

# Privacy Policy

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## Welcome to SMARTLIGHT ANALYTICS, LLC

At SmartLight Analytics, safeguarding your privacy is our top priority. This Privacy Policy explains how SmartLight Analytics LLC., ("we," "us," "our") collects, uses, discloses, and safeguards your personal data in compliance with applicable data protection laws. Whether you're a client, partner, or a visitor to our website (the "Site"), we are committed to maintaining transparency and security in all interactions with your information. We are committed to handling your personal information in accordance with this Privacy Policy and applicable laws.

We reserve the right to update this Privacy Policy periodically. Any changes will be posted on the Site and will take effect immediately. By continuing to use our website, products or related services after updates are made, you accept these changes. If you do not agree with the policy, we advise you not to use the SmartLight Analytics Platform.

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## What Constitutes Personal Information?

The term “personal information” in this Privacy Policy refers to any information or data that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to a particular identifiable natural person or household, or any other information or data that constitutes “personal information”, “personal data,” or “personally identifiable information.”

An identifiable natural person, or “Data Subject,” is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location information, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

## Personal Information We Collect

We collect the following information in the course of providing you with our products and related services:

Category of Information	What We Collect	Why We Collect It
<b>Client Contact Information</b>	Name, email, phone number, and other client identifiers	To manage contractual communications, deliver services, process orders, handle billing, and contact clients regarding engagements.
<b>Account Information – Clients &amp; Users</b>	Account login credentials (e.g., email, password), business contact details (name, title, company, phone)	To create and manage user accounts, enable access to Online Services, monitor log-ins, and detect or prevent fraudulent activity.
<b>Applicant &amp; Employee Data</b>	SSN, DOB, banking details, address, phone number, resume/CV, employment-related identifiers	To evaluate job applications, administer employment relationships, comply with legal requirements, and manage workforce operations.
<b>Cookies and First-Party Tracking</b>	Cookies and similar tracking technologies	To operate our website efficiently, improve user experience, and support marketing efforts.
<b>Third-Party Tracking &amp; Analytics</b>	Third-party cookies and analytics data, behavioural insights for advertising purposes	To analyze site traffic, improve marketing, and deliver relevant advertising based on user interests.
<b>Email &amp; Communication Tracking</b>	Engagement metrics such as open and click-through rates	To measure communication effectiveness and improve outreach.
<b>Feedback &amp; Support Requests</b>	Content submitted via support inquiries, online forms, or correspondence	To respond to questions, address issues, improve services, and enhance support offerings.
<b>Website Interaction &amp; Device Info</b>	Click behavior, device/browser metadata, IP addresses, form inputs, session timing	To understand how visitors use our Site, improve functionality, and prevent fraud.
<b>Social Media Profile Data</b>	Information shared via social media (e.g., name, username, language, country, profile picture), based on user privacy settings	To maintain our social media presence, interact with followers, and improve outreach.
<b>System Logs &amp; Usage Metrics</b>	Device/browser type, OS version, IP address, click paths, activity timestamps	To monitor network performance, improve features, and ensure security.
<b>Survey &amp; Research Responses</b>	Responses provided in surveys or feedback instruments	To gather user insights and improve our services (collected with consent).
<b>General Client Relationship Activities</b>	All relevant personal and business contact details	To conduct “Know Your Client” checks, communicate about current/future engagements, create marketing materials, and handle complaints or requests.

We do not collect sensitive data.

## How We Collect Your Personal Information:

In addition to the information we collect directly from you, SmartLight Analytics may receive information about you from other sources, such as third parties, business partners, affiliates, or publicly available records. For example, if you apply for a job or become an employee, we may conduct background checks.

SmartLight Analytics is committed to complying with data protection laws in all the regions where it operates and provides products and related services. These laws, collectively referred to as "Data Protection Laws," govern individual privacy and breach notification requirements.

If you are located in a U.S. state with privacy protection legislation, please refer to the "Your Privacy Choices" section for additional details.

## Google Analytics and Cookies Policy

SmartLight Analytics uses Google Analytics to help analyze how visitors use the Site. Google Analytics collects information such as how often users visit our site, what pages they visit, and other actions they take while interacting with the site. This data helps us improve the performance and user experience of our website.

Google Analytics may collect information about your device and browsing activities, including:

- **IP Address**
- **Browser Type**
- **Operating System**
- **Pages Visited**
- **Time Spent on Pages**
- **Geolocation Data (Approximate Location)**

Please note that Google Analytics operates through cookies, small text files placed on your device to track activity. These cookies may remain on your device after your session has ended. To opt-in or opt-out of the use of Google Analytics, you can manage your cookie consent preferences in the cookie consent manager via our website's cookie banner. Additionally, you can manage your preferences through your browser settings, including blocking or deleting cookies.

You can also opt out of Google Analytics tracking entirely by installing the Google Analytics Opt-out Browser Add-on, which prevents Google Analytics from collecting information on websites you visit. For more information on how Google collects and processes data through Google Analytics, please visit [Google's Privacy Policy](#).

If you prefer not to be tracked by Google Analytics, you may:

- Adjust your browser settings to block or delete cookies.
- Use the Google Analytics Opt-out Browser Add-on as mentioned above.

While disabling cookies or opting out of Google Analytics may limit certain functionalities on the SmartLight Analytics website, it will not prevent you from using the Site.

If you have further questions about the use of Google Analytics on the Site, please contact us at [privacyinfo@smartlightanalytics.com](mailto:privacyinfo@smartlightanalytics.com).

## Artificial Intelligence (AI) Use Disclaimer

To support our services, SmartLight leverages secure, privacy-conscious technologies. Our proprietary models, combined with the expertise of our clinical, data science, and investigative teams, are utilized in servicing our clients. SmartLight's AI use is guided by HIPAA requirements and healthcare expertise and used solely to promote quality of care, improve outcomes, and reduce plan fiduciary risk.

**We do not use AI tools to collect or process sensitive personal data or information protected by law (such as health or financial data).**

We are committed to protecting the privacy and rights of individuals in our use of AI and uphold the following principles:

- **Compliance with Privacy Laws:** All AI-supported processing is conducted in accordance with applicable data protection laws and within the boundaries of this Privacy Policy.
- **Security and Confidentiality:** We implement appropriate technical and organizational measures to secure any personal data processed against unauthorized access, misuse, or disclosure.
- **Bias and Fairness:** We take reasonable steps to ensure that our inferential analytics claims analysis is fair, relevant, and free from discriminatory impact on any patient population or healthcare provider.
- **Transparency:** We aim to provide clear information about how data is processed using our proprietary tools, and how individuals can exercise their privacy rights in this context.

Client data shared directly with SmartLight (such as through our website or services) is never used to train AI models and remains subject to strict data protection protocols, contractual safeguards, and this Privacy Policy.

## How We Share Your Personal Information

We may share your personal information in the following situations:

- **With service providers and business partners** – We share information with authorized contractors, vendors, and other third parties who help us deliver our products, operate our Online Services, or support our business operations.
- **For legal and safety purposes** – We may disclose information if we believe it is necessary to protect the rights, property, or safety of our company, our clients, or others; to comply with laws, legal processes, or government requests; or to enforce our agreements, including for billing and collections.
- **For business transactions** – Your information may be shared with a buyer, successor, or other party in connection with a merger, acquisition, restructuring, or sale of assets.
- **To fulfill the purpose for which it was provided** – For example, if you request a service or submit information for a specific purpose, we will use and share it as necessary to complete that request.
- **With your consent** – In cases where you have given us permission to share your information for a specific purpose.

We do **not** sell your personal information or share it with third parties for their direct marketing purposes.

## Your Privacy Rights

Depending on your location and applicable laws, you may have the following rights regarding your personal information:

<b>Access</b> – You may request reasonable access to the personal information we hold about you.
<b>Data Portability</b> – You may request a copy of personal information you have provided to us in a portable, readily usable format, where technically feasible. California residents may also request details on the categories of personal information we share with third parties for direct marketing purposes (see our <i>Supplemental Privacy Rights Notice</i> ).
<b>Correction</b> – You may request that we update or correct your personal information. We may maintain historical information in our backup files as permitted by law.
<b>Deletion</b> – You may request that we delete your personal information. We will honor deletion requests as required by law, subject to our need to retain certain information to comply with legal obligations, resolve disputes, enforce agreements, or for other legitimate business purposes.
<b>Object to Processing</b> – You may object to certain uses or disclosures of your personal information.
<b>Revoke Consent</b> – If our processing of your personal information is based on your consent, you may withdraw that consent. Please note that doing so may limit our ability to provide some services. In some cases, we may deny your request if permitted or required by law or if we cannot verify your identity.
<b>Promotional Communications</b> – You may opt out of receiving promotional emails by following the unsubscribe instructions in those emails. We may still send you service-related communications.
<b>Online Tracking</b> – Our Sites do not currently respond to “Do Not Track” signals or similar browser settings.

**To exercise these rights, please contact us using the information provided in the *Contact Us* section below. We will respond to your request in accordance with applicable laws.**



SmartLight Analytics will need to verify your identity before processing any requests related to your personal information. We may verify your identity through a phone call or email. Depending on the nature of your request, we may ask for information such as your name or account details. In some cases, we may also request a signed declaration confirming your identity. After receiving your request, we will make reasonable efforts to provide, correct, or delete your personal information as requested.

In certain cases, you may appoint an authorized agent to make privacy requests on your behalf. SmartLight Analytics will require verification that you have granted the authorized agent permission to act on your behalf. You will need to provide a copy of the signed authorization permitting the agent to make the request, and you must verify your own identity directly with us. If you are an authorized agent submitting a request on behalf of an individual, please include the following:

- A notarized statement completed by both you and the individual, confirming you are authorized to act on their behalf.

## Who handles your personal data?

The use of, and access to, your personal information by us is restricted to only authorized individuals who need to know that information to provide our products and related services to you, and who have received training about the importance of protecting personal information. Our service providers and business partners are also contractually bound to maintain the confidentiality of personal information and may not use the information for any unauthorized purposes.

## Information Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access and disclosure.

Unfortunately, no method of transmission of information via the internet or electronic storage is completely secure. Although we take reasonable efforts to protect your personal information, we cannot guarantee the security of your personal information transmitted to us through our website or other electronic means. Any electronic transmission of personal information is at your own risk. In the event that we are required by law to inform you of a breach of your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

## International Data Transfers

We transfer and store data in the United States. Where required by law, we implement safeguards that align with industry best practices and compliance with applicable regulations.

## How We Retain Your Personal Information

SmartLight Analytics retains personal information for as long as necessary to fulfil the purposes outlined in this Privacy Policy or as required by law. Typically, personal information is kept for as long as your account remains active or until you request deletion. The exact retention periods vary based on the type of information and why it is collected. Factors we consider include the volume and sensitivity of the data, potential risks of unauthorized use or disclosure, and legal requirements.

We may anonymize your personal information, ensuring it can no longer be associated with you, for research, statistical, or business purposes. We may retain this anonymized data indefinitely. Personal information may also be kept for backup, archival, or audit purposes, and to comply with legal obligations or resolve disputes. For further details on retention periods, please contact us at [privacyinfo@smartlightanalytics.com](mailto:privacyinfo@smartlightanalytics.com).

## Other Important Information

- **Third-Party Providers:** Some of the services on the Site may be embedded or linked from third-party providers. These third parties may use cookies or other tracking technologies to collect information about you, including for interest-based advertising. We do not control their privacy practices, and this Privacy Policy does not apply to any third-party website or service you may access through the Site. Please contact the third-party provider directly with questions about their privacy policies.
- **Non-Personal Information:** This Privacy Policy does not limit our use or disclosure of aggregated, anonymized, or non-personally identifiable information.

At the customer's request, personal data relating to them may be removed or anonymized from SmartLight Analytics' systems and no longer used for the purposes listed in the policy.

## Children's Policy

The SmartLight Analytics' website, the sale of its products and related services are not intended for children under the age of **18**. We do not knowingly collect or contact personal information from children under 18. If we become aware that Personal Information has been collected from a child under the age of 18 without parental consent, we will take steps to delete it immediately.



## Changes to Our Privacy Policy

Any changes to this Privacy Policy will be posted on the Site. If material changes are made to how we treat your personal information, we may notify you via email or through a notice on our website's homepage. By continuing to use the Site or purchase and use our products and related services after changes are posted, you accept these revisions. The date of the last revision is stated at the top of this Privacy Policy. It is your responsibility to ensure we have a current and valid email address and to periodically review this Privacy Policy for updates.

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## Contact Information

For questions or concerns about this Privacy Policy, contact us at:

SMARTLIGHT ANALYTICS, LLC  
4965 Preston Park Blvd. Suite 350  
Plano, TX 75093  
Email: [privacyinfo@smartlightanalytics.com](mailto:privacyinfo@smartlightanalytics.com)



# Supplemental California Privacy Rights Notice

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## California Privacy Disclosures

The California Consumer Privacy Act (hereafter: 'CCPA') and the California Privacy Rights Act (hereafter: CPRA) provide California consumer residents who reside in California with specific rights regarding their Personal Information (which we also refer to as personal data). In addition to the above this section describes your CCPA/CPRA rights and explains how to exercise those rights.

The following does not apply to de-identified or aggregated personal data or data publicly available, which are not considered Personal Information since they do not identify any individual.

## Your Rights

- **"Right to Know"**: You may have the right to request that we disclose to you what personal data of yours we collect, use, and/or disclose.
- **"Right to Delete"**: You may have the right to request the deletion of your personal data collected or maintained by us. Depending on your Choices, certain offerings may be limited or unavailable. Upon verifying the validity of a deletion request, we will delete your personal data from our records and instruct any service providers or third parties to delete your information, when applicable.
- **"Right to Control Use"**: You may have the right to control or limit the use of your personal data, including:
  - Right to Opt-Out of Sales/Sharing/cross-context behavioral advertising.
  - Right to Object to or Opt-Out of automated decision-making/profiling.
  - Right to Opt-Out of processing/Limit Use of Sensitive personal data.
- **"Right of Access"**: You may have the right to access your personal data, and to transmit it to another entity.
- **"Right of Correction"**: You may have the right to request amendments to your personal data if it is inaccurate or outdated in any way. Upon verifying the validity of a verifiable correction request, we will use commercially reasonable efforts to correct your personal data as directed, considering the nature of the personal Data and the purposes of maintaining your personal data.

## Non-Discrimination

We will not discriminate against you for exercising your rights under the CCPA/CPRA. Based on the complexity of the request and the applicable regulations, we may charge a fee for your request. We may offer a CCPA/CPRA-permitted financial incentive, participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.



## Exercising Your Rights

You may make a verifiable request to exercise your privacy rights by contacting us via email at [privacyinfo@smartlightanalytics.com](mailto:privacyinfo@smartlightanalytics.com) or by providing a written request by mail to SmartLight Analytics, 4965 Preston Park Blvd. Suite 350 Plano, TX 75093

You may also contact us via our telephone number 402-475-3671.

Please note that the above rights depend on a few things, and we may refuse requests if there are exceptions under the applicable law.

If we cannot verify you (or your authority to act on behalf of another person) we have the right to deny the requests. While verifying your identity we generally avoid requesting additional information from you for verification purposes. If, however, we cannot verify your identity from the information already maintained by us, we may request additional information from you, which shall only be used to verify your identity while you are seeking to exercise your rights under applicable law, and for security or fraud-prevention purposes.

We delete any new Personal Information collected for verification as soon as practical after processing your request, except as required to comply with applicable legislation.

An "authorized agent" means a natural person, or a business entity registered with the Secretary of State that you have authorized to act on your behalf, conditioned you have:

1. Provided the authorized agent with written permission to do so, and we could verify this; and
2. Verified your own identity directly with the business.

Subsection 1 does not apply when you have provided the authorized agent with a valid power of attorney.

We do our utmost to timely respond to a verifiable Individual, and in a portable format unless it is excessive, repetitive, or materially unfounded. If we require more time, we will inform you of the reason thereof and the extension period in writing.

## Do Not Sell or Share My Personal Information

We do not respond to "Do Not Sell" requests as we do not sell your Personal Information to third parties. In the twelve months before the effective date of this Privacy Notice, we have not sold any Personal Information of Clients, as per the definition of the CCPA/CPRA and similar laws.

After receiving your opt-in consent, we may disclose Personal Information collected via cookies for cross-contextual behavioral advertising purposes, which may qualify as sharing your Personal Information under the CCPA/CPRA. To opt-out of this use, you can adjust your cookie preferences on our website's cookie banner to block our advertising cookies.

Additionally, you can change your device settings to block cookies or install a third-party plugin to control how cookies interact with your device.