OBIX Online Education Privacy Policy

PLEASE READ THIS POLICY CAREFULLY TO UNDERSTAND HOW WE TREAT YOUR PERSONAL INFORMATION AND WHAT CHOICES AND RIGHTS YOU HAVE IN THIS REGARD. IF YOU DO NOT AGREE WITH THE TERMS AND CONDITIONS OF THIS POLICY, YOU SHOULD NOT ACCESS OR USE THE SITE.

THE SITE IS NOT INTENDED FOR USERS LOCATED IN THE EUROPEAN UNION AND THE EUROPEAN ECONOMIC AREA.

INTRODUCTION

Clinical Computer Systems, Inc. is committed to protecting the privacy and security of your personal information. We also believe in transparency, and this Policy explains how we treat your personal data. Please read this Policy carefully to learn more about how we process personal information and what rights you may have under applicable law.

When does this Policy apply? This Policy describes our practices for the personal information for which we are a "data controller" under applicable law. This includes information collected when you visit our website, https://www.obixpoet.com/ (the "**Site**"). This Policy does not apply, however, when we process personal data on behalf of a customer. For information about a customer's data practices, please contact the customer directly. We are not responsible for our customers' privacy or security practices.

HOW DO WE COLLECT AND USE PERSONAL INFORMATION?

We collect the following types of personal data for the purposes listed below. You may choose not to provide us with any personal information, but you will not be able to access portions of the Site that require personal information.

Category	Description and Purpose
Contact Information	If you contact us or submit a question via our Site, or otherwise inquire about our products or services, we collect your name, company name, email address, and phone number. We process Contact Information to provide our products and services to you, to provide customer support, to ensure the privacy and security of our Site, products, and services, to maintain our databases and back-ups, to manage our relationships with you, to communicate with you, and to keep records of our communications with you.
Communications and Inquiries	If you contact us, in addition to your Contact Information, we will receive the subject matter of your message and any comments, content, or other information that you choose to provide.

Category	Description and Purpose
	We process Communications and Inquiries to provide our products and services to you, to provide customer support, to ensure the privacy and security of our Site, products, and services, to maintain our databases and back-ups, to manage our relationships with you, to communicate with you, and to keep records of our communications with you.
Cookies and Similar Technologies	We use cookies and use similar technologies as described in the "*Cookies and Similar Technologies*" section of this Policy. If you choose to disable cookies and similar technologies, some areas and features of the Site may not work properly. We process Cookies and Similar Technologies to operate the Site, to serve you the content and functionality you request, to ensure the privacy and security of our Site, to develop new services, to enhance your experience and provide you with a more personal and interactive experience, and for usage analytics purposes.
Device and Usage Information	When you visit the Site, we automatically collect information from your browser and your device, which includes the date and time of your visit as well as your location, Internet Protocol (IP) address or unique device identifier, domain server, browser type, access time, and data about which pages you visit. We process Device and Usage Information to operate the Site, to serve you the content and functionality you request, to ensure the privacy and security of our Site, to develop new services, to enhance your experience and provide you with a more personal and interactive experience, and for usage analytics purposes.

Cookies and Similar Technologies

First and Third-Party Cookies

A "cookie" is a small file created by a web server that can be stored on your device (if you allow) for use either during a particular browsing session (a "session" cookie) or a future browsing session (a "persistent" or "permanent" cookie). "Session" cookies are temporarily stored on your hard drive and only last until they expire at the end of your browsing session. "Persistent" or "permanent" cookies remain stored on your hard drive until they expire or are deleted by you. Local shared objects (or "flash" cookies) are used to collect and store information about your preferences and navigation to, from, and on a website. First-party cookies are set by the website you're visiting, and they can only be read by that site. Third-party cookies are set by a party other than that website.

Other Similar Technologies

In addition to cookies, there are other automatic data collection technologies, such as Internet tags, web beacons (clear gifs, pixel tags, and single-pixel gifs), and navigational data collection (log files, server logs, etc.) that can be used to collect data as users navigate through and interact with a website. For example, web beacons are tiny graphics with unique identifiers that are used to understand browsing activity. In addition, UTM codes are strings that can appear in a URL when you move from one web page or website to another. The string can represent information about browsing, such as which advertisement, page, or publisher sent the user to the receiving website.

What Cookies and Similar Technologies Are in Use and Why Do We Use Them?

Other Third-Party Technologies

Some third parties may use data collection technologies to collect information about you when you browse the Internet. We do not control these third parties' technologies or how they may be used. If you have questions about targeted content, you should contact the responsible party directly or consult their privacy policies.

Choices About Cookies

Most web browsers are set by default to accept cookies. If you do not wish to receive cookies, you may set your browser to refuse all or some types of cookies or to alert you when cookies are being stored. These settings may affect your enjoyment of the Site's functionality. You can adjust your cookies preferences at any time within the cookies banner or cookies preference center. Adjusting the cookie settings may not fully delete all of the cookies that have already been created. To delete them, you should review your web browser settings after you have changed your cookie settings. The links below provide additional information about how to disable cookies or manage the cookie settings:

Google Chrome: https://support.google.com/chrome/answer/95647?hl=en

Firefox: https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences

Microsoft Edge: https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09

Safari: https://support.apple.com/guide/safari/manage-cookies-sfri11471/mac and https://support.apple.com/en-us/HT201265

For more information about how to modify your browser settings to block or filter cookies, visit http://www.aboutcookies.org/. You may learn more about internet advertising practices and related consumer resources at https://youradchoices.com/control, https://thenai.org/about-online-advertising/faq, and http://www.networkadvertising.org/choices.

HOW DO WE SHARE YOUR PERSONAL INFORMATION?

When we are acting as the data controller or where permitted by applicable law, we may share your personal information in the following contexts.

Category	Disclosure Contexts
Corporate Affiliates	We share personal information with our corporate subsidiaries and affiliates and with their respective officers, directors, employees, accountants, attorneys and agents.
Acquisitions and Similar Transactions	We may disclose your personal information in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our company assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred
Legal Obligations and Rights	We disclose personal information in response to subpoenas, warrants, court orders or other legal process, or to comply with relevant laws. We may also share personal information in order to establish or exercise our legal rights, to defend against a legal claim, and to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of contract. We may also disclose personal information as needed to protect vital interests.
Service Providers	We share personal information with our agents, contractors and service providers. Among other things, service providers help us to administer the Site; support our provision of products and services; send marketing communications; provide technical support; and assist with other legitimate purposes permitted by law.
Professional Advisors	We share personal information with our insurers and other professional advisors, including attorneys, accountants, consultants, and auditors, that need access to your information to provide operational or other support services on our behalf.
Deidentified or Aggregated Data	We share aggregated information and information that does not identify any specific individual, such as groupings of demographic data and customer preferences, (i) for compliance with reporting obligations; (ii) for business or marketing purposes; and (iii) to assist us and others in understanding our users' interests, habits, and usage patterns for certain programs, content, services, marketing, and/or functionality.

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HOW LONG DO WE PROCESS YOUR INFORMATION?

We retain and use your personal information for as long as is necessary to fulfill the purposes for which it was collected, to comply with our business requirements and legal obligations, to resolve disputes, to protect our assets, to provide our services, and to enforce our agreements.

We take reasonable steps to delete the personal information we collect when (1) we have a legal obligation to do so, (2) we no longer have a purpose for retaining the information, and (3) if you ask us to delete your information, unless we determine that doing so would violate our existing, legitimate legal, regulatory, dispute resolution, contractual, or similar obligations. We may also decide to delete your personal information if we believe it is incomplete, inaccurate, or that our continued storage of your personal information is contrary to our legal obligations or business objectives.

To the extent permitted by law, we may retain and use anonymous, de-identified, and aggregated information for performance reporting, benchmarking, and analytic purposes and for product and service improvement. When we delete data, it will be removed from our active servers and databases; but, it may remain in our archives when it is not practical or possible to delete it.

We are required by law to maintain records of consumer requests submitted under the California Consumer Privacy Act and how we responded to such requests for at least 24 months. We only use this information for recordkeeping purposes.

HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We have put security measures in place to protect personal information from being accidentally lost, used, altered, or disclosed or accessed in an unauthorized manner and to detect fraudulent identify-verification activity, including when transmitting personal information in response to data subject requests. From time to time, we review our security procedures to consider appropriate new technologies and methods.

However, no security system is perfect, and no data transmission is 100% secure. As a result, while we strive to protect personal data, we cannot guarantee or warrant the security of any information transmitted to or from the Site or services. Your use of the Site is at your own risk. We cannot guarantee that your data will remain secure in all circumstances.

If a data breach compromises your personal information, we will notify you and any applicable regulator when we are required to do so by applicable law.

OBIX and OBIX BeCA are registered trademarks of Clinical Computer Systems, Inc.

YOUR RIGHTS AND CHOICES

Accuracy and Updating Your Personal Information. Our goal is to keep your personal information accurate, current, and complete. If any of the personal information you have provided to us changes, please update it in your user/account profile, or let us know via the "Contact Us" details at the end of this Policy. We are not responsible for any losses arising from any inaccurate, inauthentic, deficient, or incomplete personal data that you provide to us.

Complaints. If you believe that your rights relating to your personal information have been violated, you may lodge a complaint with us by contacting us via the "Contact Us" on our website.

Nevada Residents

Nevada residents may submit a verified request to us at obixpoet@obix.com to request that we not make any sale (as defined under Nevada law) of any covered information (as defined under Nevada law) that we have collected or will collect about you. Please provide your name and contact information in your request, and we will respond to your request in accordance with Nevada law.

California Residents

All terms used in this section shall have the meanings given in the California Consumer Privacy Act, as amended ("CCPA"), when applicable.

CCPA Notice at Collection. We collect and process personal information for as described in the "*How Do We Collect and Use Personal Information*" section of this Policy. The relevant CCPA categories for this information are listed below. We may provide a separate notice at collection if we collect additional information or intend to use information for additional purposes.

Category	CCPA Categories
Contact Information	For purposes of the CCPA, Contact Information includes the following categories of personal information: • Identifiers • Categories Described in the Customer Records Statute • Professional or Employment-related Information
Communications and Inquiries	For purposes of the CCPA, Communications and Inquiries includes the following categories of personal information: • Identifiers • Categories Described in the Customer Records Statute • Commercial Information • Audio, Electronic, Visual, or Similar Information • Professional or Employment-related Information

Category	CCPA Categories
Cookies and Similar Technologies	For purposes of the CCPA, Cookies and Similar Technologies includes the following categories of personal information: • Identifiers • Internet or Other Electronic Network Activity Information • Geolocation Data • Sensitive Information
Device and Usage Information	For purposes of the CCPA, Device and Usage Information includes the following categories of personal information: • Identifiers • Internet or Other Electronic Network Activity Information • Geolocation Data • Sensitive Information

Data Practices During Last 12 Months. The disclosures below describe our data practices during the last twelve months:

- Personal Information Collected: We have collected the categories of personal information listed below during the preceding 12 months:
    - Identifiers
    - Categories of Personal Information described in the California Customer Records statute
    - Commercial Information
    - Internet or Other Electronic Network Activity Information
    - Geolocation Data
    - Audio, Electronic, Visual, or Similar Information
    - Professional or Employment-related Information
    - Sensitive Information
- Categories of Sources: We have collected the personal information identified in this Policy from you.
- Business and Commercial Purposes for Collecting: We have collected the categories of personal information listed above for the following purposes:
    - To provide our products and services to you
    - To provide customer support
    - To ensure the privacy and security of our Site, products, and services
    - To maintain our databases and back-ups
    - To manage our relationships with you
    - To communicate with you
    - To keep records of our communications with you
    - To operate the Site,
    - To serve you the content and functionality you request
    - To develop new services

        - To enhance your experience and provide you with a more personal and interactive experience
        - Usage analytics purposes
- Personal Information Sold or Shared: We have not sold or shared categories of personal information during the preceding 12 months.
- Personal Information Disclosed for a Business Purpose. We have disclosed for a business purpose the categories of personal information listed below during the preceding 12 months. We have disclosed each category of personal information to the following categories of third parties: (1) corporate parents, subsidiaries, and affiliates; (2) advisors (accountants, attorneys); (3) service providers (data analytics, data storage, mailing, marketing, website and platform administration, technical support); and (4) operating systems and platforms.
    - Identifiers
    - Categories of Personal Information described in the California Customer Records statute
    - Commercial Information
    - Internet or Other Electronic Network Activity Information
    - Geolocation Data
    - Audio, Electronic, Visual, or Similar Information
    - Professional or Employment-related Information
    - Sensitive Information
- Business and Commercial Purposes for Disclosing: We have disclosed to the identified categories of third parties the categories of personal information listed above for the following purposes:
    - To provide our products and services to you
    - To provide customer support
    - To ensure the privacy and security of our Site, products, and services
    - To maintain our databases and back-ups
    - To manage our relationships with you
    - To communicate with you
    - To keep records of our communications with you
    - To operate the Site,
    - To serve you the content and functionality you request
    - To develop new services
    - To enhance your experience and provide you with a more personal and interactive experience
    - Usage analytics purposes

No Financial Incentive. We do not offer financial incentives or any price or service difference in exchange for the retention or sale of your personal information.

Do Not Sell or Share My Personal Information. Under the CCPA, you have the right to direct us to stop selling or sharing your personal information to third parties and to refrain from doing so in the future. For purposes of the CCPA, we do not sell personal information as defined under applicable law.

Limited Use of Sensitive Information. We only use or disclose sensitive personal information for purposes permitted by the CCPA and to which the right to limit does not apply.

CCPA Individual Rights. California consumers have the rights described below. However, these rights do not apply in all instances and are subject to certain exceptions as a matter of law. By way of example, these rights do not apply where we collect or sell a consumer's personal information if: (1) we collected that information while the consumer was outside of California, (2) no part of a sale of the consumer's personal information occurred in California, and (3) no personal information collected while the consumer was in California is sold.

Request to Know. As a California resident, you have the right to request: (1) the specific pieces of personal information we have collected about you; (2) the categories of personal information we have collected about you; (3) the categories of sources from which the personal information is collected; (4) the categories of personal information about you that we have sold or shared and the categories of third parties to whom the personal information was sold or shared; (5) the categories of personal information about you that we disclosed for a business purpose and the categories of third parties to whom the personal information was disclosed for a business purpose; (6) the business or commercial purpose for collecting, disclosing, selling, or sharing personal information; and (7) the categories of third parties to whom we disclose personal information. Our response will cover the 12-month period preceding our receipt of a verifiable request unless a longer period is requested by you.

Request to Delete. As a California resident, you have a right to request the erasure/deletion of certain personal information collected or maintained by us. As described herein, we will delete your personal information from our records and notify any service providers and contractors (as defined under applicable law) to delete your personal information from their records. However, we are not required to honor a deletion request if an exemption applies under the law.

Right to Correct. As a California resident, you have a right to correct inaccuracies in your personal information, taking into account the nature of the personal information and the purposes for which we process the personal information. We will use commercially reasonable efforts to correct the inaccurate personal information as directed by you.

Right to Limit Use and Disclosure. As a resident of California, you have the right to limit our use and disclosure of your sensitive personal information to that use which is necessary to perform our services and provide our goods as requested by you, or as otherwise permitted by law. We only use or disclose sensitive personal information for purposes permitted by the CCPA and to which the right to limit does not apply.

Right to Opt Out. As a resident of California, you have the right to direct us to stop selling or sharing your personal information to third parties and to refrain from doing so in the future. For purposes of this right, we do not sell or share personal information as defined under applicable law.

Submission Process. You may submit a request to exercise the above rights via a toll-free telephone call to 888-871-0963, by email to obixpoet@obix.com, or by submitting your request through the form available on our Site. If a request is submitted in an incorrect manner or if it is deficient, we will either (1) treat the request as if it had been submitted via the designated manner, or (2) provide you with specific directions on how to submit the request or remedy any deficiencies, as applicable.

Verification Process. We are required to verify the identities of those who submit requests to know or to delete. To determine whether the individual making the request is the consumer about whom we have collected information, we will verify your identity by matching the identifying information provided by you in the request to the personal information that we already maintain about you. As a part of this process, you will be required to provide your name, email address, and telephone number. We will inform you if we cannot verify your identity.

- If we cannot verify the identity of the person making a request for categories of personal information, we may deny the request. If the request is denied in whole or in part for this reason, we will provide a copy of, or direct you to, our privacy policy.
- If we cannot verify the identity of the person making the request for specific pieces of personal information, we are prohibited from disclosing any specific pieces of personal information to the requestor. However, if denied in whole or in part for this reason, we will evaluate the request as if it is seeking the disclosure of categories of personal information about the consumer.
- If we cannot verify the identity of the person making a request to delete, we may deny the request.
- If there is no reasonable method by which we can verify the identity of the requestor to the degree of certainty required, we will state this in our response and explain why we have no reasonable method by which we can verify the identity of the requestor.

Authorized Agents. Authorized agents may submit requests via the methods identified in this Policy. If you use an authorized agent to submit a request to know or a request to delete, we may require: (1) the authorized agent to provide proof that you gave the agent signed permission to submit the request; (2) you to verify your identity directly with us; and (3) you to directly confirm with us that you provided the authorized agent permission to submit the request. However, we will not require these actions if you have provided the authorized agent with power of attorney pursuant to the California Probate Code.

Excessive Requests. If requests from a consumer are manifestly unfounded or excessive, in particular because of their repetitive character, we may either (1) charge a reasonable fee, or (2) refuse to act on the request and notify the consumer of the reason for refusing the request. If we charge a fee, the amount will be based upon the administrative costs of providing the information or communication or taking the action requested.

Non-Discrimination. You have the right not to receive discriminatory treatment by us due to your exercise of the rights provided by the CCPA. We do not offer financial incentives and price or service differences, and we do not discriminate against consumers, employees, applicants, or independent contractors for exercising their rights under the CCPA.

California Shine the Light. Under California Civil Code Section 1798.83, California residents who provide personal information in obtaining products or services for personal, family, or household use may be entitled to request and obtain from us once a calendar year information about the information we shared, if any, with other businesses for direct marketing uses. At present, we do not share your personal information with third parties for those third parties' direct marketing purposes. Please be aware that not all information sharing is covered by the "Shine the Light" requirements and only information on covered sharing, if any, will be included

in our response. As part of the California Online Privacy Protection Act, all users of our Site may make any changes to their information at any time by contacting us at obixpoet@obix.com.

THIRD-PARTY SITES AND SERVICES

This Policy does not apply to any third-party websites or applications. The Site may contain links to, and media or other content from, third parties. These links are to external resources and third parties that have their own privacy policies. Because of the dynamic media capabilities of the Site, it may not be clear which links are to external, third-party resources. If you click on a third-party link, you will be redirected away from the Site. You can check the URL to confirm whether you have left the Site.

We cannot and do not (1) guarantee the adequacy of the privacy or security practices employed by or the content and media provided by any third parties or their websites, (2) control third parties' independent collection or use or your information, or (3) endorse any third-party information, products, services, or websites that may be reached through embedded links on the Site.

Any information provided by you or automatically collected from you by a third party will be governed by that party's privacy policy and terms of use.

CHILDREN

Our Site, products, and services are not directed to children under the age of 13, nor is information knowingly collected from children under the age of 13. No one under the age of 13 may access, browse, or use the Site or provide any information to us. If we learn that we have collected or received personal information from a child under the age of 13 without a parent's or legal guardian's consent, we will take steps to stop collecting that information and delete it. If you believe we have any received information from a child under the age of 13, please contact us using the "Contact Us" details provided below.

For more information about COPPA, please visit the Federal Trade Commission's website at: https://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/childrens-online-privacy-protection-rule.

UPDATES AND CHANGES TO THIS POLICY

We may add to, change, update, or modify this Policy from time to time. We will post all changes to this Policy on this page, and the updated policy will be effective immediately upon posting. If we make material changes, we will also notify you through a notice on the homepage of the Site for a reasonable period of time. We may also, in our discretion, notify you of changes to this Policy via email.

You are expected to, and you acknowledge and agree that it is your responsibility to, carefully review this Policy prior to using the Site, and from time to time, so that you are aware of its current terms. Your continued use of the Site after the "Last Updated" date will constitute your acceptance of and agreement to any changes and to our collection and sharing

of your information according to the then-current Policy. If you do not agree with this Policy and our practices, you should not use the Site.

CONTACT US

If you have any questions or concerns, wish to exercise your rights, or want to submit a complaint, please contact us using the information below, and we will do our best to assist you.

In Writing:
2895 Greenspoint Parkway, Suite 650
Hoffman Estates, IL 60169

By Email: obixpoet@obix.com

Online: OBIX Privacy Policy Online Information Request

Telephone: 888-871-0963