SutureSign™ Privacy Policy

As part of the day-to-day business operations of Suture Health, Inc. ("SutureHealth"), including operation of the web site www.SutureSign.com (the "Website"), we receive and maintain certain health related and personal information regarding Individuals. Information received from the web site depends in part on what you do when you visit and interact with the web site. SutureHealth respects the privacy of every Individual who visits our web site. Therefore, we would like to define the types of information we receive and describe how it is maintained in this privacy policy ("Privacy Policy"). This policy refers only to the information collected and maintained from the Website.

For the purpose of this Privacy Policy, the following definitions describe the types of users who may access and use the information, products and services offered by SutureHealth:

An "Individual" is any person visiting the public sections of the Website.

A "Provider" is a physician, facility, group practice and/or their authorized representatives that may access SutureHealth's products or services available on the Website.

A "Registered User" (User) is any Provider authorized to enter the secure sections of www.SutureHealth.com.

USING THIS WEB SITE CONFIRMS YOUR CONSENT AND AGREEMENT TO OUR PRIVACY POLICY, INCLUDING COLLECTION, USE AND DISCLOSURE OF INFORMATION BY SUTUREHEALTH AS DESCRIBED HEREIN. YOUR USAGE ALSO SIGNIFIES YOUR COMPLIANCE WITH OUR APPLICABLE TERMS OF SERVICE.

SutureHealth, through its products and services, provides private and secure access to health related and personal information. In addition, SutureHealth provides private and secure access to Provider information.

Registered Users
Providers must register to access the secure areas of SutureHealth. Privacy and security are top priorities at SutureHealth. For that reason, SutureHealth has implemented a process that helps protect Protected Health Information ("PHI"), as that term is defined by the Health Insurance Portability & Accountability Act of 1996, as amended ("HIPAA"), contained on our site from inappropriate access. Before a Registered User can access medical information available on our site, the user must first be authenticated as being a provider or a representative of a provider as defined above.

E-Mail
Providers: Do not send e-mail containing personal information to SutureHealth.
SutureHealth cannot secure personal information sent by e-mail because such information can be accessed by other Internet users. If you send SutureHealth a question by e-mail, SutureHealth's use

or disclosure of that information will be limited to the minimum necessary for responding to your question.

Information Collected Before Registration: SutureHealth obtains personal information regarding physician providers from a third party source including but not limited to state medical license numbers. This data is protected within a secure firewall environment, access to which is limited to only SutureHealth and its representatives.

Information Collected During Registration: SutureHealth collects personal data during the registration process, including but not limited to names and email addresses. SutureHealth will not sell nor distribute personally identifiable or contact information. SutureHealth reserves the right to provide a service to third parties who may wish to contact you through our network provided that you have given consent for such services to be rendered. As part of the service provided by SutureHealth, you understand that SutureHealth will contact you on the behalf of other healthcare providers.

Statistical Data on Website Usage – SutureHealth continually strives to enhance the features and services that are offered to our web site. In an effort to determine the effectiveness and functionality of our web site, we monitor aggregated data regarding the use of our web site. For instance, we may track the number of visits to a certain page; direct links from other web sites; and frequency of usage for independent services. Although we reserve the right to share this information as indicated above, this statistical data, does not contain any personal information that could disclose the user's identity.

Disclosure of Non-Public Personal Information, including Personal Health Information (PHI): We restrict access to nonpublic personal information, including PHI. Information may be shared with entities (i.e. providers and vendors) that assist SutureHealth in providing services to our Registered Users. Information is provided to nonaffiliated third parties as required or allowed by federal and state law. SutureHealth maintains physical, electronic, and procedural safeguards that comply with federal regulations to guard nonpublic personal information, including but not limited to high-level encryption.

Disclosure to Providers: SutureHealth discloses nonpublic personal information including PHI to Providers through their access to the website. This information is disclosed to Providers for treatment, payment or health care operations (TPO) as allowed under HIPAA. To ensure that Providers are only accessing patient information for TPO, SutureHealth has implemented the following safeguards:

- The accompanying Terms of Service outlines acceptable uses of patient information.
- SutureHealth maintains audit trails of user activity.
- SutureHealth requires both a user name and password for access to PHI.
- Providers default access to PHI is limited to those records with which they or their associates (i.e. providers who are in the same practice or facility) or representatives need to have access for treatment, payment, or health care operations. For some facilities this is determined by their need to create or modify patient records. Notwithstanding however,

these facilities will only have access to the medical information that they have submitted into the system; thus, alleviating those access concerns which often times arises in a competitive market environment.

Disclosure to Third Parties: SutureHealth operations, maintenance employees and contractors may have limited access to your nonpublic personal information, including PHI, while providing products or services to SutureHealth. These contractors include vendors and suppliers that provide us with technology, services, and/or content for the operation and maintenance of our Web site. Access to your nonpublic personal information, including PHI, by these contractors is limited to the information reasonably necessary for the contractor to perform its limited function for SutureHealth. We also contractually require that our operations and maintenance contractors 1) protect the privacy of your nonpublic personal information, including PHI, consistent with this Privacy Policy, and 2) not use or disclose your nonpublic personal information, including PHI, for any purpose other than providing us with products and services as required by law.

Disclosure of Aggregate Information: SutureHealth may disclose aggregate information to third parties. This information may contain medical information; however, it is not associated to a specific individual. Depending on the circumstances, SutureHealth may or may not charge third parties for this Aggregate Information. SutureHealth requires parties with whom aggregate information is shared to agree that they will not attempt to make this information personally identifiable, such as by combining it with other databases.

Retention of Information Collected
The non-public personal information collected and maintained from this web site will be retained for six years from the date of its creation or the date when it was last in effect, whichever is later.

Use of Cookies
A "cookie" is a mechanism that permits a web server to send small pieces of information or text through your browser to be stored on your hard drive. This information or text allows the server to identify frequent visitors of individual web sites. SutureHealth may place a cookie on your computer that will allow us to identify users so that we may enhance their experience on our web site. Our cookies are not used to track your activity on any site other than SutureHealth.com nor will they be utilized to send unsolicited e-mail or provide us with the Users personally identifiable information.

Security
SutureHealth takes precautions to protect its Users' nonpublic personal information. When Users submit sensitive information to SutureHealth, the information is protected both online and off-line.

While SutureHealth uses SSL encryption to protect sensitive information online, SutureHealth protects User-information off-line. Only employees who need the information to perform their jobs are granted access to personally identifiable information. Furthermore, all employees are kept up-to-date on SutureHealth security and privacy practices. Finally, the servers that store personally identifiable information are kept in a secure environment.

Despite our efforts to protect your nonpublic personal information, including PHI, there is always some risk that an unauthorized third party may illegally gain access to systems or that transmissions of your information over the Internet may be intercepted. If you believe someone has accessed your information without authorization, please contact SutureHealth immediately at 1-800-878-8814 or support@SutureHealth.com.

Breach of non-public information: If there is a breach of non-public, personally identifiable data, we will first determine if PHI was accessed during the breach. If PHI was not accessed, SutureHealth will make a determination of the risk associated with such breach and take action as deemed necessary. If PHI was accessed, SutureHealth will comply with all current state and federal regulations. In either case, SutureHealth will take measures to prevent future breaches.

SutureHealth Reserves The Right To Modify Its Privacy Policy: SutureHealth reserves the right to change or update this Privacy Policy at any time. Any changes made to our privacy policy will be posted on this site in a manner that is easily identifiable. Please review our privacy policy on a regular basis to review any changes.