

Beacon Orthopaedics Privacy Statement

Overview

Beacon Orthopaedics and Sports Medicine, Ltd. ("Beacon") is committed to providing security and privacy regarding the collection and use of its patient's information, as well as that of all visitors to its website ("The Beacon Site" or the "Web Site"). Beacon's corporate policy is to protect the privacy and confidentiality of its customers and those individuals whose health care information may be identified within the transaction data services supplied by Beacon to its customers. This Privacy Statement describes what information Beacon collects and how that information is protected and used.

Beacon operates under the following privacy principles:

- ☐ Information supplied by a visitor that could be used to identify or contact that visitor, such as name, e-mail address or other similar information ("Personal Information"), will not be disclosed to anyone unless the visitor indicates that Beacon may do so.
- ☐ Beacon may share statistical information about its visitors as a group, such as usage habits, demographics and similar information that cannot be used to identify or contact visitors ("Aggregate Information"), with third parties. However, Beacon will not share Personal Information about a visitor at any time without the visitor's permission.
- ☐ The only information Beacon obtains about an individual visitor to its Web Site is information supplied voluntarily by that visitor by visiting the site.
- ☐ Personal Information about an individual contained within electronic health transactions, reports and other summaries derived from electronic health transactions, or within administrative information necessary to conduct electronic health transactions, that can be used to identify or contact that individual will be protected by Beacon as "Individually Identifiable Health Information" in accordance with the requirements and definitions of the Health Insurance Portability and Accountability Act (HIPAA) of 1996 (Public Law 104-191) and any implementing regulations.
- ☐ Beacon will also observe all other state and federal laws relating to transmission, storage, and access to medical records and other health care data

Disclosure of Personal Information

Except as set forth herein, Beacon will not disclose any Personal Information about its visitors and customers to unaffiliated companies. Any Personal Information provided to entities affiliated with Beacon will be treated in accordance with the terms of this Privacy Statement.

Except as set forth herein, Beacon will not disclose any Personal Information contained within payment processing or electronic health transactions to unaffiliated companies. Any Personal Information provided to entities affiliated with Beacon will be treated in accordance with the terms of this Privacy Statement.

Beacon will consider, and may release, Personal Information to third parties to comply with law or to protect the rights, property or safety of Beacon and its customers.

Beacon may provide to third parties Aggregate Information that does not allow the individuals to be identified or contacted.

Registration

The Beacon Site may require visitors to register either before accessing the Web Site or as a requirement to access specific portions of the Web Site. Registration may include the collection of contact information such as visitor name, e-mail address, phone, or other personal information.

IP Addresses

An IP address is a number assigned to a computer for accessing the Internet. All computer identification on the Internet is conducted with IP addresses, which allow computers and servers to recognize and communicate with each other. Beacon's webserver collects IP addresses in order to conduct system administration, report aggregate information to sponsors and advertisers, and to conduct site analysis. If a visitor requests pages from the Beacon Web Site, the Beacon servers enter the visitor's IP address into a

log. To maintain visitor anonymity, Beacon does not associate IP addresses with records containing Personal Information. However, Beacon will use IP addresses to identify any visitors who refuse to comply with Beacon terms of service, and to identify visitors who threaten its service, site, or customers.

Cookies, Javascript, Web Beacons

The Beacon Site may place a text file called a "cookie" in the browser files of the computer accessing its Web Site. Cookies are pieces of information that a web site transfers to an individual's hard disk for record keeping purposes. The Beacon Site may use cookies during an online session to confirm that access to its site is authorized and to control certain parameters of the communication session with its Site.

JavaScript is a programming language that's used to automate certain web features such as buttons that light up when selected and menus that expand. Beacon may use JavaScript to enhance its website and to assist in the tracking of anonymous data. If a visitor disables JavaScript, many of the features on the Beacon Site may not work.

The Beacon Site may also contain electronic images known as Web beacons, or clear gif technology, that can be used to assist in determining what content is effective on the website. Web beacons are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movement of Web users. The main difference between the two is that clear gifs are invisible on the page and are much smaller, about the size of the period at the end of this sentence. Web beacons are not used to access personal information. They are a technique used to compile aggregate statistics about usage of websites. Web beacons collect a limited set of information including a cookie number, time and date of a page view and a description of the page on which the Web beacon resides.

Clear Gifs can "work with" existing cookies on a computer if they are both from the same website or web marketing/customer service company. That means, for example, that if a person visited "www.companyX.com", which uses a web marketing company's clear gif, the website or web marketing company would match the clear gif's identifier and the web marketing company's cookie ID number, to show the past online behavior for that computer. This collected information would then be given to the website.

In addition, Beacon may use clear gifs in HTML-based emails to let Beacon know which emails have been opened by the recipients. This allows Beacon to gauge the effectiveness of certain communications and the effectiveness of marketing campaigns.

Payment Processing and Electronic Health Transactions

Some Beacon Site features may use applications to collect data to facilitate a payment processing or electronic health transactions. Beacon will obtain the user's explicit permission to transfer this data to the third party to facilitate this transaction as part of the transaction processing service agreement voluntarily entered into with Beacon.

Beacon may store this information to verify the transaction for customer service and accounting reasons and may use this information to help personalize the experience on the Beacon Site. Beacon may also share this information with other third parties on an aggregate basis, but not in any manner that would permit the third party to identify or contact individual users of its Site.

External Links

In order to provide visitors with greater value, Beacon may provide links to various third party web sites. However, even if a third-party affiliation exists between Beacon and that destination site, BEACON EXERCISES NO AUTHORITY OVER LINKED SITES, EACH OF WHICH MAINTAINS INDEPENDENT PRIVACY AND DATA COLLECTION POLICIES AND PROCEDURES. BEACON ASSUMES NO RESPONSIBILITY OR LIABILITY FOR THESE INDEPENDENT METHODS OR ACTIONS AND IS NOT RESPONSIBLE FOR THE INDEPENDENT POLICIES OR PROCEDURES OF DESTINATION SITES. SIMILARLY, BEACON CANNOT TAKE RESPONSIBILITY FOR THE PRIVACY INITIATIVES OR THE CONTENT OF SUCH WEB SITES. THESE DESTINATION LINKS ARE PROVIDED ONLY FOR CONVENIENCE, AND AS SUCH, THEY ARE ACCESSED AT THE USER'S OWN RISK. However, Beacon wishes to protect the integrity of the Beacon Web Site and its destination links, so any comments pertaining to the Beacon Web Site or any sites accessed through Beacon links would be appreciated.

Security

Beacon combines industry-standard technical safeguards with employee policies to help prevent the loss, misuse or alteration of Personal Information under its control. Only authorized Beacon employees, agents or independent contractors are permitted to access Personal Information, and all such employees, agents

and independent contractors must agree in writing to abide by the Beacon Privacy Statement. Those who violate the Privacy Statement are subject to disciplinary action, up to and including termination. Beacon employs strict security measures to safeguard online transactions; Personal Information is stored in secured systems and is always encrypted when sent via Internet channels.

Despite these security measures, BEACON DOES NOT REPRESENT OR WARRANT THAT PERSONAL INFORMATION WILL BE PROTECTED AGAINST LOSS, MISUSE OR ALTERATION BY THIRD PARTIES.

Children's Policy

Beacon believes that protecting the privacy of children is very important. Beacon's websites are not designed to attract individuals under the age of 18. In accordance with the Children's Online Privacy Protection Act ("COPPA"), Beacon does not collect or store any personal information, even in aggregate, about children under the age of 13. If Beacon discovers that it has received any information from a child under the age of 13 in violation of this policy, Beacon will delete that information immediately. If a visitor believes that Beacon has any information from or about anyone under the age of 13, please contact Beacon at the contact points specified below.

Privacy Statement Changes

Beacon may change this Privacy Statement at any time by posting revisions to its Web Site. The use of the Site constitutes acceptance of the provisions of this Privacy Statement and the continued usage after such changes are posted constitutes acceptance of each revised Privacy Statement. If the user does not agree to the terms of this Privacy Statement or any revised statement, then they should exit the Site immediately.

Contacting the Web Site

If there are any questions about this privacy statement, the practices of this Web Site, or the interaction with this Web Site, please contact:

Beacon Orthopaedics
500 E Business Way.
Cincinnati, OH 45241
(513) 354-3700 or toll free: (800) 773-4353

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