# **Privacy Policy**

RG NeuroTECH, PLLC (dba NeuroQUE)

Effective Date: 08/01/2025

RG NeuroTECH, PLLC ("RG NeuroTECH," "we," "our," "us") respects your privacy. Across our business and in our NeuroQUE application and services, we collect, store, and use your personal information only for clearly defined purposes. We use your information to support and enhance our relationship with you—for example, to provide clinical support, improve accuracy of EEG interpretation, facilitate research validation, ensure regulatory compliance, and share product, service, and company updates.

We do not sell your personal information. We only share your personal data outside RG NeuroTECH with your consent, as required by law, to protect patients, customers, or the public, or with vendors and partners who help us fulfill our obligations to you. Those partners are contractually required to protect your information and maintain confidentiality.

At any time, you may contact RG NeuroTECH with questions or concerns about privacy. You may also request access, correction, or deletion of your personal data. We strive to protect the security of your data by employing appropriate technical, administrative, and organizational safeguards.

PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING THE NEUROQUE APP OR SERVICES. IF YOU DO NOT ACCEPT THIS POLICY, DO NOT USE THE SERVICES. By accessing or using NeuroQUE, you agree that we may collect, use, and disclose technical and personal information about you as described below.

# **Privacy and Data Security**

Your right to privacy and data security is a primary concern at RG NeuroTECH. That's why, when you use NeuroQUE or visit rgneurotech.com, we help you maintain control over your personal data. These guidelines apply to all domestic RG NeuroTECH websites and applications, including the NeuroQUE mobile app available on Apple App Store and Google Play.

#### Information We Collect

We only request personal information where necessary to support your use of the NeuroQUE app and services. Examples include:

- 1. Registering an account in the NeuroQUE app
- 2. Submitting a support request
- 3. Participating in clinical validation studies (with IRB approval when required)
- 4. Providing feedback via surveys or user testing
- 5. Subscribing to newsletters or updates
- 6. Clinical or operational data shared through EMR/EHR integration

Information requested may include your name, email address, phone number, organization, role (e.g., physician, researcher), as well as EEG-related data, study metadata, or other similar information necessary for analysis. If significantly different information is required, we will inform you of the purpose.

#### **How We Use Your Information**

The information you provide is kept confidential and used only to support your relationship with RG NeuroTECH. Specifically, we may use it to:

- Improve accuracy of EEG interpretation through NeuroQUE's Al-assisted tools
- Provide customer service and technical support
- Alert you to product upgrades, new services, research findings, or regulatory updates
- Conduct research and validation studies (with appropriate consent/IRB approval)
- Enhance clinical outcomes by identifying abnormal EEG findings more effectively

Agents or contractors of RG NeuroTECH who have access to your personal data are required to keep the information confidential and may use it only to carry out the services they perform for us.

We may also be required to disclose personal information for law enforcement, fraud prevention, regulatory compliance (including HIPAA obligations), or if we reasonably believe disclosure is necessary to protect RG NeuroTECH, its users, or the public.

# HIPAA Compliance and Protected Health Information (PHI)

As a healthcare-related service, NeuroQUE may receive, process, or store Protected Health Information (PHI) as defined under the Health Insurance Portability and Accountability Act of 1996 (HIPAA). RG NeuroTECH is committed to maintaining full HIPAA compliance.

- Minimum Necessary Rule: We access, use, and disclose only the minimum amount of PHI needed to perform the intended function (e.g., EEG analysis, reporting).
- Business Associate Agreements (BAAs): When working with covered entities (such as hospitals, clinics, or researchers), RG NeuroTECH will sign and honor a BAA that defines our HIPAA responsibilities.
- Safeguards: We employ administrative, technical, and physical safeguards to protect PHI, including encryption of data at rest and in transit, secure authentication, and restricted role-based access.
- Use and Disclosure: PHI is used solely for providing the NeuroQUE service, supporting clinical operations, and fulfilling research validation studies. PHI is not used for marketing or non-clinical purposes without explicit authorization.
- Patient Rights: Patients have rights under HIPAA to access, amend, and request restrictions on their PHI. RG NeuroTECH will work with covered entities to support these rights.
- Breach Notification: In the event of a breach of unsecured PHI, RG NeuroTECH will
  comply with HIPAA's breach notification requirements and promptly inform affected
  parties and covered entities as required by law.

## **Your Choices and Rights**

- Opt-Out of Marketing: You may opt-out of receiving marketing communications at any time by following unsubscribe instructions or contacting us directly.
- Access & Correction: You may request to review, correct, or delete your personal data by contacting RG NeuroTECH.
- Clinical Data Use: Where NeuroQUE is used in a research or healthcare setting, additional protections under HIPAA and applicable research regulations (including IRB approval) apply.

#### **Data Security**

RG NeuroTECH is committed to protecting the confidentiality, integrity, and availability of your information. We use industry-standard measures including encryption, access controls, and secure hosting practices. For clinical and EEG data, we comply with HIPAA and applicable data protection laws.

## **Cookies & Analytics**

The NeuroQUE app and website may use cookies or analytics technologies to improve performance, customize user experience, and support research insights. This does not provide us with direct personal identifiers unless you provide them voluntarily.

#### **Third-Party Sites and Services**

The NeuroQUE app and rgneurotech.com may contain links to third-party websites or services. These sites are not governed by this Privacy Policy, and RG NeuroTECH is not responsible for their practices. We encourage you to review third-party privacy policies before sharing personal information.

#### **Your Consent**

By using NeuroQUE and our services, you consent to the collection and use of your information as described. If we make material changes to this Privacy Policy, we will update the effective date and post a notice on our website or within the NeuroQUE app.

#### **Contact Us**

RG NeuroTECH, PLLC

Attention: Privacy

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