#

# **Privacy Policy**

Satya Health Sciences, Inc., **(“Satya”, “we”, “us”, or “our”**) recognizes that its users care about their privacy, including how their personal information is collected and used. Satya is committed to respecting the personal privacy of our website visitors and users. The following statement summarizes the privacy practices of Satya’s website (“**Platform**”), informing visitors of why and how Satya collects personal information online and how Satya uses this information.

This privacy policy (the “**Privacy Policy**”) describes the ways in which Satya collects, uses, and shares information collected from or about you while you are using our Platform. This Privacy Policy applies to Satya's Platform only. We are not responsible in any way for the privacy practices of other websites (including Practice Better), third parties (including your healthcare provider) with whom you communicate through the Platform or any third-party applications or websites which may be linked to the Satya’s Platform.

**What is personal information?**

Personal information is any information that can be used to identify a specific individual, and includes such information as a name, a home address, home telephone number, IP Address, device ID, and e-mail address.

When you provide Personal Information through the Platform or Practice Better mobile application, *via* creating your account or in communication with us, you are consenting to the manner in which your Personal Information will be collected, used, disclosed and otherwise managed by Satya or any other third party, including your Personal Information, as set forth below. Satya respects the privacy of the individuals that use the Platform, and this Privacy Policy describes how Satya uses the data including Imaging Data, Lab Data and Medical History data (as defined under terms of use) it collects or receives from users of the Platform.

Your information, including Personal Information, may be stored in anonymized form in the United States of America/ Canada where the data protection and other laws may not be as comprehensive as those in your country. By using the Platform you consent to your information being collected, used and transferred as set forth in this Privacy Policy, as amended from time-to-time.

### **Information Collected**

#### Personal Information

If you use the Platform, Personal Information about you may be collected and processed by Satya’s employees, agents of Satya, service providers (including Practice Better) or employees of Satya’s service providers. You can choose not to provide certain information by opting out, although you then may not be able to take advantage of certain Platform features. Satya generally limits access to Personal Information about you (except as otherwise disclosed in this Privacy Policy) to employees, agents, service providers and employees of service providers who Satya believes reasonably need to come into contact with that information to provide products or services to you or in order to do their jobs. However, when we share information with third parties (including Practice Better), such as your healthcare provider, at your direction, Satya has no control over how that information is used, stored or shared.

If you create an account or access restricted portions of the Platform on the Platform, Satya may collect your name, gender, age, email address, and in some instances, title, street address, city, state, country, postal code, telephone number, information related to your logs, and any other information useful to Satya’s products and services, if you provide it to us. If you send correspondence to us such as e-mails or letters, Satya will collect such information, including any Personal Information, in a file specific to you. In general, if you intentionally provide us with Personal Information, Satya will collect it. Satya may always use your Personal Information to provide customer support. In addition, any third party you select to receive information about your logs, Satya will also share your Personal Information with such third parties. You may direct us at any time to stop sharing your Personal Information with a specified third party, and Satya will use reasonable efforts to stop such sharing in a timely manner.

From time to time, Satya may request other Personal Information in order to provide features, functions or services, including on behalf of third parties you identify, but you will always have the choice to decide whether or not to provide the requested information.

When you share your location privately with others or add location information, such as GPS data, to your private posts or uploaded information, we treat that like all other types of Personal Information. When you download or use apps created by Satya or its affiliates, we may receive information about your location and your mobile device, including a unique identifier for your device. We may use this information to provide you with location-based services, such as search results, and other personalized content. Most mobile devices allow you to deactivate location services.

As part of the registration process or logging or uploading any information on the Platform, we will require an email address because it allows us to identify you uniquely. We will send you an email confirming your registration on the Platform, and to respond to forgotten password requests. We also may request your email address to send an e-mail message related to updates for your logs, accounts and/or profiles. Satya may send promotional emails about Satya’s products and services, including describing new features or products. You may unsubscribe to these emails at any time using directions provided in such an e-mail or in this Privacy Policy. Satya always reserves the right to contact you about your account or customer service issues.

####

#### Non-Identifiable Information

Satya collects and compiles information relating to your use of the Platform which is not Personal Information, such as time, date, browser type, browser language, and operating system, domain name of your internet service provider (collectively, the “Non-Identifiable Information”) as part of the operation of this Platform or during the course of your activities on or use of this Platform.

Satya may use “cookies” and similar technologies such as bots in connection with operation of the Platform to help Satya to personalize and tailor its services and improve the quality of those services by tracking and storing user preferences, trends and patterns. If you visit any restricted access or password protected portions of the Platform, you may be required to use cookies, which may include or be linked to Personal Information.

To better serve you and improve the visitor experience on our website, Satya's website collects some information about our visitors and uses web analytics services including Google Analytics. These tools use cookies to anonymously collect and generate information about your visit to our sites (including your IP address). This information may be used by Satya to identify system problems and monitor network traffic. No personal information is collected through these tools that would allow the Satya or our service provider to identify individuals.

#### Financial Data

Financial information, such as data related to your payment method (e.g., valid credit card number, card brand, expiration date, address) that we may collect when you purchase, order, return, exchange, or request information about our services from the Site or our mobile application if you accept to provide us this information. We store only very limited, if any, financial information that we collect. Otherwise, all financial information is stored by our payment processor, and you are encouraged to review their privacy policy and contact them directly for responses to your questions.

### **Use and Sharing of Information**

Generally, and except as indicated at the time of collection, Satya does not sell or lease any Personal Information about you to any third party. Satya uses Personal Information for the purpose for which you provided it and will not sell or rent your Personal Information. More specifically Satya uses personal information in a limited number of ways including but not limited to:

* foremost to complete transactions;
* deliver the selected product or Services; and
* respond to questions or comments.

As stated above, Satya will sell or lease your Personal Information with third parties at your direction and consent, or third parties you signed up with or through, or direct us to share with, to allow your healthcare provider or practice to access and see your logs. If you correspond with us and include Personal Information, Satya uses the Personal Information to respond to you, including providing you customer support.

Satya may use your email address to send you information about Satya’s products or services, but you may opt out from receiving these promotional messages. However, Satya always reserves the right to contact you about your account or customer service issues. In the event that Satya is or substantially all of its assets are sold or otherwise transferred, all information Satya has about you may be included in the transferred assets.

In nearly all cases, the data or information may be collected or processed by, and transferred to, Satya’s facilities in the United States and in other countries where Satya does business. This may be done through the Platform’s Internet Service Provider (ISP) or through the use of such tools as Google Analytics. This information is gathered to improve the quality of Satya’s services and Satya’s ability to market those products and services to specific individuals and organizations that could benefit from them.

If you invite others to join the Platform, we may send a message on your behalf using your name as well as other communications, including reminders. Of course, anyone may opt out of receiving such communications by following the instructions in the e-mail.

We may use other publicly available or proprietary information to supplement Personal Information as well as other information provided by you. Satya may aggregate information (gather up data across all or selected user accounts) in a manner that creates Non-Identifiable Information and disclose such information to advertisers and other third parties for other marketing, promotional, statistical and other useful purposes. Generally, the Non-Identifiable Information is used to provide better services to users and to improve the Platform.

Satya will release information, including Personal Information in connection with any applicable laws, regulation, or legal process (such as a search warrant, subpoena, statute or court order). Satya may disclose Personal Information to protect or enforce the rights, property or safety of Satya, its users or other third parties, including the disclosure of information with other companies and organizations relating to fraud protection and credit risk reduction.

Satya may provide Personal Information to Satya’s trusted businesses or persons to process it for us, based on Satya’s instructions and in compliance with Satya’s Privacy Policy and any other appropriate confidentiality and security measures.

By using the Platform (which resides in part on servers located in the United States of America/ Canada, you unambiguously consent to any collection, processing, transfer, or use of any Personal Information, or Non-Identifiable Information, as provided in this policy. If you do not consent to any collection, processing, transfer, or use of such information, as provided in this Policy, you may discontinue using the Platform.

#### **Security**

While Satya uses commercially reasonable technical, physical, operational and procedural safeguards to protect Personal Information from loss, misuse, alteration, and unauthorized access or disclosure, due to the nature of Satya’s business, including its dependence on the public Internet, Satya cannot ultimately ensure that private communications and Personal Information will not be intercepted by third parties or otherwise obtained in ways not described in this Privacy Policy. Although Satya attempts to protect the privacy of users, Satya cannot absolutely guarantee that such information will remain private. While no security measure can guarantee against compromise, Satya regularly reviews and updates its security measures in an effort to provide appropriate security for all information held by Satya.

**Confidentiality**

The communication between You and Satya with respect to documents, reports, discussions, actions, information and data (including Medical History Data, Imaging Data and Lab Data), including details personal and healthcare data, shall be confidential at all times (“**Confidential Information**”) and shall not be used or disclosed by Satya to any person, except with Your prior written consent. Can we again qualify this with “identifiable data”

Any identifiable information (including the Medical History Data, the Lab Data and the Imaging Data) collected by us via questionnaire or by any other means in the course of providing Services will not be shared further with any other person/third party other than Practice better for the purposes of providing Services. However, anonymized data with respect to any Medical History Data, Lab Data and Imaging Data will be stored privately and can be used to improve the programme and follow medical metrics. This anonymized data may be used by Satya to show the efficacy of the various programmes.

The obligations of not disclosing Confidential Information will not be applicable in case: (a) any information relating to this Agreement or to the subject matter in question is required to disclosed pursuant to any law or demanded by governmental authorities; (b) during the course of a medical emergency; (c) information which is or becomes publicly available; or (d) any information required to be disclosed in connection with the enforcement of, or any proceeding under, this Agreement and such disclosure shall not be deemed to be a breach of confidentiality.

#### **Children**

Satya takes children’s privacy seriously and does not knowingly collect, use, or disclose Personal Information from children, and is committed to complying with all applicable laws and requirements, such as the Information Technology Act, 2000 and Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011).  Satya encourages all parents and guardians to instruct their children in the safe and responsible use of personal information on the Internet.  The Platform is not intended for use by or directed at persons under the age of 18, and Satya does not knowingly collect information from persons under the age of 18.  Satya asks persons under the age of 18 to not use the Platform.

#### **Advertising**

Satya permits third party advertising companies to display ads to you when you visit the Platform. These companies may collect and use Non-Identifiable Information about your visits to the Platform in order to provide advertisements about goods and services that may be of interest to you. These ads are not owned by Satya. Be advised that Satya’s policies may or may not reflect or mirror such third-party ad providers’ policies. If you would like more information about this practice and to know your choices about not having this information used by these companies, please contact these ad providers directly.

#### **California and Delaware “Do Not Track” Disclosures**

California and Delaware law require us to indicate whether we honor “Do Not Track” settings in your browser concerning targeted advertising. At this time, there is no worldwide uniform or consistent industry standard or definition for responding to, processing or communicating Do Not Track signals. Thus, like many other websites and online services, we do not currently respond to any Do Not Track browser requests.

#### **California Privacy Rights**

Under California law, California residents have the right to request in writing from businesses with whom they have an established business relationship, (a) a list of the categories of personal information, such as name, email and mailing address, and the type of services provided to the customer, that a business has disclosed to third parties (including affiliates that are separate legal entities) during the immediately preceding calendar year for the third parties’ direct marketing purposes and (b) the name and address of all such third parties. To request the above information, please email us at support@novoliver.com with a reference to California Disclosure Information. Please note that we are only required to respond to each customer once per calendar year.

#### **Your Consent and Changes to the Privacy Policy**

By using the Platform, you consent to the collection and use of your information as Satya has outlined in this Privacy Policy and to Satya’s Terms of Use.

Satya reserves the right to change, modify or update the terms of this Privacy Policy at any time without notice. Satya posts the revised Privacy Policy on the Platform and indicates the date of the current statement below, so you know when it was last updated. If the changes are material in Satya’s sole determination, Satya will, if possible, give you reasonable advance notice and an opportunity to review the changes before they become effective. If you do not agree to the revised terms and conditions of the Privacy Policy, stop using the Platform. Continued use of the Platform after any such revision or modification constitutes your acceptance of the Privacy Statement as so revised or modified.

#### **Feedback**

If you have questions regarding Satya’s Privacy Policy, please email us at support@novoliver.com to contact us. Applicable data protection laws may give you the right to control our use and processing of your personal information. These may include the right (i) to request access to and a copy of your personal information, (ii) to request rectification or erasure of your personal information; (iii) to object to processing of your personal information; (iv) to restrict processing or to opt-out of any sale of your personal information; and (v) to data portability. Where we are using your personal information with your consent, you also have the right to withdraw your consent at any time, though this will not affect our uses of your personal information prior to the withdrawal of your consent. In addition, you may have the ability to review, correct or delete certain personal information via your Account if you have one.

**Notice and procedure for making complaints with respect to infringements of rights**

If You believe that Your rights are being infringed by an item or information on the Website, You may submit a notice to us (**Notice**).

Upon receipt of a Notice, a ticket number for the complaint logged by You will be provided to You via which you will be able to track the status of your application. We may take certain actions, including removing information or an item, all of which are taken without any admission as to liability and without prejudice to any rights, remedies or defenses, all of which are expressly reserved. Furthermore, in submitting a Notice, You grant us the right to use, reproduce, modify, adapt, publish, translate, create derivative works from, and display its content throughout the world in any media. This includes forwarding the Notice to the parties involved in the provision of the allegedly infringing content. You agree to indemnify us for all claims brought by a third party against us arising out of or in connection with the submission of a Notice.

Important Warning: Giving false, misleading or inaccurate information in the Notice to us may result in civil and/or criminal liability. You should contact a legal advisor should You have any questions.

This Notice can be sent via Email to customer.support@novoliver.com.

The privacy statement was last updated on 06/06/2022.