

**Effective Date: NOVEMBER 23, 2020**

## **YOUR PRIVACY IS IMPORTANT TO US**

We take your privacy very seriously and we are committed to protecting it. We believe that you should easily know what information we collect and use, as well as to understand your rights with respect to your personal information.

This Privacy Policy sets out how Paige.AI, Inc. (“Paige,” “us,” “we,” or “our”) collects, uses, and discloses information obtained through our websites, including [paige.ai](https://paige.ai) and its subdomains, (collectively, “Websites”) and the online services we operate (collectively, the “Services”) and applies solely to information collected by or in connection with the Websites and the Services and not those that Paige.AI does not operate.

Your access and use of the Websites and Services are subject to this Privacy Policy, and any separate Terms of Use for any of the Websites and Services that may be in effect at any time.

Please read the following carefully to understand our policies and practices regarding your information and how we will treat it. If there are any terms in this Privacy Policy that you do not agree with, please discontinue use of our Websites and our Services. You may contact [privacy@paige.ai](mailto:privacy@paige.ai) with any questions or concerns related to this policy.

If you are a patient of one of our Provider Customers and have questions about your treatment or handling of your health-related information, you should check with your health care provider. Our Provider Customers are primarily responsible for determining how we use and disclose the Personal Information.

## **WHAT INFORMATION WE COLLECT**

“Personal Information” is information that can be used to identify you by itself or when it is combined with other information, such as a name, address, cell phone number, or e-mail address.

We may collect Personal Information from you in various ways, such as:

*Direct identifiers, such as your name, address, email address, telephone number, or an IP address or other online identifier.* You may provide this information to us directly using contact forms on our Websites.

*Geolocation and use information* for our Websites and Services that may be automatically generated when you use the Websites and Services. We collect this information through Google Analytics when you visit the Websites or use our Services. Such Non-Personal Information may include, without limitation, your internet protocol (IP) address, geolocation as provided by the location services and GPS features of the device you are using to access one of our Websites or Services when location services have been enabled, browser type, operating system, the dates and times of page views, the duration of time spent at those pages, and if you linked to one of our Websites from another website, the address of that other website.

You may opt out of Google Analytics’ services using the Opt-Out feature provided by Google or by installing the Google Analytics Opt-out Browser tool: <https://tools.google.com/dlpage/gaoptout>. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy>.

**WHAT WE DO WITH THE INFORMATION WE GATHER**

Our primary purpose in collecting this information is to understand your interest in our products and services and to provide you with better service. We will not use, disclose, or share your information except as described in this Privacy Policy.

**How we use the information**

In particular, we may use your information for the following purposes:

- Manage the Services we provide to you;
- Send you technical notices, updates, security alerts, information regarding changes to our policies, and support and administrative messages;
- Prevent and address fraud, breach of policies or terms, and threats or harm;
- Monitor and analyze trends, usage, and activities;
- Conduct research, including focus groups and surveys;
- Identify and authenticate an account holder for our Services;
- Process and deliver the Services to you;
- Improve of our Services and related products, other Paige websites, applications and marketing efforts;
- Provide access to free and/or purchased downloads and other similar content;
- If you have opted-in to receive additional communications, we may periodically send notifications about new products, special offers or other information which you have indicated are of interest to you;
- We may use the information to customize the website content presented to you and to align with your computer's operating system;
- To correspond with you, respond to your comments, questions, and requests, and provide customer service; and
- To conduct our business and perform related research, develop analytics, and aggregated data that allow us and our business partners to improve our Services and related products and services.

**How we share the information**

We do not sell, trade, or otherwise transfer to outside parties Personal Information we collect from you without your consent, except as described below:

- We may share aggregated data to conduct our business, improve the delivery of our Services, to develop analytics, and to enable us and our business partners to improve and promote our products and services.
- We may share Personal Information to authorized agents or third-party contractors whom we employ to perform tasks on our behalf and to the extent we need to share information with them to conduct our business or to provide our products, services, and offers to you.
- We may disclose Personal Information to third parties if we believe it is necessary to investigate potential violations of our Terms of Use, or to enforce those Terms of Use.
  - We may disclose Personal Information under the following uncommon circumstances: As required by law;

- If we believe that disclosure is necessary to protect ours or others' rights, property, or safety;
- To comply with a judicial proceeding, court order, or legal process served on us or the Services;
- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;
- If Paige or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets; or
- In connection with any other actual or proposed corporate transaction or insolvency proceeding involving all or part of the business or assets to which the information pertains.

**Length**

We keep your Personal Information only for as long as we continue to have a business purpose for it or as otherwise required by law.

**Communications from Us and Other Third Parties**

When you send email or other communications to Paige, we may retain those communications in order to process your inquiries, respond to your requests, and improve our Websites and related products and services. When you send and receive messages, we may collect and maintain information associated with those messages.

We may send you information by email on products, services, special deals, and promotions offered by us. If you are an existing customer, we will only contact you by email with such information where you have consented for us to do.

Where we permit selected third parties to use your data, we (or they) will contact you by email only if you have consented to this.

Out of respect for your privacy, we will also provide an option to elect not to receive these types of communications. You can also exercise the right at any time by contacting us at [privacy@paige.ai](mailto:privacy@paige.ai).

**Storage**

The information that we collect directly from you is stored in the United States by us and/or our business partners for the purposes of providing the Websites and other services uses outlined in this Privacy Policy and by our Terms of Use and by submitting your Personal Information, you agree to this storage.

All information you provide directly to us online is stored on our secured servers which are located in the United States.

Some of the information collected through the use of cookies may be stored outside of the United States. See our section below on Cookies to review what information we collect through such cookies.

**SECURITY**

We will take technical, administrative, and physical steps reasonably necessary to restrict access to Personal Information to authorized individuals.

We strive to use reasonable physical, technical, and administrative measures to protect information under our control. To the extent we provide your Personal Information to any third parties, we will request that they use substantially the same level security measures to protect your information. If you create copies of information from the Websites or our Services, we cannot protect the security and privacy of the information contained in such copies.

#### **LINKS TO OTHER SITES**

Our Websites may contain links to enable you to easily visit other websites of interest. Once you use these links to leave any of our Websites, we do not have any control over other websites and their data collection practices. Accordingly, we cannot be responsible for the protection and privacy of any information which you provide while visiting other websites, as those sites are not governed by this Privacy Policy.

#### **CONTROLLING YOUR PERSONAL INFORMATION**

Under applicable data protection laws in the European Union, the following rights apply:

**Right to access and obtain a copy of your personal information:** You are entitled to request confirmation whether we process any of your personal information. Where this is the case, you may have access to your personal information and to certain information about how it is processed. In some cases, you can ask us to provide you with an electronic copy of your information. In some limited circumstances, you also have the right to request portability of your personal information.

**Right to correct your personal information:** If you can demonstrate that the personal information we hold about you is not correct, you can ask that this information is updated or otherwise corrected.

**Right to be forgotten/have data deleted:** In certain circumstances you have the right to have your personal data deleted. You may make such a request at any time. However, this right is subject to any legal rights or obligations we may have to retain data. For situations where in accordance with the law, we determine that your request to have your personal information deleted must be granted, we will do so without undue delay.

**Right to restrict or object to the processing of your data:** In certain circumstances you have the right to obtain restriction of the processing of your personal information, or to object on certain processing thereof on grounds relating to your particular situation.

To exercise your rights, you can contact us at the following address: [privacy@paige.ai](mailto:privacy@paige.ai).

To the extent our processing of your personal information is based on your consent, you also have the right to withdraw your consent at any time. Withdrawal of your consent will not affect the lawfulness of any processing based on your consent before the receipt of such withdrawal.

You can also lodge a complaint about our processing of your personal information with the data protection authority of the European Member State of your habitual residence, of your place of work, or of an alleged infringement of your rights).

Regardless of geography, any person may choose to restrict the collection or use of Personal Information gathered by Paige in the following way:

- Opting out of additional communications by checking the associated box on forms used within our Websites or by using the “unsubscribe” link in any promotional email message from Paige.

#### **INFORMATION YOU POST TO PUBLIC AREAS OR PROVIDE TO US**

Please keep in mind that whenever you voluntarily make Personal Information or other private information available in public areas for viewing by third parties online (for example, on blogs, discussion forums, or other community posting or social networking sites), such information can be seen, collected, and used by others besides us. We cannot be responsible for any unauthorized third-party use of such information, nor for the substance of any such user-generated content.

#### **MINORS**

Our Websites and Services, and any other products and service we may provide through our Websites are not directed nor marketed to people under 18 years of age. We do not knowingly collect Personal Information from children under 18. The Websites and the services are not designed or intended to attract, and is not directed to, children under eighteen (18) years of age. If we become aware that a child under 18 has provided us with Personal Information, we will take reasonable steps to remove such information from our systems and terminate the applicable account. If you become aware that a child has provided us with Personal Information without your consent, please contact us at [info@paige.ai](mailto:info@paige.ai).

#### **COOKIES**

Our Website uses “cookies” required for the operation of our Site (“Essential Cookies”). These cookies enable services you have specifically asked for. These cookies remain on your device only until you close your browser after visiting our websites. Some cookies remember choices you make to improve your experience (Functionality Cookies”). These Functionality Cookies remain on your device for an extended period of time. When you revisit our Websites we recognize Functionality Cookies and remember your preferences or can automatically log you on to the website. Personal information on our system may be associated with Functionality Cookies but the cookies themselves do not contain any of your personal information. Further general information about cookies and how they work is available at [www.allaboutcookies.org](http://www.allaboutcookies.org).

We do not use technology that recognizes a “do-not-track” signal from your web browser.

#### **CHANGES TO OUR PRIVACY POLICY**

Paige may update this Privacy Policy from time to time. If we decide to change our Privacy Policy, we will post those changes on this page and update the Privacy Policy modification date at the top of this page and, where appropriate, notify you of any material changes we make to the Privacy Policy by email. Please check back frequently to see any updates or changes to our Privacy Policy. This Privacy Policy shall be deemed effective as of the "Effective Date" date.

If you have questions, suggestions, wish to make a complaint, or require a copy of your information, please contact us at: [privacy@paige.ai](mailto:privacy@paige.ai).

If you wish to contact our Data Protection Officer, you can do so by post to:

Data Protection Officer  
Paige.AI, Inc.  
11 Times Square, 37<sup>th</sup> Floor  
New York, NY 10036

If you are in the European Union and wish to contact our Article 27 Representative, you can do so using the following contact information:

Instant EU GDPR Representative Ltd.  
69 Esker Woods Drive  
Lucan Co., Dublin, Ireland  
email: [contact@gdprlocal.com](mailto:contact@gdprlocal.com)  
Tel: + 353 15 549 700