

-Laguna's Site and Services Privacy Policy

Last Revised: December 23, 2020

Laguna Health Inc. (“Laguna”, “we” or “us”) respects the privacy of the users of its Site or Services (“User” or “you”) and is committed to protect its Users’ personal information. We believe that you have a right to know our practices regarding the information we may collect and use about you when you use our Site or Services. Please read the following carefully to understand Laguna’s views and practices regarding your personal information.

Capitalized terms which are not defined herein, shall have the meaning ascribed to them in our Terms of Use available at <http://docs.getlaguna.com/terms.pdf>, into which this Privacy Policy is incorporated by reference.

1. Your consent (please read carefully)

BY ENTERING, CONNECTING TO, ACCESSING OR USING THE SITE OR OUR SERVICES, YOU AGREE TO THE TERMS AND CONDITIONS SET FORTH IN THIS PRIVACY POLICY, INCLUDING TO THE POSSIBLE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION AS SPECIFIED HEREIN. **PLEASE NOTE:** IF YOU DISAGREE WITH ANY TERM PROVIDED HEREIN, PLEASE REFRAIN FROM CONNECTING, ACCESS OR USING OUR SITE OR SERVICES.

2. Which information may we collect about Users?

We collect two types of data and information from our Users:

- 2.1. **Non-personal Information.** The first type of information is non-identifiable and anonymous information (“**Non-personal Information**”). **We are not aware of the identity of the User from whom we have collected the Non-personal Information.** Non-Personal Information is any unconcealed information which does not enable identification of an individual User, and which is available to us when such User uses our Site. Non-personal Information which is being gathered consists of technical information, behavioral information and aggregated information, and may contain, among other things, the activity of the User on the Site, type of operating system, device type, User's 'click-stream' on the Site, keyboard language, screen resolution, time spent on various screens of the Site, metadata, etc.
- 2.2. **Personal Information.** The other type of information we collect is individually identifiable information. To put it simply, this information identifies an individual or is of a private and/or sensitive nature, such as your contact information (“**Personal Information**”), including:

2.2.1. Personal Information that is provided voluntarily:

- **Communications with Laguna:** Personal Information you provide us as part of any communications with Laguna, by any means, including by approaching our customer services, or approaching us in order to receive technical support, including by phone (such information may include marketing and communication data that includes your preferences in receiving marketing from us and your communication preferences). We may record such calls for quality assurance purposes and in order to improve our Services.
- **Contact and Registration Details:** Personal Information is collected from the details the Users provide us as part of setting their Account, which includes the User's first and last name, email address and mobile telephone number. Additional information may be requested in the future.
- **Medical-related Forms:** Personal Information may also be included in medical and insurance related forms you may fill out on the Site or in connection with our Services. For example, we will be able to obtain your medical records per your request, once you will have completed and submitted the Authorization Form.
- **Personal Health Information:** Personal information concerning your medical condition (“**PHI**”) will be provided to us by you. You may provide us with PHI upon opening an

Account, in communications with us, or otherwise. You may also authorize us to collect your PHI from insurers and/or Medical Providers (e.g. in the Authorization Form). Any PHI that you choose to provide us with, or otherwise make accessible to us, will be protected in accordance with the strictest standards of the Health Insurance Portability and Accountability Act ("HIPAA") and applicable laws.

2.2.2. Personal Information collected via technology:

- Location Data
 - Geolocation: While using the Site or Services, we will collect, process, monitor and/or remotely store your IP address, which allows us to determine your approximate location ("Geolocation") using a third-party service provider. We may use this information for analyzing the usage of our Services and for security purposes.
 - Device Location: In such case that you permit us to use location services on your device, we will collect, process and/or remotely store your accurate location information as reported by the device's GPS sensor. Users are able to stop this information collection at any time by disabling location access in your device settings.
 - Personalization: Your device location or Geolocation may be used to personalize your experience and the Services provided to you. For example, we may send you messages or reminders as you leave the premises of the hospital.

For avoidance of doubt, any Non-personal Information connected or linked to or associated with any Personal Information shall be deemed as Personal Information as long as such connection, linkage or association exists.

3. How do we collect information about our Users?

There are several methods we use to collect information:

- 3.1. **We collect information through your entry, connection, access and/or use of the Site or Services.** In other words, when you are using the Site or our Services, we are aware of it and may gather, collect and store the information relating to such usage (such as the Non-personal Information detailed above and your IP address), either independently or through the help of our authorized third-party service providers as detailed below.
- 3.2. **We collect information that you provide us voluntarily.** We collect Personal Information, or are exposed to Personal Information, as detailed in Section 2.2.1 above
- 3.3. **We collect information we receive from our Medical Provider.** Some Users may be referred to our Services via a Medical Provider. Other Users may authorize us to obtain Personal Information from Medical Providers. Depending on the circumstances and your permissions, the Medical Providers may provide us with your contact details and/or PHI.

We may gather, collect and store such information either independently or through the help of our authorized third-party service providers as detailed below.

4. What are the purposes of the collection and processing of information?

4.1. Non-personal Information is processed in order to:

- Enhance the User's experience of our Services;
- Create statistical information and learn about the preferences of Users and general trends on our Services (e.g. understand which features are more popular than others);
- Keep the Site and Services safe and secure, and prevent fraud; and
- Improve, develop and upgrade our Services.

4.2. Personal Information is processed in order to:

- Enable the operation of the Site and/or Services and administer your Account;
- Respond to your inquiries or support requests;
- Provide the full functionality of the Services, with the main purpose of providing you with tailored, personalized and relevant information and/or reminders related to a medical condition and/or a particular treatment;
- Send notifications, emails or messages (whether general or User-specific) to the User, whether as part of the Services or in connection with the Services;
- Verify the User's identity when s/he signs in to the Account;
- Determine general geo-location information (i.e., state) from which the User's device is connected to the Internet and GPS information of the User's device in order for us to show Users geographically relevant content, and/or services in Users' vicinity;
- Add your contact details to our mailing list for the purposes of sending you information, status updates relevant to your treatment (when applicable), updates about Laguna's developments, products and services, new offerings, research or news by email, SMS, phone, through web-browser notification or through the post. You have the right to opt-out of marketing messages at any time by following the instructions in such message or by contacting us at: connect@getlaguna.com
- Enable us to contact Users for the purpose of providing them with technical assistance and in order to provide them the Services;
- Provide Users with updates, notices, announcements, and additional information related to Laguna including with respect to changes made to our Terms;
- Conduct internal operations, including troubleshooting, data analysis, testing, research and statistical purposes;
- Keep the Site and Service safe and secure and for prevention of fraud and crime;
- Comply with our legal obligations and in order to be able to protect our rights and legitimate interests;
- Maintain our data processing records and general administrative purposes; and
- Email tracking – we may use tracking technology within the email we may send you in order to improve interactions with you and to better understand whether our emails were opened and read, and such tracking may include capturing the time and date in which you opened our email messages and the type of device you use to open such emails.

5. Sharing Personal Information with Third Parties

5.1. Laguna respects your privacy and will not disclose, share, rent, or sell your Personal Information to any third party, other than as permitted under this Privacy Policy.

5.2. In addition to using the information collected by us for the purposes described under Section 4 above, we may also share your information in the following cases:

- **Laguna Personnel**: Personal Information that we collect and process may be transferred to or accessed by personnel of Laguna for the sole purpose of enabling the operation of the Site and Service and to contact you. Please note that all Laguna personnel that will have access to your Personal Information are under an obligation of strict confidentiality with respect to such Personal Information.
- **Service Providers**: we may share Personal Information with our authorized service providers, including our affiliates, commercial software providers, consultants and data processors who perform services on our behalf, including without limitation, companies that provide analysis, messaging services and services which host the Site and Services. Please note that we collect, hold and manage your Personal Information through a third

party's cloud-based services, as reasonable for business purposes, which may be located in countries outside of your jurisdiction. For more information regarding our Service Providers, please refer to Section 9 below.

- **Medical Provider Partners.** Our Site and Services serve, among other things, as a platform that eases your communications with the applicable Medical Providers. If you are referred to us by a Medical Provider, you hereby acknowledge and agree that your Personal Information might be shared with such Medical Provider.
- **In addition, we may share Personal Information in the following cases:** (a) to satisfy any applicable law, regulation, legal process, subpoena or governmental request; (b) to enforce this Privacy Policy or any other agreement or terms of service between you and Laguna, and to defend against any claims or demands asserted against us by you or on your behalf; (c) to detect, prevent, or otherwise address fraud, security or technical issues; (d) to protect the rights, property, or personal safety of Laguna, its Users or the general public; (e) when Laguna is undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of the assets of Laguna (while such acquired company or investor may be located in countries outside of your jurisdiction); and (g) pursuant to your explicit approval prior to the disclosure.

Please note that we are a HIPAA compliant company and require all third parties, including corporate and business affiliates, Service Providers, Medical Providers that are exposed to your PHI to sign a BAA agreement with us.

5.3. For avoidance of doubt, Laguna may transfer and disclose Non-personal Information to third parties at its discretion including without limitation for statistical, analytical and research purposes and for customization, developing and improvement of our Site and Services.

6. Your Rights

Laguna acknowledges you have the right to access and change the Personal Information we collect and process. **If you wish to access or to correct, amend, or delete Personal Information, please send us an email to: connect@getlaguna.com** and we will respond within a reasonable timeframe, but in any event no later than permitted by applicable law. Additionally, please note that in order to ensure that you have as much control over your Personal Information and other information as possible, you may modify certain parts of your information by yourself, in the Account.

Important: Terminating your Account will not necessarily delete your Personal Information that is stored on our servers. If you wish to delete all Personal Information (including PHI) that we have collected about you please send a deletion request to connect@getlaguna.com and we will delete it within a reasonable timeframe; however, please note that we may be required by applicable laws and regulations to retain certain Personal Information for a longer period.

Please note that aggregate and/or anonymous information derived from your Account and/or use of the Site or Services may remain on Laguna servers indefinitely.

7. Location of Your Data

The information collected from you by Laguna, as detailed in this Privacy Policy, may be transferred to, and stored at, servers that may be located in countries outside of your jurisdiction and in a country that is not considered to offer an adequate level of protection under your local laws. It may also be processed by Laguna and its suppliers, service providers or partners' staff operating outside your country.

Laguna is committed to protecting your Personal Information and will take appropriate steps to ensure that your Personal Information is processed and stored securely and in accordance with applicable privacy laws, as detailed in this Privacy Policy. Such steps include putting in place data transfer agreements or ensuring our third-party service providers comply with Laguna's data transfer protection measures.

8. Minors

The Site and Service is intended for Users over the age of sixteen (16). Therefore, Laguna does not intend and does not knowingly collect directly Personal Information from children under the age of sixteen (16) and does not wish to do so. We reserve the right to request proof of age at any stage so that we can verify that minors under the age of sixteen (16) are not using the Site or Service. If we learn that we collected Personal Information from minors under the age of sixteen (16) we will delete that information as quickly as possible. If you have reasons to suspect that Laguna collected Personal Information from minors under the age of sixteen (16), please notify us at connect@getlaguna.com, and we will delete that information as quickly as possible.

9. Third Party Service Providers and Third Party Software

- 9.1. While using the Site and Services we may be using third party service providers, who may collect, store and/or process your information, as detailed in this Privacy Policy.
- 9.2. Note that we collect, hold and/or manage your Personal Information through Laguna's authorized third parties whom are vendors of certain products or services (such as hosting cloud services) (including, as applicable, their affiliates) solely and limited to providing us with such requested services, and not for any other purposes.
- 9.3. Such vendors may be located in a country that does not have the same data protection laws as your jurisdiction.
- 9.4. Such third parties service providers include without limitation the following categories of service providers:
 - **Customer engagement and content management services;**
 - **Hosting and cloud computing services**, including our service provider Amazon (AWS), which Privacy Policy can be found at <https://aws.amazon.com/privacy/>;
 - **Sending SMS links to open an Account**, including our service provider Amazon (AWS), whose Privacy Policy can be found at <https://aws.amazon.com/privacy/>;

Please read such third party service providers' Terms of Use and Privacy Policies to understand their privacy practices.

10. Links to Third Party Websites

Certain links provided in the Site or Service permit Users to leave enter non-Laguna sites or services. Those linked sites and services are provided solely as a convenience to you. Those linked sites and services are not under the control of Laguna and it is not responsible for the availability of such external sites or services, and does not endorse and is not responsible or liable for any content advertising, products, services or other information on or available from such linked sites and services or any link contained in a linked site or service.

Laguna reserves the right to terminate any link at any time. You further acknowledge and agree that Laguna shall not be responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused by or in connection with use of or reliance on any such content, goods or services available on or through any such linked sites or resource. Most of such linked sites and services provide legal documents, including terms of use and privacy policy, governing the use thereof. It is always advisable to read such documents carefully before using those sites and services, *inter alia*, in order to know what kind of information they are collecting.

11. Cookies & Local Storage

When you access or use the Site or Service, we and/or our third party service providers may use industry-wide technologies such as User persistent identifiers (or other similar technologies), which store certain local information on your device ("**Local Storage**") which may enable, *inter alia*, automatic activation of certain features and make the User's Site experience and usage simpler, more relevant, convenient and effortless. Such information is locally stored in the User's device. Laguna and/or our authorized third party service providers may access such information. Laguna and/or our

authorized third party service providers may use both session cookies (which expire once you close the Site) and persistent cookies (which stay on the User's device until he/she deletes them). Such Local Storage used by the Site may store non-personal information (such as the different pages viewed by a User within the Site) as well as User persistent identifier, which will be collected in accordance with the terms specified herein. It is easy to prohibit and/or delete the Local Storage, *inter alia*, through the Settings option of your web-browser. Most browsers will allow you to erase cookies from a device, block acceptance of cookies, or receive a warning before a cookie is stored. For detailed instructions regarding the blocking of cookies, please refer to your browser 'help', 'tool' or 'edit' section or see <http://www.allaboutcookies.org/manage-cookies/>. However, if you block or erase cookies, or change the settings of your browser, your Site experience may be affected and may be limited.

12. Security

We take reasonable measures to maintain the security and integrity of our Site and Service and prevent unauthorized access to it or use thereof through generally accepted industry standard technologies and internal procedures. Please note, however, that there are inherent risks in transmission of information over the Internet or other methods of electronic storage and we cannot guarantee that unauthorized access or use of your Personal Information will never occur.

To the extent that Laguna implemented the required security measures under applicable law, Laguna shall not be responsible or liable for unauthorized access, hacking, or other security intrusions or failure to store or the theft, deletion, corruption, destruction, damage, or loss of any data or information included in the Personal Information.

13. Changes to the Privacy Policy

Laguna reserves the right to change this Privacy Policy at any time, so please re-visit this page frequently to check for any changes. In case of any material change, we will make reasonable efforts to post a clear notice on the Site or we will send you an e-mail regarding such changes to the e-mail address that you have provided us with. Such material changes will take effect seven (7) days after such notice was provided on our Site or sent to you via e-mail, whichever is the earlier. Otherwise, all other changes to this Privacy Policy are effective as of the stated "Last Revised" and your continued use of the Site or Service on or after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes. In the event that the Terms should be amended to comply with any legal requirements, the amendments may take effect immediately, or as required by the law and without any prior notice.

14. Have any Questions?

If you have any questions (or comments) concerning this Privacy Policy, please send us an email to the following address: connect@getlaguna.com and we will make an effort to reply within a reasonable timeframe.