

VICONIC HEALTH

PRIVACY NOTICE

This Privacy Notice was last updated April 14, 2023.

For any questions or concerns relating to data privacy, please contact:

VICONIC HEALTH
Attn: Data Privacy
1100 Oakwood Blvd
Dearborn, MI 48124
info@viconichealth.com

VICONIC Health (“VICONIC,” “we,” “us,” or “our”) respects the privacy of our users and all those who submit personal information to VICONIC through this website or by other means. Accordingly, we have provided this privacy notice (“Notice”) to inform you, the user (“you” or “user”) of how we collect, use, share, store, and protect your personal information. By using or accessing VICONIC’s website (“Website”) or otherwise submitting your personal information to us through webforms, hard copies, order forms, purchase orders, email, fax or any other medium, whether electronic, auditory, visual, or physical, you are representing that you understand the terms of this Notice. If you do not agree to the terms of this Notice, do not continue to use the Website or any of VICONIC’s products or services, and do not provide us with your personal information at any time.

Collection of Your Information

When you use the Website or VICONIC’s services you may choose to provide VICONIC with certain personal information (“PI”) about yourself. Other PI may be automatically collected by your use of the Website and certain webforms and chatbots therein. Further, we may collect other information about your use of the Website that is not PI. Generally, PI means information about an individual who can be identified from use of that information (or from that information when combined with other information in our possession or likely to come into our possession), including information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Specific types of PI include names, social security numbers, unique identifiers (such as user names), physical addresses, mailing addresses, cookies, geolocation data, phone numbers, and IP addresses. PI does *not* include aggregated or anonymized data, or data that is otherwise specifically excluded from current data privacy laws.

In the interest of providing transparency to our users, we have provided the following list of the categories of PI that we collect, and some examples of the personal information that would fall into each category. By using the Website, submitting webforms, submitting payment information, submitting emails or faxes, submitting hard copies of documents, or submitting PI through any other medium, whether electronic, auditory, visual, or physical, or providing consent for the use of your PI, you are providing consent for us to collect the following PI.

Except for our collection of your browser data through cookies when you visit our Website, we only collect PI you voluntarily provide to us, either through your submission of PI (i) through web forms and chat widgets on our Website or any Linked Website (as hereinafter defined), (ii) via email or fax to one of VICONIC's employees or agents, (iii) by phone to one of VICONIC's employees or agents, or (iv) via hardcopy to VICONIC.

- **Personal Identifiers** - (Name, phone number, email, fax number, and mailing address):
 - We may use Personal Identifiers to (i) improve our products and services, to inform you about our products and updates, (ii) conduct recruitment and retention campaigns via phone, email, fax or hardcopy, (iii) provide individualized help and care to our clients, (iv) comply with laws, legal processes, or regulations, as well as law enforcement authorities, other government officials or other third parties pursuant to a subpoena, a court order or other legal process, and/or (v) protect the vital interests of a person, to protect our property, services, and legal rights, and to support our audit, compliance, and governance functions.

- **Customer Records** - (Name, mailing address, ACH, routing number, bank account number, and credit card numbers):
 - We may use Customer Records to (i) process payments for our products and services (ii) improve our products and services, to inform you about our products and updates, (iii) provide individualized help and care to our clients, (iv) comply with laws, legal processes, or regulations, as well as law enforcement authorities, other government officials or other third parties pursuant to a subpoena, a court order or other legal process, and/or (v) protect the vital interests of a person, to protect our property, services, and legal rights, and to support our audit, compliance, and governance functions.

- **Usage Data** - (IP address, pixels, unique device identifier cookies, location data, website interactions, and first party cookies which track: website direction tracking, operating systems used to access website, browser types, and languages):
 - We may use Usage Data to (i) provide the products and services you have requested or authorized and to help us manage the availability and connectivity of the Website, (ii) improve our products and services, (iii) inform you about our products or updates, and to provide individualized help and care to our clients, and (iv) analyze your responses to certain web traffic and prompts.

- **Geolocation Data** - During your use of the Website, we collect your location information through your device's IP address. We may also gather information about your location

using other technologies and forms (such as when you provide a shipping address when place an order for our products):

- We may use Geolocation Data to (i) improve our products and services, to inform you about location-specific products, services, and discounts, (ii) ship you our products, (iii) provide individualized help and care to our clients, (iv) comply with laws, legal processes, or regulations, as well as law enforcement authorities, other government officials or other third parties pursuant to a subpoena, a court order or other legal process, (v) analyze our adherence to applicable tax regulations and possible nexus with certain jurisdictions through third-party advisors, and/or (vi) protect the vital interests of a person, to protect our property, services, and legal rights, and to support our audit, compliance, and governance functions.
- **Commercial Data** - (data relating to your inquiries about products, warranties, services, purchases, service requests):
 - We may use Commercial Data to (i) improve our Website, products and services, (ii) inform you about our products and updates, and (iii) provide individualized help, care, and targeted services and advertisements to our clients.

VICONIC's Use and Sharing of PI

Other than as specifically outlined above, and excepting the broader use of aggregated data as discussed below, we also generally use the PI we collect in one or more of the following ways:

- Website Administration;
- Marketing and Advertising;
- To improve products and our service offerings;
- To deliver our products and services
- To comply with applicable laws or regulations;
- In response to a subpoena, a court order, or other legal process; and/or
- As part of a sale, merger, reorganization, or restructuring.

As a general rule, we may share all of the above listed categories of PI if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of us, our clients, or others. Further, certain aspects and components of our services are performed through contracts with outside persons or organizations, such as marketing, outcomes data collection, legal services, etc. At times it may be necessary for us to provide your PI to one or more of these outside persons or organizations who assist us with our operations.

This Notice does not restrict our collection, use, or disclosure of any aggregated information or information that does not identify, or cannot be reasonably linked to, any individual. For example, we may choose to share aggregated data with unaffiliated third parties, in an anonymous form that does not allow the third party to associate the information we shared as being your PI.

To be clear, other than as described herein, we will not collect additional categories of PI or use the PI we collect for materially different, unrelated, or incompatible purposes without providing you notice. Except as described in this Notice, we do not sell, share, distribute, lease, or transfer your PI to any third parties.

Security

In compliance with applicable law and industry standards, we have put in place reasonable physical, electronic, and administrative procedures to safeguard the PI we collect. We take reasonable steps and regularly assess our privacy and security policies and procedures and comply with laws designed to protect the privacy and security of your PI. Unfortunately, transmission of information via electronic or physical means is not completely secure; accordingly, we cannot guarantee the security of any such information. Any transmission of PI or data is entirely at your own risk.

Retention of Information

We will retain your PI only for as long as is necessary for the purposes set forth herein, which shall be at least as long, but in no way limited to, the time that you use the Website or our products and services. If you would like us to delete your data before our internally designated purge date, you may request that we do so. However, we may retain and use your PI to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Cookies

Our Website uses cookies to track your activity on the Website and to hold certain information. Cookies are small files placed on your device. Cookies help analyze Website traffic, provide information about your use of the Website, and help the Website work more efficiently by responding to you as an individual (such as tailoring operations to your needs, likes and dislikes by gathering and remembering your preferences).

Do Not Track Signals and Requests

“Do not track” signals and requests are sent from your browser to websites you visit indicating you do not want to be tracked or monitored. In most circumstances you need to affirmatively elect to turn on the “do not track” signals or requests. Websites are not required to accept these signals or requests, and many do not. At this time, neither our Website nor the widgets existing therein honor “do not track” signals or requests.

Consent

You are responsible for any third-party PI obtained, published, or shared through this Website or VICONIC by your actions, and you represent, warrant, and covenant that you have adequately obtained and complied with said third party's consent in providing their PI to us.

Linked Websites

We may provide links to other websites, landing pages, widgets, plug-ins and applications for your convenience, or to offer additional services such as payment processing (collectively “Linked Websites”). Linked Websites are independent from our Website and are not governed by this Notice. We do not review, maintain, endorse, or control the Linked Websites or the information, software, products, or services available on the Linked Websites. We also have no control over the Linked Websites’ privacy policies or posted privacy notices. Access or use of any of the Linked Websites is entirely at your own risk. If you have any questions about a Linked Website’s privacy policies or notices, you should contact them directly.

International Transfers and Processing of PI

We store information received through or by our Website in our cloud server hosted in the United States. If you are providing the information from another country, you understand that the information will be transferred, stored and used in the United States. Your consent to this Notice followed by your use of the Website or VICONIC’s products and services represents your agreement to that transfer.

Protection for Children (Minors)

We have no intention of collecting PI from minors (*children under the age of 18*). If we become aware that PI from a minor under 18 has been collected without the consent of the parent or guardian of such minor, we will use all reasonable efforts to delete such information.

Changes to the Notice

We reserve the right, at our sole discretion, to amend this Notice at any time. If at any time in the future we plan to use PI in a way that differs from what is described in this Notice or choose to amend this Notice, we will post those changes on the Website. Your continued use of the Website or VICONIC’s services following the posting of any changes to this Notice constitutes affirmative acceptance of those changes.