

# Privacy and TeleHealth Alert Device, Inc.

## Contents

PART ONE: INTRODUCTION .....	2
PART TWO: PRIVACY POLICY SUMMARY .....	3
PART THREE: FULL PRIVACY POLICY.....	6
Disclosures and Notices.....	15

## PART ONE: INTRODUCTION

TELEHEALTH ALERT DEVICE, INC. OPERATES THE THAD CONNECT APP. WE VALUE YOUR PRIVACY AND WE ARE COMMITTED TO KEEPING YOUR PERSONAL DATA CONFIDENTIAL. WE USE YOUR DATA SOLELY IN THE CONTEXT OF HELPING YOU IMPROVE YOUR HEALTH OR HELPING YOU IMPROVE THE HEALTH OF ANOTHER BY OFFERING A CONVENIENT AND SECURE MOBILE APP AND WEB SITE WITH TOOLS THAT ALLOW USERS TO MONITOR AND REMOTELY TRANSMIT PATIENT-GENERATED HEALTH DATA.

THIS PRIVACY POLICY APPLIES TO PERSONAL DATA THAT TELEHEALTH ALERT DEVICE, INC. COLLECTS FROM USERS OF TELEHEALTH ALERT DEVIC, INC. APP AND WEB SITE (COLLECTIVELY, THE "APP"). **"PERSONAL DATA" INCLUDES ANY INFORMATION THAT CAN BE USED ON ITS OWN OR IN COMBINATION WITH OTHER INFORMATION TO IDENTIFY OR CONTACT ONE OF OUR USERS.** WE BELIEVE THAT TRANSPARENCY ABOUT THE USE OF YOUR PERSONAL DATA IS OF UTMOST IMPORTANCE. IN THIS PRIVACY POLICY (THE "POLICY"), WE PROVIDE YOU DETAILED INFORMATION ABOUT OUR COLLECTION, USE, MAINTENANCE, AND DISCLOSURE OF YOUR PERSONAL DATA. THE POLICY EXPLAINS WHAT KIND OF INFORMATION WE COLLECT, WHEN AND HOW WE MIGHT USE THAT INFORMATION, HOW WE PROTECT THE INFORMATION, AND YOUR RIGHTS REGARDING YOUR PERSONAL DATA.

Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it. For the purposes of Applicable Data Protection Laws, including the European Economic Area data protection law, (the "Data Protection Law"), the data controller is:

TeleHealth Alert Device, Inc.  
4590 MacArthur Blvd., Suite 500  
Newport Beach, CA 92660

**BY SUBMITTING YOUR PERSONAL DATA THROUGH THIS APP, YOU ARE ACKNOWLEDGING THAT YOU HAVE READ AND AGREE TO THE TERMS OF THIS POLICY.** IF YOU DO NOT AGREE, PLEASE DO NOT LOG INTO OR ACCESS THE APP AND PLEASE DO NOT SUBMIT ANY PERSONAL DATA TO US.

PLEASE NOTE THAT **WE OCCASIONALLY UPDATE THIS PRIVACY POLICY** AND THAT **IT IS YOUR RESPONSIBILITY TO STAY UP TO DATE** WITH ANY AMENDED VERSIONS. IF WE MODIFY THE POLICY, WE WILL POST THE UPDATED POLICY ON OUR WEBSITE. YOU MAY STORE THIS POLICY AND/OR ANY AMENDED VERSION(S) DIGITALLY, PRINT THE POLICY, OR SAVE IT. ANY CHANGES TO THIS PRIVACY POLICY WILL BE EFFECTIVE IMMEDIATELY UPON PROVIDING NOTICE, AND SHALL APPLY TO ALL INFORMATION WE MAINTAIN, USE, AND DISCLOSE. IF YOU CONTINUE TO USE THE APP FOLLOWING SUCH NOTICE, YOU ARE AGREEING TO THOSE CHANGES.

## PART TWO: PRIVACY POLICY SUMMARY

For your convenience, we have summarized the key points from our Privacy Policy below. You may access our full Privacy Policy [HERE](#).

### **THAD as Responsible Entity/Controller**

TeleHealth Alert Device, Inc. (“We”, “Us”, “the Company”, or “THAD”) is the controller of your Personal Data (as defined below), and we may process this data in accordance with our Privacy Policy. If we are processing Personal Data on behalf of a third party, the terms of this Privacy Policy do not apply; instead, the terms of that third party’s privacy policy will apply. If you leave our App via a link to a third party, we are no longer the controller, and you will be subject to that party’s Privacy Policy. You may contact us with any questions about our Privacy Policy at [compliance@telehealthalert.com](mailto:compliance@telehealthalert.com). You may reach our Data Protection Officer at [compliance@telehealthalert.com](mailto:compliance@telehealthalert.com).

### **What information do We collect and why?**

We collect “PERSONAL DATA”, which includes any information that can be used on its own or in combination with other information to identify or contact one of our users. For a description of the types of personal data we collect, please review this section in the full Privacy Policy. In some cases, this Personal Data may be or may include “protected health information”. Personal Data does not include any information posted or shared via a public forum.

We may use Personal Data to (1) communicate with you about and manage your User Account; (2) store data; (3) comply with the law; (4) respond to requests from public and government authorities; (5) enforce our terms and conditions; (6) manage and improve our operations and App; (7) provide additional functionality; (7) protect our rights, privacy, safety or property, and/or that of you or others; and (8) allow us to pursue available remedies or limit the damages that we may sustain. Additional uses are described in this section of the full Privacy Policy.

We only use or disclose your Personal Data when it is legally mandated or where it is necessary to fulfill the purposes described above (and in the full Privacy Policy). Where required by law, we will ask for your prior consent before doing so.

*Failure to Provide Data.* Providing your Personal Data is not statutorily or contractually mandated. However, if you choose not to provide this information, we cannot create a User Account, and you will be unable to use our Services.

### **Will We share your Personal Data with anyone else?**

- Yes, with any individual with whom you choose to connect via the App (e.g., a caregiver or spouse)
- Yes, with third parties that help us power our App
- Yes, with third parties and the government when legal or enforcement issues arise
- Yes, with third parties in the event of a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of THAD’s corporate entity, assets, or stock (including in connection with any bankruptcy or similar proceedings).

For more details regarding the above, review this section in the full Privacy Policy.

We may, from time to time, rent or sell aggregated data and/or other information that does not contain any personal identifiers (i.e., if the information has been anonymized by stripping out identifiers such as name, address, phone number, etc.). The purpose of this type of disclosure is to provide healthcare professionals, research institutions, and other interested parties (e.g., pharmaceutical and/or device manufacturers) real world information about the usefulness of the data.

### **Where is your Personal Data stored, transmitted and/or maintained?**

Personal Data that THAD collects through the App will be stored on secure third-party cloud servers. Personal Data may be transmitted to third parties; those third parties may store or maintain the data on their secure servers. These third parties are not permitted to transfer your Personal Data outside of the United States.

### **How long will We maintain your information?**

We store your Personal Data for as long as you maintain a User Account and up to 30 days after the account is closed. For more information on Personal Data retention, review this section of the full Privacy Policy.

### **How do We protect your Personal Data?**

THAD uses a combination of reasonable physical, technical, and administrative security controls to maintain the security and integrity of your Personal Data, to protect against any anticipated threats or hazards to the security or integrity of such information, and to protect against unauthorized access to or use of such information in our possession or control that could result in substantial harm or inconvenience to you. However, Internet data transmissions, whether wired or wireless, cannot be guaranteed to be 100% secure. As a result, we cannot absolutely ensure the security of information you transmit to us. By using the App, you are assuming this risk. For more information on the safeguards We have in place to protect your Personal Data, review this section of the full Privacy Policy.

### **Your Rights**

You have certain rights relating to your Personal Data, subject to local data protection laws. These rights may include the right to:

- access your Personal Data held by us
- erase/delete your Personal Data, to the extent permitted by applicable data protection laws
- receive communications related to the processing of your personal data that are concise, transparent, intelligible and easily accessible;
- restrict the processing of your Personal Data to the extent permitted by law (while we verify or investigate your concerns with this information, for example);
- object to the further processing of your Personal Data, including the right to object to marketing;
- request that your Personal Data be transferred to a third party, if possible;

- receive your Personal Data in a structured, commonly used and machine-readable format
- lodge a complaint with a supervisory authority
- rectify inaccurate Personal Data and, taking into account the purpose of processing the Personal Data, ensure it is complete
- not be subject to a decision based solely on automated processing, including profiling, which produces legal effects ("Automated Decision-Making"); and
- withdraw your consent at any time (to the extent we base the collection, processing and sharing of your Personal Data on your consent) without affecting the lawfulness of the processing based on such consent before its withdrawal.

For more details on your rights and choices and how to exercise them, please review the full Privacy Policy.

**How can you contact us with questions or concerns?**

If you have any questions about this Privacy Policy, please contact us by email at [compliance@telehealthalert.com](mailto:compliance@telehealthalert.com) or please write to:

TeleHealth Alert Device, Inc.  
4590 MacArthur Blvd., Suite 500  
Newport Beach, CA 92660

**Please note that email communications are not always secure; so please do not include sensitive information in your emails to us.**

## PART THREE: FULL PRIVACY POLICY

Effective date: November 11, 2019

Last updated: November 2019

WE AT TELEHEALTH ALERT DEVICE, INC. VALUE YOUR PRIVACY AND ARE COMMITTED TO KEEPING YOUR PERSONAL DATA CONFIDENTIAL. WE USE YOUR DATA SOLELY IN THE CONTEXT OF HELPING YOU IMPROVE YOUR HEALTH BY OFFERING A CONVENIENT AND HIGH-QUALITY MOBILE APP AND WEB SITE WITH TOOLS THAT ALLOW USERS TO EASILY AND PURPOSEFULLY MANAGE COMPLEX MEDICAL CONDITIONS.

THIS PRIVACY POLICY APPLIES TO PERSONAL DATA THAT COLLECTS FROM USERS OF THAT'S APP AND WEB SITE (COLLECTIVELY, THE "APP"). **"PERSONAL DATA" INCLUDES ANY INFORMATION THAT CAN BE USED ON ITS OWN OR WITH OTHER INFORMATION IN COMBINATION TO IDENTIFY OR CONTACT ONE OF OUR USERS.** WE BELIEVE THAT TRANSPARENCY ABOUT THE USE OF YOUR PERSONAL DATA IS OF UTMOST IMPORTANCE. IN THIS PRIVACY POLICY, WE PROVIDE YOU DETAILED INFORMATION ABOUT OUR COLLECTION, USE, MAINTENANCE, AND DISCLOSURE OF YOUR PERSONAL DATA. THE POLICY EXPLAINS WHAT KIND OF INFORMATION WE COLLECT, WHEN AND HOW WE MIGHT USE THAT INFORMATION, HOW WE PROTECT THE INFORMATION, AND YOUR RIGHTS REGARDING YOUR PERSONAL DATA.

THE PERSONAL DATA WE COLLECT AND TRANSMIT MAY, IN SOME CIRCUMSTANCES, BE CONSIDERED "HEALTH DATA" (data related to a user's physical or mental health). THEREFORE, OUR PRIVACY PRACTICES ARE INTENDED TO COMPLY WITH THE GENERAL DATA PROCESSING REGULATION ("GDPR") PROVISIONS REGARDING SENSITIVE PERSONAL DATA. IN ADDITION, WE INTEND TO COMPLY WITH STATE AND FEDERAL LAW RELATED TO HEALTH DATA, WHERE APPLICABLE. FOR ADDITIONAL INFORMATION RELATED TO YOUR HEALTHCARE INFORMATION, PLEASE CONTACT OUR PRIVACY OFFICER AT [compliance@telehealthalert.com](mailto:compliance@telehealthalert.com).

Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it. For the purposes of Applicable Data Protection Laws including the European Economic Area data protection law, (the "Data Protection Law"), the data controller is:

TeleHealth Alert Device, Inc.  
4590 MacArthur Blvd., Suite 500  
Newport Beach, CA 92660

**BY SUBMITTING YOUR PERSONAL DATA THROUGH THIS APP, YOU ARE ACKNOWLEDGING THAT YOU HAVE READ AND AGREE TO THE TERMS OF THIS POLICY.** IF YOU DO NOT AGREE, PLEASE DO NOT LOG INTO OR ACCESS THE APP AND DO NOT SUBMIT ANY PERSONAL DATA TO US.

PLEASE NOTE THAT **WE OCCASIONALLY UPDATE THIS PRIVACY POLICY AND THAT IT IS YOUR RESPONSIBILITY TO STAY UP TO DATE** WITH ANY AMENDED VERSIONS. IF WE MODIFY THE PRIVACY POLICY, WE WILL POST A LINK TO THE MODIFIED POLICY ON OUR WEBSITE. YOU CAN STORE THIS POLICY AND/OR ANY AMENDED VERSION(S) DIGITALLY, PRINT IT, OR SAVE IT IN ANY OTHER WAY. ANY CHANGES TO THIS PRIVACY POLICY WILL BE EFFECTIVE IMMEDIATELY UPON PROVIDING NOTICE, AND

SHALL APPLY TO ALL INFORMATION WE MAINTAIN, USE, AND DISCLOSE. IF YOU CONTINUE TO USE THE APP FOLLOWING SUCH NOTICE, YOU ARE AGREEING TO THOSE CHANGES.

CAPITALIZED TERMS, IF NOT DEFINED IN THIS PRIVACY POLICY, ARE DEFINED IN THE TERMS OF USE, WHICH IS ACCESSIBLE ON OUR WEBSITE AT [WWW.TELEHEALTHALERT.COM](http://WWW.TELEHEALTHALERT.COM).

In case you have any questions or concerns after reading this Privacy Policy, please do not hesitate to contact us at [compliance@telehealthalert.com](mailto:compliance@telehealthalert.com). We appreciate your feedback.

### **Responsible Entity/Controller**

TeleHealth Alert Device, Inc. (“We”, “Us”, “the Company”, “THAD”) is the Controller of your Personal Data and we may process this data in accordance with this Privacy Policy. If we are processing Personal Data on behalf of a third party that is not an agent or affiliate of Us, the terms of this Privacy Policy do not apply—instead, the terms of that third party’s privacy policy will apply. You can contact Us with any questions about our Privacy Policy at [compliance@telehealthalert.com](mailto:compliance@telehealthalert.com). You can reach our data protection officer at [compliance@telehealthalert.com](mailto:compliance@telehealthalert.com).

### Links to Other Sites

Our App may contain links to websites and services that are owned or operated by third parties (each, a “Third-party Service”). Any information that you provide on or to a Third-party Service or that is collected by a Third-party Service is provided directly to the owner or operator of the Third-party Service and is subject to the owner’s or operator’s privacy policy. We are not responsible for the content, privacy or security practices and policies of any Third-party Service. To protect your information, we recommend that you carefully review the privacy policies of all Third-party Services that you access.

### **What Personal Data do we collect?**

We collect “PERSONAL DATA”, which includes any information that can be used on its own or with other information in combination to identify or contact one of our users. In some cases, this Personal Data may be or may include healthcare information or “protected health information.” The types of Personal Data we collect are described below.

### Demographic Data

We collect demographic information such as your name, email address, age, gender, phone number, postal address, and personal health information. Primarily, the collection of your Personal Data assists us in creating your User Account, which you can use to securely track, manage, and transmit to your healthcare provider your Personal Data. We may also use your demographic data for the purposes of internal data analysis.

### Payment Data

If you make purchases via our App, we may require that you provide to us your financial and billing information, such as billing name and address, credit card number or bank account information.

### Support Data

If you contact THAD for support or to lodge a complaint, we may collect technical or other information from you through log files and other technologies, some of which may qualify as Personal Data (e.g., IP

address). Such information will be used for the purposes of troubleshooting, customer support, software updates, and improvement of the App and related services in accordance with this Privacy Policy. Calls with THAD may be recorded or monitored for training, quality assurance, customer service, and reference purposes.

#### Device, Telephone, and ISP Data

We use common information-gathering tools, such as log files, cookies, web beacons, and similar technologies to automatically collect information, which may contain Personal Data, from Your computer or mobile device as you navigate our App, or interact with emails We have sent You. The information we collect may include your Internet Protocol (IP) address (or proxy server), device and App identification numbers, location, browser type, Internet service provider and/or mobile carrier, the pages and files you viewed, your searches, your operating system and system configuration information, and date/time stamps associated with your usage. This information is used to analyze overall trends, to help us provide and improve our App and to guarantee their security and continued proper functioning.

#### Health Data

In addition to demographic information, we may collect information regarding your health conditions, medications, medical appointments, insurance provider, communications between the user and his or her Provider and communications between the user and THAD staff, third-party clinical staff, or call center personnel. We collect this information to help healthcare providers and patients track and manage the patients' health conditions.

#### **How will We use Your Personal Data?**

We process Your Personal Data for purposes based on legitimate business interests, meeting our contractual obligations to you, complying with our legal obligations, and/or your consent. We only use or disclose your Personal Data when it is legally mandated or where it is necessary to fulfill the purposes described herein. Where required by law, we will ask for your prior consent before doing so.

#### Specifically, we process Your Personal Data for the following legitimate business purposes:

- To fulfill our obligations to You under the Terms of Use or another applicable services agreement
- To communicate with You about and manage Your User Account
- To properly store and track Your data within our system
- To respond to lawful requests from public and government authorities, and to comply with applicable state/federal law, including cooperation with judicial proceedings or court orders.
- To protect our rights, privacy, safety or property, and/or that of you or others by providing proper notices, pursuing available legal remedies, and acting to limit Our damages
- To handle technical support and other requests from You
- To enforce and ensure your compliance with our Terms of Use or the terms of any other applicable services agreement We have with You
- To manage and improve our operations and the App, including the development of additional functionality
- To manage payment processing
- To evaluate the quality of service You receive, identify usage trends, and thereby improve Your user experience

- To keep our App safe and secure for You and for Us
- To send You product, service and new feature information and/or information about changes to our terms, conditions, and policies (with your consent, if required by law)
- To allow us to pursue available remedies or limit the damages that we may sustain
- To provide access to a third party user (with your consent), to enable that individual to monitor your progress and overall condition and to follow up with you, as they deem appropriate (e.g., you can give access to your caregiver, parent, child, or spouse).
- To send you marketing communications, including newsletters, new product offerings, SMS messages, and push notifications about THAD and its affiliates and partners (with your consent, if required by law).
- To aggregate and anonymize Your data to assist THAD in optimizing its services and algorithms that monitor physiological data.

\*\*You can opt-out of receiving promotional emails by changing the notification preferences in your account settings or by unsubscribing via the “Unsubscribe” link in any THAD email. Opting-out of these emails will not end transmission of important service-related emails that are necessary to your use of the App.

### **Where is your Personal Data processed?**

Personal Data THAD collects through the App will be stored on secure servers in the United States, even if you are accessing the App from outside the United States. Your country’s data protection laws may not apply, and may be more stringent than those to which THAD is legally subject. Personal Data may be transmitted to third parties, which parties may store or maintain the data on their secure servers.

### **Will we share your Personal Data with anyone else?**

Yes, with Our legal affiliates and TeleHealth Alert Device, Inc. We may share your Personal Data with the following companies to which we are legally related (companies that we own or which own Us) and who have agreed to the same Privacy obligations laid out herein, but only to help us power and provide the App to You.

Yes, with any third party with whom you choose to connect via the App (“Third Party User”).

We will share information you enter into the App, as well as any reports generated by the App based on the information you enter, with the Third-Party User with whom you choose to share data via the App. If you permit Third Party User access to your account, that user will also have access to your activity within the platform (e.g., access@telehealthalert.com). If, at any point, you want to deny access to one or more Third-Party Users, you can do so by contacting the company from which you purchased the App and any associated devices.

Yes, with third parties that help us power our App

THAD has a limited number of service providers and other third parties (“Business Partners”) that help us run various aspects of our business. These Business Partners are contractually bound to protect Your Personal Data and to use it only for the limited purpose(s) for which it is shared. Business Partners’ use of Personal Data may include, but is not limited to, the provision of services such as data hosting, IT services, customer service, and billing management.

Yes, with third parties and the government when legal or enforcement issues arise

We may share your Personal Data, if reasonable and necessary, to (i) comply with legal processes or enforceable governmental requests, or as otherwise required by law; (ii) cooperate with third parties in investigating acts in violation of this Agreement; or (iii) bring legal action against someone who may be violating the Terms of Use or who may be causing intentional or unintentional injury or interference to the rights or property of THAD or any third party, including other users.

Yes, with third parties that provide advisory services

We may share Your Personal Data with Our lawyers, auditors, accountants, or banks, when We have a legitimate business interest in doing so.

Yes, with third parties in the event of a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of THAD's corporate entity, assets, or stock (including in connection with any bankruptcy or similar proceedings)

If We share Your Personal Data with a third party other than as provided above, You will be notified at the time of data collection or transfer, and You will have the option of not permitting the transfer.

**Anonymized Data**

We may, from time to time, rent or sell aggregated data and/or other information that does not contain any personal identifiers (i.e., if the information has been anonymized by stripping out identifiers such as name, address, phone number, etc.). The purpose of this type of disclosure is to provide healthcare professionals, research institutions, and other interested real-world information about the usefulness of the data and to assist THAD in optimizing its services and algorithms that monitor physiological data. Once your data is anonymized, it is no longer Personal Data, and we are not restricted in our use of that data for any purpose.

**How long do we retain Personal Data?**

We will retain your Personal Data for as long as you maintain a User Account and up to 30 days after the account is closed. The exact period of retention will depend on the type of Personal Data, our contractual obligation to you, and applicable law. We keep your Personal Data for as long as necessary to fulfill the purpose for which it was collected, unless otherwise required or necessary pursuant to a legitimate business purpose outlined herein. At the end of the applicable retention period, we will remove your Personal Data from our databases and will request that our Business Partners remove your Personal Data from their databases. If there is any data that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing of such data. We retain anonymized data indefinitely. Contact Us at [compliance@telehealthalert.com](mailto:compliance@telehealthalert.com). regarding the applicable data retention period for your Personal Data.

NOTE: Once we disclose your Personal Data to third parties, we may not be able to access that Personal Data any longer and cannot force the deletion or modification of any such information by the parties to whom we have made those disclosures. Written requests for deletion of Personal Data other than as described should be directed [compliance@telehealthalert.com](mailto:compliance@telehealthalert.com).

**WHAT IS YOUR COOKIE POLICY?**

Cookies are small files that a web server sends to your computer or device when you visit a web site that uses cookies to keep track of your activity on that site. They hold a small amount of data specific to that web site, which can later be used to help remember information you enter into the site (like your email or other contact info), preferences selected, and movement within the site. If you return to the previously visited web site (and your browser has cookies enabled), the web browser sends the small file to the web server, which tells it what activity you engaged in the last time you used the site, and the server can use the cookie to do things like expedite logging in and retrieving user data and keeping your browser session secure.

We use cookies and other technologies to, among other things, better serve you with more tailored information, and to facilitate efficient and secure access to the Applications. We use two types of cookies: essential and non-essential cookies. Essential cookies are those necessary for use to provide services to you. All other cookies are non-essential. We use two types of non-essential cookies: (1) cookies used to analyze your behavior on a website (“Analytics Cookies”); and (2) cookies used to provide you enhanced functionality (“Functional cookies”). We have provided, below, a full list of our cookies, categorized as described above. We have described the purpose of each, whether they are THAD or Third Party cookies, and how to withdraw consent to their use. We have also indicated which cookies are “session cookies” (which last for as long as you keep your browser open) and “persistent cookies” (which remain on your hard drive until you delete them or they expire).

We may also collect information using pixel tags, web beacons, clear GIFs or other similar technologies. These may be used in connection with some Site pages and HTML formatted email messages to, among other things, track the actions of Site users and email recipients, and compile statistics about Site usage and response rates.

**Essential Cookies:**

<i>Cookie Name, Who Controls It, and Duration</i>	<i>Purpose</i>	<i>Information Collected</i>	<i>How to Withdraw Consent</i>
<b>auth-tokens-token</b> THAD 8 weeks	To authenticate you when you sign into the service.	A generated token that allows the server to identify you.	Do not use our Service if you do not want to receive this cookie.

**Functional Cookies:**

<i>Cookie Name, Who Controls It, and Duration</i>	<i>Purpose</i>	<i>Information Collected</i>	<i>How to Withdraw Consent</i>
<b>Facebook Cookies</b> Facebook Various	THAD integrates with Facebook for purposes of logging you in. Facebook uses cookies as part of this integration. THAD will never post on your behalf or access your	Email address, name, and birthdate from Facebook.  No identifying information is transmitted TO	Do not use THAD or Facebook Connect if you do not wish to receive these cookies.

	Facebook data other than name, birthdate and email address.	Facebook, only FROM Facebook at the user's explicit request.	
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**Analytics Cookies:**

<i>Cookie Name, Who Controls It, and Duration</i>	<i>Purpose</i>	<i>Information Collected</i>	<i>How to Withdraw Consent</i>
<b>analytics</b> THAD Permanent	For correlating website visitors before and after they login or register for THAD	Randomly generated code. No information is collected.	Do not use THAD if you do not wish to receive this cookie.
<b>UTM_</b> THAD	For tracking what marketing campaign a visitor to the site came from.	No information is collected or stored in these cookies.	Do not use THAD if you do not wish to receive this cookie.

**How can You “Opt Out” of Cookies**

THAD does not respond to “Do Not Track” signals or other related mechanisms at this time.

You may opt-out from the collection of non-essential device and usage data on your web by managing your cookies at the individual browser level. [Click here](#) for ways to erase cookies from your computer and to prevent cookies from being created on your browser. Please note, however, that by blocking or deleting cookies and similar technologies used on our websites, You may not be able to take full advantage of the websites.

**How do we protect your Personal Data?**

THAD is committed to protecting the security and confidentiality of your Personal Data. We use a combination of reasonable physical, technical, and administrative security controls to maintain the security and integrity of your Personal Data, to protect against any anticipated threats or hazards to the security or integrity of such information, and to protect against unauthorized access to or use of such information in our possession or control that could result in substantial harm or inconvenience to you. However, Internet data transmissions, whether wired or wireless, cannot be guaranteed to be 100% secure. As a result, we cannot absolutely ensure the security of information you transmit to us. By using the App, you are assuming this risk.

**Safeguards**

The information collected by THAD and stored on secure servers is protected by a combination of technical, administrative, and physical security safeguards, such as authentication, encryption, backups, and access controls. If THAD learns of a security concern, we may attempt to notify you and provide information on protective steps, if available, through the e-mail address that you have provided to us or

by an in-app notification. Depending on where you live, you may have a legal right to receive such notices in writing.

You are solely responsible for protecting information entered or generated via the App that is stored on your device and/or removable device storage. THAD has no access to or control over your device's security settings, and it is up to you to implement any device-level security features and protections you feel are appropriate (e.g., password protection, encryption, remote wipe capability, etc.). We recommend that you take any and all appropriate steps to secure any device that you use to access our App.

NOTWITHSTANDING ANY STEPS THAT WE TAKE, IT IS NOT POSSIBLE TO GUARANTEE THE SECURITY OR INTEGRITY OF DATA TRANSMITTED OVER THE INTERNET. THERE IS NO GUARANTEE THAT YOUR PERSONAL DATA WILL NOT BE ACCESSED, DISCLOSED, ALTERED, OR DESTROYED BY BREACH OF ANY OF OUR PHYSICAL, TECHNICAL, OR ADMINISTRATIVE SAFEGUARDS. THEREFORE, WE DO NOT AND CANNOT ENSURE OR WARRANT THE SECURITY OR INTEGRITY OF ANY PERSONAL DATA YOU TRANSMIT TO US, AND YOU TRANSMIT SUCH PERSONAL DATA AT YOUR OWN RISK.

### **How can you protect your Personal Data?**

Please be advised that we will NEVER send you an email requesting confidential information such as account numbers, usernames, passwords, or social security numbers, and you should NEVER respond to any email requesting such information. If you receive such an email purportedly from THAD, DO NOT RESPOND to the email, DO NOT CLICK ON ANY LINKS AND/OR OPEN ANY ATTACHMENTS in the email, and NOTIFY THAD SUPPORT at [compliance@telehealthalert.com](mailto:compliance@telehealthalert.com).

You are responsible for taking reasonable precautions to protect your user ID, password, and other User Account information from disclosure to third parties, and You are not permitted to circumvent the use of required encryption technologies. You should immediately notify THAD at [compliance@telehealthalert.com](mailto:compliance@telehealthalert.com). if you know of or suspect any unauthorized use or disclosure of your user ID, password, and/or other User Account information, or any other security concern.

### **Your Rights**

You have certain rights relating to your Personal Data, subject to local data protection laws. These rights may include the right to:

- access your Personal Data held by us
- erase/delete your Personal Data, to the extent permitted by applicable data protection laws
- receive communications related to the processing of your personal data that are concise, transparent, intelligible and easily accessible;
- restrict the processing of your Personal Data to the extent permitted by law (while we verify or investigate your concerns with this information, for example);
- object to the further processing of your Personal Data, including the right to object to marketing;
- request that your Personal Data be transferred to a third party, if possible;
- receive your Personal Data in a structured, commonly used and machine-readable format
- lodge a complaint with a supervisory authority

- rectify inaccurate Personal Data and, taking into account the purpose of processing the Personal Data, ensure it is complete
- not be subject to a decision based solely on automated processing, including profiling, which produces legal effects ("Automated Decision-Making"); and
- withdraw your consent at any time (to the extent we base the collection, processing and sharing of your Personal Data on your consent) without affecting the lawfulness of the processing based on such consent before its withdrawal.

You can exercise the rights listed above at any time by contacting us at [compliance@telehealthalert.com](mailto:compliance@telehealthalert.com).

### **How do you update, correct, or delete Personal Data?**

You may change your email address, contact information or make corrections to other information by contacting our Data Manager at [compliance@telehealthalert.com](mailto:compliance@telehealthalert.com). Please note that in order to comply with certain requests to limit use of your Personal Data, we may need to terminate your account and your ability to access and use the Services, and you agree that we will not be liable to you for such termination or for any refunds of prepaid fees paid by you. You may deactivate your account by contacting [compliance@telehealthalert.com](mailto:compliance@telehealthalert.com).

Although we will use reasonable efforts to do so, you understand that it may not be technologically possible to remove from our systems every record of your Personal Data. The need to back up our systems to protect information from inadvertent loss means a copy of your Personal Data may exist in a non-erasable form that will be difficult or impossible for us to locate or remove.

### **Can You "OPT-OUT" of receiving communications from Us?**

We will not market third-party services to you without your consent. We will only send emails to you regarding your THAD account and services unless we have your express consent to do otherwise. You can choose to filter these emails using your e-mail client settings, but we do not provide an option for you to opt out of these emails. You can opt out of daily emails by responding to the email using the opt out or "unsubscribe" hyperlink found at the bottom of the email.

### **Information submission by minors**

We do not knowingly collect Personal Data from individuals under the age of 18 and the App is not directed to individuals under the age of 13. We request that these individuals not provide Personal Data to Us. If we learn that Personal Data from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you are aware of a user under the age of 13 using the App, please contact us at [compliance@telehealthalert.com](mailto:compliance@telehealthalert.com).

If you are a resident of California under the age of 18 and have registered for an account with us, you may ask us to remove content or information that you have posted to our websites.

### **California Residents**

California residents may request and obtain from us, once a year, free of charge, a list of third parties, if any, to which we disclosed their Personal Data for direct marketing purposes during the preceding

calendar year and the categories of Personal Data shared with those third parties. If you are a California resident and wish to obtain that information, please submit your request by sending us an email at [compliance@telehealthalert.com](mailto:compliance@telehealthalert.com) with "California Privacy Rights" in the subject line.

### **Contact Us**

If you have any questions about this Privacy Policy, please contact us by email at [compliance@telehealthalert.com](mailto:compliance@telehealthalert.com) or please write to:

TeleHealth Alert Device, Inc.  
4590 MacArthur Blvd., Suite 500  
Newport Beach, CA 92660

Please note that email communications are not always secure; so please do not include sensitive information in your emails to us.

## Disclosures and Notices

### *Cookie Banner*

"By continuing to use our Web site, you are agreeing to our placing cookies on your computer in order to analyze the way you use our Web site. Please read the Privacy Policy carefully for more details about the information we collect when you use this site."

**\*\*This is called "implied consent"--you are getting implied consent from the individual that, if they continue to use the site, they have agreed to your cookie policy. The more stringent requirement, which is implied by GDPR (which it is not at all clear is necessary) is to not permit folks who haven't clicked "accept" on the cookie banner to access the site.**

#### *Click Wrap*

##### **"Terms of Use**

**By clicking 'I Accept', you confirm that you have read the Privacy Policy and Terms of Use, that you understand them, and that you agree to be bound by them."**

Once the individual clicks the "I accept" button, the redisclosure click wrap agreement should pop up.

#### *Redisclosure Notice*

You need explicit consent to use and redisclose the "medical information" you receive from your customers (CA Law and GDPR). The redisclosure consent must be separate from any other acknowledgement. It needs to be in 14-point font, and available for download, so that the individual can save a copy.

##### **Authorization of Disclosure of Personal Data**

**By clicking 'I Accept', you hereby authorize THAD to disclose your information, including healthcare and other medical information, to your healthcare provider(s) and those third-party entities listed in the [Privacy Policy (include link)] for the purposes outlined in therein.**

**This Authorization will remain in effect until 2050, or until you revoke such authorization in writing, after which THAD will no longer be authorized to disclose your medical information until and unless you execute another Authorization.**

**You have the right to receive a copy of this authorization upon request. Should you wish to receive a copy of this authorization, please send a request to [compliance@telehealthalert.com](mailto:compliance@telehealthalert.com).**