

GS HEALTHCARE, LLC. PRIVACY POLICY

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This privacy policy (“Policy”) for GS Healthcare, LLC (“GHSC”, “we”, “us”, “ our”) describes how and why we might collect, store, use and/or share (“process”) your information when you use our services (“Services”), such as when you:

- Visit our website, or any website of ours that links to this Policy
- Engage with us in other related ways, including any sales, marketing, or event

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services.

Summary of Key Points

This summary provides key points from our privacy notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our [table of contents](#) below to find the section you are looking for.

What personal information to we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with use and the Services, the choices you make, and the products and features you use. Learn more about [personal information you disclose to us](#).

Do we process any sensitive information? We may process sensitive personal information when necessary with your consent or as otherwise permitted by applicable law. Learn more about [sensitive information we process](#).

Do we receive any information from third parties? We may receive information from public databases, marketing partners, social media platforms, and other outside sources. Learn more about [information we collected from other sources](#).

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with the law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more about [how we process your information](#).

In what situations and with which parties do we share personal information? We may share information in specific situations and with specific third parties. Learn more about [when and with whom we share your personal information](#).

How do we keep your information safe? We have organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more about [how we keep your information safe](#).

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. Learn more about [your privacy rights](#).

How do you exercise your rights? The easier way to exercise your rights is by contacting us. We will consider and act upon any request in accordance with application data protection laws.

Want to learn more about what we do with any information we collect? [Review the privacy policy in full](#).

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1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

We collect personal information that you voluntarily produce to use when you register on the Services, express interest in obtaining information about use or our Services, when you participate in activities on the Services, or otherwise when you contact us.

Personal information provided by you. The personal information that we collect depends on the context of your interactions with use and the Services, the choices you make, and the features you use. The personal information we collect may include the following:

- Names
- Phone numbers
- Email addresses
- Mailing addresses
- Job titles

- Usernames
- Passwords
- Contact preferences
- Contact or authentication data
- Billing addresses
- Debit/credit card numbers

Sensitive Information. When necessary, with your consent or as otherwise permitted by applicable law, we process the following categories of sensitive information:

- Health data
- Financial data
- Genetic data
- Biometric data
- Data about a person's sex life or sexual orientation
- Information revealing race or ethnic origin
- Information revealing political opinions
- Information revealing religious or philosophical beliefs
- Information revealing trade union membership
- Social security numbers or other government identifiers

Payment Data. We may collect data necessary to process your payment if you make purchases, such as your payment instrument number, and the security code associated with your payment instrument. All payment data is stored by _____. You may find their privacy notice link(s) here:_____.

Information automatically collected

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (such as your name or contact information) but may include device and usage information, such as our IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operations of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. The information we collect includes:

- *Log and Usage Data.* Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date and time stamps associated with your usage, pages, and files viewed, searches, and other actions you take

such as which features you use), device event information (such as system activity, error reports (sometimes called “crash dumps”), and hardware settings).

- *Device Data.* We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.
- *Location data.* We collect location data such as information about your device’s location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

Information collected from other sources

In order to enhance our ability to provide relevant marketing, offers, and services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, and from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), Internet Protocol (IP) addresses, social media profiles, social media URLs, and custom profiles, for purposes of targeted advertising and event promotion.

2. HOW DO WE PROCESS YOUR INFORMATION?

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- **To facilitate account creation and authentication and otherwise manage user accounts.** We may process your information so you can create and log in to your account, as well as keep your account in working order.
- **To deliver and facilitate delivery of services to user.** We may process your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may process your information to provide you with the requested service.
- **To send administrative information to you.** We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- **To fulfill and manage your orders.** We may process your information to fulfill and manage your orders, payments, returns, and exchanges made through the Services.
- **To save or protect an individual’s vital interest.** We may process your information when necessary to save or protect an individual’s vital interest, such as to prevent harm.

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

If you are located in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent.** We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time. Learn more about [withdrawing your consent](#).
- **Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfill our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

If you are located in Canada, this section applies to you.

We may process your information if you have given us specific permission (i.e., express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e., implied consent). You can [withdraw your consent](#) at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way
- For investigations and fraud detection and prevention
- For business transactions provided certain conditions are met
- If it is contained in a witness statement and the collection is necessary to access, process, or settle an insurance claim
- For identifying injured, ill, or deceased persons and communication with next of kin.
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records.
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced.

- If the collection is solely for journalistic, artistic, or literary purposes
- If the information is publicly available and is specified by the regulations

4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

We may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.
- **Business Partners.** We may share your information with our business partners to offer you certain products, services, or promotions.

5. WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?

The Services may link to third-party websites, online services, or mobile applications and/or contain advertisements from third parties that are not affiliated with us and which may link to other websites, services, or applications. Accordingly, we do not make any guarantee regarding any such third-party websites, services, or applications. The inclusion of a link towards a third-party website, service, or application does not imply an endorsement by us. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this Policy. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services, or applications that may be linked to or from the Services. You should review the policies of such third parties and contact them directly to respond to your questions.

6. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our [Cookies Notice](#).

7. HOW LONG DO WE KEEP YOUR INFORMATION?

We will only keep your personal information for as long as it is necessary for the purpose set out in this Policy, unless a longer retention period of required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this Policy will require us keeping your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

8. HOW DO WE KEEP YOUR INFORMATION SAFE?

We have implemented appropriate and reasonable and technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

9. DO WE COLLECT INFORMATION FROM MINORS?

We do not knowingly solicit data from or market to children under eighteen (18) years of age. By using the Services, you represent that you are at least eighteen (18) or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than eighteen (18) of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age eighteen (18), please contact us through the contact details provided.

10. WHAT ARE YOUR PRIVACY RIGHTS?

In some regions (like to EEA, UK, Switzerland, and Canada), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; (iv) if applicable, to data portability; and (v) not to be subject to automated decision-making. In certain circumstances, you may also have the right to object to the processing of your personal information, you can make such a request by contacting us through the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS POLICY?" below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your Member State data protection authority or UK data protection authority.

If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us through the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS POLICY?" below or updating your preferences.

However, please note that this will not affect the lawfulness of the processing before its withdrawal, nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Opting out of marketing and promotional communications: You can subscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, or by contacting us through the contact details provided in the section “HOW CAN YOU CONTACT US ABOUT THIS POLICY?” below. You will then be removed from the marketing lists. However, we may still communicate with you – for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can contact us through the contact details provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. You may also opt out of interest-based advertising by advertisers on our Services. You may also opt out of interest-based advertising by advertisers on our Services.

11. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this state, no uniform technology standard for recognizing and implementing DNT signals have been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we much follow in the future, we will inform you about that practice in a revised version of this Policy.

12. DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

If you are a resident of California, Colorado, Connecticut, Utah or Virginia, you are granted specific rights regarding access to your personal information.

What categories of personal information do we collect?

Category	Examples	Collected
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A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internal Protocol address, email address, and account name	Yes
B. Personal information as defined in the California Customer Records statute	Name, contact information, education, employment, employment history, and financial information	Yes
C. Protected classification characteristics under state or federal law	Gender and date of birth	Yes
D. Commercial information	Transaction information, purchase history, financial details, and payment information	Yes
E. Biometric information	Fingerprints and voiceprints	Yes
F. Internet or other similar network activity	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems, and advertisements	Yes
G. Geolocation data	Device location	Yes
H. Audio, electronic, visual, thermal, olfactory, or similar information	Images and audio, video or call recordings created in connection with our business activities	Yes
I. Professional or employment-related information	Business contact details in order to provide you our Services at a business level or job title, work history, and professional qualifications if you apply for a job with us	Yes
J. Education Information	Student records and directory information	Yes
K. Inferences drawn from collected personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	No
L. Sensitive personal information	Account login information, biometric data, citizenship or immigration status, debit or credit card numbers, drivers' licenses, genetic data, health data, personal data from a known child, precise geolocation, racial or ethnic origin, religious or philosophical beliefs, sex life or sexual orientation, social security numbers and state id card numbers	Yes

We will use and retain the collected personal information as needed to provide the Services or for one (1) year or for as long as the user has an account with us (whichever is longer)

Category L information may be used, or disclosed to a service provider or contractor, for additional, specified purposes. You have the right to limit the use or disclosure of your sensitive personal information.

We may also collect other personal information outside of these categories through instances where you interact with us in person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

How do we use and share your personal information?

Learn about how we use your personal information in the section, “HOW TO WE PROCESS YOUR INFORMATION?”

Will your information be shared with anyone else?

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Learn more about how we disclose personal information to in the section, “WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?”

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be “selling” of your personal information.

We have not disclosed, sold, or shared any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months. We will not sell or share personal information in the future belonging to website visitors, users, and other consumers.

California Residents

California Civil Code §1798.83, also known as the “Shine The Light” law permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact details provided.

If you are under eighteen (18) years of age, reside in California, and have a registered account with the Services, you have the right to request removal of unwanted data that you publicly post on the Services. To request removal of such data, please contact us through the contact details provided and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g., backups, etc.).

CCPA Privacy Notice

This section applies only to California residents. Under the California Consumer Privacy Act (CCPA), you have the rights listed below.,

The California Code of Regulations defines a “resident” as:

- 1) Every individual who is in the State of California for other than a temporary or transitory purpose and
- 2) Every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose.

All other individuals are defined as “non-residents.”

If this definition of “resident” applies to you, we must adhere to certain rights and obligations regarding your personal information.

Your rights with respect to your personal data

Right to request deletion of the data – Request to delete

You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation, or any processing that may be required to protect against illegal activities.

Right to be informed – Request to know

Depending on the circumstances, you have a right to know:

- Whether we collect and use your personal information;
- The categories of personal information that we collect;
- The purpose for which the collected personal information is used;
- Whether we sell or share personal information to third parties;
- The categories of personal information that we sold, shared, or disclosed for a business purpose;
- The categories of third parties to whom the personal information was sold, shared, or disclosed for a business purpose;
- The business or commercial purpose for collecting, selling, or sharing personal information; and
- The specific pieces of personal information we collected about you.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

Right to Non-Discrimination for the Exercise of a Consumer’s Privacy Rights

We will not discriminate against you if you exercise your privacy rights.

Right to Limit Use and Disclosure of Sensitive Personal Information

If the business collects any of the following:

- Social security information, drivers’ licenses, state ID cards, passport numbers
- Account login information

- Credit card numbers, financial account information, or credentials allowing access to such accounts
- Precise geolocation
- Racial or ethnic origin, religious or philosophical beliefs, union membership
- The contents of email and text, unless the business is the intended recipient of the communication
- Genetic data, biometric data, and health data
- Data concerning sexual orientation and sex life

You have the right to direct that business to limit its use of your sensitive personal information to that use which is necessary to perform the Services

Once a business receives your request, they are no longer allowed to use or disclose your sensitive personal information for any other purpose unless you provide consent for the use or disclosure of sensitive personal information for additional purposes.

Please note that sensitive personal information that is collected or processed without the purpose of inferring characteristics about a consumer is not covered by this right, as well as the publicly available information.

To exercise your right to limit use and disclosure of sensitive personal information, please contact us through the contact details provided.

Verification process

Upon receiving your request, we will need to verify your identify to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with information you have preciously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g., phone or email) that you have preciously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. However, if we cannot verify your identify from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identify and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

Other privacy rights

- You may object to the processing of your personal information.
- You may request correction of your personal data if it is incorrect or no longer relevant or ask to restrict the processing of the information.

- You can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA.
- You may request to opt out from future selling or sharing of your personal information to third parties. Upon receiving an opt-out request, we will act upon the request as soon as feasibly possible, but no later than fifteen (15) days from the date of the request submission.
- We will honor your opt-out preferences if you enact the Global Privacy Control (GPC) opt-out signal on your browser.

To exercise these rights, you can contact us through the contact details provided. If you have a complaint about how we handle your data, we would like to hear from you.

Colorado Residents

This section applies only to Colorado residents. Under the Colorado privacy Act (CPA), you have the rights listed below. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law.

- Right to be informed whether or not we are processing your personal data
- Right to access your personal data
- Right to correct inaccuracies in your personal data
- Right to request deletion of your personal data
- Right to obtain a copy of the personal data you previously shared with us
- Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale or personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects (“profiling”)

To submit a request to exercise these rights described above, please contact us through the contact details provided.

If we decline to take action regarding your request and you wish to appeal our decision, please email us at _____. Within forty-five (45) days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions.

Connecticut Residents

This section applies only to Connecticut residents. Under the Connecticut Data Privacy Act (CTDPA), you have the rights listed below. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law.

- Right to be informed whether or not we are processing your personal data
- Right to access your personal data
- Right to correct inaccuracies in your personal data
- Right to request deletion of your personal data
- Right to obtain a copy of the personal data you previously shared with us

- Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects (“profiling”)

To submit a request to exercise these rights described above, please contact us through the contact details provided.

If we decline to take action regarding your request and you wish to appeal our decision, please email us at _____. Within sixty (60) days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions.

Utah Residents

This section applies only to Utah residents. Under the Utah Consumer Privacy Act (UCPA), you have the rights listed below. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law.

- Right to be informed whether or not we are processing your personal data
- Right to access your personal data
- Right to request deletion of your personal data
- Right to obtain a copy of the personal data you previously shared with us
- Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data

To submit a request to exercise these rights described above, please contact us through the contact details provided.

Virginia Residents

Under the Virginia Consumer Data Protection Act (VCDPA):

“Consumer” means a natural person who is a resident of the Commonwealth acting only in an individual or household context. It does not include a natural person acting in a commercial or employment context.

“Personal data” means any information that is linked or reasonably linkable to an identified or identifiable natural person. “Personal data” does not include de-identified data or publicly available information.

“Sale of personal data” means the exchange of personal data for monetary consideration.

If this definition of “consumer” applies to you, we must adhere to certain rights and obligations regarding your personal data.

Your rights with respect to your personal data:

- Right to be informed whether or not we are processing your personal data
- Right to access your personal data
- Right to correct inaccuracies in your personal data

- Right to request deletion of your personal data
- Right to obtain a copy of the personal data you previously shared with us
- Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects (“profiling”)

Exercise your rights provided under the Virginia VCDPA

You may contact us through the contact details provided.

If you are using an authorized agent to exercise your rights, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

Verification process

We may request that you provide additional information reasonably necessary to verify you and your consumer’s request. If you submit the request through an authorized agent, we may need to collect additional information to verify your identity before processing your request.

Upon receiving your request, we will respond without undue delay, but in all cases, within forty-five (45) days of receipt. The response period may be extended once by forty-five (45) additional days with reasonably necessary. We will inform you of any such extension within the initial 45-day response period, together with the reason for the extension.

Right to appeal

If we decline to take action regarding your request, we will inform you of our decision and the reasoning behind it. If you wish to appeal our decision, please contact us through the contact details provided. Within sixty (60) days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If your appeal is denied, you may contact the Attorney General to submit a complaint.

13. DO OTHER REGIONS HAVE SPECIFIC PRIVACY RIGHTS?

Australia and New Zealand

We collect and process your personal information under the obligations and conditions set by Australia’s Privacy Act of 1988 and New Zealand’s Privacy Act of 2020 (Privacy Act).

This Policy satisfied the notice requirements defined in both Privacy Acts, in particular: what personal information we collect from you, from which sources, for which purposes, and other recipients of your personal information.

If you do not wish to provide the personal information necessary to fulfill their applicable purpose, it may affect our ability to provide our services, in particular:

- Offer you the products or services that you want
- Respond to or help with your requests

- Manage your account with us
- Confirm your identity and protect your account

At any time, you have the right to request access to or correction of your personal information. You can make such a request by contacting us by using the contact details provided in the section “HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?”

If you believe we are unlawfully processing your personal information, you have the right to submit a complaint about a breach of the Australian Privacy Principles to the Office of the Australian Information Commissioner and a breach of New Zealand’s Privacy Principles to the Office of New Zealand Privacy Commissioner.

14. DO WE MAKE UPDATES TO THIS POLICY?

We may update this Policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Policy frequently to be informed of how we are protecting your information.

15. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have questions or comments about this Policy, you may contact our Data Protection Officer (DPO) by email at _____, or contact us by post at:

16. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please contact us through the contact details provided.