

Privacy Policy

Effective Date: October 1, 2025

1. Overview

Alpine Labs, Inc. (“Alpine Labs,” “we,” “us,” or “our”) operates **MedLocker**, a consumer health platform that helps individuals collect, store, and share their medical records securely.

We are committed to protecting your privacy and giving you full control over your personal health information (“PHI”) and other personal data.

This Privacy Policy explains how we collect, use, disclose, and protect your information when you use MedLocker, visit our websites (including **alpinelabs.ai** and **medlocker.app**), or interact with our services.

2. How We Fit Within HIPAA

Alpine Labs is **not a HIPAA Covered Entity**, and in most cases we do **not act as a Business Associate**. Our platform operates under the **patient-directed access** model described in HIPAA (45 CFR § 164.524):

- You, the **individual**, authorize the release of your medical records to MedLocker.
- We act as your **agent**, retrieving and storing your records **on your behalf**.
- Once your information reaches MedLocker, HIPAA no longer governs our handling of it; instead, the **Federal Trade Commission (FTC)** and **state privacy laws** apply.

In certain limited cases—such as when Alpine Labs provides services directly to a healthcare provider, insurer, or life-science company—Alpine Labs may enter into a **Business Associate Agreement (BAA)** and comply with the **HIPAA Security and Privacy Rules** for that specific data flow.

3. Information We Collect

a. Information You Provide

- Account information (name, email, phone number, login credentials)
- Demographic information you choose to share
- Medical record data obtained under your authorization
- Payment information (when you participate in paid data-sharing or research programs)
- Support communications and feedback

b. Information from Connected Sources

With your explicit consent, MedLocker may retrieve health records from:

- Hospitals, clinics, and healthcare providers
- Health insurers and payers
- Laboratories, pharmacies, or imaging centers
- Other third-party health apps or APIs (e.g., 1upHealth, Apple Health)

c. Automatically Collected Information

We may collect limited technical data such as:

- Device type, browser, and operating system
- Usage logs, app events, and crash analytics
- IP address (used only for security and fraud prevention)

We do not use cookies for behavioral advertising and do not sell your data to advertisers.

4. How We Use Your Information

We use your information to:

1. Provide, maintain, and improve MedLocker services
 2. Retrieve and manage your health data at your request
 3. Facilitate secure sharing or monetization of your data (only with your opt-in consent)
 4. Communicate important updates or respond to your inquiries
 5. Detect, investigate, and prevent security incidents or misuse
 6. Comply with legal obligations and enforce our Terms of Use
-

5. How We Share Information

We share your data only under the following conditions:

Type of Sharing	Description
With your consent	You choose to share or license your data (e.g., to a life-science company or researcher).
For de-identified analytics	We may use de-identified or aggregated data to improve services or produce anonymized insights.

Type of Sharing	Description
With service providers	Vendors who help us operate (e.g., secure cloud hosting, data storage) under strict confidentiality and security requirements.
For legal reasons	When required by law, court order, or regulatory request, or to protect our users or the public.

We never sell identifiable personal or medical data.

6. Data Security

We apply **HIPAA-grade technical and organizational safeguards**, including:

- Encryption at rest and in transit
- Role-based access control
- Detailed access logging and monitoring
- Secure data deletion procedures
- Annual security assessments and incident-response protocols

Our systems are hosted on **Google Cloud Platform (GCP)** under a signed **Business Associate Agreement** with Google, ensuring HIPAA-aligned infrastructure.

7. Data Retention

We retain your data for as long as your account remains active or as needed to provide our services. You may request deletion of your account and associated data at any time (see **Section 9: Your Rights**).

8. Children's Privacy

MedLocker is intended for adults 18 years and older.

Parents or legal guardians may use MedLocker to manage medical records for their minor children, but children cannot create accounts directly.

9. Your Rights

You have full control over your information.

You may:

- Access or download your data at any time
- Correct inaccuracies in your records
- Withdraw consent or delete your account
- Opt out of research or data-sharing programs
- Request a record of disclosures made under your account

Requests can be made by contacting **privacy@alpinelabs.ai**.

10. International Users

MedLocker is currently operated and hosted in the **United States**.

If you access our services from outside the U.S., you understand your data will be transferred to and processed in the U.S.

11. Updates to This Policy

We may update this Privacy Policy to reflect changes in our practices or applicable laws.

If we make significant updates, we will notify you through the app or by email before the changes take effect.

12. Contact Us

If you have questions about this Privacy Policy or our data practices, please contact:

Alpine Labs, Inc.

Attn: Privacy & Compliance

15 Highland Meadow Dr, Alexander, NC 28701

 privacy@alpinelabs.ai