



Data Use Policy

Revision 1.1

03/09/2014

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1. Information Sources

Liquid Grids collects data from various social media outlets, websites, user forums and other sources including, but not limited to:

- Facebook
- Twitter
- YouTube
- Google+
- Tumblr
- Pinterest
- Various disease-specific forums
- Purchased or client provided email lists

Liquid Grids DOES NOT collect information from sources including, but not limited to:

- Text Messages
- Any Covered Entity's Protected Healthcare Information
- Conversations or data protected by privacy settings on a given information source
- Conversations or data protected by privacy or data use policies on a given information source

2. Information we receive

The information Liquid Grids collects from the sources cited in the "Information Sources" section below may consist of information including, but not limited to:

- Real Name
- Screen Name (a.k.a. username, alias, avatar)
- Geographic Location
- Date/Time information
- Publicly available posts including any associated media (images, videos, etc.)
- Age
- Birthdate
- Contact information such as email, phone number or physical address
- Connections of a poster to other people within a community
- Unique, platform-specific user identification number
- Unique, platform-specific post identification number
- Other metadata related to the post or poster

Any information ingested by Liquid Grids' data systems from any external data source that is not explicitly named above will not be stored and will be destroyed immediately.

3. How we use information

Liquid Grids may use any information that is publicly available through one of the sources named in the “Information Sources” section above. This data is used for analysis purposes and may be made available to our customers at an aggregate level. The analysis data contains information about a disease or medical condition, at an aggregate level, based on the conversations Liquid Grids has collected and analyzed. This information may contain, but is not limited to:

- Words commonly used to describe the disease or condition
- Time of day when people are speaking about the disease or condition
- Common demographic data about the people having disease or condition conversations including age, gender, their level of influence amongst a subset of other people, and geographic data
- Common symptoms, diagnoses, treatments, or procedures related to the disease or condition
- Comorbid diseases or conditions associated with the disease or condition of interest
- Speculative predictive measures derived from trends identified within the data

The raw data, in conjunction with its derived analytics data will be used by Liquid Grids for the purposes of precision marketing and advertising as well as for assessing relevant disease-related topics of conversation and demographic information.

4. How long we keep data

The data collected from one of the sources named in the “Information Sources” section above, all derived analytics data, and all user data stored or created by Liquid Grids is the sole property of Liquid Grids. Liquid Grids will store this data in perpetuity, or until the data is no longer needed for business uses, at which point it will be destroyed.

Information that is retrieved from any of the sources named in the “Information Sources” section above that is not considered necessary for business use will not be stored and will be destroyed immediately.

In the event that Liquid Grids enters into an agreement to collect data on behalf of another party, Liquid Grids will adhere to the contracting party’s security, privacy, and data use policies.

5. Privacy

Liquid Grids will only expose raw and proprietary analytics data to its customers through a user interface, at an aggregate level, for the purposes of precision marketing and advertising. Liquid Grids and its customers will never contact an individual represented by such data other than through a marketing and advertising campaign, and will do so in accordance with platform-specific and applicable regulatory bodies’ security, privacy and data use policies. The data will be anonymized and cleansed of any individually identifiable information before being exposed, transferred to or used by Liquid Grids’ customers. Liquid Grids will never sell, transfer, or expose individually identifiable information to 3rd parties.

6. Advertising

Liquid Grids may allow their customers to use information harvested from 3rd parties or analytics data generated by Liquid Grids using harvested data to create target groups for advertising campaigns.

Liquid Grids will always adhere to and comply with the data usage, privacy, and security policies of the 3rd parties from whom it harvests data. Liquid Grids will also always strictly adhere to any applicable, prevailing policies from appropriate regulatory organizations including but not limited to the Food & Drug Administration (FDA), Federal Trade Commission (FTC) and others.

7. Cookies, pixels & Other Similar Tracking Technologies

Liquid Grids may employ cookies, pixels or other similar tracking technologies to measure the effectiveness of an advertisement after an advertisement has been clicked on. Advertisements produced from the Liquid Grids platform will direct the user who has clicked on the advertisement to various properties owned either by Liquid Grids or by a customer of Liquid Grids. Cookie, pixel, or any other tracking data will be used solely by Liquid Grids or their customers and will never be sold to any 3rd party.

8. HIPAA Compliance

8.1. Protected Health Information

8.1.1. Definition of Protected Health Information

To get to protected health information, you have to examine two definitions that were in Section 1171 of Part C of Subtitle F of Public Law 104-191 (August 21, 1996): Health Insurance Portability and Accountability Act of 1996: Administrative Simplification. These statutory definitions are of health information and individually identifiable health information.

“Health information means any information, whether oral or recorded in any form or medium, that–

(A) is created or received by a health care provider, health plan, public health authority, employer, life insurer, school or university, or health care clearinghouse; and

(B) relates to the past, present, or future physical or mental health or condition of any individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.”¹

¹ Source: <http://www.hipaa.com/2009/09/hipaa-protected-health-information-what-does-phi-include/>

8.1.2. Liquid Grids only uses publicly available information, which does not consist of any Protected Health Information as defined by HIPAA above; therefore, HIPAA policies and standards do not apply to Liquid Grids' operations or data

8.2. Covered Entities

8.2.1. Definition of Covered Entities

As required by Congress in HIPAA, the Privacy Rule covers:

- Health plans
- Health care clearinghouses
- Health care providers who conduct certain financial and administrative transactions electronically. These electronic transactions are those for which standards have been adopted by the Secretary under HIPAA, such as electronic billing and fund transfers.

These entities (collectively called "[covered entities](#)") are bound by the privacy standards even if they contract with others (called "business associates") to perform some of their essential functions. The law does not give the Department of Health and Human Services (HHS) the authority to regulate other types of private businesses or public agencies through this regulation. For example, HHS does not have the authority to regulate employers, life insurance companies, or public agencies that deliver social security or welfare benefits. See the fact sheet and [frequently asked questions](#) about the standards on Business Associates for a more detailed discussion of the covered entities' responsibilities when they engage others to perform essential functions or services for them.²

8.2.2. Liquid grids shall not collect, store or process electronic medical records (EMRs), electronic health records (EHRs), personal health records (PHRs) or claims data

8.2.3. Liquid Grids is not a Health plan, Health care clearinghouse, or Health care provider who conducts certain financial and administrative transactions electronically, therefore Liquid Grids shall not be considered to be a "Covered Entity"

8.3. Business Associate Relationships

8.3.1. "The mere selling or providing of software to a covered entity does not give rise to a business associate relationship if the vendor does not have access to the protected health information of the covered entity. If the vendor does need access to the protected health information of the covered entity in order to provide its service, the vendor would be a business associate of the covered entity."³

² Source: <http://www.hhs.gov/hipaafaq/about/190.html>

³ Source: <http://www.hhs.gov/hipaafaq/providers/business/256.html>



8.3.2. Liquid Grids shall not have access to the protected health information of any client who is a covered entity

9. Opt-out Policy

9.1. Individuals that wish to opt-out of having their data used by the Liquid Grids platform may send a formal request, in writing, by mail to opt-out. Once received and approved, Liquid Grids shall add the individual(s) to the system opt-out list and information related to that individual shall no longer be used by any Liquid Grids' systems. Required information for an opt-out request includes:

- Full name of individual wishing to opt-out
- Correspondence address
- Phone number
- A list of social platforms that they no longer wish Liquid Grids to collect their information from including the corresponding social network IDs