

VERICARDIA
PRIVACY POLICY

Last revised: October 15, 2020

PLEASE READ THIS PRIVACY POLICY CAREFULLY

Healthcare Innovation Technologies Inc., the owner of VeriCarida mobile application, and its affiliates (“**VeriCardia**,” “**we**,” “**our**,” and/or “**us**”) value the privacy of individuals who use our website www.vericardia.com (the “**Site**”), VeriCardia mobile application (the “**App**”), and related services, including the virtual ECG reviews (the “**ECG Reviews**”) and online consultations (the “**Online Consultations**”) (collectively, the “**Services**”) provided by board-certified cardiologists (the “**Cardiologist(s)**”) associated with Ocean Heart Group LLC (the “**OHG**”).

This privacy policy (“**Privacy Policy**”) explains how we collect, use, and share information from or about individuals who use our Services (“**Users**”). It describes what information other Users or Cardiologists can see when you use our Services. This Privacy Policy also tells you about your rights and choices with respect to Personal Information, and how you can contact us if you have any questions or concerns. By using the App and/or Services, you agree to the collection, use, disclosure of Personal Information, and agree to the procedures that this Privacy Policy describes. In addition to this Privacy Policy, your use of the App and the Services is subject to our Terms of Use.

For the purpose of this Privacy Policy, “**Personal Information**” means any information that, by itself or in combination with other information, identifies or can reasonably be used to identify an individual, such as their name, email address, telephone number, address, date of birth, or health information. Personal Information does not include information that is anonymized. “**Protected Health Information**” or “**PHI**” has the meaning provided in the Health Insurance Portability and Accountability Act (“**HIPAA**”), and you must read about the way we collect and process your PHI in our HIPAA Notice of Privacy Practices available at [\[link\]](#).

1. INFORMATION WE COLLECT

To access the App and the Services, we may ask that you provide certain Personal Information. Where applicable, we indicate whether and why you must provide us with your Personal Information, as well as the consequences of failing to do so. If you do not provide your Personal Information when requested, you may not be able to use the App and the Services.

Information You Provide to Us

Account Information. We collect the information you provide to us when you create an account on the App (the “**Account**”), including your name, email address, password, date of birth and sex. We also collect any optional information you choose to add to your Account.

Payment Information. When you add a credit card, other payment method to your Account or make a payment through the App, we collect information about that payment method. A service provider that handles payments for us will receive your payment method information.

Communications. If you contact us directly, we may collect additional information about you. For example, when you contact us for customer support, we may receive your name and email address, the contents of your message, attachments that you may send to us, and other information you choose to provide. We may also store such information in order for it to be available in case of a dispute

between us. When we send you emails, we may collect information on whether you open them to learn how to deliver a better customer experience and improve our Services.

Health information. When you use our Services you might submit certain health information that deserves special protection under HIPAA. Please note that the use and disclosure of such data is regulated in a OHG Notice of Privacy Practice that you can find here [\[link\]](#).

If you seek to apply for a job with us, you may submit to us your contact information, cover letter, and/or your resume. We collect the information you choose to provide to us in the application process.

Information We Collect When You Use the App

Device Information. We receive information about the device and software you use to access the App and the Services, including IP address, web browser type, operating system version, phone carrier and manufacturer, installed applications, device identifiers, mobile advertising identifiers, and push notification tokens.

Usage and Behavioral Information. To help us understand how you use the App and Services and to help us improve them, we automatically collect information about your interactions with the App, including content you view, functionalities you use, and the dates and times of your visits.

Information from Cookies and Similar Technologies. A cookie is a small piece of data that a website can send to your computer's internet browser, which is then stored on your computer's operating system. Cookies are used on websites to recognize users and keep track of their preferences. We and third-party partners collect information using cookies, pixel tags and similar technologies. Our third-party partners, such as analytics and advertising partners, may use these technologies to collect information about your online activities over time and across different services. For more information about our use of cookies, please see our Cookie Policy. Please note that you can choose to delete or choose not to accept all the cookies but if you do so, you may not be able to utilize certain features of the App and/or Services to the full extent.

2. USING PERSONAL INFORMATION

VeriCardia uses the information we collect for the following purposes:

To operate, provide, maintain, improve and enhance the App and Services;

To personalize your experience on the App by providing tailored content and recommendations (for example, we use your email address to help you create and manage your Account on the App);

To understand and analyze how you use the App and Services in order to develop new products, services, features, and functionalities;

To connect you with the Cardiologist that suits your needs;

For marketing and advertising purposes, including behavioral advertising, such as developing and providing promotional and advertising materials that may be relevant, valuable or otherwise of interest to you as well as to assist us in advertising the App and Services on third party websites. If required under applicable law, we will only send marketing communications to you with your consent;

To communicate with you (including via the App, email, text messages, push notifications) in order to provide you with updates and other information relating to the App and Services, provide information to you including ECG Reviews, respond to comments and questions, and provide customer support;

To facilitate transactions and payments;

For our business purposes, including audits, quality assurance processes, prevention of fraud;

For compliance purposes, including enforcement of our Terms of Use and other legal rights, or as may be required by applicable law, regulations, judicial process or government agency;

For other purposes not covered in this Privacy Policy, for which we will provide a separate notice to you at the time of collection of information. We may use and disclose information that we collect through the App in aggregate form or otherwise de-identified, for business purposes other than listed in this Privacy Policy, if such information can no longer be used to identify any individual.

3. SHARING PERSONAL INFORMATION

We may share or otherwise disclose Personal Information in the following circumstances:

We may disclose Personal Information to our affiliates or partners as necessary to provide the Services or for other purposes for which such Personal Information was collected;

We may share Personal Information with vendors and service providers as necessary to provide the Services;

We may make certain Personal Information available to third parties (i) for our business, marketing purposes and/or (ii) in order to utilize third-party tools to understand interests, habits, and usage patterns of our Users as well as functionality of the App and Services. We only share your Personal Information with such third parties in order to improve our App and Services or as necessary to provide Services to you;

We may access, preserve and disclose Personal Information if we believe doing so is required or appropriate, in our sole discretion, to: (i) comply with any applicable law, regulation, legal process or government agency request (such as a court order or subpoena), or otherwise cooperate with any law enforcement or government agency; (ii) take precautions against liability claims; (iii) protect your, our, or any third party's rights, property, or safety; (iv) investigate or defend ourselves against any third-party claim or allegation; and (v) protect the security and integrity of the App and Services;

We do not rent, sell, or share Personal Information with companies that are not our affiliates for their marketing purposes, unless we have your permission;

We may share Personal Information with Cardiologists in order to provide Services to you. Online Consultations on the App are confidential, but not anonymous. When using the App, your Account information, including your real name and any additional information available on the Account, are visible to the Cardiologist providing Services to you. By initiating the Services, you consent to share your Account information with the Cardiologist providing Services to you.

We may disclose or transfer Personal Information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets.

4. SECURITY

We make commercially reasonable efforts to protect Personal Information by using physical and electronic safeguards designed to protect the integrity and security of Personal Information. We also

use physical, organizational, and technical safeguards designed to comply with the Health Insurance Portability and Accountability Act (“**HIPAA**”) security standards for data transfers subject to HIPAA regulations. We take all commercially reasonable precautions to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction. However, as no electronic transmission or storage of Personal Information is entirely secure, we make no guarantees as to the security or privacy of Personal Information.

5. RETENTION OF PERSONAL INFORMATION

We take measures to retain your Personal Information for a period of time that is no longer than necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law. When determining the retention period, we take into account various criteria, such as the type of Services provided to you, nature and length of our relationship with you, impact on the Services we provide to you if we delete some or all of your Personal Information, mandatory retention periods provided by law and the relevant statute of limitations.

6. YOUR CHOICES AND RIGHTS

Certain Personal Information is required to create and maintain an Account and can be edited but not deleted. You can add, edit, or delete optional Personal Information to your Account at any time in your Account settings with the exception of your e-mail which cannot be changed.

To request to delete, or to limit the use or disclosure of Personal Information, please contact us at info@vericardia.com.

You can unsubscribe from our marketing communications, such as announcements of new features or special offers, via the link provided in promotional emails. Even if you opt out of receiving marketing communications from us, you will continue to receive administrative messages from us.

In the process of creating an Account, we will ask about your notification preferences. If you agree, we may send you email, text message, or mobile push notifications, providing you with Account, App, and Services-related reminders or updates. You may opt out of receiving notifications via App at any time by adjusting your notification settings of the App. You may also opt out of receiving notifications via e-mail by using the unsubscribe option available in every email we send or simply sending us a separate request via email.

You may terminate your Account at any time by selecting to remove your account in the settings of the App.

7. CHILDREN

The App and Services may only be used by individuals over 18 years old, and we do not knowingly collect Personal Information from individuals under the age of 18. If you learn that your child has provided Personal Information to us, please alert us at info@vericardia.com. If we learn that we have collected Personal Information from an individual under 18 years old, we will promptly take steps to delete such information.

8. GOOGLE / THIRD PARTY PARTNERS

The App may incorporate and/or use services provided by Google, Inc. (the “**Google**”).

Google Analytics. Google Analytics is a web analytics service that uses cookies which we may use for the purpose of understanding how Users use the App and Services, as well as for compiling reports on Site usage and activity. You may refuse the use of cookies in the settings of your browser. However, this may prevent some features on the App from working. You can prevent Google’s collection of data through cookies such as your IP address by downloading and installing the browser plug-in available here (<https://tools.google.com/dlpage/gaoptout?hl=en-GB>). More information about how Google uses cookies can be found here (<https://policies.google.com/technologies/cookies?hl=en-US>).

Google Maps. We may use visual mapping services on the Site and/or the App. Please be aware that the Terms of Service of Google Maps/Earth (https://www.google.com/intl/en-US_US/help/terms_maps/) and Google Privacy Policy (<https://policies.google.com/privacy?hl=en-US>) also apply to your use of the App and Services.

Google reCAPTCHA. We may use Google reCAPTCHA on the Site and/or the App.

Facebook Pixel. We use Facebook’s “Custom Audience Pixel” on our website. With its help, we can keep track of what users do after they see or click on a Facebook advertisement.

HotJar. We use Hotjar in order to better understand our users’ needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users’ experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don’t like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users’ behavior and their devices. This includes a device’s IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our website. Hotjar stores this information on our behalf in a pseudonymized user profile. Hotjar is contractually forbidden to sell any of the data collected on our behalf.

9. THIRD PARTY SITES

Our Services may contain links to third-party sites. When you click on one of these links, you are visiting a website that is not operated by us, and the operator of such website may have different privacy rules. We are not responsible for the privacy practices of any third-party sites. This Privacy Policy does not apply to your activities on third-party sites or any information you disclose to third parties.

10. CONTACT US

We are responsible for the collection and processing of your Personal Information obtained in connection with the App and Services. If you have any questions, comments, or concerns about our processing activities, please contact us at info@vericardia.com.

11. CHANGES TO THIS PRIVACY POLICY

We may amend and/or otherwise modify this Privacy Policy at any time to appropriately represent our current policies. We will notify you of any changes to this Privacy Policy by sending you a notice to

the email address you provided to us during registration. Any such revisions will take effect one week after the posting. You understand and agree that your continued access or use of the App after such change signifies your acceptance of the updated or modified Privacy Policy.