

b.well Connected Health Tracking Technology Policy

This Tracking Technology Policy (“**Tracking Technology Policy**”) is a supplement to the [b.well Privacy Policy](#) (“**Privacy Policy**”), including any Additional Notices like the b.well Smart Connect Terms of Use and TEFC A Privacy and Security Notice (“**Smart Connect Terms**”), and the [Privacy and Security Statement for b.well Enterprise Customers and their End Users](#) (“**the Privacy and Security Statement**”). Any conflict or inconsistency is resolved with precedence given to protecting your privacy rights and the security of your information.

1. About b.well

b.well is a connected health technology provider that powers consumer-centered health data access and exchange, working with our industry partners to create timely, relevant and personalized health experiences for patients and consumers, to help solve healthcare’s fragmentation problem.

2. What are tracking technologies?

Tracking technologies are device, internet or software-based technologies that use data, code or tiny graphics and device identifiers with web pages and browsers to understand the information you consume online and how you navigate between different online resources, including your interactions with our services (“**usage data**” or “**passive data**”).

3. What kind of information could we be collecting with tracking technologies?

Usage data or passive data includes:

- **Device information:** device type, operating system and unique identifiers;
- **Browser information:** browser type, version and technical data;
- **Usage information:** the features used, interactions, views, searches, connection requests acceptance or rejection of different calls to action, impressions, access time, recommendations reactions, and the pages visited;
- **Location information:** country, time zone and IP address;
- **Connection information:** network information and connection quality;
- **Performance information:** the error reports and loading times;
- **Digital information:** credentials, necessary cookies and trackers and logs.

Depending upon the permission capabilities in your devices and browsers, you may be able to limit our access to some usage data. In some cases, this can change the way you interact with our services, or limit their performance.

4. Why do we use this information?

Legal basis for using your information

We use this information if there is a valid legal basis in accordance with applicable privacy laws and the contractual commitments listed above. It means we use this information based on the following:

- **To perform, monitor and report on the performance of our services (contract performance):** Usage data reflects general patterns and trends about how users interact with our services (for example, feature utilization, navigation flows, and performance metrics). We use usage data to analyze, maintain, and improve the functionality, performance, and user experience in our related services, and to generate reports, which we may share on an anonymized, aggregated basis with customers and the public.
- **When you give permission (consent):** To provide you with optional features as you choose (e.g. conversational AI).
- **To keep our technology secure and running smoothly (legitimate business interest):** For example, to fix errors, provide support, help prevent theft, fraud and abuse and improve the usability and effectiveness of our services.
- **To meet legal requirements (legal compliance):** When we are required by applicable laws and regulations to retain certain records or share information with authorities.

5. Additional privacy controls

Data minimization practices. We apply data minimization principles when we use this information; for example, by performing operations with deidentified or aggregated information, unless personally identifiable information is strictly necessary. We never share, sell or otherwise trade in personally identifiable usage data under this policy.

Restrictions on cross-platform tracking. We do not use or contract with providers of cross-platform tracking technologies. We may share usage data with customers that integrate our services with the application you use to access our services. In this instance, we are acting as their subprocessor, and their relevant terms and privacy policy apply.

Tracking technology suppliers. When we use tracking technologies from a third-party, they must be under a written agreement as one of our sub-processors. This means they are bound to privacy and security commitments that at least as stringent as our own. All b.well sub-processors are vetted and go through our third party risk management process. We publish and maintain a current [list of b.well sub-processors](#) on our website, with a brief description of our purpose of use.

6. Activities that are out-of-scope for this policy

Except as otherwise disclosed above, this Tracking Technology Policy does not cover usage data collected by any other third parties – such as advertising networks, web analytics companies and social media and networking platforms that may be tracking your activities through browsers, devices, or other applications. We are not responsible for the data practices of these unaffiliated third parties. While we use encryption and other methods to limit usage data collection by these third parties in our services, these efforts on their own might not be enough to prevent them from collecting your information. Please select browsers and devices that alert you to third party tracking technologies and help you manage or restrict their data collection activities.

7. Revision History

Effective Date	Link to prior version (as applicable)	Description
May 12, 2020	https://www.icanbwell.com/legal/codes-policy-may-2020/	First published version
February 18, 2026	N/A	Overall updates to reflect best practices