

Giffen Solutions Inc.

SAFE HARBOR PRIVACY STATEMENT

Effective: 10-14-2014

This Statement describes how Giffen Solutions Inc. (“Giffen Solutions”, “we”, “us”) and its clients collect, use, and disclose certain personally identifiable information that it receives in the United States from the European Union (“EU Personal Data”) while on our Web site www.medxcom.com. This privacy policy does not cover any other Web sites that may be owned or controlled by us or our mobile application.

Giffen Solutions complies with the U.S.-E.U. Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal data from the European Union member countries. Giffen Solutions has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view Giffen Solutions’s certification, please visit <http://www.export.gov/safeharbor/>

Categories of Individual Data Subjects

In general, Giffen Solutions may obtain EU Personal Data in the United States about several different types of individuals, including direct customers and customers of Giffen Solutions ecommerce merchant customers. Giffen Solutions practices with respect to each of these types of individual data subjects are described below.

DIRECT CUSTOMERS

Giffen Solutions generally collects, uses, and discloses information about direct customers located in the EU in accordance with the Website Privacy Policy at <http://medxcom.com/wp-content/uploads/2014/08/Giffen-Solutions-Privacy-Statement-8-18-2014.pdf>. If you become a direct customer we will collect your name, practice name, practice address, phone number and email address as well as the name, last four digits of social security number, gender, date of birth, phone numbers, street address and email address of your patients. We use this information to contact you about the services in which you have expressed interest, provide you with your

login details, allow you to add your patients, view mail and recordings, obtain appointment requests, obtain refill requests for your clients, add your practice, add people to your health network, view your on call calendar, and to send you service related emails. You have the ability to upload certain files to make it easier for you to create your patient list or on call list. These are stored on our site for your own personal use. They must remain on our site in order for us to satisfy record keeping requirements.

Dashboard. This is where doctors are able to view their on call status, next on call days scheduled for the next 30 days, and any voice mail or secure email messages you may have.

On call Calendar. You may view the on call calendar to see who is on call on what day so that you are able to tell what your schedule is for the next 30 days and/or make arrangements to switch on call days.

Phones. This is a list of phone numbers where others may reach you at, whether it be your mobile phone number, home phone number or work number. You may also indicate how you would like to be contacted for urgent calls whether it be through a phone call or a text message alert. You may set your call rules for when others are able to contact you and how they may contact you.

Voice Mail/Recordings. When you login you are able to listen and/or delete your voice messages, read your emails in your general mailbox, review call recordings, and approve recording requests from your patients.

Secure Messages. You are able to send secure messages to other Healthcare providers as well as patients and know that your messages are being delivered securely via Secure Socket Layer Technology (SSL).

Appointment Requests. You are able to review, edit, cancel and comment on any appointment requests that you may receive from your patients.

Refill Requests. You are able to review and either approve or deny a patients refill request.

My Profile. Here you are able to upload a photo of yourself, add the address of your practices, add medical licenses that you have obtained, add specialties you may have, add your board certifications, affiliated hospitals, medical schools attended, languages that you speak, research and

developments, publications, awards, professional memberships and other professional activities.

My Practices. Here is where you may add users of this account for a specific practice and allow other doctors to access the account. You may also set up the practice settings by adding the name of the practice, phone number, default on call doctor , phone number, on call start and end times, select to transcribe or record calls, and address of the practice.

My Patients. Here is where you are able to view a list of your patients, upload files to their accounts or add new patients.

Settings. You are able to change your password, phone Pin, or practice settings.

PATIENTS OF GIFFEN SOLUTIONS CLIENTS

Giffen Solutions may obtain various types of EU Personal Data about our clients or their patients. Such data may include names, street addresses, phone numbers, email addresses, emergency contact information such as name and phone number of the person you delegate as your emergency contact, and complete descriptions of the medical services provided by Giffen Solutions's clients. Giffen Solutions may use these types of EU Personal Data for business purposes, including to allow you to set up appointments with your doctors, request refills of medication, request recorded phone call logs, to deliver or provide products or services; to establish or maintain client and business relationships; to provide access to Internet-based and e-commerce activities; to perform accounting functions and other legal requirements of American and foreign regulatory and compliance obligations; and to conduct other activities as necessary or appropriate in connection with the servicing and development of the business relationship. Employees and agents of our clients, business partners, and suppliers may contact us if any of their EU Personal Data changes, or if they would like to access and correct EU Personal Data that we maintain about them. However, clients should contact the Physician where Giffen Solutions's transaction originated to access and correct their own data. In any event, such persons can also contact us by sending an email to privacy@medxcom.com, or by using the information at the end of this privacy statement. Also, to the extent that any of these individuals receive marketing communications from Giffen Solutions, and wish to unsubscribe

or otherwise stop receiving such communications, they can contact us at privacy@medxcom.com.

We will also collect Health information about you or your dependents, such information includes wellness status, vitals, medical problems, medications that are currently taken, allergies, procedures, hospitalizations, immunizations, and lab results. You may at any time update this information by logging into your account. We allow you to make appointments with your providers and ask for the date and time and purpose for the visit, you may also add comments to your request.

Refill Requests. We provide you a way to request refills of certain medication that you or your dependents may be close to running out of or have already run out of. These requests will be provided either to your Doctor or the pharmacy in which you fill your prescription requests.

Tracking. We provide you a way to track yours or your dependents height, weight and the date on which you provided this information, we use this information to allow you to track your own information and so that your health care provider may go back in and see your progress.

Insurance. You may add your insurance provider, policy ID, Group Number, Plan Name, Policy Holder, image on front and back of the card and an image of your driver's license. This information is used in case you did not bring any identification with you to a visit or if you were brought into the emergency room.

Dependents. If you wish to add dependents we will ask you for their name, gender, last four of their social security number, date of birth and a profile photo (if you wish to upload one). We ask you for this information so that you or your dependents are able to use the service.

Files. You are able to upload any medical files or informational files to your account so that you have records saved and are able to access them at any time.

Recording Requests. We save recordings of our voice mails and/or emails so that we are easily able to reference a particular conversation or email that was sent between you and your doctor. You may at any time request a recording from a specific date.

Health Team. You are able to add your health teams names, group names, city and state so that you have records of all physicians in one central area and so that you are able to make appointments online quicker.

Profile Photos: You or your dependents may at any time remove or request removal of your profile photos by logging into your account and deleting it or by emailing us at privacy@medxcom.com.

Clients

Giffen Solutions provides a wide variety of services and solutions to its business clients ("Clients") that facilitate services including on call lists, appointment scheduling for individuals ("Data Subjects"). In some instances, Giffen Solutions may obtain access to

EU Personal Data about such Data Subjects in the course of providing the services and solutions. In other specific instances, Giffen Solutions may also obtain access to data about our Clients' end users in the course of providing support services to the Clients ("End Users"). Such data may include names, addresses, phone numbers, email addresses, full description of products being transported, and other information, depending on the particular Client and application at issue.

Wherever we obtain access to EU Personal Data about Data Subjects or End Users, we are acting as a mere data processor on behalf of our Clients, and we therefore conduct such activities strictly in accordance with their instructions and pursuant to our contractual arrangements with them. If you are an End User with an existing relationship with one of our Clients, you should refer to the Client's website to understand the privacy practices that apply to EU Personal Data that we may maintain about you. Moreover, if you would like to access and review your EU Personal Data, you should contact our Client with any such requests. We will cooperate as appropriate with requests from our Clients to assist with such responses.

Other Necessary Disclosures

Giffen Solutions may disclose EU Personal Data to business partners and subcontractors as necessary in connection with the performance of requested services or as otherwise appropriate in connection with a legitimate business need, such as processing a credit card payment or sending out emails on our behalf. Giffen Solutions may also disclose EU Personal Data as required by

law, such as to comply with a subpoena, or similar legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request. If we are involved in a merger, acquisition, or sale of all or a portion of our assets, you will be notified via email and/or prominent notice on our Web site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information. In these situations, Giffen Solutions will require the recipient of the data to protect the data in accordance with the relevant principles in the Safe Harbor, or otherwise take steps to ensure that the EU Personal Data is appropriately protected. Giffen Solutions may also disclose EU Personal Data where required or permitted by law, or where Giffen Solutions believes that such disclosures are appropriate in connection with a law enforcement request.

Testimonials

We post customer testimonials on our web site which may contain personal information. We do obtain the customer's consent via email prior to posting the testimonial to post their name along with their testimonial. To request removal of your personal information from our testimonials, contact us at privacy@medxcom.com. In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

Cookies

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. We use cookies on this site. We do not link the information we store in cookies to any personally identifiable information you submit while on our site.

We use both session ID cookies and persistent cookies. We use session cookies to make it easier for you to navigate our site. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's "help" file.

We set a persistent cookie to store your passwords, so you don't have to enter it more than once. Persistent cookies also enable us to track and target the interests of our users to enhance the experience on our site.

The use of cookies by our tracking utility company is not covered by our privacy statement. We do not have access or control over these cookies. Our tracking utility company use session ID cookies to make it easier for you to navigate our site and to track traffic statistics on our behalf.

We employ or our third party tracking utility partner employs a software technology called clear gifs (a.k.a. Web Beacons), that helps us better manage content on our site by informing us what content is effective. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies and are used to track the online movements of Web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on Web pages and are about the size of the period at the end of this sentence. We do not tie the information gathered by clear gifs to our customers' personal information.

[Accessing Your Personally Identifiable Information](#)

If your personally identifiable information changes, or if you no longer desire our service, you may correct, update, or delete inaccuracies by emailing us at privacy@mexcom.com, by logging into your account and updating your profile, or by contacting us by postal mail at the contact information listed below. We will respond to your request to access within 30 days.

We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services contact us at the email address listed above. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

[Data Security and Integrity](#)

Giffen Solutions has global hosting centers that store and process EU Personal Data in the United States. Giffen Solutions takes reasonable precautions to protect EU Personal Data in these centers from loss, misuse and unauthorized access, disclosure, alteration, and destruction. Giffen

Solutions also makes reasonable efforts to keep EU Personal Data reliable for its intended use, accurate, current, and complete.

We follow generally accepted industry standards to protect the personally identifiable information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. When you enter sensitive information (Such as personal health information and social security number) into our forms, we encrypt the transmission of that information using secure socket layer technology (SSL).

If you have any questions about security on our Web site, you can email us at privacy@medxcom.com

Links to Other Sites

This Web site contains links to other sites that are not owned or controlled by us. Please be aware that we are not responsible for the privacy practices of such other sites.

We encourage you to be aware when you leave our site and to read the privacy policies of each and every Web site that collects personal information.

This privacy policy applies only to information collected by this Web site.

Blogs

Our blog is managed by a third party application that may require you to register to post a comment. We do not have access or control of the information posted to the blog. You will need to contact or login into the third party application if you want the personal information that was posted to the comments section removed. To learn how the third party application uses your information, please review their privacy policy.

Social Media Widgets

Our Web site includes Social Media and Widgets, such as the Share this button or interactive mini-programs that run on our site. These Features may

collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing it.

Changes in this Privacy Statement

If we decide to change our privacy policy, we will post those changes to this privacy statement, the home page, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

We reserve the right to modify this privacy statement at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, by email, or by means of a notice on our home page prior to the change becoming effective.

Questions

If you have any questions about this safe Harbor Privacy Statement, or if you would like to request access to EU Personal Data that we may maintain about you, please contact us as follows:

Giffen Solutions, Inc.

privacy@medxcom

OR 90 Washington Valley Road

Bedminster, NJ 07921

Giffen Solutions, Giffen Solutions, Inc.