

PRIVACY POLICY

Shunya Health Inc. (“**Company**” or “**we**” or “**us**”, and their respective connotations) respects your privacy and we are committed to protecting the privacy and security of your personal information (“**Personal Information**”), including Protected Health Information (“**PHI**”) and sensitive data, in compliance with the Health Insurance Portability and Accountability Act (“**HIPAA**”) standards, through this privacy policy (“**Privacy Policy**”), and our compliance with all applicable laws and regulations.

We have created this Privacy Policy to inform you of our policies regarding the collection, use, and disclosure of Personal Information we collect when you use our Website (*defined below*), Platform (*defined below*) services, mobile applications, products, and content (“**Services**”), as well as the rights and choices you may have associated with your Personal Information.

For any requests or inquiries in relation to this Privacy Policy, please refer to the **Contact Us** section below.

The information on this page applies to the Personal Information we collect through or regarding your interactions, use, and experience with our website (available at: shunyahealth.com) (*including through integrations with third-party software or applications*) (our “**Website**”), and our computer application (our “**App**” and together with Website, hereinafter referred to as “**Platform**”).

About our Privacy Policy

The Platform gathers certain information with prior consent from the following: (a) the users utilising the Platform, and (b) any visitors of the Platform (collectively “**Users**” or “**you**”, and their respective connotations).

This Privacy Policy is meant to help the Users understand what information we collect, why we collect it, what information we disclose and how the Users can update, manage, export, and delete their information. This Privacy Policy shall be read in compliance with the applicable laws in the places we operate.

Your Consent

The Users will be deemed to have read, understood and agreed to the terms as provided in this Privacy Policy once they provide their consent or continue using the Platform after this Privacy Policy is presented to them. By granting their assent to this Privacy Policy, Users provide consent to such use, collection and disclosure of Personal Information as prescribed in this Privacy Policy.

We reserve the right to update or change this Privacy Policy at any time, and the Users should check this Privacy Policy periodically. To inform you of any material change as regards the manner in which we collect or process your information, including changes to this Privacy Policy, our updated Privacy Policy will be posted by us on the Platform, indicating the date on which the Privacy Policy was last updated at the top of the Privacy

Policy. We will endeavour to notify you for any such material changes, on a best efforts' basis.

Scope of this Privacy Policy

This Privacy Policy applies to Personal Information, data and other content we collect:

- based on the use of the Services;
- in communications email, text, and other messages between the Services, Platform and Users via web forms or chat, as applicable;
- in communications submitted to the Services using web forms and the social media/comment features on the Services, as applicable; and
- when you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this Privacy Policy.

This Privacy Policy does not apply to information collected by us:

- offline or through any other means, including on any other website or apps operated by us or any third party. You should review the terms and policies of those websites or apps before clicking on any links; or
- any third-party links, including through any application or content (including advertising) that may link to or be accessible from or on the Services.

Information that you Provide us

All information collected by the Company is with the Users' consent. The Company is however free to use, collect, and disclose information of the Users which is in the public domain.

When Users use or sign-up to the Platform, the Users may provide the Company with certain information including Personal Information voluntarily, specific to the nature of the service being availed on the Platform, and/or certain information may be collected by the Company depending solely on the usage of the Platform. The Users hereby consent to the collection of such information by the Company.

Information collected by the Company shall include but not be limited to the following:

- **Account Information** – Users that choose to register on Platform will have to provide a valid email address or phone number. If a User elects to sign up with an external authentication service, e.g. Google Sign-In, we will fetch and store email address, name and other details from such service.
- **Health Information** – Medical history, treatment records, diagnostic information
- **Transaction Information** – Users that choose to purchase a paid version of certain Services shall provide the Company (and its payment processors, including debt collectors) with billing details such as credit card information, billing email, banking information, location at the time of transaction and/or a billing address.

- **Event registrations and other form submissions** – We record information that you submit when you (i) register for any event, including webinars or seminars, (ii) subscribe to our newsletter or any other mailing list, (iii) submit a form in order to download any product, whitepaper, or other materials, (iv) participate in contests or respond to surveys, or (v) submit a form to request customer support, get a quote or to contact 100ms for any other purpose.
- **Interactions with Us** – We may record, analyze and use Your interactions with us, including email, telephone, and chat conversations with Our sales and customer support professionals, for improving Our interactions with You and other customers.

Information Collected Automatically

- **Information from browsers, devices and servers** – When a User interacts with the Services, we collect and process metadata to provide additional context about the way the Service is being used. We collect information that web browsers, mobile devices and servers make available, such as the internet protocol address, browser type, language preference, time zone, referring URL, date and time of access, operating system, mobile device manufacturer and mobile network information. We include these in our log files to understand more about visitors to our Website and Platform.
- **Information from cookies and tracking technologies** – We use temporary and permanent cookies to identify Users and to enhance User experience. We also use cookies, beacons, tags, scripts, and other similar technologies to identify visitors, track website navigation, gather demographic information about visitors and users, understand email campaign effectiveness and for targeted visitor and user engagement by tracking Your activities on Our websites. We mostly use first-party cookies and do not use third-party cookies or other third-party tracking technologies on Our websites for non-essential or intrusive tracking.
- **Information from application logs and mobile analytics** – We collect information about Your use of Our products, services and mobile applications from application logs and in-house usage analytics tools, and use it to understand how Your use and needs can improve Our products. This information includes clicks, scrolls, features accessed, access time and frequency, errors generated, performance data, storage utilized, user settings and configurations, and devices used to access and their locations.

Information that we Collect from Third Parties

- **Signups using federated authentication service providers** – You can log in to the Platform Services using supported federated authentication service providers such as Facebook, Twitter, LinkedIn, Microsoft and Google. These services will authenticate your identity and give you the option to share certain Personal Information with us, such as your name and email address.
- **Information from social media sites and other publicly available sources** – When you provide feedback or reviews about our products, interact, or engage with us on marketplaces, review sites or social media sites such as Facebook, Twitter, LinkedIn and Instagram through posts, comments, questions and other interactions, we may collect such

publicly available information, including profile information, to allow us to connect with you, improve our products, better understand User reactions and issues, or to reproduce and publish your feedback on our Websites.

Third parties may collect certain information by way of cookies, through our Platform. Such information may be collected, *inter alia*, for the following purposes: (a) advertising; (b) marketing; and (c) data analytics.

If the Company has reasons to suspect that the information provided by any User is misleading, inaccurate, obsolete or incomplete, the Company reserves the right to refuse provision of the Services to the User, at its sole discretion, without incurring any liability to the User or any third-party. We will not be liable for reliance on or consequences of any misleading, inaccurate, obsolete or incomplete information.

When you sign in to your account with on the Platform, or avail our Services, you consent to our collection, storage, and use, in accordance with this Privacy Policy.

How and why do we use your Personal Information?

We collect Personal Information only necessary for the following purposes:

- To communicate with you (such as through email) about Services that you have signed up for, changes to this Privacy Policy, changes to our terms of Service, or important notices;
- To keep you posted on new products and services, upcoming events, offers, promotions and other information that we think will be of interest to you;
- To ask you to participate in surveys, or to solicit feedback on our products and Services;
- To comply with legal and regulatory requirements, including HIPAA;
- To set up and maintain your account, and to do all other things required for providing Services, such as enabling collaboration, providing website and mail hosting, and backing up and restoring your data;
- To understand how users use our products and Services, to monitor and prevent problems, and to improve our products and Services;
- To provide User support, and to analyze and improve our interactions with Users;
- To detect and prevent fraudulent transactions and other illegal activities, to report spam, and to protect the rights and interests of the Company, its Users, third parties and the public;
- To update, expand and analyze our records and identify new Users;
- To analyze trends, administer our Websites, and track visitor navigations on our Websites to understand what visitors are looking for and to better help them;
- To monitor and improve marketing campaigns and make suggestions relevant to Users;
- To improve and enable you to avail our Services, increasing efficiency of existing features, and develop new features;
- To assess your application credentials and potentially provide you with a job in case you applied for a job through the Platform;
- To effectively deliver our Services to you, we use your Personal Information and other information to engage in important supporting activities such as: (i) billing and collections,

including maintenance of records in the event of a subsequent billing dispute; (ii) troubleshooting, quality control, and analytics; and (iii) monitoring the performance of our systems and Platform.

- To notify you of necessary information related to the Platform and Services and your account on the Platform from time to time;
- To maintain records and provide you with an efficient, safe and customized experience while using the Platform;
- As we believe to be necessary or appropriate, and only as permitted under applicable law: (i) to comply with legal processes; (ii) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (iii) to protect our operations, including in connection with investigating security incidents; (iv) to protect our rights, privacy, safety or property; or (v) to transfer the data and the rights associated therewith to a third party as part of reorganization or a sale of the assets of any division of the Company or the entire Company itself; and
- We may use Personal Information, including sensitive information of the Users to create non-identifiable, anonymous “aggregate data” for the purposes of marketing, research and analysis.

We may combine the Personal Information we collect or remove pieces of Personal Information to limit or prevent identification of a particular User or device to help with the purpose of research and marketing. This Privacy Policy does not apply to our use of such aggregated or de-identified information.

We normally collect or use Personal Information from Users only where we have their consent to do so, where we need the Personal Information to perform a contract with Users, or where the processing is in our legitimate interests and not overridden by the data protection interests or fundamental rights and freedom of the Users. In some cases, we may have legal obligation to collect or retain Personal Information or may need the Personal Information to protect vital interests of Users.

We keep your Personal Information for no longer than necessary for the purpose for which it is processed. The length of time for which we retain Personal Information depends upon the purpose for which we collect and use it and/or as required to comply with the applicable laws.

Cookies

We use cookies to understand and save your preferences for future visits, to advertise on other sites, and to compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. Cookies are small files that a site or its service provider transfers to your computer’s hard drive through your web browser, only if you allow, that enables the sites or service providers’ systems to recognize your browser and capture and remember certain information.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies. If you delete or decline cookies, some features of the Platform may not work or may not work as designed. Additionally, if you choose to disable cookies, you may be unable to access certain parts of the Platform. A banner asking you to accept our cookies policy will be displayed upon the first visit to our Platform (or the first visit after you delete your cookies). Unless you have adjusted your browser setting so that it will refuse cookies and/or you have not accepted our cookies policy, our system will issue cookies when you log on to our Platform.

For more information on cookies and how to disable them, you can consult the information provided by the Interactive Advertising Bureau at www.allaboutcookies.org.

How we Protect your Personal Information?

The security of your Personal Information is important to us, and we have implemented reasonably sufficient means to protect the same, including access controls and data encryption. However, no method of transmission over the internet, or method of electronic storage, is 100% secure and we cannot guarantee its absolute security. We have implemented best industry practices and security policies, rules and technical measures to protect the data, including Personal Information, that is under the Company's control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss, in compliance with all applicable laws. However, for any data loss or theft due to unauthorized access to the Users' electronic devices through which the Users avail the Services, we shall not be held liable for any loss whatsoever incurred by the Users or any third-party.

When payment information is being transmitted on or through the Platform, it will be protected by encryption technology of a third-party payment services providers, including payment gateways. You agree, acknowledge and consent to such sharing of your information with third party service providers to process payments and manage your payment-related information, which will include your Personal Information. The Company guarantees that the transmissions of your payment-related information will always be secure.

Do we Transfer your Personal Information Internationally?

All or any information processed by the Company may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States, India, or such other countries, which may have different data protection laws from the laws in the country of your residence. We undertake to safeguard your information in accordance with the applicable laws.

Disclaimers

The Platform may contain links to other websites. Please note that when Users click on one of these links, they are entering another website over which we have no control and for which we will bear no responsibility. Often these websites require the User to enter their Personal Information. We encourage and recommend the Users to read the privacy policies of all such websites as their policies may differ from our Privacy Policy. Users agree that we

shall not be liable for any breach of their privacy or Personal Information or loss incurred by their use of such websites or services. The inclusions or exclusions are not suggestive of any endorsement by the Company of the website or contents of the website. The Users may visit any third-party website linked to the Platform at their risk.

You also may provide information (such as ratings, reviews, tips, photos, comments, likes, bookmarks, friends, lists, etc.) to be published or displayed on publicly accessible areas of our Services, or transmitted to us or third-parties (collectively, "**Contributions**"). Your Contributions are posted on and transmitted to others at your own risk. Although we limit access to certain pages, you may set certain privacy settings for such information by logging into your account profile. Additionally, we cannot control the actions of other users of our Services with whom you may choose to share your Contributions. Therefore, we cannot and do not guarantee that your Contributions will not be viewed by unauthorized persons. We may display this information on the Services, share it with businesses, and further distribute it to a wider audience through third party sites and services. You should be careful about revealing any sensitive details about yourself in such postings.

What are Your Rights?

As a User, the Company grants you complete control over the information submitted by you to the Company. The rights pertaining thereto are enumerated below:

- **The right to access the information we have on the User** – You have a right to request that we provide you with a copy of your Personal Information that we hold, and you have the right to be informed of: (a) a summary of your Personal Information which is being processed us; (b) the processing activities undertaken by us with respect to your Personal Information; (c) the data controller's identity (i.e., information about persons who control the manner in which your Personal Information is processed); and (d) the entities or categories of entities to whom your Personal Information may be transferred.
- **The right of rectification** – You have a right to rectify in the profile section of the Platform or request that we rectify inaccurate Personal Information, complete the incomplete Personal Information or update the Personal Information. We may seek to verify the accuracy of the Personal Information before rectifying it.
- **The right to erasure** – You can also request that we erase your Personal Information in limited circumstances where: (i) it is no longer needed for the purposes for which it was collected; (ii) you have withdrawn your consent (where the data processing was based on consent); (iii) following a successful right to object (see right to object); (iv) it has been processed unlawfully; or (v) to comply with any legal obligations of the Company.

We are not required to comply with Your request to erase Personal Information if the processing of your Personal Information is necessary: (i) for compliance with a legal obligation; and/or (ii) for the establishment, exercise or defence of legal claims.

- **The right to withdraw consent** – Users have the right to withdraw their consent at any time, when consent is given pertaining to Personal Information.

- **The right to lodge a complaint with the local supervisory authority** – You have a right to lodge a complaint with the relevant local supervisory authority if you have concerns about how we are processing your Personal Information. We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.
- **The right to be informed** – Users have the right to be informed about third parties with which their Personal Information has been shared.
- **The right to unsubscribe** – You may always opt-out of receiving future e-mail messages and newsletters from the Company. We provide you with the opportunity to opt-out of receiving communications from us by choosing the appropriate options for unsubscribing under your emails. To opt-out, you can also send us a message at srikant@shunyahealth.com. Please note, however, that you generally cannot opt-out of service-related announcements, e.g., if the Service is temporarily suspended or if delivery of a product or service is delayed.
- **The right to nominate** – Users shall have the right to nominate any other individual, who shall, in the event of death or incapacity of such user, exercise the rights provided above.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the Personal Information requested to you. We reserve the right to charge a fee, where permitted by law, for instance, if your request is manifestly unfounded or excessive.

You can exercise your rights by contacting us at srikant@shunyahealth.com. Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.

Please take note, we may not always be able to fully address Your request, for example, if it would impact the duty of confidentiality we owe to other Users, or if we are legally entitled to deal with the request in a different way.

Legal Age and Capacity for Consent in your Jurisdiction

Our Services are intended for adults, and can be used by minors subject to the legal consent of their parent or legal guardian. We do not knowingly collect Personal Information from children who are under 18 (eighteen) years of age for its own purposes. If you have achieved the age of majority and intend to avail the Services, or if you are the legal guardian of a minor intending to avail the Services, i.e., any person below 18 (eighteen) years of age, you hereby agree and acknowledge that you have provided your informed and unconditional consent on behalf of yourself or on behalf of the minor (as applicable), in accordance with applicable laws. If you become aware of any data we may have collected from children under age 18 (eighteen), please contact us at srikant@shunyahealth.com.

Do California Residents have Specific Privacy Rights?

This section for California Residents supplements this Privacy Policy to comply with the California Consumer Privacy Act of 2018 (“**CCPA**”) and the California Privacy Rights Act (“**CPRA**”) of 2023.

The CCPA and the CPRA are California laws that provide its residents with certain rights over information about them, including notice about the categories of Personal Information we have collected from them in the preceding 12 (twelve) months and the purposes for which the information is used or disclosed, and correction of Personal Information.

In the preceding 12 (twelve) months, depending how you interact with our Platform, we may have collected the following categories of Personal Information (as defined under Cal. Civ. Code §1798.140(v)(1)):

- **Identifiers**, such as your name, address, unique personal identifier, email, phone number, or similar identifiers.
- **Commercial information**, such as information relating to transactions with us involving you or the person that you work for (for example, details of products developed by us or Services that we have supplied to, or obtained from, you or the person you work for), and information about events to which you or those related to you are invited, and your Personal Information and preferences to the extent that this information is relevant to organising and managing those events.
- **Internet or other electronic network activity information**, such as technical information, including the Internet Protocol (IP) address used to connect your computer to the internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, click-stream data, locale preferences, your mobile carrier, and system configuration information.
- **Geolocation data**, such as geolocation, to the extent you have configured your device to permit us to collect such information.
- **Information relating to evaluation of your mental health and inferences drawn from any of the information listed above**, such as your preferences, characteristics, behaviour and attitudes.

For more information about the Personal Information that we collect and how we collect it, please refer to foregoing sections of this Privacy Policy which deal with information collected by us.

Sales of Personal Information under the CCPA

The Company does not sell Personal Information, nor do we possess any actual knowledge of any sale of Personal Information.

Additional Privacy Rights for California Residents

In addition to the rights provided under foregoing section on the rights of Users, Users who are California residents are also entitled to the following rights:

- **Non-Discrimination** – It is the right of California residents not to receive any discriminatory treatment from us for the exercise of their rights conferred by the CCPA.
- **Authorized Agent** – Only the Users, or someone legally authorized to act on behalf of the Users, may make a verifiable consumer request related to their Personal Information. Users may also make a verifiable consumer request on behalf of their minor children. To designate an authorized agent, please contact us at srikant@shunyahealth.com and provide written authorization signed by the User and his/her designated agent.
- **Verification** – To protect Users’ privacy, we will undertake the following steps to verify Users’ identity before fulfilling their request. When you make a request, we will ask you to provide sufficient information that allows us to reasonably verify that you are the person about whom we collected Personal Information or an authorized representative, which may include asking you for additional proof of identity and asking questions regarding your account and use of our Services.
- **California “Shine the Light” law** – California’s “Shine the Light” law (California Civil Code Section 1798.83) permits Users of our Services who are California residents to request and obtain from us, once a year and free of charge, a list of third parties with whom we have shared any Personal Information belonging to any of our Users, for their marketing purposes. To make such a request, please contact us at srikant@shunyahealth.com.
- If you are under 18 (eighteen) years of age and reside in California having a registered account with us, you have the right to request removal of unwanted data that you publicly post on the website. To request removal of such data, please contact us at srikant@shunyahealth.com, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the website, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.).
- **Do not track** – As per California law, it is required that we let you know how we respond to web browser Do Not Track (“DNT”) signals. DNT is a privacy preference that Users may set in their web browsers. Please acknowledge that we do not respond to such DNT requests at this time.
- **Response Timing** – We are required to respond to any of the verifiable consumer requests to exercise these above rights within 45 (forty-five) days. Should we be unable to comply within such period, we will contact you and let you know whether we can complete your request or whether we need more time to complete your request with reason. Any disclosure we provide will only cover the 12 (twelve) month period preceding the verifiable consumer request’s receipt.

Regarding information we disclose to third parties, you have the right to opt out of such disclosure at any time. You can exercise your right to opt out (or any other rights) by emailing us at srikant@shunyahealth.com.

Grievance Officer

Any complaints, abuse or concerns with regards to content and or comment or breach of the terms in this Privacy Policy shall be immediately informed to the designated Grievance Officer as mentioned below in writing or through email signed with the electronic signature:

Name: Srikant Rao

Email: srikant@shunyahealth.com

Your use of the Platform and any dispute over privacy is subject to this Privacy Policy and the Company's terms of Service available at the Company's Website.

Contact Us

If there are any questions regarding this Privacy Policy, you may contact us using the email address below:

srikant@shunyahealth.com

+1.765.476.3381