



Privacy Policy

Effective September 18, 2026

This Privacy Policy describes how Cohere Health ("Cohere", "we", "our", or "us") collects, uses, shares, and protects personal information when you interact with our Services.

If you are a resident of California, please review the additional [notice](#) that applies to you.

For questions, please contact us at:

Cohere Health
PO Box 1290
Portsmouth, NH 03802

compliance@coherehealth.com

1. SCOPE OF PRIVACY POLICY

This Privacy Policy applies to the Cohere website (coherehealth.com), any other website or online service that links to this Privacy Policy, and any content, functionality, products, or services offered through them. It also applies when you communicate or otherwise interact with us. Collectively, these are the "Services."

Cohere provides AI-powered products and services to health plans and healthcare providers ("Clients") to help streamline utilization management, reduce costs, and improve access for healthcare. In providing these services, Cohere may receive and process information about patients, including protected health information, as a business associate to our Clients and on behalf of, and at the direction of, those Clients. In these circumstances, the Client determines how patient information is used and shared, and the Client's Notice of Privacy Practices, not this Privacy Policy, applies. If patients have questions about how a Client handles your information, please contact that Client directly.

Job candidates should refer to our Candidate Privacy Policy for information about how we collect, use, and share their personal information.

This Privacy Policy only covers Cohere. If you visit other websites or services, even ones we link to, their own privacy policies apply. We encourage you to review those policies directly.



2. INFORMATION WE COLLECT

Depending on the nature of your interaction with Cohere, we may collect personal information as follows:

- Directly from you, when you provide information to us or interact with us:
 - *Account information*, including your email address, selected password, and communications preferences when you create a Cohere account.
 - *Contact information*, including your name, email address, telephone number, and any other information you choose to include when you communicate with us.
 - *Employment information*, including your employer, job title, and business contact information.
 - *Payment information*, including payment information and transaction history if you engage in a transaction through the Services.
 - *Any additional information* you choose to provide, including questions, suggestions, and feedback.
- Automatically from you, *device information and online user activity* when you visit our Services, as described in the next section.
- From third parties:
 - *Information about the marketing and advertisements* you have seen or clicked on, from online advertising companies.
 - *Contact and professional information*, such as your name, email address, and employer, from event sponsors or organizers when we participate in or sponsor events, webinars, conferences, or similar programs.

Please note some of this information may be collected by external parties on our behalf.

3. COOKIES AND INFORMATION COLLECTED BY AUTOMATED MEANS

Certain information is automatically collected from you when you interact with our Services. This information includes:

- *Usage details* about your interaction with our Services, such as the date, time, and length of visits, specific pages or content accessed during the visits, search terms, frequency of the visits, and referring address.
- *Device information* about the device you use to access our Services, such as IP address, device type, unique device identifier, operating system, browser type, and mobile network information.
- *Location information* where you choose to provide our Services with access to information about your device's location.
- *Site usage and session information* about your interaction with the Services, including the resources that you access, pages viewed, how much time you spent on a page, and how you reached our Services. We also log the details of your visits to our Services and information generated in the course of using our Services, such as mouse movements, clicks, page visits, text entered, how long you spent on a page, and other details of your actions on our Services.

Much of this information is collected through cookies and other tracking technologies, which may be operated by our partners who assist us in providing the Services, serving ads, understanding usage of the Services, and security and fraud prevention.

See Section 6 (**PRIVACY CHOICES**) for more information on managing your cookies preferences and opting out of third-party cookies.

4. HOW WE USE INFORMATION

We use the personal information we collect from you to:

- Provide and operate the Services; create and manage Cohere accounts; process transactions; manage client relationships; provide client support and account management; and administer webinars and other programs.
- Respond to your requests and questions; communicate with you; provide troubleshooting and other support; and provide important notices.

- Manage, maintain, and operate the Services; diagnose or fix technology problems; monitor the performance of the Services; analyze user preferences and trends; and understand how you access and use the Services.
- Design and administer marketing and promotional campaigns; send you promotional and special offers; and evaluate the effectiveness of these campaigns.
- Improve the Services; grow our business; better understand our client base; administer surveys for market research; and develop new products and services.
- Comply with legal requirements; defend against legal claims or other demands; respond to subpoena, court order, or other legal process or request; protect the rights of Cohere, you, or others; and detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal.
- Perform internal administration, auditing, and operations activities.

We may use and share information in an aggregated or de-identified manner data at our discretion, including for research, analysis, modeling, marketing, and improvement of our Services.

5. HOW WE SHARE INFORMATION

We may share the information we collect in the following instances:

- *With service providers* that we believe need the information to perform a technology or other professional function for us such as IT, customer support, communication providers, accounting, auditing, and other professional services.
- *With social media platforms*, information about you and your interaction with us. If you interact with social media objects on our Services, both the platform and your connections on the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform.
- *With analytics providers* that help us measure and analyze how you use the Services via cookies so we can measure and improve the performance of the Services.
- *With advertising partners* who assist us in serving advertising to others who may be interested in the Services. These third parties may use tracking technologies to collect or receive information from the Services and elsewhere on the internet and use that information to provide measurement services and target ads. These advertising partners may allow other companies to access information about you so that they may market other products you may be interested in.

- *When a corporate event occurs*, we reserve the right to transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information the same as described in this Privacy Policy.
- *For legal purposes*; where necessary to comply with the law; in response to court orders, law enforcement or legal process, including for national security purposes; to establish, protect, or exercise our legal rights; as required to enforce our terms of use or other contracts; to defend against legal claims or demands; or to detect, investigate, prevent, or take action against illegal activities, fraud, or situations involving potential threats to the rights, property, or personal safety of any person.

6. PRIVACY CHOICES

This section describes the choices you have regarding the collection, use, and sharing of your personal information:

- *Access and update account information*: If you have an account, you can review and update certain account information, such as your contact information, by logging in.
- *Opt out of cookies*: You have options to limit how cookies and other tracking technologies collect information about your online activity:
 - To manage your cookie preferences, please click the Cookie Settings link in the footer and update your preferences. Please note that you will need to set preferences on each browser and device you use to visit our Services.
 - Generally, you can modify your browser setting to disable or reject cookies across the internet; but if you do so, some features of our Services may not function properly or be available. Please note that you will need to set preferences on each web browser and device you use to visit our Services.
 - Because definitions and rules for “Do Not Track” have not yet been established, including whether such signals must be user-enabled, we do not respond to “Do Not Track” signals. If your browser offers you the ability to use Global Privacy Control (GPC) to communicate your privacy preferences to us, we honor such signals.

- You may be able to prevent third parties from using your information for interest-based advertisements across the internet by visiting the [NAI](#) or the [Digital Advertising Alliance](#). Please note this does not opt you out of being served ads, nor will it prevent the receipt of interest-based advertising from other companies that do not participate in these programs.
- You may also opt out of third-party cookies we use by visiting their opt out pages. These are examples of our cookie providers, but the list is not exhaustive. In addition, we are not responsible for the effectiveness of any of these opt-out mechanisms:
 - We use Google to customize our advertising and serve you ads based on your browsing behavior. You can learn more about Google [here](#) and opt-out of personalized advertising through Google's [Ad Settings](#).
 - We use Microsoft Clarity to understand how you use and interact with our website. You can learn more about Microsoft [here](#).
 - We use Google Analytics to collect usage details. You can learn more about privacy and Google Analytics [here](#), and opt out of collection of your data by using the Google Analytics [Opt-out Browser Add-on](#).
- Opt out of email marketing: If you no longer wish to receive marketing emails from us, you can click the unsubscribe link at the bottom of our marketing emails.

With respect to information shared with us by a Client, please contact the relevant Client for options regarding the manner in which your information is collected, used, or disclosed.

7. HOW WE PROTECT AND STORE YOUR INFORMATION

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf. If you use our Services outside of the United States, you understand that we may collect, process, and store your personal information in the United States and other countries.

8. UPDATES TO THIS PRIVACY POLICY

We may make changes to this Privacy Policy from time to time. The date at the top of this Privacy Policy indicates when this Privacy Policy was last revised. If we make material changes to this Privacy Policy, we will notify you as necessary through written, electronic, or other means.

9. ADDITIONAL NOTICE: CALIFORNIA RESIDENTS

As a California resident, you have the right to receive certain disclosures regarding our collection, use, and disclosure of your personal information, as well as certain rights to your personal information. California residents will not receive discriminatory treatment for exercising these privacy rights.

Collection, Use, and Retention

The following chart describes our practices about the collection, use, and retention of your information. The categories we use to describe the information are those listed in California law. Some of the categories include very different types of information within the same category and certain personal information may fall into multiple categories. How we use and how long we keep the information within each category will vary, and not all types of information within the same category will be used for all the purposes listed.

Category	Required Information
Personal identifiers	Examples of what we collect: Name, email address, physical address, unique identifiers (such as those assigned in cookies). Sources: Directly from you; from third parties. Purpose of collection and use: All purposes listed in Section 4. Retention Considerations: Certain information is maintained throughout our relationship with you in order to provide the Services. When we no longer provide Services to you, we may still need this information for a period of time for business and legal requirements.
Personal information categories listed in the California Customer Records statute	Examples of what we collect: Telephone number, address Sources: Directly from you; from third parties. Purpose of collection and use: All purposes listed in Section 4. Retention Considerations: Certain information is maintained throughout our relationship with you in order to provide the Services. When we no longer provide Services to you, we may still

	need this information for a period of time for business and legal requirements.
Internet or other similar network activity	Examples of what we collect: Device ID, browsing history, search history, IP address, interaction with a website. Sources: Automatically from you; third parties. Purpose of collection and use: All purposes listed in Section 4. Retention Considerations: Internet or other similar network activity is typically deleted at regular intervals when the information is no longer necessary for the purpose for which it was collected.
Geolocation data	Examples of what we collect: Coarse information (e.g. IP address), device location. Sources: Automatically from you. Purpose of collection and use: All purposes listed in Section 4. Retention considerations: Geolocation data is deleted at regular intervals when the information is no longer necessary for the purposes for which it is collected.
Employment information	Examples of what we collect: Employer name, job title, business contact information Sources: Directly from you. Purpose of collection and use: All purposes listed in Section 4. Retention considerations: This information is generally retained for the duration of our relationship with the applicable client, business partner, or prospective client. When we no longer provide Services to you, we may still need this information for a period of time for business and legal requirements.
Sensitive information	Examples of what we collect: Password or credentials allowing access to an account. Sources: Directly from you. Purpose of collection and use: All purposes listed in Section 4. Retention Considerations: Certain information is maintained throughout our relationship with you in order to provide the Services. When we no longer provide Services to you, we may still need this information for a period of time for business and legal requirements.

Inferences	Examples of what we collect: Interests, preferences, consuming tendencies. Sources: Created about you based on information you provide; third parties. Purpose of collection and use: All purposes listed in Section 4. Retention considerations: Certain information is maintained throughout the life of our relationship with you in order to provide the Services.
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California law also requires us to provide information regarding the criteria we use to determine the length of time for which we retain personal information. We utilize the following criteria to determine the length of time for which we retain personal information:

- The business purposes for which the information is used, and the length of time for which the information is required to achieve those purposes.
- Whether we are required to retain the information type in order to comply with legal obligations or contractual commitments, to defend against potential legal claims, or as otherwise necessary to investigate theft or other activities potentially in violation of our policies and procedures applicable to you or against the law, to ensure a secure online environment, or to protect health and safety.
- The privacy impact of ongoing retention on you.
- The manner in which information is maintained and flows through our systems, and how best to manage the lifecycle of information in light of the volume and complexity of the systems in our infrastructure.

Individual pieces of personal information may exist in different systems that are used for different business or legal purposes. A different maximum retention period may apply to each use case of the information. Certain individual pieces of information may also be stored in combination with other individual pieces of information, and the maximum retention period may be determined by the purpose for which that information set is used.

Sale, Sharing, and Other Disclosure of Personal Information and Right to Opt-Out

Any category of information listed in the chart above may be disclosed for a business purpose to service providers and contractors, which are companies or individuals that we engage to conduct activities on our behalf.

California law also requires us to provide you with information regarding the parties to whom we sell (disclosing personal information for monetary or other benefit) or share (disclosing personal information for purposes of cross-context behavioral advertising) your information.



We use cookies and similar tracking technologies to operate and improve our Services, understand and analyze how individuals interact with our Services, personalize user experiences, and deliver advertising that may be more relevant to your interests. Under California law, some of these activities may constitute a “sale” or “sharing” of personal information. Specifically, we may sell or share personal information in the following ways:

- Personal identifiers: Analytics and advertising partners
- Internet or other similar network activity: Analytics and advertising partners

To opt out of the sale or sharing of your personal information via cookies, please click the Cookie Settings link in the footer and set your preferences. Cohere does not have actual knowledge that it sells or shares the personal information of consumers under 16 years of age.

Additional Rights

Residents of California also have the right to access, correct, and delete certain personal information we collect about them. You or your authorized agent may submit a request to exercise these rights by completing the applicable form: please use this [form](#) for deletion requests and this [form](#) for access or correction requests.

For your security and to ensure unauthorized third parties do not access your personal information, we will require you to verify your identity before we can act on your request. We do this by asking you to provide personal identifiers we can match against information we may have collected from you previously and confirm your request using the email account stated in the request.

While you also have the right to limit use of your sensitive personal information, we only process your sensitive personal information for purposes allowed by law and therefore do not offer an option to limit further processing.