

## PERIPHERAL BRAIN

### PRIVACY POLICY

Last Modified: April 6, 2020

Effective Date: April 6, 2020

Peripheral Brain, LLC, a Virginia limited liability company (referred to in this Privacy Policy as “*Peripheral Brain*”, “*we*”, “*us*”, or “*our*”) respects your privacy and we are committed to protecting it through compliance with this Privacy Policy. Except as otherwise defined herein, all terms used in this Privacy Policy have the meanings set forth in the Terms of Service, located at [Terms of Service](#) (the “*Terms of Service*”).

**1. Introduction.** This Privacy Policy describes the types of information we may collect through your use of the Peripheral Brain System and our practices for collecting, using, maintaining, protecting, and sharing that information. This Privacy Policy applies to all information that we collect through the Peripheral Brain System. This Privacy Policy does not apply to information that you provide to third parties or that we may collect from you or about you in other ways, including through e-mails you may send to us or through third parties.

**2. Updates to Privacy Policy.** As technology changes and as our business grows and develops, we may modify this Privacy Policy from time to time. Changes to this Privacy Policy will be made and will become effective as described in the Terms of Service.

**3. Children Under Age 13.** We are committed to protecting the privacy of children under the age of thirteen (13) years (each a “*Child*” and collectively, “*Children*”). Use of the Peripheral Brain System by Children is prohibited by the Terms of Service. The Peripheral Brain System is not designed for or marketed to Children, and we do not knowingly collect Personal Information (as defined below) from Children. If we learn we have collected or received Personal Information from a Child, we will delete that information. If you believe we might have any information from or about a Child, please contact us at: [info@medicalperipheralbrain.com](mailto:info@medicalperipheralbrain.com)

**4. Definitions.** As used in this Privacy Policy:

**4.1.** “*Diagnostic Information*” means information collected through your use of the Peripheral Brain Website and Peripheral Brain Apps, including device state information, unique device identifiers, device hardware and operating system information, information relating to how the Peripheral Brain Website and Peripheral Brain Apps function.

**4.2.** “*Personal Information*” means personally-identifiable information (information relating to an individual that can be used to identify, locate, or contact that individual, alone or when combined with other personal or identifying information), such as: name, home or physical address, e-mail address, phone number, or personal characteristics (such as photos, age or date of birth, race, gender, number or gender of children, height, weight, religion, occupation, education, political party affiliation, medical conditions or other health information, fingerprints, handwriting), Sensitive Information (as defined below), or any other information about an

individual that we collect through the Peripheral Brain System and maintain in personally identifiable form in combination with other personally-identifiable information.

**4.3.** “*Sensitive Information*” means Social Security numbers, passport numbers, driver’s license numbers, bank account numbers, credit or debit card numbers, insurance policy numbers, login or authentication credentials (such as passwords), or other similar information.

**4.4.** “*Non-Personal Information*” means information or content other than Personal Information, including, for example, aggregated or anonymized information about our users and other information that does not identify any individual.

## **5. Types of Information Collected.**

**5.1. Visitor Information.** We may automatically collect information about you when you use the Peripheral Brain Website and Peripheral Brain Apps, such as the pages and other materials you access, the amount of data transferred, the links you click, the amount of time you spend interacting with each page, and other information about your interactions with the Peripheral Brain Website and Peripheral Brain Apps, as well as certain standard information that your browser sends to every website that you visit, including your Internet Protocol (IP) address, operating environment (such as browser type and version, browser plugins installed, operating system version, regional and language settings, screen size and/or resolution, windows size, and page size), access dates and times, and referring websites. The Peripheral Brain Website and Peripheral Brain Apps may use cookies, flash cookies, web beacons, and other technologies for a variety of purposes, such as saving and retrieving information about you, your visit, and assisting in displaying relevant promotions and advertising to you. We may use such technologies to share non-Personal Information with third parties or to retrieve Non-Personal Information from third parties. At this time, the Peripheral Brain System does not respond to “Do Not Track” signals sent to us by your browser.

**5.2. Analytics Tools.** We may, from time to time, use a various third party analytics tools, including a tool called “Google Analytics” (including Google Analytics Demographics and Interest Reporting features), to collect information about your use of the Peripheral Brain System, which helps us provide content that is relevant to you and optimized for the devices that you use (such as smartphones and tablets). We respect and value your privacy, and we never combine the information collected through the use of Google Analytics with Personal Information. We use the information we receive from Google Analytics only to improve the Peripheral Brain System and our content and marketing. Google’s use and sharing of information collected by Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Use (<http://www.google.com/analytics/tos.html>) and the Google Privacy Policy (<http://www.google.com/privacypolicy.html>). You can opt-out of Google Analytics for Display Advertising and customize Google Display Network ads using Google’s Ad Settings (<https://www.google.com/settings/ads>) tool. As an added privacy measure, you can use the Google Analytics Opt-out Browser Add-on (<https://tools.google.com/dlpage/gaoptout/>).

**5.3. Information You Provide.** In order to use certain features of the Peripheral Brain System, you must create an account (a “*Peripheral Brain Account*”). When you create and use your Peripheral Brain Account, you may provide us with a wide variety of information, such as your name, billing address, e-mail address, phone number, messages you send us, and other types of information. We will store and use such information only in accordance with this Privacy Policy.

**6. Use of Non-Personal Information.** We may use Non-Personal Information (including, for example, aggregated information about our users or information that does not identify any individual) for any purposes whatsoever (including without limitation, advertising, marketing, enhancing, designing, or developing products and/or services, and research), and we may share Non-Personal Information with others, including our partners, affiliates, and our service providers.

**7. Cookie Policy.** We may use cookies and other similar technologies, such as HTML 5 local storage, to provide the Peripheral Brain System to you.

**7.1. Cookies and Local Storage.** Cookies are small text files placed onto your device when you visit and interact with the Peripheral Brain Website and Peripheral Brain Apps. Local storage is a technology that allows a website or application to store information locally on your device. These technologies enable us to provide and enhance your experience using the Peripheral Brain Website and Peripheral Brain Apps.

**7.2. How We Use Cookies and Local Storage.** We use these technologies to provide the Peripheral Brain Website and Peripheral Brain Apps to you and to analyze and improve the Peripheral Brain Website and Peripheral Brain Apps, and other aspects of the Peripheral Brain System. Our uses generally fall into one of the following categories:

**7.2.1. Essential Processes and Security:** To enable essential functions of the Peripheral Brain Website and Peripheral Brain Apps, such as to facilitate logging you in to the Peripheral Brain Website and Peripheral Brain Apps, facilitating payments, protecting your security, and helping us fight spam, abuse, and violations of the Terms of Service.

**7.2.2. Preferences:** To remember information about your browser and your preferences.

**7.2.3. Performance, Analytics, and Research:** To help us understand and measure how you use the Peripheral Brain Website and Peripheral Brain Apps and to improve the Peripheral Brain System.

**7.3. Blocking and Removing Cookies.** We are committed to protecting your privacy, as described in this Privacy Policy. Most browsers allow you to modify your settings to accept or deny all cookies or to request your permission each time a website attempts to place a cookie on your device, and most browsers allow you to delete cookies that have already been placed on your device. However, the Peripheral Brain Website and Peripheral Brain Apps will not function

properly if you prevent the Peripheral Brain Website and Peripheral Brain Apps from placing cookies on your device.

## **8. Use of Personal Information.**

**8.1.** We will only store and use your Personal Information as is reasonably necessary or appropriate in connection with your use of the Peripheral Brain System, including: (a) to contact you in connection with your use of the Peripheral Brain System, including to respond to your inquiries; (b) for authentication and identification purposes; (c) to enable us to provide the Peripheral Brain System; (d) to process your Paid Subscriptions and to provide you with notices about your Peripheral Brain Account and your Paid Subscriptions; (e) to fulfill any other purpose for which you provide such information to us; (f) in any other way we may describe when you provide the information; (g) to carry out our obligations and enforce our rights; (h) to provide you with relevant advertising and promotions; (i) to ensure your compliance with the Terms of Service and/or to investigate any potential breach of the Terms of Service; and (j) to protect our networks, data, software, or business interests. You understand and agree that we may transfer, process, maintain, and store your Personal Information, Your Content, and other information in any country (or in multiple countries), including countries other than your country of residence or the country or countries where you use the Peripheral Brain System.

**8.2.** We are committed to protecting your privacy and we will not sell, lease, or disclose your Personal Information to any third party except as described in this Privacy Policy. We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. We do not share Personal Information with our advertisers unless you opt-in to such sharing as described in Section 9 below. However, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

**8.3.** In addition to using and disclosing your Personal Information in the manner described above and elsewhere in this Privacy Policy, we may disclose your Personal Information:

**8.3.1.** to any person, entity or organization which you consent for us to disclose your Personal Information to;

**8.3.2.** to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which Personal Information held by us about our users is among the assets transferred;

**8.3.3.** to any of the Peripheral Brain Parties (as defined in the Terms of Service), our business partners and agents who provide hosting services, and website and technical support providers, as is necessary or required in connection with the operation, maintenance, and support of the Peripheral Brain System;

**8.3.4.** to any person, entity or organization in order to facilitate the provision of the Peripheral Brain System, such as providing your name and payment information to our third party payment processor if you purchase any paid services that we may offer from time to time;

**8.3.5.** to comply with any legal requirements, subpoena, discovery requests, or court orders, to defend any legal or administrative proceedings, or as we believe in good faith is necessary to comply with any laws or legal requirements;

**8.3.6.** as we believe is necessary or appropriate in an emergency situation, including without limitation, to prevent criminal activity, personal injury or property damage;

**8.3.7.** to law enforcement, financial institutions, or other appropriate authorities in connection with any investigation of suspected criminal or fraudulent activity by any person or entity; and

**8.3.8.** if we believe it is necessary or appropriate to protect the rights, property, or safety of the Peripheral Brain Parties, our users, or third parties (including, without limitation, to facilitate the enforcement of our rights under the Terms of Service).

**9. Opt-In Sharing Features.** We will not knowingly disclose your Personal Information to a third party if we know or have reason to believe that the third party will use your Personal Information for direct marketing purposes, unless you choose to opt-in to such sharing.

**10. Payment Information.** We may, from time to time, use one or more third party payment processors, including Stripe, Inc. (“*Stripe*”) and PayPal, Inc. (“*PayPal*”), to process payments made in connection with the Peripheral Brain System. Your Payment Information (as defined in the Terms of Service) collected through the Peripheral Brain System is transmitted directly to our payment processors and is not stored by us. You acknowledge and agree that the processing of payments is subject to the terms and privacy policies of our payment processors and that we are not responsible for any acts or omissions of our payment processors. You acknowledge and agree that payments processed using Stripe are subject to the Stripe Terms of Service (<https://stripe.com/us/terms>) and the Stripe Privacy Policy (<https://stripe.com/us/privacy>) and that payments processed using PayPal are subject to the PayPal User Agreement (<https://www.paypal.com/us/webapps/mpp/ua/useragreement-full>) and the PayPal Privacy Policy (<https://www.paypal.com/us/webapps/mpp/ua/privacy-full>), as amended from time to time by Stripe or PayPal.

**11. Security.** We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure, including the use of TLS to encrypt information you send through the Peripheral Brain Website and Peripheral Brain Apps. The safety and security of your information also depends on you. You are responsible for safeguarding the username and password associated with your Peripheral Brain Account and notifying us immediately if you suspect your username and password or your Peripheral Brain Account have been compromised. Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your

Personal Information, we cannot guarantee the security of your Personal Information transmitted to or through the Peripheral Brain System. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained in the Peripheral Brain System.

**12. Third Party Sites.** The Peripheral Brain Website and Peripheral Brain Apps and the Peripheral Brain Materials may contain links to other websites that are operated by third parties. Once you have clicked on a link connecting you to such third party website, you will leave the Peripheral Brain System and be taken to a website that we do not control. This Privacy Policy does not apply to any Personal Information (or other information) collected on a third party site. We suggest you read the privacy policy of the third party site before providing any Personal Information on such third party site. We are not responsible for any use by any person or entity of any information that you may provide while accessing or using any websites or services provided by a third party.

**13. Access to and Change of Personal Information.** You may contact us at any time to: (a) request the removal of the Personal Information you provided to us from our databases; and (b) update your Personal Information. However, certain information associated with financial transactions related to the Peripheral Brain System may be retained permanently for legal, tax, and business reasons. In addition, because certain Personal Information may be necessary to provide the Peripheral Brain System to you, you understand that the removal of that Personal Information may require us to delete your Peripheral Brain Account. When your Personal Information or Your Content is updated or deleted, copies of such information may remain in our backups for a period of time.

**14. Contacting Us.** You may contact us with questions relating to this Privacy Policy by email at [info@medicalperipheralbrain.com](mailto:info@medicalperipheralbrain.com).