



GLNT Privacy Policy

Updated April 30, 2019

Great Lakes NeuroTechnologies's Privacy Approach

Great Lakes NeuroTechnologies ("GLNT") takes the privacy of its Customers seriously. Below is the GLNT Privacy Policy, which governs the way in which GLNT processes any personal information that the Customer provides to us. If GLNT changes the Privacy Policy, GLNT will post an updated version thereof on their website, which is available on demand, so that the Customer can always access the Privacy Policy and understand how GLNT treats any personal information that is collected.

1. Collection and Use of Personal Information

Personal information is data that, using reasonable methods, can identify a single person.

You may be asked to provide your personal information anytime you are in contact with GLNT or a GLNT affiliated company. GLNT and its affiliates may share this personal information with each other and use it consistent with this Privacy Policy. They may also combine it with other information to provide and improve our products, services, content, and advertising. You are not required to provide the personal information that we have requested, but, if you chose not to do so, in many cases we will not be able to provide you with our products or services or respond to any queries you may have.

Here are some examples of the types of personal information GLNT may collect and how we may use it:

a. What personal information we collect

- When you create a user ID, purchase a product, download a mobile application ("app"), download a software update, connect to our services, contact us including by social media or participate in an online survey, we may collect a variety of information, including your name, mailing address, phone number, email address, contact preferences, device identifiers, IP address, location information, credit card information and profile information where the contact is via social media.
- In certain jurisdictions, we may ask for a government issued ID in limited circumstances including when setting up a wireless account, activating your device, verifying prescriptions, or as required by law.

b. How we use your personal information

We may process your personal information: for the purposes described in this Privacy Policy, with your consent, for compliance with a legal obligation to which **GLNT** is subject or when we have assessed it is necessary for the purposes of the legitimate interests pursued by GLNT or a third party to whom it may be necessary to disclose information.

- **GLNT** and its affiliates, its authorized carriers and service providers will use the Customer's personal information for the purpose of administering **GLNT's** relationship with the Customer, such as, order fulfillment, verifying the customer's identity and delivery address, authorizing debit/credit card payments and processing any other transactions authorized by the Customer. **GLNT** may also wish to inform Customers of special offers, undertake product or customer research/development and provide other marketing information to the Customer which **GLNT** thinks the Customer may find of interest. If a Customer does not wish to receive any marketing information they may request that their details are excluded from any promotional activity by contacting **GLNT** at the address displayed in section below.
- We also use personal information to help us create, develop, operate, deliver, and improve our products, services, content and advertising, and for loss prevention and anti-fraud purposes. We may also use your personal information for account and network security purposes, including in order to protect our services for the benefit of all our users. Where we use your information for anti-fraud purposes it arises from the conduct of an online transaction with us. We limit our uses of data for anti-fraud purposes to those which are strictly necessary and within our assessed legitimate interests to protect our customers and our services. For certain online transactions we may also validate the information provided by you with publicly accessible sources.
- We may use your personal information, including date of birth, to verify identity, assist with identification of users, and to determine appropriate services. For example, we may use date of birth to determine the age of **GLNT** account holders.
- From time to time, we may use your personal information to send important notices, such as communications about purchases and changes to our terms, conditions, and policies. Because this information is important to your interaction with **GLNT**, you may not opt out of receiving these communications without being completely removed from our databases and services.

- We may also use personal information for internal purposes such as auditing, data analysis, and research to improve **GLNT's** products, services, and customer communications.

c. Source of your personal information where they are not collected from you

We may have received your personal information from other persons, such as a healthcare provider who was invited or prescribed for you to participate in or utilize **GLNT's** products and/or services. We may also validate the information provided by you when creating a user ID with a third party for security and fraud prevention purposes.

2. Collection and Use of Non-personal Information

We also collect data in a form that does not, on its own, permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose. The following are some examples of non-personal information that we collect and how we may use it:

- We may collect information such as occupation, language, zip code, area code, unique device identifier, referrer URL, location, and the time zone where a **GLNT** product is used so that we can better understand customer behavior and improve our products, services, and advertising.
- We may collect information regarding customer activities on our website and from our other products and services. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our website, products, and services are of most interest. Aggregated data is considered non-personal information for the purposes of this Privacy Policy.

If we do combine non-personal information with personal information the combined information will be treated as personal information for as long as it remains combined.

3. Who May Process Data

- Personal information will only be collected with the Customer's consent.
- The Customer's personal information (as defined above) may be processed by **GLNT**.
- **GLNT** may disclose or receive personal information or documents about the Customer to/from other companies within the **GLNT** group, its authorized carriers and its service providers including Credit Reference agencies.
- **GLNT** may be required to disclose personal information or documents about a customer if required to do so by law in accordance with US legislation or other countries' regulatory bodies or representatives.
- **GLNT** will not disclose your personal information to any third parties without your consent.

4. Quality

- **GLNT** will take all reasonable steps to ensure that personal information that is held is accurate, complete and up to date.

5. Cookies

- A small file may be sent by **GLNT** to the Customer's computer or device when the Customer visits **GLNT**'s Website or interacts with the device and/or app. This will enable **GLNT** to identify the Customer's computer, device, and/or app, track their behavior on **GLNT**'s Website or app, and to identify the Customer's particular areas of interest so as to enhance the Customer's future interactions with **GLNT**. **GLNT** may use cookies to collect and store personal data and link information stored by cookies with personal data the Customer supplies to **GLNT**. Save for the use of cookies and sensor data associated with various products and/or apps, **GLNT** does not automatically log data or collect data apart from information the Customer specifically provides to **GLNT**. The Customer can change their settings to reject cookies but this may preclude the Customer's use of certain parts of the Website or app.
- Information collected by cookies and other technologies that may include Internet Protocol (IP) addresses or similar identifiers are considered personal information. Similarly, to the extent that non-personal information is combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Policy.

6. Security Measures

- **GLNT** uses Secure Sockets Layer (SSL) encryption when collecting or transferring sensitive data such as credit card information. SSL encryption is designed to make the information unreadable by anyone but the intended receiver. Use of this security measure is often indicated by either an unbroken key or closed lock (depending on your browser) or the 'https' (as opposed to 'http') prefix on the site address.
- Notwithstanding the above, **GLNT** cannot guarantee the protection of Customers' personal data transmitted electronically due to the nature of the Internet. Customers should be aware that when personal information is disclosed on the Internet it may be collected by another user and may result in unsolicited messages from other Internet users.

7. Information Sharing

GLNT does not trade, sell or rent your personally identifiable information other than as outlined in this privacy policy. **GLNT** will only share your personally identifiable information in the following situations:

1. **GLNT** has your consent to share the information
2. **GLNT** needs to provide the information to other companies or healthcare providers to fulfill your request for a product or service. For example; a shipping company, credit card processing company, prescribing physician, or service partner. (Without your consent, these companies do not have the right to use the personally identifiable information provided beyond what is necessary to assist **GLNT**.)
3. **GLNT** finds that your actions violate the usage guidelines outlined in any of the **GLNT** Terms and Conditions.
4. **GLNT** feels that an emergency situation has arisen which requires us to release information before you can be contacted for consent. For example; a verified family emergency.
5. It may be necessary – by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence – for **GLNT** to disclose your personal information. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate. We may also disclose information about you, but only where there is a lawful basis for doing so, if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users. This could include providing information to public or governmental authorities. Additionally, in the event of a reorganization, merger, or sale we may transfer any and all personal information we collect to the relevant third party.
6. As part of an audit process through which a 3rd party is assessing the security, quality, integrity or such or **GLNT**'s policies, procedures and systems. All efforts will be made to prevent any such information from being passed any further by using non-personal reference identifiers in any report resulting from such an audit and any such auditor and auditing agency would be bound to confidentiality on any such data or information potentially revealed.

When your information is shared with third parties, we require those third parties to handle it in accordance with relevant laws. Personal information will never be shared with third parties for their marketing purposes.

8. Links

- The **GLNT** website or app may contain links to other web sites. **GLNT** is not responsible for the privacy practices of sites owned and operated by other companies. When you leave the **GLNT** web site, please read the privacy policies of each web site that collects personally identifiable information. This privacy statement applies solely to information collected by **GLNT**, and such information remains private and secure when you follow links to other web sites.

9. Anti-Spamming Policy

GLNT is committed to a zero-tolerance, anti-Spamming policy. Under this policy, we prohibit:

- Manipulating identifiers, such as email headers, to disguise the origin of any content transmitted to or through **GLNT**'s computer systems.
- Relaying email through a third party's mail servers without the permission of that third party.
- Using or causing to be used **GLNT** computer systems to facilitate the transmission of unsolicited, unauthorized material. This includes any promotional materials, URL's, "junk mail," "chain letters," "pyramid schemes," or any other form of unauthorized solicitation that you may upload, post, email, transmit, or otherwise make available
- Using "robots" or otherwise harvesting others' email addresses from the **GLNT** servers for purposes of sending unsolicited or unauthorized material
- Uploading, posting, emailing, or transmitting the same message, URL, or post multiple times
- Allowing third parties to contact our customer database without the customer's prior consent
- Emailing non **GLNT** customers promotional or marketing materials without their prior consent
- Emailing **GLNT** customers who have opted out of email based contact promotional or marketing materials without their prior consent.

10. Voluntary Customer Surveys

In keeping with **GLNT**'s commitment and obligation to monitor customer satisfaction and improvement opportunities, **GLNT** may periodically conduct both business and individual

customer surveys. We encourage our customers to participate in these surveys because they provide us with important information that helps us to improve the types of services we offer and how we provide them to you. Your personal information and responses will remain strictly confidential, even if the survey is conducted by a third party. Participation in our customer surveys is voluntary. We take the information we receive from individuals responding to our customer surveys and combine (or aggregate) it with the responses of other **GLNT** customers to create broader, generic responses to the survey questions (such as gender, age, residence, hobbies, education, employment, industry sector, or other demographic information). We then use the aggregated information to improve the quality of our Services to you, and to develop new services and products. This aggregate, non-personally identifying information may be shared with third parties.

11. Other Partners and Sponsors

- Some **GLNT** products and services are or may be offered in conjunction with a non-affiliated partner. To provide some of these products and services, the partner may need to collect and maintain personal information. In these instances, you will be notified before any such data is collected or transferred and may decide not to use that particular service or feature. **GLNT** will share non-personal and aggregate information (except as described above), but not personal information, with such partners in order to administer any such co-branded products or services offered.
- At some websites, you can purchase products and services or register to receive materials, such as a brochure, a catalog or new product and service updates. In many cases, you may be asked to provide contact information, such as your name, address, email address, phone number, and credit/debit card information. **GLNT** has no control over the third parties' use of any personal information you provide when placing such an order. We strongly suggest you review the third parties' privacy policy before providing any of your information.

12. Special Cases

It is **GLNT's** policy not to use or share the personal information about individuals in ways unrelated to the ones described above without also providing you an opportunity to opt out or otherwise prohibit such unrelated uses. However, **GLNT** may disclose personal information about individuals, or information regarding your use of the Services or internet sites accessible through our Services, for any reason if, in our sole discretion, we believe that it is reasonable to do so, including: to satisfy laws, such as the Electronic Communications Privacy Act, regulations, or governmental or legal requests for such

information; to disclose information that is necessary to identify, contact, or bring legal action against someone who may be violating our terms of uses or other policies; to operate the Services properly; or to protect **GLNT** and our customers.

13. Location-Based Services

To provide location-based services on **GLNT** products, **GLNT** and our partners and licensees may collect, use, and share precise location data, including the real-time geographic location of your **GLNT** product or device utilizing a **GLNT** app. Where available, location-based services may use GPS, Bluetooth, and your IP Address, along with crowd-sourced Wi-Fi hotspot and cell tower locations, and other technologies to determine your devices' approximate location. Unless you provide consent, this location data is collected anonymously in a form that does not personally identify you and is used by **GLNT** and our partners and licensees to provide and improve location-based products and services. For example, your device may share its geographic location with application providers when you opt in to their location services.

14. Retention of Personal Information

GLNT will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy and our service specific privacy summaries. When assessing these periods we carefully examine our need to collect personal information at all and if we establish a relevant need we only retain it for the shortest possible period to realize the purpose of collection unless a longer retention period is required by law.

15. Revisions to this Policy

GLNT reserves the right to revise, amend, or modify this policy and our other policies and agreements at any time and in any manner.

16. Conflicts with this Policy

If the terms of any **GLNT** agreement or Terms & Conditions should conflict with the terms of this Policy with respect to the collection, control, and use of your information, then this Policy shall control.

17. Contact Details

If the Customer has any inquiries or concerns about this Privacy Policy, or wishes **GLNT** to cease processing the information it has about that Customer as a result of the Customer's use of **GLNT**'s web site, please contact **GLNT** at the address below:

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