

Oso Home Care, Inc. Privacy Policy

Last Updated: 1/1/2023

Oso Home Care, Inc. (hereinafter referred to as “Oso,” “us,” “we,” “our,” or “Company”) has created this Privacy Policy to disclose how we collect, use, share, and protect information about you, as well as to inform you of privacy rights you may have and how to exercise them. Oso, is committed to protecting the privacy and security of your information. This Privacy Policy applies to anyone who interacts with Oso through our websites and services (collectively, our “Services”).

By accessing or using our Services, you consent to the use of information that is collected, submitted, used, or disclosed as described in this Privacy Policy and to the updates to this Privacy Policy posted here from time to time.

Oso Privacy Policy Scope

This Privacy Policy applies to the personal information of users of our Services except as described below.

This Privacy Policy does not apply to information collected by or provided in connection with an application for employment, ongoing employment, or former employment with Oso. If you are an Oso employee or applicant for employment, please see the Oso Employee and Applicant Privacy Policy for information about how Oso collects, uses, processes, discloses, and retains employment information not covered by this policy.

This Privacy Policy does not apply to the practices of third parties that we do not own or control (such as third-party websites that you may access from our websites), or to individuals that Oso does not employ or manage. We have no control over or responsibility regarding the information collected from you by others, such as third-party websites that you access through links on our websites. Instead, such information practices are governed by those entities’ privacy policies. Please review the privacy policies of any third-party websites for information on how those entities collect and use your information.

This Privacy Policy does not apply to Protected Health Information (“PHI”) as defined by HIPAA or other applicable laws. Please see the Oso Notice of Privacy Practices https://osohomecare.com/s/npp_booklet_hc_provider.pdf for more information about our privacy practices pertaining to PHI.

Types of Personal Information We Collect

Personal information means any information that identifies, relates to, describes, or could be reasonably associated or linked with a particular person or household. It also includes other information that may be associated with you, such as your usage data, location, preferences, or interests, if that information can be used to identify you, your household, or your device, or any other information as otherwise defined under applicable law. The types of personal information we collect about you depend on your interactions with us and are described in more detail below.

Oso collects the following types of information from you and other users who use our websites or Services:

- **Usage and Technical Information:** includes features that gather information about how users use it. This assists us with better serving users' particular interests and needs. This information may include: website pages viewed, browser or operating system information, mobile device type, aggregate and/or deidentified data related to a person's interaction with our website.

Please note, that we appreciate all feedback you provide regarding our Services. However, any feedback or comments sent to us shall be and remain the exclusive property of Oso. We reserve the right to share your feedback with other Oso personnel or third parties of our choosing in order to improve our Services.

Residents of California may limit the use of their sensitive personal information by contacting us via the weblink: <https://osohomecare.com/contact-us/>

How We Collect Information

1. **Personal Information We Collect Automatically:** We automatically collect certain personal information when you access and use our Services. The types of information we collect may include:
 - a. **Individual Identifiers:** includes your name, username, date of birth, contact information such as mailing address, phone number, and email address.
 - b. **Payment and Transactional Information:** includes your payment and transactional information including services purchased. Note that we use third party payment processors to facilitate your payments and do not store your payment information.
 - c. **Internet Activity.** We collect certain information about your internet activity when you use our website and Services. Such information may include your IP address.
 - d. **Usage Data.** Oso collects information about your activity on our Services via cookies and similar technologies. Please see the "Cookies" section below for more information on cookies.

How We Use Your Information

Oso may use the information it collects in a variety of ways for its business or commercial purposes, such as to:

- Facilitate your use of the Services;
- Facilitate your movement through the Services;
- Analyze traffic to and through our website;

- Protect or enforce Oso’s rights and properties;
- Protect or enforce the rights and properties of others;
- Comply with applicable laws, in response to a lawful and enforceable request by a law enforcement, judicial, or other public authority, or in connection with an applicable legal obligation; and
- Where you otherwise have given Oso your consent and permission to do so.

How We Disclose Your Information

We may also disclose your information for the following purposes:

- To protect our users and network against fraud and security threats.
- To comply with a legal obligation.
- To protect and defend our rights or property.
- To prevent or investigate possible wrongdoing in connection with the Services.
- To protect the personal safety of individuals or the public.
- To protect against legal liability.
- When there is a good faith belief that such action is necessary to investigate or protect against harmful activities to our guests, visitors, associates, or property (including our websites), or to others. This may include disclosures to law enforcement to investigate potential criminal activity or other civil violations.

We may disclose your information to the following types of entities and third parties:

- **Law Enforcement or Other Lawful Authority:** We may from time to time be required to provide information to law enforcement or other governmental authorities pursuant to a warrant, court order, or other lawful process.

Over the last 12 months, we have disclosed for a business purpose the following categories of personal information:

Category of Information	Examples of Data Types Disclosed	Categories of Recipients
Usage and Technical Information	Information about your interaction with our website.	Our Service Providers, and government entities (where required by law)

Categories of Personal Information Sold

We do not sell your personal information including sensitive personal information to third parties. Please note that “sale” of personal information does not include those instances when such information is part of a merger, acquisition, or other transaction involving all or part of our business. If we sell all or part of our business, make a sale or transfer of assets, or are otherwise involved in a merger or other business transaction, we may transfer your personal information to a third party as part of that transaction. If such transaction materially affects the manner in which your personal information is processed, we will notify you of such change prior to its implementation.

How Your Information is Stored, Transferred, and Secured

Data Transfers

Oso’s offices are located in the United States and our Services are not directed to clients in other jurisdictions. If you are located in the European Economic Area (“EEA”) and you use our Services, this will involve transferring your personal information outside of the EEA. Many of our external third parties are based outside of the EEA, so their processing of your personal information will involve a transfer of information outside of the EEA. For example, Oso hosts the information it collects at its data center in the United States. As a result, your information may be subject to access requests from governments, courts, law enforcement officials and other lawful authorities in another jurisdiction according to its laws. Subject to the applicable laws, we will use reasonable efforts to ensure that appropriate protections are in place to maintain protections on the personal information.

Retention and Deletion of Personal Information

We will retain your personal information for as long as necessary to provide our Services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected. Under applicable regulations, we will keep records containing client personal information, account opening documents, communications and anything else as required by applicable laws and regulations. We will not retain your personal information or sensitive personal information longer than reasonably necessary for the purposes for which the information was collected.

We may rectify or remove incomplete or inaccurate information, at any time and at our own discretion.

Securing Your Information

Oso takes the privacy and security of your information seriously, and uses reasonable, appropriate and customary procedures and technologies to help protect the confidentiality of any personal information we collect. Oso employs reasonable administrative, physical, and technical safeguards to protect the information we collect, process, and store. However, no website, network, or system can be absolutely protected against intentional or malicious intrusion attempts despite taking appropriate and reasonable precautions. Furthermore, Oso does not control the devices, computer or network through which you access our website or over which you may choose to send personal information or other information to us, and therefore cannot prevent potential interceptions or compromises to your information while in transit. Oso makes no guarantee as to the security, integrity or confidentiality of any information transmitted to or from our website.

Oso is committed to safeguarding your information to the best of its ability but cannot guarantee the security of electronic communications or transmission made over the Internet.

Cookies

Our website uses cookies - small data files stored by your web browser on your computer's hard drive - to track which areas of our website are used the most and to help us make our website more informative and user-friendly, and other purposes as described in this Policy.

Oso may receive, store and use the information you enter on our website or which is collected during your use of our Services. Such information will generally not personally identify you and may include the date and time of your visit, pages accessed, the web browser you use, the internet address of any website from which you linked directly to our website and related information.

The our website uses the following types of cookies:

- 'Session cookies' which are stored only temporarily during a browsing session in order to allow normal use of the system and are deleted from your device when the browser is closed;

Your Cookie Choices

When it comes to how you want to use or allow cookies to be used on your devices, you are in control. Most internet browsers are initially set to accept cookies. You may set your browser to block or otherwise control what cookies your browser or device accepts via your settings. Additionally, you can choose to modify your settings and delete those cookies that are otherwise stored on your device. Please note that, if you choose not to accept cookies, some website features and the personalization of our Services may no longer work for you. Please consult the instructions provided by your browser or your mobile device manufacturer to determine how you can limit the placement of and/or remove cookies or other similarly used technologies.

“Do Not Track” Signals

Our websites are not currently designed to respond to “Do Not Track” signals. “Do Not Track” is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable “Do Not Track” by visiting the “Preferences” or “Settings” page of your web browser. Do Not Track is different from Global Privacy Control (“GPC”), which may notify websites of consumers’ privacy preferences regarding the sale or sharing of Personal Information, or the use of Sensitive Personal Information.

Children’s Privacy

All of our Services, including our website, are intended for adult audiences, and are not directed to or meant for individuals under the age of 16 (“Children”). As such, we do not knowingly collect personal information from anyone under the age of 16, and Children under 16 may not use our websites.

If you are a parent or guardian and you are aware that your child has violated this Privacy Policy and provided us with personal information, please Oso Home Care at 888-701-7178. If we become aware that we have collected personal information from Children without verification of parental consent, we will take steps to remove that information from our servers.

Privacy Information for California Residents

Oso has in place policies and procedures to facilitate the exercise of privacy rights available to California residents. If you are a California resident, California law requires us to disclose the following information with respect to our collection, use, and disclosure of personal information.

- **Your Privacy Rights** Subject to certain limitations, you have the following rights under California law:
 - **Right to Access:** to have access to your personal information upon verifiable request. You may receive a copy of such information upon receipt of a verifiable request, along with other information related to the collection or processing.
 - **Right to Correct:** to correct inaccuracies in the personal information that Oso holds about you upon receipt of a verifiable request.
 - **Right to Disclosure of Direct Marketers:** to have access upon simple request, and free of charge, the categories and names/addresses of third parties that have received personal information for their direct marketing purposes.
 - **Right to Information About Collecting, Selling, Sharing, or Disclosing Personal Information:** upon receipt of a verifiable request, you may obtain a list of:
 1. The specific pieces of your personal information Oso holds;
 2. The categories of personal information collected about you, sold to or shared with third parties, or disclosed to third parties for business purposes;
 3. The categories of personal information sold or shared within the last 12 months;
 4. The categories of sources from which personal information is collected;
 5. The business or commercial purpose for collecting, selling, or sharing personal information; and
 6. The categories of third parties with whom personal information is shared, sold, or disclosed for a business purpose.
 - **Right to Opt-Out of the Sale or Sharing of Personal Information:** California residents have the right to opt-out of the sale or sharing of their personal information under certain circumstances. As noted elsewhere, we do not sell your personal information.
 - **Right to Deletion:** to obtain the deletion of your personal information in the situations set forth by applicable data protection law and upon receipt of a verifiable request.
 - **Right to Limit:** to limit certain uses or disclosures of sensitive personal information. Our uses of sensitive personal information are described in the Sensitive Personal Information section above.

- **Right to Non-Discrimination.** As defined under relevant law, you have a right to non-discrimination in the Services or quality of Services you receive from us for exercising your rights.

Please contact us utilizing the methods listed in the “<https://osohomecare.com/contact-us/>” Section below in relation to exercising these rights. We may ask you to provide information about yourself so that we can verify your identity as part of this process. This information may include your name, email address, and any other information necessary to reasonably verify your identity, to ensure that your information is not shared with anyone impersonating you. We may ask for additional information if we have difficulty confirming your identity. We will not share your information or honor other requests in those situations in which we are unable to confirm a request for your information is a “verifiable request.” Once we have verified your identity, we will work to fulfill your request in a timely manner. Please note there may be some situations in which we are unable to fulfill your request, such as if we cannot find any information about you within our systems. Additionally, we may not be able to honor a deletion request in some situations, such as if your information is necessary to fulfill the Services you requested or meet a legal obligation. We will inform you whether we can fulfill your rights request.

Under California law a consumer can appoint an “authorized agent” to make certain verifiable requests upon their behalf, such as the right to know what information we collect about the consumer or to request deletion of the consumer’s information. An “authorized agent” may submit a request on behalf of a California resident who has authorized the agent to act on their behalf. Because the security and privacy of your information is paramount, we will ask that you identify such persons and directly confirm that such persons are authorized to act as your agent and exercise your applicable rights under California law in such situations. This may require us to contact you directly and alert you that an individual has claimed to be your agent and is attempting to access or delete your information. We will also independently verify your identity to ensure that an unauthorized person is not attempting to impersonate you and exercise your rights without authorization. We will not share your information or honor any other requests in those situations where you cannot or do not grant permission in writing for an identified authorized agent to act on your behalf, or where we cannot independently verify your identity.

If you are a California resident and have any questions about this Privacy Policy, our practices, your personal information, or your rights and choices under applicable laws, please <https://osohomecare.com/contact-us/> at the information below.

Your California Privacy Rights Regarding Direct Marketing Information

California residents have the right to request information from a company regarding the manner in which it shares certain categories of personal information with third parties for their direct marketing purposes, in addition to the rights set forth above.

Under California law, you have the right to send us a request at the designated address listed below in the “<https://osohomecare.com/contact-us/>” section to receive the following information:

- The categories of information we disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year;
- The names and addresses of the third parties that received the information; and

- If the nature of the third party’s business cannot be determined from their name, examples of the products or services marketed.

To make such a request, please provide sufficient information for us to determine if this applies to you, and attest to the fact that you are a California resident. Please also provide a current California address for our response. You may make this request in writing to us at the address provided in the “<https://osohomecare.com/contact-us/>” Section. Any such request must include “California Privacy Rights Direct Marketing Information Request” in the first line of the description, and include your name, street address, city, state and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through the address provided for this purpose below.

Note that responsive information may be provided in a standardized format that is not specific to you.

Privacy Rights Information for Residents of Other States

Subject to limitations, residents of other states may also have certain privacy rights, depending on where they live. To submit a request to exercise your rights, please contact us using any of the methods in the “Contact Us” Section. Any request to exercise your rights must include your name, state of residence, the right or rights you would like to exercise, and a means of contacting you.

<https://osohomecare.com/contact-us/>

Please direct any questions you may have about this Privacy Policy to any one of the following:

By mail:

Oso Home Care

Attn: HR Department

17175 Gillette, Irvine, CA 92614

By e-mail: glanza@osohomecare.com

By Phone: 888-701-7178

Updates to this Privacy Policy

Oso reserves the right to revise this Privacy Policy from time to time at our sole discretion. Our website will link to our current Privacy Policy and any changes we make will be reflected in an update to our Privacy Policy and by revising the “last updated” date at the top of this Privacy Policy. You are advised to check back to this page periodically to learn of any changes made to our policies. Changes to this Privacy Policy are effective when they are posted on this page.

Difficulty Accessing Our Privacy Policy

Individuals with disabilities who are unable to usefully access our Privacy Policy online may <https://osohomecare.com/contact-us/> to inquire how they can obtain a copy of our policy in another, more easily readable format.