

# WEBSITE PRIVACY POLICY

Last updated [12/31/2020]

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## INTRODUCTION

Ginkgo Health Group (“we” or “us” or “our”) respects the privacy of our users (“user” or “you”). This Privacy Policy explains how we treat personal information that we collect and receive through our website at ginkgohealthgroup.com and our cloud based platform Ginkgo AI, including any other media form, media channel, mobile website, or mobile application related or connected thereto (collectively, the “Site”) . Please read this privacy policy carefully.

You consent to the use of your information in accordance with this Privacy Policy by using this Site:

- a. directly, if you sign up for an account on our Site either as individuals or as clinics which are granted licenses to use our Ginkgo AI cloud based platform to help with clinical management (“Licensed Clinics”) ; or
- b. indirectly, if you are patients, employees, agents, vendors, or other related parties of our Licensed Clinics (collectively, the “Related Parties of Licensed Clinics”) without raising objections when the clinics inform you of this Privacy Policy and of the fact that your information will be uploaded and saved into our database as necessary to facilitate the clinics’ management.

If you do not agree to this Privacy Policy, please do not visit, install, use, register to or otherwise access any of our Site, If you are Related Parties of Licensed Clinics and do not agree to this Privacy Policy, please let our Licensed Clinics know about your disagreements so they wouldn’t upload and store your personal information in our database.

We reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the “Last Updated” date of this

Privacy Policy. Any changes or modifications will be effective immediately upon posting the updated Privacy Policy on the Site, and you waive the right to receive specific notice of each such change or modification.

You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the Site after the date such revised Privacy Policy is posted.

## **INFORMATION YOU PROVIDE TO US**

You may provide us with information in a variety of ways, including but not limited to:

- Registering/Signing Up at Our Site: When you choose to sign up for an account or newsletters on our Site;
- Using Our Products or Services: When you search for, order or use our products or services;
- Communications: When you contact us, submit a comment or an opinion through our Site, or register for more information regarding our products or services;
- Promotions: We may offer promotions, such as surveys and sweepstakes for which we need personal information to administer;
- Using Products or Services of Our Licensed Clinics: When our Licensed Clinics search for or order products or services on your behalf through our Ginkgo AI cloud based platform;
- Dealing or Interacting with Our Licensed Clinics: When you are Related Parties of Licensed Clinics and provide your information to our Licensed Clinics as necessary to their business management

## **INFORMATION WE COLLECT ABOUT YOU**

The information we may collect on the Site includes:

## **Personal Data**

Personally identifiable information, such as your name, physical address, email address, telephone number, internet protocol (IP) address, and demographic information, such as your age, gender that you voluntarily give to us or our Licensed Clinics when you contact us or our Licensed Clinics, visit our Sites, download/use our mobile applications or services, use products or devices from us or our Licensed Clinics, or view our or our Licensed Clinics' advertisements. You are under no obligation to provide us or our Licensed Clinics with personal information of any kind, however your refusal to do so may prevent you or our Licensed Clinics from using certain features of the Site.

## **Derivative Data**

Information our servers automatically collect when you access the Site, such as your IP address, your browser type, your operating system, your access times, and the pages you have viewed directly before and after accessing the Site.

## **Financial Data**

Financial information, such as data related to your payment method (e.g. valid credit card number, card brand, expiration date) that we may collect when you or your clinic on your behalf purchase, order, return, exchange products, or request information about our services from the Site.

## **Marketing Data**

We and our marketing partners may collect information regarding an interest in particular subject matter.

## **Device Data**

Device information, such as your mobile device ID, model, and manufacturer, and information about the location of your device, if you install or access the Site, depending on the permissions you've granted.

### **Third-Party Data**

Information from third parties, such as personal information or network friends, if you connect your account to the third party and grant the Site permission to access this information.

### **Data From Contests, Giveaways, and Surveys**

Personal and other information you may provide when entering contests or giveaways and/or responding to surveys from us or our Licensed Clinics.

## **USE OF YOUR INFORMATION**

Having accurate information about you permits us to provide you with a smooth, efficient, and customized experience. Specifically, we may use information collected via the Site to:

- Administer sweepstakes, promotions, and contests.
- Assist law enforcement and respond to subpoena.
- Compile anonymous statistical data and analysis for use internally or with third parties.
- Create and manage your account.
- Deliver targeted advertising, coupons, newsletters, and other information regarding promotions and the Site to you.
- Email you regarding your account or order.
- Fulfill and manage purchases, orders, payments, and other transactions related to the Site.
- Generate a personal profile about you to make future visits to the Site more personalized.
- Increase the efficiency and operation of the Site.
- Monitor and analyze usage and trends to improve your experience with the Site.
- Notify you of updates to the Site.
- Offer new products, services, mobile applications, and/or recommendations to

you.

- Perform other business activities as needed.
- Prevent fraudulent transactions, monitor against theft, and protect against criminal activity.
- Process payments and refunds.
- Request feedback and contact you about your use of the Site.
- Resolve disputes and troubleshoot problems.
- Respond to product and customer service requests.
- Send you newsletters.
- Solicit support for the Site and our health care products and services.

## **DISCLOSURE OF YOUR INFORMATION**

We may share information we have collected about you in certain situations. Your information may be disclosed as follows:

### **By Law or to Protect Rights**

If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.

### **Third-Party Service Providers**

We may share your information with third parties that perform services for us or on our behalf, including payment processing, data analysis, email delivery, hosting services, technology providers, customer service, and marketing assistance for the purpose of improving our services and products.

### **Marketing Communications**

With your consent, or with an opportunity for you or your clinic on your behalf to withdraw consent, we may share your information with third parties for marketing

purposes, as permitted by law.

### **Third-Party Advertisers**

We may use third-party advertising companies to serve ads when you visit the Site. These companies may use information about your visits to the Site and other websites that are contained in web cookies in order to provide advertisements about goods and services of interest to you.

### **Aggregated Data**

We may disclose aggregated, non-personal information about Site users or the Related Parties of Licensed Clinics without restriction.

### **Affiliates**

We may share your information with our affiliates (if any), in which case we will require those affiliates to honor this Privacy Policy. 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.

### **Social Media Contacts**

If you connect to the Site through a social network, your contacts on the social network will see your name, profile photo, and descriptions of your activity.

### **Other Third Parties**

We may share your information with advertisers and investors for the purpose of conducting general business analysis. We may also share your information with such third parties for marketing purposes, as permitted by law.

### **Sale or Bankruptcy**

If we reorganize or sell all or a portion of our assets, undergo a merger, or are acquired by another entity, we may transfer your information to the successor entity. If we go out of business or enter bankruptcy, your information would be an asset transferred or acquired by a third party. You acknowledge that such transfers may occur and that the transferee may decline honor commitments we made in this Privacy Policy.

We are not responsible for the actions of third parties with whom you share personal or sensitive data, and we have no authority to manage or control third-party solicitations. If you no longer wish to receive correspondence, emails or other communications from third parties, you are responsible for contacting the third party directly.

## **THIRD-PARTY WEBSITES**

The Site may contain links to third-party websites and applications of interest, including advertisements and external services, that are not affiliated with us. Once you have used these links to leave the Site, any information you provide to these third parties is not covered by this Privacy Policy, and we cannot guarantee the safety and privacy of your information. Before visiting and providing any information to any third-party websites, you should inform yourself of the privacy policies and practices (if any) of the third party responsible for that third-party website, and should take those steps necessary to, in your discretion, protect the privacy of your information. We are not responsible for the content or privacy and security practices and policies of any third parties, including other sites, services or applications that may be linked to or from the Site.

## **SECURITY OF YOUR INFORMATION**

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure your personal information, please be aware that despite our efforts, no security measures are perfect

or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, please be aware that we cannot guarantee complete security of your personal information.

## **POLICY FOR CHILDREN**

We do not knowingly solicit information from or market to children under the age of 13. If you become aware of any data we or our licensed clinics have collected from children under age 13, please contact us using the contact information below

## **CONTROLS FOR DO-NOT-TRACK FEATURES**

Most web browsers and some mobile operating systems 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. No uniform technology standard for recognizing and implementing DNT signals has 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 must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.

## **OPTIONS REGARDING YOUR INFORMATION**

### **Account Information**

You or your clinic on your behalf may at any time review or change the information in your account or health care file by:

- Logging into your or your clinic’s account settings and updating your information
- Contacting us using the contact information provided below

Upon termination of your account or upon termination of your clinic’s license agreement



if you are Related Parties of Licensed Clinics, we will deactivate or delete your information from our active databases. However, some information may be retained in our files as we deem necessary to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use, resolve disputes, and/or comply with legal requirements.

### **Emails and Communications**

If you no longer wish to receive correspondence, emails, newsletters, or other communications from us, you may opt-out by contacting us using the contact information provided below

If you no longer wish to receive correspondence, emails, newsletters, or other communications from third parties, you are responsible for contacting the third party directly.

## **CONTACT US**

If you have questions or comments about this Privacy Policy, please contact us at: [support@ginkgohealing.com](mailto:support@ginkgohealing.com).