# remedi<sup>™</sup> Privacy Policy

Last Updated and Effective: April 13, 2022

We at remedi<sup>TM</sup>, a US-based technology company ("**remedi**", "**us**", "**our**", or "**we**"), are strongly committed to transparency, and we want you ("**you**" or "**your**") to understand how we collect, use, share and protect your personal information, as well as how you can manage the personal information we collect. This Privacy Policy applies to your interactions with us or your use of or interactions with our website, (www.remedi.us), mobile apps, social media pages, services, features, or other branded digital properties, either online or offline (collectively, our "**Services**").

For the purposes of EU and UK privacy laws, remedi<sup>™</sup> is the data controller of your personal data.

By using our Services, you acknowledge the terms of this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use our Services. If you do not understand, or if you have questions about, this Privacy Policy, please contact us before using, or continuing to use, our Services.

We reserve the right to change our Privacy Policy from time to time by posting the changes here. If we choose to amend this Privacy Policy, we will revise the Last Updated date at the top of this Privacy Policy when we post the updated version. We may also provide you with notice by prominently posting on our mobile app, via email or both, if we make any significant changes to this Privacy Policy. We may also highlight those changes at the top of this Privacy Policy and provide a prominent link to it for a reasonable length of time following the change. Your use of our Services after we have informed you in one of these ways that we made changes to our Privacy Policy will mean that you have accepted those changes.

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## 1. TYPES OF INFORMATION WE COLLECT

We collect two basic types of information from you when you provide it to us or when you use or interact with our Services: personal information and non-personal information.

Personal information includes all information that relates to you or which are opinions about you personally and either identifies or may be used to identify you personally (collectively, "personal information"). We may only collect limited types of personal information from you depending upon the device you are using and how you interact with us or use or interact with our Services. For example, we may receive personal information in several ways, including, for example:

- Account information: When you register for the Services, we will ask for certain information about you, such as your name and email. If you use an account from an online social platform (e.g., Facebook) to register for the Services, we will request your permission to access certain information about you from that social platform. For example, if you log in using your Facebook account, we will request your permission to access your basic information on Facebook, such as your name, profile picture, and list of friends.
- Information you provide in your user profile: After you register for the Services, you will have the opportunity to create a Profile about yourself, including a photo or image associated with your account and a description of why you are using the Services. How much information you disclose on your Profile is entirely up to you, though at a minimum, your Profile will include information you provided to us in the account registration process (excluding your contact information) and certain information about your activity in the Services including the date that you joined and your "Supported Rooms". All registered users of the Services can view your full profile.
- Public Content: You have the opportunity to contribute to the Services through audio discussions, talk/comment threads, and bulletin boards in (i) rooms that you create or join that are accessible by certain Users as designated by you or the member who created the room (e.g., family and/or friends); and/or (ii) rooms that you create and/or join that are accessible to any User (i.e., all registered Users of the Services). How much information you disclose through audio discussions, talk/comment threads, and bulletin boards is entirely up to you. Your contributions ("Public Content") may include, but is not limited to, name and other identity data, email, phone number, gender, age, residence data, generalized and non-tracked location data, social media accounts, languages spoken, employment-related information, group or association data, education-related information, area(s) of specialty data, interests of subject data, and special categories of data as described in Section 11 below. Your Public Content becomes public information once you post it, and copies of it may continue to be viewable even after you delete your account, but it will not be linked to your account. Note that if you include personal information about yourself in your Public Content, it can be used and viewed by others. Please remember that you are not permitted to disclose any personal information about another User or anyone else in your Public Content (see our community guidelines).
- Messaging. The Services allow you to exchange messages with other Users using the messaging feature. We may store these messages in order to deliver them and allow you to manage them.
- Information that we collect through use of our Services: device-related information (operating system, unique device identifiers, mobile network system, etc.), hardware and browser settings, date and time of requests, requests made, pages visited, search engine terms you used to reach our Services, and IP address. We will retain this information for a reasonable length of time not exceeding 3 years to allow us to understand how people use our Services and any technical issues they may have.
- Information when individuals communicate or interact with us in any way, either online or offline: contact
  details (this may include a social media account if that is the way the individual communicated with us), details of the
  communications with us, and the details of the messages exchanged. We will retain this information: (a) if you are a

member of TM<sup>TM</sup>, for the duration of your membership; (b) if you are a subscriber, for the duration of your subscription; or (c) if you are neither, for the length of any contract between us or a reasonable amount of time not to exceed three years to understand how people interact with us and any technical issues that may require improvement.

- Information about the way our Services are used: when and where the individual subscribed to us and downloaded our software, things subscribed under or downloaded from us, whether electronic communications from us were opened, comments, images, and materials left on our Services or engaged with us on social media, and clicked links in electronic communications from us. We will retain this information for a reasonable length of time not exceeding three years to allow us to understand how people use our Services and the impact of any changes we make.
- Information that we collect from third-party partners: contact information from commercial partners if there is consent to have data shared with us in this way- Google analytics etc. Royal Mail's National Change of Address and BT Operator Services Information System (OSIS) file, and (depending on social media account settings) contact information from social networks when individuals sign up with a social media account. We retain (a) information relating to payments or anti-fraud measures for the length of the contract between us and six years after, in case there are any issues; and (b) information relating to statistical analysis for a reasonable length of time not exceeding two years to help us better understand our subscriber and member base over time.
- Information that we collect incidentally from other sources or public sources: information available in the media, information presented on our social media platforms, information collected by internet search engines, and publicly available information collected by the US Treasury Department and other government entities. We retain (a) information relating to media awareness and social media for as long as the information is publicly available; (b) information collected incidentally by security systems for as long as reasonable; and (c) information relating to our legal obligations for as long as reasonably required to provide a record of compliance with the law.
- Information that we collect from individuals representing other organizations or entities: contact details of
  individuals working for organizations or entities, details related to our interaction with those individuals, and other
  business-related personal information regarding such individuals. We retain this information for the duration of our
  relationship with the relevant organization and we are not made aware that the individual no longer works for them.
- Information that we collect through member's use of the Services: account login information, account settings and
  preferences, mailing address, device-related information (operating system, unique device identifiers, mobile network
  system, etc.), date and time of requests, requests made, pages visited, search engine terms used, and IP address. We
  retain this information for as long as the individual is a member of the Services.
- Information when making a purchase: contact details (name, email, address, etc.), payment details, the product purchased, and information about such items. We retain this information for the length of the contract between us and up to six years after in case there are any issues.

We strive to uphold data minimization principles and only seek to collect personal information from you for the purposes described in this Privacy Policy. You can always refuse to provide your personal information, but please note that some personal information is necessary to provide our Services.

Non-personal information includes information that does not personally identify you or information that has been anonymized (collectively, "non-personal information"). When we combine non-personal information with personal information, we treat the combined information as personal information.

# Cookies

Like many websites and apps, we use "cookies", which are small text files that are stored on your computer or equipment when you visit certain online pages that record your preferences and actions, including how you use the website. We use this information for analytics purposes which allows us to improve your browsing experience. The information we collect through these technologies will also be used to manage your session. Out of these cookies, the cookies that are categorised as "necessary" are stored on your browser as they are essential for the working of basic functionalities of the website. These necessary cookies cannot be disabled.

**Cookie Opt-out.** You can set your browser or device to refuse all cookies or to indicate when a cookie is being sent. If you delete your cookies, if you opt-out from cookies, or if you set your browser or device to decline these technologies, some Services may not function properly. Our Services do not currently change the way they operate upon detection of a <u>Do Not Track</u> or similar signal.

#### Online Analytics

We also use various types of online analytics including Google Analytics, a web analytics service provided by Google, Inc. ("Google"), on our website. Google Analytics uses cookies or other tracking technologies to help us analyze how users interact with and use the website, compile reports on the related activities, and provide other services related to website and app activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a return visitor, and any referring website or app. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google's privacy policies. To learn more about Google's partner services and to learn how to opt-out of tracking of analytics by Google click here.

# Offline Interactions and Other Sources

We also may collect personal information from other sources, such as our partners or third party service providers, or from our offline interactions with you for the purposes listed in the **How We Use Personal Information** section below, including to enable us to verify or update information contained in our records and to better customize the Services for you. For example, if you apply for a position with us, we may collect information from former employers, employment/recruiting agencies, credit reference agencies, or other background check agencies.

#### Social Media Integration

Our Services may, from time to time, contain links to and from social media platforms. You may choose to connect to us through a social media platform, such as Facebook, LinkedIn or Twitter, and when you do, we may collect additional information from you, including the information listed above. Please be advised that social media platforms may also collect information from you. When you click on a social plug-in, such as Facebook's "Like" button or Twitter's "Tweet" button, that particular social network's plugin will be activated and your browser will directly connect to that provider's servers. We encourage you to review the social media platforms' usage and disclosure policies and practices, including the data security practices, before using them.

## <u>Surveys</u>

From time to time, and subject to your consent where required by applicable local law, we may provide you with the opportunity to participate in surveys, some of which might be sponsored or conducted by a third party. Participation in these surveys is completely voluntary. If you choose to participate, we will request certain personal information from you. If there is a third party sponsor involved in the survey, we may provide certain personal information to the third party sponsor. Please make sure to review the sponsor's privacy policy and be aware that any surveys offered by us may be governed by specific rules and terms and conditions that are separate from and in addition to this Privacy Policy. By participating in any such surveys you will become subject to those rules, including but not limited to receiving emails containing survey communications.

# 2. HOW WE USE PERSONAL INFORMATION

We primarily use personal information to provide, maintain, and improve our Services, but we may also use personal information to do any or all of the following:

- facilitate your interactions and transactions with us and other users, such as requests for support or additional Services;
- we may store Public Content, display it to other Users, and, in the case of content contributed to rooms accessible to all registered Users of the Services, use it for promotional purposes.
- respond to your requests, communications, suggestions, comments, inquiries, and requests (including your feedback about our Services);
- administer our relationship with you and your membership with us, including offering you materials, resources, and other information to support your membership;
- develop new products, features, and services;
- better understand the preferences of our users;
- provide personalized Services, including content and ads;
- provide you with, and improve, relevant marketing offers or information from us or relevant third parties;
- facilitate your participation in our surveys and promotions;
- ensure our systems and premises are secure;
- develop and manage relationships with our business partners;
- respond to legally binding requests from law enforcement, regulatory authorities, or other third parties;
- defend, protect or enforce our rights or applicable terms of service or to fulfill our legal or contractual obligations;
- manage any dispute and accidents and take legal or other professional advice;
- to prevent fraud or the recurrence of fraud;
- assist in the event of an emergency;
- comply with applicable law; or
- any other purpose with your consent.

We may also combine your personal information collected through various sources, including information collected through our Services, and develop a customer profile that will be used for the purposes above.

Except as otherwise permitted or required by applicable law, we only retain personal information for as long as we need to use the information for the purposes listed above, including, for legal, regulatory, backup, archival, accounting, and/or audit purposes.

We may use personal information to create non-personal information. We may use non-personal information for any legitimate business purpose.

#### 3. WHY WE USE PERSONAL INFORMATION

We may use personal information for a number of reasons:

- to fulfill our contractual obligations to you, including to provide our Services to you;
- the individual has given consent for a particular purpose (for example, where an individual has given us consent to send them electronic marketing);
- when using the information is necessary for our legitimate interests or those of a third party, provided we have balanced these against the individual's rights and interests; and
- in order to comply with a legal obligation (for example, responding to government or law enforcement information requests).

Our legitimate interests for using personal information are:

- to effectively administer and manage our business;
- to ensure effective administration and management of the individual's relationship with us, including providing our Services:
- to understand how our members use our Services and to manage our Services;
- to carry out research and analysis on what Services or products our members want or how they would like us to improve our Services and products;
- to understand how our members use our Services and identify any issues in how the Services are used and how we can improve the member's experience;
- to tell our members about the various products and Services we can offer;
- to understand and respond to inquiries and feedback;
- to better tailor and personalize the promotions and benefits that we can offer to our members;
- to ensure our systems and premises are secure;
- to develop relationships with business partners;
- to ensure debts are paid;
- to operate suppressors to exclude you from direct marketing if you unsubscribe;
- to share data in connection with acquisitions and transfers of our business;
- to manage our relationships with business partners;
- to prevent, detect, or investigate unauthorized use of our Services and ensure we comply with the law and our policies;
- to manage any dispute and accidents and take legal or other professional advice.

## 4. HOW WE SHARE PERSONAL INFORMATION

We only share personal information in limited circumstances. For example, we may share personal information with our third party service providers, suppliers, vendors, professional advisors and business partners, which may include IT service providers, financial institutions and payment providers, customer relationship management vendors, other cloud-based solutions providers, lawyers, accountants, auditors and other professional advisors. We contract with such vendors and advisers to ensure that they only process your personal information under our instructions and ensure the security and confidentiality of your personal information. We share personal information with these third parties to help us:

- with the uses described in the **How We Use Information** section above;
- in the operation, management, improvement, research and analysis of our Services;
- with our marketing and promotional projects, such as sending you information about products and services you may
  like and other promotions (provided you have not unsubscribed from receiving such marketing and promotional
  information from us); and
- comply with your directions or any consent you have provided us.

We may share personal information with law enforcement and regulatory authorities or other third parties as required or permitted by law for the purpose of:

- responding to a subpoena, court order, or other legal processes;
- defending, protecting, or enforcing our rights;
- assisting in the event of an emergency; and
- complying with applicable law.

In accordance with applicable law, we may also transfer or assign personal information to third parties as a result of, or in connection with, a sale, merger, consolidation, change in control, transfer of assets, bankruptcy, reorganization, or liquidation. If we are involved in defending a legal claim, we may disclose personal information about you that is relevant to the claim to third parties as a result of, or in connection with, the associated legal proceedings.

We share non-personal information with third parties as reasonably necessary to meet our business needs.

## 5. HOW WE PROTECT PERSONAL INFORMATION

We are dedicated to ensuring the security of your personal information. We use physical, electronic, and administrative security measures appropriate to the risks and sensitivity of the personal information we collect. We aim to provide secure transmission of your personal information from your devices to our servers. We have processes to store personal information that we have collected in secure operating environments. Our security procedures mean that we may occasionally request proof of identity before we disclose your personal information to you. We try our best to safeguard personal information once we receive it, but please understand that no transmission of data over the Internet or any other public network can be guaranteed to be 100% secure. If you suspect an unauthorized use or security breach of your personal information, please contact us immediately.

## 6. INTERNATIONAL DATA TRANSFERS

We are a global business. As such, the personal information we collect from you may be transferred to and stored by our group companies, or IT vendors and other service providers (as specified in **How We Share Personal Information** above) who operate on our behalf. We also transfer information to a number of providers of business applications as well marketing service providers. These providers are primarily located in the United States, but may also be located in other jurisdictions.

In certain cases, there may not be an adequacy decision by the European Commission and/or United Kingdom authorities in respect of those countries. Adequacy of data protection is instead ensured by Standard Contractual Clauses approved by the European Commission in accordance with Article 46(2)(c) of the General Data Protection Regulation, or any equivalent clauses approved by the authorities in the United Kingdom including any additional safeguards as required by EU / UK data protection laws that we have in place with that third party. A copy may be requested by contacting our Data Protection Officer.

#### 7. CHILDREN'S PRIVACY

Our Services are not for children or those under the age of 16. We do not knowingly collect personal information from children or other persons who are under 16 years of age. Individuals who are children or those under the age of 16 should not attempt to provide us with any personal information. If you think we have received personal information from children or those under the age of 16, please contact us immediately.

# 8. YOUR CALIFORNIA PRIVACY RIGHTS

If you reside in California, you have the right to request information regarding the disclosure of your personal information to third parties for the third parties' direct marketing purposes. California residents under 18 years old, in certain circumstances, may request and obtain removal of personal information or content that you have posted on our Services. Please be mindful that this would not ensure complete removal of the content posted by you on our Services. To make any request pursuant to California privacy law, please contact us.

## 9. YOUR CHOICES

We offer you certain choices in connection with our Services.

# Access to your personal information

You may request to access or review the personal information that we have collected about you. To submit a request, please contact us using the information below.

## Deleting your personal information

You may request that we delete the personal information that we have collected about you. Please note that we may retain an archived copy of your records as required by applicable law or to enforce our rights. To submit a request, please <u>contact us</u> using the information below.

## Updating your personal information

The accuracy of the personal information we have about you is very important and you may request to update or correct your information. To submit a request, please contact us using the information below.

## Email Communications / Direct Marketing

You may have the opportunity to receive certain communications from us related to our Services. If you provide us with your email address in order to receive communications, you can opt-out of marketing emails at any time by following the instructions at the bottom of our emails and adjusting your email preferences. Please note that certain emails may be necessary for the operation of our Services. You will continue to receive these necessary emails, if lawful and appropriate, even if you unsubscribe from our optional marketing communications.

## Cookies / Beacons

If you wish to minimize information collected by cookies or beacons, you can adjust the settings of your device or browser. You can also set your device or browser to automatically reject any cookies. You may also be able to install plug-ins and add-ins that serve similar functions. However, please be aware that some Services may not work properly if you reject cookies. In addition, the offers we provide when you visit us may not be as relevant to you or tailored to your interests. For more information about how our Services use cookies, please see our Cookie Notice.

## **Network Advertising Initiative**

Certain websites you visit may provide options regarding advertisements you receive. If you wish to minimize the amount of targeted advertising you receive, you can opt-out of certain network advertising programs through the Network Advertising Initiative (NAI) Opt-Out Page or through the Digital Advertising Alliance Opt-Out Tool. Please note that even if you choose to remove your personal information (opt-out) you will still see advertisements while you're browsing online. However, the advertisements you see may be less relevant to you. For more information or to opt-out of certain online behavioral advertising, please visit <a href="http://www.aboutads.info">http://www.aboutads.info</a>.

Additionally, many advertising network programs allow you to view and manage the interest categories that they have compiled from your online browsing activities. These interest categories help determine the types of targeted advertisements you may receive. The NAI Opt-Out Page provides a tool that identifies its member companies that have cookies on your browser and provides links to those companies.

## Do Not Track

Some devices and browsers support a "Do Not Track" (or, DNT) feature, a privacy preference that you can set in certain browsers, which is intended to be a signal to websites and services that you do not wish to be tracked across different websites or online services you visit.

Please note that we cannot control how third party websites or online services you visit through our website respond to Do Not Track signals. Check the privacy policies of those third parties for information on their privacy practices. Our Services do not currently change the way they operate upon detection of a <u>Do Not Track</u> or similar signal.

## 10. THIRD PARTY WEBSITES AND APPS

Our website and Services may contain links to other websites or apps operated by third parties. Please be advised that the practices described in this Privacy Policy do not apply to information gathered through these third party websites and apps. We have no control over, and are not responsible for, the actions and privacy policies of third parties and other websites and apps.

## 11. EUROPE / UNITED KINGDOM

This section provides additional information to individuals who are a resident of a member state of the European Union (EU), the United Kingdom, or the European Economic Area (EEA).

If you have questions or concerns regarding the use of your personal information, please contact us.

#### **Automated Decision Making**

We do not make solely automated decisions based on your data. If you have any questions about this, please contact us at <a href="mailto:gdprprivacy@remedi.us">gdprprivacy@remedi.us</a>

# Special Categories of Personal Information

If you subscribe to use the Services, we may collect and receive special categories of personal information about you that you disclose in the course of using the Services. Your use of the Services may include disclosure of past, current, or future data concerning health, which means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about their health status, e.g., information derived from an individual's medical tests, including genetic data and biological samples, information relating to an individual's disability, disease, risk of illness, medical history, clinical treatment, or their physiological or biomedical state. Similarly, please only inform us of your health issues, racial or ethnic origin, or sexual life or orientation to the extent necessary to facilitate your use of the Services.

Information collected	How we use it	Why we use it	How long we retain it
Information that you have voluntarily self-reported to us in the course of using the Services through posting on room bulletins and participation in audio discussions:  Past, current, or future health related information;  Sexual life or orientation;  Ethnic or racial identity;  Dietary requirements that may imply specific religious beliefs or medical conditions;  Titles and honorifics that imply specific religious beliefs; and	who you have voluntarily invited to rooms or who	<ul> <li>You have voluntarily self-reported and consented to our processing.</li> <li>You may have negative health effects if we do not process this data.</li> <li>Processing the information is necessary in the public interest to comply with health-related accessibility laws.</li> </ul>	We retain health-related data and data that may or may not imply health or medical conditions, sexual life or sexual orientation, ethnic or racial identity, religious, philosophical or political beliefs for the duration of your membership.

review system to make the		
app experience better for		
the user		
	app experience better for	app experience better for

# Your Privacy Rights

You may have – in accordance with applicable data protection laws – the following rights when it comes to our handling of your personal information. Please note that many of these rights are not absolute, and we may have grounds for refusing to comply with your request to exercise them (for example, where we are (a) required or permitted by law to process your personal data in a way that is incompatible with your request, or (b) able to rely on exemptions under data protection law which entitle us to process your personal data in a way that is incompatible with your request). Where such circumstances apply, we will inform you of this at the time you make a request to exercise your rights.

Your right	How to use it
Right of access – you may have the right to request a copy of the personal information we have about you and to request supporting information explaining how the personal information is used.	You can email your request to us at gdprprivacy@remedi.us
Right of rectification – you may have the right to request that we rectify inaccurate personal information about you.	You can email your request to us at gdprprivacy@remedi.us
Right of erasure / to be forgotten – you may have the right to request that we erase personal information about you.	You can email your request to us at gdprprivacy@remedi.us
	It may not always be possible for you to use this right if, for example, if it is still necessary for us to perform the contract or we need to keep the information by law or because of a legal dispute.
Right to restrict processing – in some situations, you may have the right to request that we do not use the personal information you have provided (for example, if you believe it to be inaccurate).	You can email your request to us at gdprprivacy@remedi.us
Right to data portability – you may have the right to receive your personal information in a structured, commonly used and machine-readable format and to transmit such information to another controller.	You can email your request to us: gdprprivacy@remedi.us
Right to withdraw consent – where we process your personal information based on consent (including direct marketing consents), you have the right to withdraw consent at any time. However, this will not affect the lawfulness of the processing based on consent before its withdrawal. Furthermore, even in case of a withdrawal we may continue to use your personal information as permitted or required by law.	You can email your request to us at gdprprivacy@remedi.us

Right to object – where we are processing your personal information based on a legitimate interest (or those of a third party) you may challenge this. However, we may be entitled to continue processing your personal information where we can demonstrate that we have compelling legitimate grounds to process your information (which override your rights and freedoms), or where continuing to process your personal information is relevant to the establishment, exercise or defence of legal claims. You also have the right to object where we are processing your personal information for direct marketing purposes.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information, or access someone else's personal information on their behalf (or to exercise any of the other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is complex or you have made a number of requests. In this case, we will notify you and keep you updated. Should we be unable to comply with your request, we will provide an explanation.

## **Data Protection Officer Contact Information**

You may contact our Data Protection Officer with any issues or questions you have regarding our processing of personal information.

EMAIL - gdprprivacy@remedi.us

POSTAL ADDRESS - 3800 Buchtel Blvd, #100339, Denver, CO 80210

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (Tel: 0303 123 1113 or at <a href="https://www.ico.org.uk">www.ico.org.uk</a>). Alternatively, you can also make a complaint to the supervisory authority in the Member State of the EU or EEA in which you are resident. We would however appreciate the chance to deal with your concerns before you approach the ICO or a supervisory authority, so please contact us in the first instance.

#### 12. CONTACT US

We welcome requests, questions, comments, and feedback on this Privacy Policy and our management of personal information. If you have requests, questions, concerns, or feedback, you can always contact us in the following ways. For your protection, we may need to verify your identity before assisting with your request, such as verifying that the information used to contact us matches the information that we have on file.

Email	info@remedi.us
Mail	3800 Buchtel Blvd, #100339, Denver, CO 80210