

RESOLUTION LABS, LLC Privacy Policy

Effective Date 16Jan2024

ABOUT THIS POLICY

RESOLUTION LABS, LC (“RL”) values your privacy and the protection of your personal data. This policy (“Policy”) explains how RL its affiliates, subsidiaries or related companies, a full list of which can be found below (together, “RL,” “our,” “us,” or “we”), collects, uses, shares, transfers and processes data collected from or about you.

LIST OF AFFILIATES:

RESOLUTION LABS, LLC
SEPQUANT, INC.

“Personal Data” is any information that can be used to directly or indirectly identify an individual or that can be reasonably expected to link to an individual. This can include items such as name, address, telephone number, credit card details, email address, ID number, Internet Protocol (“IP”) address of an electronic device used by an individual, or other identifying code (even absent of other identifying information). Statistical and non-identifiable metric data are not considered Personal Data.

SCOPE: This Policy describes the types of Personal Data that we may collect, process or disclose about you and how you may govern this processing by exercising applicable legal rights. This Policy applies to both online and offline information collection, including your use of websites or subdomains operated by us, any mobile applications, when we provide products and/or services to you or notify you about prospective items of interest and in other situations where you interact with us in-person, by telephone or by mail where this Policy is posted or referenced.

There may be occasion where you have been provided with a circumstance-specific privacy notice that is separate from this policy, such as privacy notices for specific activities such as recruitment. To the extent you were provided with a different notice, those notices apply and govern our interactions with you. If you provide Personal Data about parties other than yourself, you are responsible for ensuring their knowledge of how we will process their personal data, and, where applicable, obtaining any necessary consents required in advance.

We are committed to processing Personal Data in accordance with applicable laws. Please note that if you do not wish to provide your Personal Data to us, some products and/or services may become unavailable to you. Your use of any or all these platforms indicates you have been notified of our collection, use, transfer, and disclosure of your information as described in this Policy to the extent permitted by applicable law.

YOUR INFORMATION:

We connect with individuals for many different reasons. Those interactions may result in us directly or indirectly gaining access to Personal Data about you. The below summarizes how we may collect, process, and use Personal Data, our legal basis for processing your information, and the potential recipients of your information. Please note, not all instances may be applicable in all circumstances.

GENERAL CATEGORIES OF PERSONAL DATA COLLECTED

The below denotes the categories and sources of Personal Data that may be processed under this Policy in addition to the purposes and legal bases for such processing. Please note that the items contained within this table may be shared, received or processed by RL, our partners that assist us in providing the products or services or help us improve our marketing or administration, Healthcare Practitioners (“HCPs”), patients, persons with the legal right to access the Personal Data and Parties involved in potential business transactions.

Identity and Contact Information:

Examples of Personal Data Processed- Transaction records, products and services (purchased, obtained, or considered), requested documentation, customer service records, financial transaction history, transfers of value, and financial account number.

Sources of Personal Data- Directly from you; from your devices; from our business partners; from publicly available sources; from your Healthcare Practitioner; from your patients; from other subsidiaries, affiliates or related companies of RL.

Purpose of Processing the Personal Data - To provide you with our products and services; to communicate with you; to identify and authenticate you; to customize content for you; to detect security incidents; to protect against malicious or illegal activity; to ensure the appropriate use of our products and services; to improve our products and services; for short-term, transient use; for administrative purposes; for marketing, internal research, and development; and/or for quality assurance.

Legal Basis for Processing the Personal Data- For the purposes of our legitimate interests; in the public interest; to comply with a legal obligation; to perform a contract; in circumstances where we have requested and received consent; and for other purposes that may be required or allowed by law dependent upon the type of Personal Data.

Demographic Information:

Examples of Personal Data Processed- Age, gender, marital status, disability, and date of birth.

Sources of Personal Data- Directly from you; from your devices; from our business partners; from publicly available sources; from your Healthcare Practitioner; from your patients; from other subsidiaries, affiliates or related companies of RL.

Purpose of Processing the Personal Data - To provide you with our products and services; to communicate with you; to identify and authenticate you; to customize content for you; to detect security incidents; to protect against malicious or illegal activity; to ensure the appropriate use of our products and services; to improve our products and services; for short-term, transient use; for administrative purposes; for marketing, internal research, and development; and/or for quality assurance.

Legal Basis for Processing the Personal Data- For the purposes of our legitimate interests; in the public interest; to comply with a legal obligation; to perform a contract; to protect vital interests; for the purposes of assisting medical treatment and/or diagnosis; ensuring quality and safety of

medical products/services/devices; in circumstances where we have requested and received consent; and for other purposes that may be required or allowed by law dependent upon the type of Personal Data.

Commercial and Financial:

Examples of Personal Data Processed- Transaction records, products and services (purchased, obtained, or considered), requested documentation, customer service records, financial transaction history, transfers of value, and financial account number.

Sources of Personal Data- Directly from you; from your devices; from our business partners; from publicly available sources; from your Healthcare Practitioner; from your patients; from other subsidiaries, affiliates or related companies of RL.

Purpose of Processing the Personal Data - To provide you with our products and services; to communicate with you; to identify and authenticate you; to customize content for you; to detect security incidents; to protect against malicious or illegal activity; to ensure the appropriate use of our products and services; to improve our products and services; for short-term, transient use; for administrative purposes; for marketing, internal research, and development; and/or for quality assurance.

Legal Basis for Processing the Personal Data- For the purposes of our legitimate interests; in the public interest; to comply with a legal obligation; to perform a contract; in circumstances where we have requested and received consent; and for other purposes that may be required or allowed by law dependent upon the type of Personal Data.

Professional and Educational Information:

Examples of Personal Data Processed- Job title or position, employer, National Provider Identifier number, work skills, employment history, graduate degree, certification, specialized training, responses to surveys and questionnaires, and enrollment history for our education and training events, LinkedIn profile.

Sources of Personal Data- Directly from you; from your devices; from our business partners; from publicly available sources; from your Healthcare Practitioner; from your patients; from other subsidiaries, affiliates or related companies of RL.

Purpose of Processing the Personal Data- To provide you with our products and services; to communicate with you; to identify and authenticate you; to customize content for you; to detect security incidents; to protect against malicious or illegal activity; to ensure the appropriate use of our products and services; to improve our products and services; for short-term, transient use; for administrative purposes; for marketing, internal research, and development; and/or for quality assurance.

Legal Basis for Processing the Personal Data- For the purposes of our legitimate interests; in the public interest; to comply with a legal obligation; to perform a contract; ensuring quality and safety of medical products/services/devices; in circumstances where we have requested and received consent; and for other purposes that may be required or allowed by law dependent upon the type of Personal Data.

Technical Information:

Examples of Personal Data Processed- IP addresses, browser type, browser language, device type, advertising IDs associated with your device (such as Apple's Identifier for Advertising (IDFA) or Android's Advertising ID (AAID)), the date and time you use our products and services, Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our products and services, activity on our products and services and referring websites or applications, data collected from cookies or other similar technologies, and geolocation information.

Sources of Personal Data- Directly from you; from your devices; from our business partners; from publicly available sources; from your Healthcare Practitioner; from your patients; from other subsidiaries, affiliates or related companies of RL.

Purpose of Processing the Personal Data - To provide you with our products and services; to communicate with you; to identify and authenticate you; to customize content for you; to detect security incidents; to protect against malicious or illegal activity; to ensure the appropriate use of our products and services; to improve our products and services; for short-term, transient use; for administrative purposes; for marketing, internal research, and development; and/or for quality assurance.

Legal Basis for Processing the Personal Data- For the purposes of our legitimate interests; in the public interest; to comply with a legal obligation; to perform a contract; to protect vital interests; for the purposes of assisting in medical treatment and/or diagnosis; ensuring quality and safety of medical products/services/devices; in circumstances where we have requested and received consent; and for other purposes that may be required or allowed by law dependent upon the type of Personal Data.

Health Information:

Examples of Personal Data Processed- Information regarding your treatment, including your date of birth, sex/gender, treatment dates, medical history, and treatment information, patient-reported outcome measures (e.g., responses to questionnaires and surveys), X-rays, magnetic resonance imaging, medical scans, user activity, pictures and videos of treatment activities, therapy completion and use details, and communications with your Healthcare Provider and/or patient, including audio and/or video from telehealth sessions, allergy information; Medical Insurance Information and details pertaining thereto.

Sources of Personal Data- Directly from you; from your devices; from our business partners; from publicly available sources; from your Healthcare Practitioner; from your patients; from other subsidiaries, affiliates or related companies of RL.

Purpose of Processing the Personal Data- To provide you with our Products and Services; to communicate with you; to identify and authenticate you; to customize content for you; to detect security incidents; to protect against malicious or illegal activity; to ensure the appropriate use of our Products and Services; to improve our Products and Services; for short-term, transient use; for administrative purposes; for marketing, internal research, and development; and/or for quality assurance.

Legal Basis for Processing the Personal Data- For the purposes of our legitimate interests; in the public interest; to comply with a legal obligation; to perform a contract; to protect vital interests; for the purposes of medical treatment and/or diagnosis; ensuring quality and safety of medical products/services/devices; in circumstances where we have requested and received consent; and for other purposes that may be required or allowed by law dependent upon the type of Personal Data.

HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA):

If you are a patient based in the US, please note that this Policy is distinct from your Healthcare Practitioner's HIPAA Notice of Privacy Practices, which describes how your HCP uses and discloses individually identifiable information about your health that it collects, as well as any other privacy practices it applies. Personal Data we receive on behalf of your Healthcare Practitioner is not subject to this Policy.

AGGREGATED, ANONYMIZED AND DE-IDENTIFIED DATA:

RL may process anonymized and/or de-identified data. This is data for which the characteristics that can identify you, directly or indirectly, have been removed such that you are no longer identifiable, and this information is no longer considered Personal Data under data protection laws. This includes in the United States the removal of identifiers from protected health information required under HIPAA, 45 CFR § 164.514(b)(2), for such data to be considered deidentified. We rely on our legitimate business interest, scientific or historical research and/or statistical purposes, consent or other purposes that may be required or allowed by law as the legal basis to anonymize Personal Data.

We may also obtain and use certain types of combined data sets such as demographic data for any purpose ("Aggregated Data"). Aggregated Data may be derived from your personal data but does not directly or indirectly reveal your identity. For example, we may aggregate certain information technology-related data of yours with others' data to calculate the percentage of users accessing a specific feature on our website. We may use Aggregated Data for any purpose without restriction. However, if we re-combine or re-connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Policy.

COMBINING INFORMATION:

We combine information we collect on the website with information we receive from you in person, by email, or by other forms of communication. We also combine information you provide with information we obtain from third parties, service providers, publicly available sources and our subsidiaries, affiliates or related companies.

INFORMATION COLLECTED FROM CHILDREN:

Our sites and apps are meant for adults. We do not knowingly collect Personal Data from children 17 years old or younger without permission from a parent or legal guardian. If you are a parent or legal guardian and think your child has given us information, you can email or write to us using the details in the 'Contact Us' section below.

INFORMATION STORAGE:

We may transfer, process, and store your information to the US, Canada, or European Union member states, the United Kingdom, or other countries. Our affiliates or other third-party service providers may also transfer, process, or store your information in the US or other countries. Our sites and businesses may be subject to US laws, which may not afford the same level of protection as those in your country.

CROSS BORDER DATA TRANSFERS:

We may transfer your Personal Data to recipients in countries other than the country in which your Personal Data was originally collected. When we transfer your Personal Data in such a manner, we take steps for your data to be protected consistent with the laws and requirements in your country, including the requirements that apply to cross-border data transfers. We implement appropriate technical and organizational measures to provide a level of security appropriate to the risk of protecting your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access. As is the case with all websites, applications, products, and services, we unfortunately cannot guarantee security of the data collected at all times.

SALE OR TRANSFER OF DATA:

If we are involved in a sale or transfer of all or some of our business assets or operations via a share or asset transaction, your personal data may be transferred to the acquiring organization who will be required to take at least the same or higher standards of care in the treatment of your Personal Data. Should such a sale or transfer occur, if required by law, you will be informed about this and may withdraw your consent to or, as applicable, instigate any other legally available rights as detailed in the “Rights and Choices” section of this Policy with regards to the processing and use of your Personal Data by the transferee.

COOKIES, WEB BEACONS AND OTHER TRACKING TOOLS”

As outlined in the table above your interaction with our websites is an additional source for collecting your information. We may use “cookies”, web beacons, and other technologies to help us evaluate and improve the content or functions of the products or services we provide. We collect your information through several methods:

- Web beacons
- Pixels
- Tags
- Tracking Cookies
- Marketing Cookies
- Analytic Cookies
- Social Media Cookies

Our Cookie Policy provides more detailed information about this topic and how we use cookies to enhance your experience and better serve you.

THIRD PARTY LINKS AND TOOLS:

We may link to other sites or apps on our platforms that we do not control. If you click on a third-party link, you will be taken to a platform we do not control. This policy does not apply to the privacy practices of that website or platform. Read other companies' privacy policies carefully. We are not responsible for these third parties. Our site may also serve third party content that contains their own cookies or tracking technologies. We do not control the use of those technologies.

DATA RETENTION:

We will retain Personal Data for as long as is necessary to carry out the purposes the Personal Data was collected for or for the period prescribed by applicable laws, whichever is longer. In considering how long to retain your Personal Data the following are considered:

- The potential risk of harm if the data was subject to unauthorized use or disclosure;
- The volume and sensitivity of the Personal Data;
- Applicable legal requirements; and
- If circumstances have changed such that the purposes for which the Personal Data was collected can be achieved by other means.

When the retention of your Personal Data is no longer required we will delete or anonymize the data as per the details provided above.

YOUR RIGHTS AND CHOICES:

Some jurisdictions have provided individuals with rights in relation to the processing of their Personal Data. These rights are not available to everyone, and they do not necessarily apply in all contexts. Depending on the applicable law or the legal basis, you may have the right to:

- Object to the processing of your Personal Data;
- Request access to your Personal Data;
- Request correction of your Personal Data should your Personal Data be inaccurate, incomplete, or obsolete;
- Request erasure/deletion of your Personal Data;
- Withdraw your consent to future processing where we processed Personal Data on the basis of your consent;
- Request restrictions on the processing of your Personal Data, including restricting the sale of or sharing of your Personal Data;
- Request the transfer of your Personal Data to yourself or a third party;
- Opt-out of certain transfers to third parties.

To exercise a right that you believe you may be entitled to under applicable law you can contact us directly by submitting a request through this web site. We may need to verify your identity before we fulfill your request or, under applicable law, we may be unable to action your submission. We shall notify you in a timely manner of such decisions or requirements as necessary.

Filing a Complaint. If you are not able to resolve a problem directly with us and wish to make a formal complaint, you can contact your local data protection authority or other enforcement authority.

CONTACT US:

If you have any questions about this Policy or our data practices, you can write to us at:

Resolution Labs, LLC
Attn: Data Privacy Office
1428 Ryan Road
New Haven, IN 46745
USA

POLICY UPDATES:

From time to time we may change our privacy policies. The most updated copy will be found on our website. Please check our site periodically for updates.