

## ONLINE PRIVACY POLICY AGREEMENT

**Update 1/31/22**

Telemedicine.com, Inc. values its users' privacy. This Privacy Policy ("Policy") will help you understand how we collect and use personal information from those who visit our website or make use of our online facilities and services, and what we will and will not do with the information we collect. Our Policy has been designed and created to ensure those affiliated with Telemedicine.com, Inc. of our commitment and realization of our obligation not only to meet, but to exceed, most existing privacy standards.

We reserve the right to make changes to this Policy at any given time. If you want to make sure that you are up to date with the latest changes, we advise you to frequently visit this page. If at any point in time Telemedicine.com, Inc. decides to make use of any personally identifiable information on file, in a manner vastly different from that which was stated when this information was initially collected, the user or users shall be promptly notified by email. Users at that time shall have the option as to whether to permit the use of their information in this separate manner.

This Policy applies to Telemedicine.com, Inc., and it governs any and all data collection and usage by us. Through the use of [www.telemedicine.com](http://www.telemedicine.com), you are therefore consenting to the data collection procedures expressed in this Policy.

Please note that this Policy does not govern the collection and use of information by companies that Telemedicine.com, Inc. does not control, nor by individuals not employed or managed by us. If you visit a website that we mention or link to, be sure to review its privacy policy before providing the site with information. It is highly recommended and suggested that you review the privacy policies and statements of any website you choose to use or frequent to better understand the way in which websites garner, make use of and share the information collected.

Specifically, this Policy will inform you of the following

1. What personally identifiable information is collected from you through our website;
2. Why we collect personally identifiable information and the legal basis for such collection;
3. How we use the collected information and with whom it may be shared;
4. What choices are available to you regarding the use of your data; and
5. The security procedures in place to protect the misuse of your information.

### **Information We Collect**

It is always up to you whether to disclose personally identifiable information to us, although if you elect not to do so, we reserve the right not to register you as a user or provide you with any products or services. This website collects various types of information, such as:

- Voluntarily provided information which may include your name, address, email address, billing and/or credit card information etc. which may be used when you purchase products and/or services and to deliver the services you have requested.

- Information automatically collected when visiting our website, which may include cookies, third party tracking technologies and server logs.

In addition, Telemedicine.com, Inc. may have the occasion to collect non-personal anonymous demographic information, such as age, gender, household income, political affiliation, race and religion, as well as the type of browser you are using, IP address, or type of operating system, which will assist us in providing and maintaining superior quality service.

Telemedicine.com, Inc. may also deem it necessary, from time to time, to follow websites that our users may frequent to glean what types of services and products may be the most popular to customers or the general public.

Please rest assured that this site will only collect personal information that you knowingly and willingly provide to us by way of surveys, completed membership forms, and emails. It is the intent of this site to use personal information only for the purpose for which it was requested, and any additional uses specifically provided for on this Policy.

### **Why We Collect Information and For How Long**

We are collecting your data for several reasons:

- To better understand your needs and provide you with the services you have requested;
- To fulfill our legitimate interest in improving our services and products;
- To send you promotional emails containing information we think you may like when we have your consent to do so;
- To contact you to fill out surveys or participate in other types of market research, when we have your consent to do so;
- To customize our website according to your online behavior and personal preferences.

The data we collect from you will be stored for no longer than necessary. The length of time we retain said information will be determined based upon the following criteria: the length of time your personal information remains relevant; the length of time it is reasonable to keep records to demonstrate that we have fulfilled our duties and obligations; any limitation periods within which claims might be made; any retention periods prescribed by law or recommended by regulators, professional bodies or associations; the type of contract we have with you, the existence of your consent, and our legitimate interest in keeping such information as stated in this Policy.

### **Use of Information Collected**

Telemedicine.com, Inc. does not now, nor will it in the future, sell, rent or lease any of its customer lists and/or names to any third parties.

Telemedicine.com, Inc. may collect and may make use of personal information to assist in the operation of our website and to ensure delivery of the services you need and request. At times, we may find it necessary to use personally identifiable information as a means to keep you informed of other possible products and/or services that may be available to you from [www.telemedicine.com](http://www.telemedicine.com)

Telemedicine.com, Inc. may also be in contact with you with regards to completing surveys and/or research questionnaires related to your opinion of current or potential future services that may be offered.

Telemedicine.com, Inc. uses various third-party social media features including but not limited to Facebook, Twitter, LinkedIn and other interactive programs. These may collect your IP address and require cookies to work properly. These services are governed by the privacy policies of the providers and are not within Telemedicine.com, Inc.'s control.

## **Disclosure of Information**

Telemedicine.com, Inc. may not use or disclose the information provided by you except under the following circumstances:

- as necessary to provide services or products you have ordered;
- in other ways described in this Policy or to which you have otherwise consented;
- in the aggregate with other information in such a way so that your identity cannot reasonably be determined;
- as required by law, or in response to a subpoena or search warrant;
- to outside auditors who have agreed to keep the information confidential;
- as necessary to enforce the Terms of Service;
- as necessary to maintain, safeguard and preserve all the rights and property of Telemedicine.com, Inc.

## **Non-Marketing Purposes**

Telemedicine.com, Inc. greatly respects your privacy. We do maintain and reserve the right to contact you if needed for non-marketing purposes (such as bug alerts, security breaches, account issues, and/or changes in Telemedicine.com, Inc. products and services). In certain circumstances, we may use our website, newspapers, or other public means to post a notice.

## **Children under the age of 13**

Telemedicine.com, Inc.'s website is not directed to, and does not knowingly collect personal identifiable information from, children under the age of thirteen (13). If it is determined that such information has been inadvertently collected on anyone under the age of thirteen (13), we shall immediately take the necessary steps to ensure that such information is deleted from our system's database, or in the alternative, that verifiable parental consent is obtained for the use and storage of such information. Anyone under the age of thirteen (13) must seek and obtain parent or guardian permission to use this website.

## **Unsubscribe or Opt-Out**

All users and visitors to our website have the option to discontinue receiving communications from us by way of email or newsletters. To discontinue or unsubscribe from our website please send an email that you wish to unsubscribe to [mail@telemedicine.com](mailto:mail@telemedicine.com). If you wish to unsubscribe or opt-out from any third-party websites, you must go to that specific website to unsubscribe or opt-out. Telemedicine.com, Inc. will continue to adhere to this Policy with respect to any personal information previously collected.

## **Links to Other Websites**

Our website does contain links to affiliate and other websites. Telemedicine.com, Inc. does not claim nor accept responsibility for any privacy policies, practices and/or procedures of other such websites. Therefore, we encourage all users and visitors to be aware when they leave our website and to read the privacy statements of every website that collects personally identifiable information. This Privacy Policy Agreement applies only and solely to the information collected by our website.

## **Notice to European Union Users**

Telemedicine.com, Inc.'s operations are located in the United States. If you provide information to us, the information will be transferred out of the European Union (EU) and sent to the United States. (The adequacy decision on the EU-US Privacy became operational on August 1, 2016. This framework protects the fundamental rights of anyone in the EU whose personal data is transferred to the United States for commercial purposes. It allows the free transfer of data to companies that are certified in the US under the Privacy Shield.) By providing personal information to us, you are consenting to its storage and use as described in this Policy.

## Your Rights as a Data Subject

Under the regulations of the General Data Protection Regulation ("GDPR") of the EU you have certain rights as a Data Subject. These rights are as follows:

- **The right to be informed:** this means we must inform you of how we intend to use your personal data and we do this through the terms of this Policy.
- **The right of access:** this means you have the right to request access to the data we hold about you and we must respond to those requests within one month. You can do this by sending an email to [mail@telemedicine.com](mailto:mail@telemedicine.com).
- **The right to rectification:** this means that if you believe some of the data we hold is incorrect, you have the right to have it corrected. You can do this by logging into your account with us, or by sending us an email with your request.
- **The right to erasure:** this means you can request that the information we hold be deleted, and we will comply unless we have a compelling reason not to, in which case you will be informed of same. You can do this by sending an email to [mail@telemedicine.com](mailto:mail@telemedicine.com).
- **The right to restrict processing:** this means you can change your communication preferences or opt-out of certain communications. You can do this by sending an email to [mail@telemedicine.com](mailto:mail@telemedicine.com).
- **The right of data portability:** this means you can obtain and use the data we hold for your own purposes without explanation. If you wish to request a copy of your information, contact us at [mail@telemedicine.com](mailto:mail@telemedicine.com).
- **The right to object:** this means you can file a formal objection with us regarding our use of your information with regard to third parties, or its processing where our legal basis is our legitimate interest in it. To do this, please send an email to [mail@telemedicine.com](mailto:mail@telemedicine.com).

In addition to the rights above, please rest assured that we will always aim to encrypt and anonymize your personal information whenever possible. We also have protocols in place in the unlikely event that we suffer a data breach and we will contact you if your personal information is ever at risk. For more details regarding our security protections see the section below or visit our website at [www.telemedicine.com](http://www.telemedicine.com).

## Security

Telemedicine.com, Inc. takes precautions to protect your information. When you submit sensitive information via the website, your information is protected both online and offline. Wherever we collect sensitive information (e.g. credit card information), that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a lock icon in the address bar and looking for "https" at the beginning of the address of the webpage.

While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to personally identifiable information. The computers and servers in which we store personally identifiable information are kept in a secure environment. This is all done to prevent any loss, misuse, unauthorized access, disclosure or modification of the user's personal information under our control.

The company also uses Secure Socket Layer (SSL) for authentication and private communications to build users' trust and confidence in the internet and website use by providing simple and secure access and communication of credit card and personal information. In addition, Telemedicine.com, Inc. is a licensee of TRUSTe.

## **Acceptance of Terms**

By using this website, you are hereby accepting the terms and conditions stipulated within the Privacy Policy Agreement. If you are not in agreement with our terms and conditions, then you should refrain from further use of our sites. In addition, your continued use of our website following the posting of any updates or changes to our terms and conditions shall mean that you agree and acceptance of such changes.

## **How to Contact Us**

If you have any questions or concerns regarding the Privacy Policy Agreement related to our website, please feel free to contact us at the following email, telephone number or mailing address.

**Email:** mail@telemedicine.com    **Telephone**

**Number:** (530) 676-0421

### **Mailing Address:**

Telemedicine.com, Inc.

3450 Palmer Dr Ste 4-268

Cameron Park, California 95682

The data controller responsible for your personal information for the purposes of GDPR compliance is:

Cheryl Kurywchak mail@telemedicine.com

(530) 676-0421

3450 Palmer Drive, STE 4-268, Cameron Park, CA 95682

## **California and Nevada Residents**

This Privacy Notice for California and Nevada Residents supplements and is expressly made part of the information contained in the Telemedicine.com, Inc. Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California or in the State of Nevada (“consumers” or “you”). We adopt this Notice to comply with both the California Consumer Privacy Act of 2018 (CCPA) and Nevada Senate Bill 220 and Chapter 603A of the laws of the State of Nevada. The above laws may not apply to each of you in each scenario and are supplied here for your reference.

Any terms defined in the CCPA have the same meaning when used in this Notice.

## **Information We Collect**

Our Websites collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, our Websites have collected the following categories of personal information from its consumers within the last twelve (12) months:

### **Category Collected**

A. Identifiers. YES

B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). YES

C. Protected classification characteristics under California or federal law. NO

D. Commercial information. YES

E. Biometric information. NO

F. Internet or other similar network activity. YES

G. Geolocation data. YES

H. Sensory data. NO

I. Professional or employment-related information. NO

J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)). NO

K. Inferences drawn from other personal information. YES

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:

o health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;

o personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

Telemedicine.com, Inc. obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our Websites.
- From third-party business partners such as social media sites, ad networks, and analytics providers.

### **Use of Personal Information**

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.
- To provide, support, personalize, and develop our Websites, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Websites, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our Websites, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Websites, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.

- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Telemedicine.com, Inc.'s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Telemedicine.com, Inc. about our Website users is among the assets transferred.

Telemedicine.com, Inc. will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **Sharing Personal Information**

Telemedicine.com, Inc. may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information with the following categories of third parties:

- Service providers.
- Data aggregators.

### **Disclosures of Personal Information for a Business Purpose**

In the preceding twelve (12) months, Company has disclosed the following categories of personal information for a business purpose:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category D: Commercial information.

Category F: Internet or other similar network activity.

Category G: Geolocation data.

Category K: Inferences drawn from other personal information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers.

### **Sales of Personal Information**

In the preceding twelve (12) months, Company has not sold personal information.

### **Your Rights and Choices**

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

### **Access to Specific Information and Data Portability Rights**

You have the right to request that Telemedicine.com, Inc. disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your

verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - o sales, identifying the personal information categories that each category of recipient purchased; and
  - o disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

### **Deletion Request Rights**

You have the right to request that Telemedicine.com, Inc. delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### **How can I opt out of Telemedicine.com's information sharing?**

You can contact us by either:

- Sending a letter to us at Telemedicine.com, Inc., Attn: Director of Privacy Administration, 3450 Palmer Drive, STE 4-268, Cameron Park, CA 95682
- [mail@telemedicine.com](mailto:mail@telemedicine.com)

Please in writing request not to receive marketing mailings that result from Telemedicine.com, Inc. data. It's important to understand that when you opt out with Telemedicine.com, Inc., we don't delete your information. We mark it on our databases as "Do Not Share." We do this because if your information is

deleted, in the future, we would have no way to know that you requested that your information not be shared. When you're marked as "Do Not Share," we'll know that you didn't want your information shared in case your information is later resubmitted. We want to be sure that consumers' requests are honored until we're told of a change.

### **Exercising Access, Data Portability, and Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Sending a letter to us at Telemedicine.com, Inc., Attn: Director of Privacy Administration, 3450 Palmer Drive, STE 4-268, Cameron Park, CA 95682
- mail@telemedicine.com

Only you, or a person registered with the California Secretary of State that you authorize 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.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

### **Response Timing and Format**

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

## **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

## **Other California Privacy Rights**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Websites that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [mail@telemedicine.com](mailto:mail@telemedicine.com).

## **Changes to Our Privacy Notice**

Telemedicine.com, Inc. reserves the right to amend this privacy Notice at our discretion and at any time. When we make changes to this privacy Notice, we will post the updated Notice on the Websites and update the Notice's effective date. Your continued use of our Websites following the posting of changes constitutes your acceptance of such changes.

## **Contact Information**

If you have any questions or comments about this Notice, the ways in which Telemedicine.com, Inc. collects and uses your information described above, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Email: [mail@telemedicine.com](mailto:mail@telemedicine.com)

Postal Address:

Telemedicine.com

3450 Palmer Drive, STE 4-268

Cameron Park, CA 95682

*Include name, address, email, phone (optional) and the reason for communication.*