

Pictal Health, LLC

PRIVACY POLICY

Last Updated: August 5, 2023

This is the privacy policy ("**Privacy Policy**") that governs how Pictal Health, LLC and our affiliated companies ("**Company**", "**we**", "**our**" or "**us**"), use Personal Data (defined below) that we process in connection with your use of this website (<http://pictalhealth.com>) and any other website we operate that links to this Privacy Policy (collectively, our "**Sites**"), our web application (<http://app.pictalhealth.com>), our "**Web App**", and all other products or services (collectively, our "**Service**").

Please read this Privacy Policy carefully to better understand how we collect, use, and disclose Personal Data about you as you use our Service. Any changes to this Privacy Policy will appear on this page, so we encourage you to review it periodically.

1. INTRODUCTION.

We are committed to respecting and maintaining the privacy and security of our customers and we recognize the need for appropriate protection and management of any Personal Data that is shared with us as part of using our Service. As used in this Privacy Policy, "**Personal Data**" means any information relating to an identified or identifiable natural person.

You may choose whether or not to provide or disclose Personal Data in connection with your use of our Service. If you choose not to provide the Personal Data we request, you may still visit and use parts of our Service, but may be unable to access or use certain features, options, programs, products, and services.

2. THE PERSONAL DATA WE COLLECT.

The types of Personal Data we collect may include, but is not limited to:

- Name
- Email address
- Password
- Birthdate
- Any health history events you enter into our system
- Device information

3. WHEN PERSONAL DATA IS COLLECTED.

The Company collects certain information that may constitute Personal Data in the following ways:

(a) [Personal Data you provide to us directly:](#)

In various areas of our Service, we provide you the opportunity to submit Personal Data, such as your name, email, birthdate and health history events.

(b) [Document Submissions.](#)

Our Service may allow users to upload documents or specifications relating to their health history. If you choose to submit documents of this nature, you may disclose certain Personal Data through our Service as a product of your submission. The Company uses commercially reasonable efforts to ensure the appropriate administrative, physical, and technical safeguards are in place as it relates to the Personal Data you provide through our Service as part of any document submission.

4. [INFORMATION COLLECTED AUTOMATICALLY.](#)

Certain information on our Service is collected automatically by means of various software tools. We have a legitimate interest in using such information to assist in log-in, systems administration purposes, information security and abuse prevention, to track user trends, and to analyze the effectiveness of our Service.

(a) [Log Files.](#)

Log files refers to the information that is automatically sent by your web browser or device (or otherwise automatically collected) each time you view or interact with our online Service. The information inside the log files may include IP addresses, type of browser, internet service provider, date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us.

(b) [Device and Online Usage.](#)

We may collect information about your computer, browser, mobile or other device that you use to access our Service. We may use cookies, pixels, log files and other techniques to collect such information, including IP address, device identifiers and other unique identifiers, browser type, browser language, operating system name and version, device name and model, version, referring and exit pages, dates and times of Service access, links clicked, features uses, crash reports and session identification information.

(c) [Cookies.](#)

We use cookies to make interactions with our Service easy and meaningful. When you visit our Service, our servers may send a cookie to your computer. We may use cookies that are session-based or persistent. Session cookies exist only during one session. They disappear from your computer when you close your browser software or turn off

your computer. Persistent cookies remain on your computer after you close your browser or turn off your computer. We use cookies that enable you to navigate our Service and use its features, such as accessing secure areas of our Service. Because required cookies are essential to operate our Service, there is no option to opt out of these cookies. We use cookies to provide features and services such as:

- Remembering your preferences and allowing you to enter your user name less frequently;
- Presenting information that's targeted to your interests, which may include our content presented on another website;
- Measuring the effectiveness of our sites, services, content, and advertising;
- Providing other services and features that are only available through the use of cookies;

The Options/Settings section of most internet browsers will tell you how to manage cookies and other technologies that may be transferred to your device, including how to disable such technologies. You can disable our cookies or all cookies through your browser settings, but please note that disabling cookies may impact some of our Service features and prevent the Service from operating properly.

(d) Do Not Track Signals.

We do not currently respond or take any action with respect to web browser "do not track" signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of Personal Data about an individual consumer's online activities over time and across third-party websites or online services. However, you may set your web browser to not accept new cookies or web beacons, be notified when one is received, or disable them altogether. Please note that by disabling these features, your experience may not be as smooth and you may not be able to take full advantage of our Service features. Please visit the Help section of your website browser for instructions on managing available preferences.

(e) Analytics Service.

We may use certain third party analytics services to improve the functionality, features, or delivery of our Service. We may also use these analytics services to record mouse clicks, mouse movements, scrolling activity, as well as any text that you type into our Service. For example, we use Mixpanel on our Service to track user trends and usage. For more information on Mixpanel's processing of Personal Data as it relates to our Service, please see <https://docs.mixpanel.com/docs/tracking/reference/default-properties>

(f) Web Beacons and Similar Tracking Technologies.

When you visit our Service, we may collect your IP address for certain purposes such as, for example, to monitor the regions from which you navigate our Service or for

troubleshooting purposes. We may also use web beacons alone or in conjunction with cookies to compile information about your usage of our Service and interaction with emails from us. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular site tied to the web beacon. We may use web beacons to operate and improve our Service.

5. THE PURPOSES FOR WHICH WE USE PERSONAL DATA.

If you submit or we collect Personal Data through our Service, then such Personal Data may be used to:

- Provide, analyze, administer, improve, and personalize the Service;
- Provide you with the Service and any product or order fulfillment;
- Contact you in connection with the Service, notifications, events, programs or offerings;
- Send you updates and promotional materials;
- Provide personalized advertising to you;
- Identify and authenticate your access to the parts of the Service that you are authorized to access;
- Protect our rights or our property and to ensure the technical functionality and security of the Service; and
- Comply with applicable law, assist law enforcement, and to respond to regulatory or other legal inquiries.

6. HOW WE DISCLOSE PERSONAL DATA.

We do not sell, lease, rent or otherwise disclose the Personal Data collected from our Service to third parties unless otherwise stated below or with your consent.

(a) Our Third Party Service Providers.

We transfer Personal Data to our third party service providers to perform tasks on our behalf and to assist us in providing our Service. For example, we may share your Personal Data with service providers who assist us in performing core functions (such as hosting, data storage, and security) related to our operation of the Service and/or by making certain interactive tools available to you as a user. We also use third parties for technical and customer support, application development, tracking and reporting functions, quality assurance, and other services. In the performance of our Service, we may share Personal Data from or about you with these third parties so that we can deliver the highest quality user experience.

(b) Aggregate Information.

To better serve our users, business partners, and to improve our Service, we may conduct research on user demographics, interests and behavior based on the Personal Data and other information provided to us. This research may be compiled and analyzed in aggregate, and we may share this aggregated information with our affiliates, agents and business partners. This aggregate information does not identify a user personally. We may also disclose aggregated information in order to describe our Service to current and prospective business partners and to other third parties for other lawful purposes.

(c) In the Event of Merger, Sale, or Change of Control.

We may transfer or assign this Privacy Policy and any Personal Data to a third party entity that acquires or is merged with us as part of a merger, acquisition, sale, or other change of control (such as the result of a bankruptcy proceeding).

(d) Other Disclosures.

We may disclose Personal Data about you if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our Terms of Use, including investigations of potential violations thereof; (iii) detect, prevent, or otherwise address fraud or security issues; or (iv) protect against harm to the rights, property or safety of the Company, our users, or the public.

7. RETENTION OF PERSONAL DATA.

We reserve the right to retain any Personal Data as long as the Personal Data are needed to: (i) fulfill the purposes that are described in Section 5, and (ii) comply with applicable law.

(a) Data backups.

We take automatic snapshots of data daily and back them up for 7 days. If you encounter lost data, please email support@pictalhealth.com immediately.

8. DATA SECURITY.

The privacy and security of Personal Data is very important to us. Taking into account the nature, scope, context and purposes of processing Personal Data as well as the risks of varying likelihood and severity for the rights and freedoms of natural persons, we have implemented appropriate technical and organizational measures to ensure and to be able to demonstrate that its processing of Personal Data is performed in accordance with applicable law. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect Personal Data, we cannot guarantee its absolute security.

9. CHILDREN'S PRIVACY.

Our Service is intended for individuals over eighteen 18 years of age. We do not target children and do not knowingly collect any Personal Data from children under the age of thirteen (13). When a user discloses Personal Data on our Service, the user is representing to us that he or she is at least eighteen (18) years of age.

10. EMAIL COMMUNICATIONS.

You may choose not to receive future promotional or advertising emails from us by selecting an unsubscribe link at the bottom of each email that you receive from us. Additionally, you may send a request specifying your communications preferences to info@pictalhealth.com. You cannot opt out of receiving transactional emails related to the performance of our services. Please note that even if you opt out of receiving the foregoing emails, we may still send you a response to any "Contact" request as well as administrative, maintenance and operational emails (for example, in connection with a password reset request).

11. CHANGES TO THIS PRIVACY POLICY.

As our organization changes over time, this Privacy Policy may change as well. We reserve the right to amend the Privacy Policy at any time, for any reason, without notice to you, other than the posting of the amended Privacy Policy on our Service.

12. CONTACTING US.

Any comments, concerns, complaints, or questions regarding our Privacy Policy may be addressed to info@pictalhealth.com.