SimpliFed Privacy Policy

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SimpliFed, Inc. ("**Company**," "**we**," "**us**," or "**our**"), is a telehealth company that provides breastfeeding support in the form of virtual lactation consultations as well as other services in the maternal health field. This Privacy Policy is designed to help you understand how we collect, use, process, and share your personal information, and to help you understand and exercise your privacy rights.

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1. SCOPE AND UPDATES TO THIS PRIVACY POLICY

This Privacy Policy applies to personal information processed by us, including on our websites, mobile applications, and other online or offline offerings. To make this Privacy Policy easier to read, our websites, mobile applications, and other offerings are collectively called the "**Services**."

We may provide additional privacy notices to individuals at the time we collect their personal information. For example, we may provide a specific privacy notice to you that describes our privacy practices in connection with the protection and sharing of your Protected Health Information under HIPAA. These additional privacy notices may supplement this Privacy Policy or may apply in lieu of this Privacy Policy.

Changes to our Privacy Policy. We may revise this Privacy Policy from time to time in our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use our Services after the new Privacy Policy takes effect.

2. PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on how you interact with us, our Services, and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Services, and information from other sources such as third-party services and organizations, as described below.

A. **Personal Information You Provide to Us Directly**

We may collect personal information that you provide to us.

- **Appointment Scheduling**. We may collect personal information when you schedule an appointment with us, such as your name, email address, and telephone number During this process, we may also collect additional personal information, including but not limited to your birthdate, your due date or your baby's birthdate, and your health plan details.

- **Account Creation**. We may collect personal information when you create an account, such as name, email address and phone number.

- **Allies**. If you are an ally (peer mom), we may collect your personal information such as your name, email address, address, social security number, and phone number.

- **Healthcare Professionals.** If you are a healthcare professional, we may collect personal information such as your professional contact information (name, mailing address, email, and telephone number), credential and institutional affiliations information, information about our programs and activities in which you have participated, information about our interactions with you, information about your published papers, your photograph, information about your prescribing of our products and services, and information contained in agreements executed with us.

- **Purchases**. We may collect personal information and details associated with your purchases, including payment information. Any payments made via our Services are processed by third-party payment processors. We do not directly collect or store any payment card information entered through our Services, but we may receive associated with your payment card information (e.g., your billing details).

- **Your Communications with Us**. We may collect personal information, such as name, email address, phone number, or mailing address when you request information about our Services, sign up for our mailing list, or otherwise communicate with us.

- **Surveys**. We may contact you to participate in surveys. If you decide to participate, we may collect personal information from you in connection with the survey.

- **Interactive Features**. We and others who use our Services may collect personal information that you submit or make available through our interactive features (e.g., messaging and chat features, commenting functionalities, forums, blogs, and social media pages). Any information you provide using the public sharing features of the Services will be considered "public," unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein. Please exercise caution before revealing any information that may identify you in the real world to other users.

- **Sweepstakes or Contests**. We may collect personal information you provide for any sweepstakes or contests that we offer. In some jurisdictions, we are required to publicly share information of sweepstakes and contest winners.

- **Conferences and Other Events**. We may collect personal information from individuals when we attend or host conferences and other events.

- **Business Development and Strategic Partnerships**. We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.

- **Job Applications**. We may post job openings and opportunities on our Services. If you respond to one of these postings, we may collect your personal information, such as your application, resume, cover letter, and/or any other information you provide to us.

B. Personal Information Collected Automatically

We may collect personal information automatically when you use our Services.

- **Automatic Collection of Personal Information**. We may collect certain information automatically when you use our Services, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services.

- **Cookie Policy (and Other Technologies).** We, as well as third parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, and other technologies ("**Technologies**") to automatically collect information through your use of our Services.

    - **Cookies**. Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.

    - **Pixel Tags/Web Beacons**. A pixel tag (also known as a web beacon) is a piece of code embedded in our Services that collects information about engagement on our Services. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

  Our uses of these Technologies fall into the following general categories:

- **Operationally Necessary**. This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity, improve security, or allow you to make use of our functionality;

- **Performance-Related**. We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how individuals use our Services (*see Analytics below*);

- **Functionality-Related**. We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed;

  Advertising- or Targeting-Related. We may use first party or third-party Technologies to deliver content, including ads relevant to your interests, on our Services or on third-party digital properties. Some of the advertising Technologies we use include:

- **Facebook Connect**. For more information about Facebook's use of your personal information, please visit Facebook's Data Policy. To learn more about how to opt-out of Facebook's use of your information, please click here while logged in to your Facebook account.

See "Your Privacy Choices and Rights" below to understand your choices regarding these Technologies.

- **Analytics**. We may use Technologies and other third-party tools to process analytics information on our Services. These Technologies allow us to better understand how our digital Services are used and to continually improve and personalize our Services. Some of our analytics partners include:

  - **Google Analytics**. For more information about how Google uses your personal information (including for its own purposes, e.g., for profiling or linking it to other data), please visit Google Analytics' Privacy Policy. To learn more about how to opt-out of Google Analytics' use of your information, please click here.

  - **Hotjar (Session Replay Analytics)**. We use Hotjar's session replay analytics services. This allows us to record and replay an individual's interaction with the Services. For more information about how Hotjar uses your personal information, please visit the "Personal Data collected from a visitor of a Hotjar Enabled Site" section of Hotjar's Privacy Policy. To learn more about how to opt-out of Hotjar's use of your information, please click here.

- **Social Media Platforms**. Our Services may contain social media buttons, such as Facebook and Instagram, which might include widgets such as the "share this" button or other interactive mini programs). These features may collect personal information such as your IP address and which page you are visiting on our Services and may set a cookie to enable the feature to function properly. Your interactions with these platforms are governed by the privacy policy of the company providing it.

C. Personal Information Collected from Other Sources

- **Third-Party Services and Sources**. We may obtain personal information about you from other sources, including through third-party services and organizations. For example, if you access our Services through a third-party application, such as an app store, a third-party login service, or a social networking site, we may collect personal information about you from that third-party application that you have made available via your privacy settings. In addition, if you are a healthcare professional, we may collect personal information such as hospital affiliation, license information, areas of interest, contact information such as address, email, and phone number, and other due diligence related information from various sources.

- **Referrals and Sharing Features**. Our Services may offer various tools and functionalities that allow you to provide personal information about your friends through our referral service. Our referral services may also allow you to forward or share certain content with a friend or colleague, such as an email inviting your friend to use our Services. Please only share with us contact information of people with whom you have a relationship (e.g., relative, friend, neighbor, or co-worker).

3. HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information for a variety of business purposes, including to provide our Services, for administrative purposes, and to market our products and Services, as described below.

A. Provide Our Services

We use your information to fulfil our contract with you and provide you with our Services, such as:

- Managing your information and accounts;
- Providing access to certain areas, functionalities, and features of our Services;
- Answering requests for customer support;
- Communicating with you about your appointment, activities on our Services, and policy changes;
- Processing your financial information and other payment methods for products or Services purchased;
- Processing applications if you apply for a job we post on our Services; and
- Allowing you to register for events.

B. Administrative Purposes

We use your information for various administrative purposes, such as:

- Pursuing our legitimate interests such as direct marketing, research and development (including marketing research)and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services;
- Short-term, transient use, such as contextual customization of ads;
- Improving, upgrading, or enhancing our Services;
- Developing new products and services;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities, including requests to exercise your rights under this Privacy Policy;
- Debugging to identify and repair errors with our Services;
- Auditing relating to interactions, transactions, and other compliance activities;
- Sharing personal information with third parties as needed to provide the Services;
- Enforcing our agreements and policies; and
- Carrying out activities that are required to comply with our legal obligations.

C. Marketing and Advertising our Products and Services

We may use personal information to tailor and provide you with content and advertisements. We may provide you with these materials as permitted by applicable law.
Some of the ways we market to you include email campaigns, text messages, custom audiences advertising**,** and "interest-based" or "personalized advertising," including through cross-device tracking.
If you have any questions about our marketing practices or if you would like to opt out of the use of your personal information for marketing purposes, you may contact us at any time as set forth in Contact Us below.

D. With Your Consent

We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.

E. **Other Purposes**

We also use your personal information for other purposes as requested by you or as permitted by applicable law.

De-identified and Aggregated Information. We may use personal information to create de-identified and/or aggregated information, such as demographic information, information about the device from which you access our Services, or other analyses we create.

4. HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We disclose your personal information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

A. **Disclosures to Provide our Services**

The categories of third parties with whom we may share your personal information are described below.

- **Service Providers**. We may share your personal information with our third-party service providers and vendors that assist us with the provision of our Services. This includes service providers and vendors that provide us with IT support, hosting, payment processing, customer service, and related services.

- **Business Partners**. We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your personal information with business partners with whom we jointly offer products or services.

- **Affiliates**. We may share your personal information with our company affiliates for example: for our administrative purposes, IT management, or for them to provide services to you or support and supplement the Services we provide.

- **Advertising Partners**. We may share your personal information with third-party advertising partners. These third-party advertising partners may set Technologies and other tracking tools on our Services to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks. This practice is commonly referred to as "interest-based advertising" or "personalized advertising."

- **APIs/SDKs**. We may use third-party application program interfaces ("**APIs**") and software development kits ("**SDKs**") as part of the functionality of our Services. For more information about our use of APIs and SDKs, please contact us as set forth in Contact Us below.

B. **Disclosures to Protect Us or Others**

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. **Disclosure in the Event of Merger, Sale, or Other Asset Transfers**

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

5. YOUR PRIVACY CHOICES AND RIGHTS

Your Privacy Choices. The privacy choices you may have about your personal information are determined by applicable law and are described below.

- **Email Communications**. If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications (e.g., communications regarding our Services or updates to our Terms or this Privacy Policy).

- **Text Messages**. If you receive an unwanted text message from us, you may opt out of receiving future text messages from us by following the instructions in the text message you have received from us or by otherwise contacting us as set forth in Contact Us below.

- **Mobile Devices**. We may send you push notifications through our mobile application. You may opt out from receiving these push notifications by changing the settings on your mobile device. With your consent, we may also collect precise location-based information via our mobile application. You may opt out of this collection by changing the settings on your mobile device.

- **Phone calls**. If you receive an unwanted phone call from us, you may opt out of receiving future phone calls from us by following the instructions which may be available on the call or by otherwise contacting us as set forth in Contact Us below.

- **"Do Not Track."** Do Not Track ("**DNT**") is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

- **Cookies and Personalized Advertising**. You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, our Services may not work properly. Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of personalized advertisements on some mobile applications by following the instructions for Android, iOS, and others.

  The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory

programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the Network Advertising Initiative and the Digital Advertising Alliance

Please note you must separately opt out in each browser and on each device.

Your Privacy Rights. In accordance with applicable law, you may have the right to:

- **Access to and Portability of Your Personal Information**, including: (i) confirming whether we are processing your personal information; (ii) obtaining access to or a copy of your personal information; and (iii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company in a structured, commonly used, and machine-readable format (also known as the "right of data portability");

- **Request Correction** of your personal information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your personal information;

- **Request Deletion** of your personal information;

- **Request Restriction of or Object to** our processing of your personal information where the processing of your personal information is based on our legitimate interest or for direct marketing purposes; and

- **Withdraw your Consent** to our processing of your personal information. Please note that your withdrawal will only take effect for future processing, and will not affect the lawfulness of processing before the withdrawal.

If you would like to exercise any of these rights, please contact us as set forth in Contact Us below or as otherwise instructed in the additional privacy notices provided at the time we collect your personal information. We will process such requests in accordance with applicable laws.

6. SECURITY OF YOUR INFORMATION

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized access, use, disclosure, or loss of personal information.

By using our Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on our Services, by mail, or by sending an email to you.

7. RETENTION OF PERSONAL INFORMATION

We store the personal information we collect as described in this Privacy Policy for as long as you use our Services, or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

8. SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS

This Supplemental Notice for California Residents only applies to our processing of personal information that is subject to the California Consumer Privacy Act of 2018 ("**CCPA**"). The CCPA provides California residents with the right to know what categories of personal information SimpliFed has collected about them, and whether SimpliFed disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding twelve months. California residents can find this information below:

Category of Personal Information Collected by SimpliFed	Category of Third Parties Personal Information is Disclosed to for a Business Purpose
Identifiers. A real name, postal address, Internet Protocol address, email address, Social Security number, or other similar identifiers.	• Service providers • Business partners • Affiliates • Service providers • Social networks • Health insurance providers
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) A name, signature, Social Security number, physical characteristics or description, address, telephone number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Personal Information does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records. Note: Some personal information included in this category may overlap with other categories.	• Service providers • Business partners • Affiliates • Service providers • Health insurance providers
Protected classification characteristics under California or federal law Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	• Service providers • Affiliates • Health insurance providers
Commercial information Products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	• Service providers • Business partners • Affiliates
Professional or employment-related information Current or past job history or performance evaluations.	• Service providers Affiliates
Inferences drawn from other personal information to create a profile about a consumer Profile reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	• Service providers • Affiliates

The categories of sources from which we collect personal information and our business and commercial purposes for using personal information are set forth in "Personal Information We Collect" and "How We Use Your Personal Information" above, respectively.

“Sales” of Personal Information under the CCPA

For purposes of the CCPA, we do not “sell” personal information, nor do we have actual knowledge of any “sale” of personal information of minors under 16 years of age

Opt-out of “Sales.” California residents may opt-out of the “sale” of their personal information by contacting us as set forth in “Contact Us” below.

Additional Privacy Rights for California Residents

Non-Discrimination. California residents have the right not to receive discriminatory treatment by us for the exercise of their rights conferred by the CCPA.

Authorized Agent. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To authorize an agent, provide written authorization signed by you and your designated agent and contact us as set forth in “Contact Us” below for additional instructions.

Verification. To protect your privacy, we will take steps to reasonably verify your identity before fulfilling your request. These steps may involve asking you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, or to answer questions regarding your account and use of our Services.

If you are a California resident and would like to exercise any of your rights under the CCPA, please contact us as set forth in “Contact Us” below. We will process such requests in accordance with applicable laws.

Refer-a-Friend and Similar Incentive Programs. As described above in “Referrals and Sharing Features” , we may offer referral programs or other incentivized data collection programs. For example, we may offer incentives to you such as discounts or promotional items or credit in connection with these programs, wherein you provide your personal information in exchange for a reward or provide personal information regarding your friends or colleagues (such as their email address) and receive rewards when they sign up to use our Services. The referred party may also receive rewards for signing up via your referral. If a referred party does not sign up for the Services, we may retain their personal information for future reference. These programs are entirely voluntary and allow us to grow our business and provide additional benefits to you. The value of your data to us depends on how you ultimately use our Services, whereas the value of the referred party’s data to us depends on whether the referred party ultimately uses our Services. Said value will be reflected in the incentive offered in connection with each program.

De-Identified Information. If we create or receive de-identified information, we will not attempt to reidentify such information, except to comply with applicable law.

California Shine the Light. The California “Shine the Light” law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties.

Right for minors to remove posted content. Where required by law, California residents under the age of 18 may request to have their posted content or information removed from the publicly-viewable portions of the Services by contacting us directly as set forth in Contact Us below.

9. SUPPLEMENTAL NOTICE FOR NEVADA RESIDENTS

If you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to third parties who intend to license or sell that personal information. You can exercise this right by contacting us at contactus@simplifed.us with the subject line "Nevada Do Not Sell Request" and providing us with your name and the email address that you used to request our Services. Please note that we do not currently sell your personal information as sales are defined in Nevada Revised Statutes Chapter 603A. If you have any questions, please contact us as set forth in Contact Us below.

10. CHILDREN'S INFORMATION

The Services are not directed to children under 13 (or other age as required by local law), and we do not knowingly collect personal information from children.

If you are a parent or guardian and believe your child has uploaded personal information to our site without your consent, you may contact us as described in Contact Us below. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it.

11. OTHER PROVISIONS

Third-Party Websites/Applications. The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen, or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

12. CONTACT US

If you have any questions about our privacy practices or this Privacy Policy, or to exercise your rights as detailed in this a Privacy Policy, please contact us at contactus@simplifed.us.