our servers may log your IP Address and sometimes your domain name. Your IP Address is used to help identify you and to gather demographic information about our customers as a whole, but does not include personally identifiable information. Our server may also record the referring page that linked you to us (e.g., another Website or a search engine); the pages you visit on the Site; the Website you visit after this Site; the ads you see and/or click on; other information about the type of Web browser, computer, platform, related software and settings you are using; any search terms you have entered on the Site or a referral site; and other Web usage activity and data logged by our Web servers. We use this information for internal system administration, to help diagnose problems

with our server, and to administer the Site. Such information may also be used to gather demographic information, such as country of origin and Internet Service Provider. We may link this information with your Personal Information.

Any or all of these activities with regard to Site usage information may be performed on our behalf by our service providers, including, for example, our analytics vendor(s) and our e-mail management partner(s).

III. USAGE OF INFORMATION.

GENERAL USAGE

We may use “cookies” and “web bugs” (described in more detail below) in the Site or in our communications with you to enhance the functionality and features of the Site in general, to verify your viewing and/or receipt of communications, to keep (and sometimes track) information about you, and to make your transactions and other activities more convenient and efficient. We use cookies, for example, to remember user preferences or minimize the need for you to re-enter information.

Cookies

A “cookie” is a small data file that a Website may send to your browser and that your browser may then store on your system. Cookies track where you travel on the Site and what you look at and transact and we may use them to deliver specific messages to you (for example, to announce a new feature that was added since the last time you visited the Site). We may use session cookies, for example, to simulate a continuous connection - cookies let us “remember” information about your preferences and passwords and allow you to move within the Site without reintroducing yourself. A cookie may enable us to relate your use of the Site to other information about you, including your Personal Information.

Most Web browsers automatically accept cookies, but you can usually refuse cookies, or selectively accept cookies, by adjusting the preferences in your browser. If you refuse cookies, there may be some features of the Site that will not be available to you and some Webpages, areas of the Site or features may not display or function properly.

Web Bugs

We may use web bugs (aka “Web beacons” or “pixel tags”) or similar technologies in the Site and/or in communications with you to enable us to evaluate Site usage information about visitors to the Site, upgrade visitor information, and know whether you have visited a Webpage or received a message. A “web bug” is typically a one-pixel, transparent image (although it can be a visible image as well), located on a Webpage or in an e-mail or other type of message, which is retrieved from a remote site on the Internet enabling the verification of an individual’s viewing or receipt of a Webpage or e-mail message. A web bug may enable us to relate your viewing or receipt of a Webpage or other message to other information about you, including your Personal Information.

USE OF PERSONAL INFORMATION

We will use the Personal Information you provide to the Site for various purposes, including, for example, to respond to your requests, to foster a positive user experience and to provide you with the services and features offered on or through the Site. We may also use your Personal Information to maintain our internal record keeping. We may also report information about your account in connection with our collection process regarding late payments, missed payments or other defaults. We may match information collected from you through different means or at different times, including both Personal Information and Site usage information, and use such information along with information obtained from other sources, including third parties. We also may compare your contact information to data in our databases in order to improve the Site and for marketing purposes. Also, advertisements and other content displayed to you on the Site may be customized to your interests and preferences, including sending users new job listings, based on your Personal Information and Site usage information, including (but not limited to) non-personally identifying information, which we may obtain from you or from other sources.

In addition, we may use your Personal Information to correspond with you, about products, services, companies and events, sponsored by us and others, that we think might interest you.

You may opt-out of receiving such correspondence from us by following the instructions in the Right to Opt In and Opt Out section above.

We also may provide visitors an opportunity to receive offers from other entities that have services, products and offers that we think might be of interest to you. Information collected on these and any other sites is subject to those sites’ privacy policies. However, we will not transfer your contact information to any unaffiliated third party for the third party’s marketing purposes unless you expressly direct us to do so. If you change your mind and no longer want to receive third party promotions, follow the instructions to opt out in the Right to Opt In and Opt Out section above.

We may analyze user behavior as a measure of interest in, and use of, the Site and e-mails, both on an individual basis and in the aggregate.

Please remember that if you post any of your Personal Information including your resume on the Site, such information may be collected and used by others over whom we have no control. We are not responsible for the use made by third parties of information you post or otherwise make available.

We retain indefinitely all the information we gather about you in an effort to make your repeated use with us more efficient and relevant. You can correct or update your resume at any time. Moreover, you can delete your resume from our online database or at any time, in which event we will remove all copies of it from our systems.

SHARING OF INFORMATION

Sale of Personal Information

Except with respect to the sale of aggregated and anonymous Data (as described further below) and as otherwise stated herein, HealthcareSource does not sell or lease your Personal Information to any other company.

Behavioral and Aggregated Information

HealthcareSource may collect, compile, maintain, process and otherwise use data and other information regarding user behavior that is gathered through your use of the Services (collectively, "Data"). We may use, disclose or sell your Data for purposes including, but not be limited to, evaluating and improving the Site and the Services, providing customer support, or sharing with third parties in connection with the development, marketing and sale of products or services that may be of interest to you. HealthcareSource will only disclose your Data to third parties, whether alone or aggregated with the Data of other customers, in anonymous forms, such as overall patterns or demographic reports, that do not personally identify or describe you or any other individual or entity.

Service Providers

We may use third party partners to help operate the Site and deliver our products and Services, and may share your information with our affiliates, advertisers, service providers and other third

parties that provide products or services for or through the Site or for our business (such as Website or database hosting companies, address list hosting companies, e-mail service providers, analytics companies, distribution companies, fulfillment companies, and other similar service providers that use such information on our behalf).

Compelled Disclosure

We reserve the right to disclose any information concerning you as necessary or appropriate to satisfy any law, regulation or other governmental request, to operate the Site properly, or to protect or defend our rights or the rights or well-being of our users or if you are involved (or are reasonably suspected to be involved) in any illegal or harmful activity, even without a subpoena, warrant or court order. We may release certain Personal Information when we believe that such release is reasonably necessary to protect the rights, property, and safety of others and ourselves. We also may disclose user information in connection with investigations or when we have reason to believe that someone is causing injury to or interference with our rights or property, other users of the Site, or anyone else that could be harmed by such activities.

From time to time, we may be required to provide Personal Information in response to a valid court order, subpoena, government investigation, or as otherwise required by law. We also reserve the right to report to law enforcement agencies any activities that we, in good faith, believe to be unlawful.

Business Transfer

HealthcareSource regards its databases of customer information (including Personal Information) as a valuable asset. In the event that HealthcareSource is or substantially all of its assets are, acquired by one or more third parties as a result of an acquisition, merger, sale, reorganization, consolidation or liquidation, such databases containing Personal Information may be one of the transferred assets. In using the Site and the Services you consent to such transfer of your Personal Information.

Publicly Provided Information

You acknowledge and agree that you have no expectation of privacy with respect to your postings on any public areas of the Site, including, without limitation, related blogs, message boards or social media sites.

ACCESS AND SECURITY OF INFORMATION

Access Rights

You may review and edit the Personal Information that is stored in your user account on the Site (e.g., your passwords and other contact information) by visiting a “My Profile” or similar area of your account on the Site or by e-mailing solutions@healthcaresource.com. Upon written request, we will send you a copy of the Personal Information we have on file in your user account (if any). You may send us new or updated information at any time. We will respond to your request to access, update or delete your information as soon as practicable. Before we are able to provide you with any information, correct any inaccuracies or delete any information, however, we may ask you to verify your identity and to provide other details to help us to respond to your request.

Security

HealthcareSource will take reasonable steps to protect the security and integrity of your sensitive Personal Information from loss, misuse, alteration or destruction, including making sensitive information available to our employees and agents on a need-to-know basis. However, due to the inherent nature of the Internet as an open global communications vehicle, we cannot guarantee that any information, during transmission through the Internet or while stored on our system or otherwise in our care, will be free or absolutely safe from unauthorized access or intrusion by others, such as hackers. By using the Site, you acknowledge that you understand and agree to assume these risks.

If you contact us by e-mail or a “contact us” or similar feature on the Site, you should be aware that your transmission might not be secure. A third party could view information you send by these methods in transit.

If you become a customer or otherwise purchase our Services, you may be able to create an account on the Site with a username and password. HealthcareSource policies preclude access to passwords by anyone at HealthcareSource or its service providers except on a need-to-know basis. If you do create a username and password, you are responsible for maintaining the strict confidentiality of your account password, and you shall be responsible for any access to or use of the Site by you or any person or entity using your password, whether or not such access or use has been authorized by or on behalf of you, and whether or not such person or entity is your employee or agent. You agree to (a) immediately notify HealthcareSource of any unauthorized

use of your password or account or any other breach of security, (b) take any reasonable steps within your control to prevent any further unauthorized use or breach, (c) ensure that you exit from your account at the end of each session, and (d) ensure that any individual leaving your organization no longer maintains any access to your account. It is your sole responsibility to protect your password, control access to and use of your account. We will not be responsible or liable for any loss or damage arising from your failure to comply with this provision.

We will have no liability for disclosure of your information due to errors or unauthorized acts of third parties during or after transmission.

In the unlikely event that we believe that the security of your Personal Information in our possession or control may have been compromised, we may seek to notify you of that development. If a notification is appropriate, we would endeavor to do so as promptly as possible under the circumstances, and, to the extent we have your e-mail address, we may notify you by e-mail. You consent to our use of e-mail as a means of such notification.

Phishing

It has become increasingly common for unauthorized individuals to send e-mail messages to consumers, purporting to represent a legitimate company such as a bank or on-line merchant, requesting that the consumer provide personal, often sensitive information. Sometimes, the domain name of the e-mail address from which the e-mail appears to have been sent, and the domain name of the website requesting such information, appears to be the domain name of a legitimate, trusted company. In reality, such sensitive information is received by an unauthorized individual to be used for purposes of identity theft. This illegal activity is known as “phishing.”

If you receive an e-mail or other correspondence requesting that you provide any sensitive information (including your password) via e-mail or to a Website that does not seem to be affiliated with HealthcareSource, or that otherwise seems suspicious to you, please do not provide such information, and report such request to us at solutions@healthcaresource.com.

Consent to Worldwide Transfer and Processing of Personal Data

When you give your personally identifiable information to HealthcareSource, it may be processed by HealthcareSource in the United States and all other countries in which HealthcareSource operates or in which our affiliates operate. Each of these countries has different privacy laws that afford varying levels of protection for your personally identifiable information. Regardless of the laws in place in these countries, HealthcareSource will treat the

privacy of your information in accordance with this Privacy Policy. By providing your personally identifiable information to HealthcareSource, you fully understand and unambiguously consent to the transfer or transmission of your information to, and processing of your information in, any jurisdiction, in accordance with this Privacy Policy.

Third Party “Linked-To” Websites

When you are on the Site you may have the opportunity to visit, or link to, other sites not operated by HealthcareSource, including other Websites operated by unaffiliated third parties. These sites may collect Personal Information about you. HealthcareSource does not control sites that are operated by these entities and we have no responsibility or liability for any tracking, data collection or other information gathering practices of these sites and third parties. This Privacy Policy does not address the information practices of those other Websites.

IV. GENERAL PROVISIONS

Changes to this Privacy Policy

HealthcareSource reserves the right to change or update this Privacy Policy, or any other of our policies or practices, at any time, and will notify users of the Site by posting such changed or updated Privacy Policy on this page. Any changes or updates will be effective immediately upon posting to the Site. Please check the Site periodically to see any changes we have made to our Privacy Policy. Your continued access or use of the Site constitutes your acceptance of the changes. Under certain circumstances, we may also elect to notify you of changes or updates to our Privacy Policy by additional means, such as posting a notice on the front page of the Site.

If you are an active customer of our Services who has registered for an account on the Site with a username and password, we may notify you of material changes to the Privacy Policy: (i) the next time you log into your account on the Site, (ii) via an email message to the e-mail address on record in your account profile, or (iii) by another means in our discretion.

Note for Parents

The Site is not geared towards children, and HealthcareSource does not knowingly solicit, collect or maintain any information from children under the age of 13. If you believe that your child under 18 has gained access to the Site without our permission, you may contact us at solutions@healthcaresource.com. If you are under 13 years of age, then please do not use or access the Site at any time or in any manner. Should a child whom we know to be under 13 send

Personal Information to us, we will use that information only to respond directly to that child (or a parent or guardian) to inform him or her that we must have parental consent before receiving his or her Personal Information, and we will then take the appropriate steps to delete such information.

Questions or Comments

If you have any questions or comments regarding our privacy practices, you may contact us at solutions@healthcaresource.com. You may also send any comments, questions or concerns by mail to:

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Woburn, MA 01801

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