

## **Cognition Med Privacy Policy**

Cognition Med LLC (“Cognition Med,” “we” or “us”) is committed to protecting the privacy and security of your personally-identifying information. We have prepared this Privacy Policy to explain how we collect, use, protect and disclose your Personal Information, Usage Data and Message Data (as those terms are defined below) when you use our mobile application (the “Services”). This Privacy Policy also explains how you can manage your information preferences. By using the Services you consent to this Privacy Policy.

### **1. INFORMATION WE COLLECT**

#### **PERSONAL INFORMATION**

When you register, we collect information that personally identifies you, such as your name, address, mobile telephone number, e-mail addresses and other information that you provide to us (“Personal Information”). You may be asked to provide us with certain Personal Information when you register to use the Services, and at other times. The decision to provide this information is voluntary. However, if you choose not to provide the requested information, you may not be able to use certain features of the Services, or the services in totality.

With your permission, which you may withdraw at any time, we will collect your contact lists and/or address book data. This allows us to connect users of the Service and place them in appropriate user groups. As such, we may indicate who of your connections are also users of the Service, and likewise, we may indicate to your connections the same regarding you. This feature allows you to connect with other users of the Service and may allow other users of the Service to communicate directly with each other. In order to do this, and to make sure we give users the most up-to-date information, we will periodically check for updates to your contact lists and/or address book data.

If you provide your third-party account credentials to us via a single-sign-on integration or otherwise sign in to the Services through a third-party site or service, you understand some content and/or information in those accounts (“Third Party Account Information”) may be transmitted into your account with us if you authorize such transmissions, and that Third Party Account Information transmitted to our Services is covered by this Privacy Policy.

#### **USAGE DATA**

We automatically collect usage information that allows us to collect information regarding how users access and use the Services (“Usage Data”). For example, when you download and use Services such as Coltrain, we automatically collect information on the type of device you use and the device identifier (or “UDID”). Additionally, each time you use the Services, we automatically collect information regarding your workflow within the app, the time and duration of your app usage, how you best communicate within the app, crash logs and other information relating to your use of the Services. We use this information to analyze trends, administer the Services, troubleshoot any user problems, and to enhance and update the Services.

#### **MESSAGE DATA**

When you send or receive messages using our Services, we may temporarily process and store your messages ("Message Data") in order to provide these Services to you. This data is transmitted at the User's discretion, and under the relevant professional guidance specific to your use of the Services, and as outlined in the End Users License Agreement (EULA). Once the stream of communication is completed by all Users or has been dormant for more than a set period, the text messaging data and documents are deleted from our relevant servers.

Cognition Med estimates that such data will be deleted within 365 (three hundred sixty-five) days after the stream of communication is complete. After its destruction, Message Data is permanently deleted and cannot be retrieved by Cognition Med. Certain pieces of information relevant to

Case discussions are stored in an Archive for retrieval by Users and for data analysis by Cognition Med. While the data is stored securely, Users are encouraged to use standard precautions and not include PHI. Additional meta data relevant to Service functions are also stored for analysis. This data helps enhance services provided by Cognition Med LLC to its Users.

We respect privacy of the data stored with Cognition Med. We neither intentionally process the data to extract personally identifiable information nor do we share the stored data with any third-party entities, agencies, or businesses that are not affiliated with Cognition Med. In addition, data considered non-essential will be expunged from the database periodically (estimated to be every 365 days).

We ensure encryption of data in transit using SSL and ensure encryption of data at rest by storing data in encrypted database instances.

## 2. HOW WE USE THE INFORMATION WE COLLECT

We use the information we collect for internal purposes only. We do not sell or rent information about you. We will not disclose information to third parties without your consent, except as explained in this Privacy Policy.

### SUPPORT SERVICES

As explained under "INFORMATION WE COLLECT – PERSONAL INFORMATION," Personal Information and your contact lists and/or address book data may be used, when permitted by you, to find and connect users of the Service. Additionally, Cognition Med may use your Personal Information to contact you regarding the Services. For example, we may, with your permission, message you to let you know about new releases, patches and other updates to the Services.

From time to time, we may establish business relationships with other businesses that we believe are trustworthy and who have confirmed that their privacy practices are consistent with ours ("Service Providers"). For example, we may contract with Service Providers to provide certain services, such as hosting and maintenance. We provide our Service Providers with only the information necessary for them to perform these services. Each Service Provider must agree to use reasonable security procedures and practices, appropriate to the nature of the information involved, in order to protect your Personal Information and Message Data from

unauthorized access, use or disclosure. Service Providers are prohibited from using Personal Information or Message Data in any manner other than as specified by us.

### 3. HOW WE PROTECT THE INFORMATION WE COLLECT

#### SECURITY

Cognition Med is committed to protecting the security of your information. We employ what we believe are industry-best security measures designed to protect your information from unauthorized access. Regardless of efforts, no data transmission over the Internet or other network, including any of Cognition Med's services, can be guaranteed to be secure. Accordingly, we cannot and do not guarantee the absolute security of any information you transmit on or through the Services, and any information you transmit is sent at your own risk. Cognition Med fully and absolutely disclaims any and all liability related to the security of such information.

#### COMPLIANCE WITH LAWS AND LAW ENFORCEMENT

Cognition Med cooperates with government and law enforcement officials to enforce and comply with the law. We may, therefore, disclose Personal Information, Usage Data, Message Data, and any other information about you, if we deem that it is reasonably necessary to: (a) satisfy any applicable law, regulation, legal process (such as a subpoena or court order) or enforceable governmental request; (b) enforce the Terms or the Services, including investigating potential violations thereof; (c) detect, prevent, or otherwise address fraud, security or technical issues; or (d) protect against harm to the rights, property or safety of Cognition Med, its users or the public as required or permitted by law.

#### YOUR INFORMATION IS MAINTAINED IN THE UNITED STATES

Please be aware that we process and store all information in the United States. By using the Services, you agree that the collection, use, transfer, and disclosure of your information and communications will be governed by the applicable laws in the United States.

### 4. MISCELLANEOUS

#### ACCURACY AND RETENTION

You can always review, correct, update, or change your Personal Information. Upon your request, we will: (1) correct, update or change your Personal Information; (2) stop sending you messages if you wish to opt out of our direct marketing efforts; and/or (3) disable your account to prevent any future activity through that account. You may make any of these requests by emailing the request to [support@coltrain.io](mailto:support@coltrain.io). If you have questions or concerns regarding this Privacy Policy, please e-mail them to [support@cognitionmed.io](mailto:support@cognitionmed.io). Please do not email any sensitive information.

#### CHANGES TO THE PRIVACY POLICY

We may periodically change this Privacy Policy. If we decide to change this Privacy Policy, we will inform you by posting the revised Privacy Policy on our website or within the messaging application. Those changes become effective upon posting, the date of which is shown as the “Revised On” date in the revised Privacy Policy. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is collected. By continuing to use the Services, you agree to be bound by the revised Privacy Policy.

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