

## **FEMVERA HEALTH ONLINE PRIVACY POLICY**

FemVera Health Inc. (“FemVera”) is committed to the privacy of your information. This Privacy Policy is meant to help you understand the information we collect, why we collect it, and how you can manage it. This Policy applies to personal information collected through our website at [www.femverahealth.com](http://www.femverahealth.com) (the “Site”) and any related services, communications, or apps (the “Services”), unless otherwise stated. By using our Site, or by purchasing our Services, you are acknowledging that you have read, understood, and accept this Privacy Policy and our Terms of Use.

In this Privacy Policy, any use of the words “you,” “yours,” or similar expressions refers to users of this Site and our Services, as well as any other individuals whose information we collect and process. References to “we,” “us,” “our” or similar expressions refer to FemVera.

This Privacy Policy does not extend to anyone whose personal information is not under our control or management, including data that is collected by other websites that you may visit before or after this Site, and which are not governed by this Privacy Policy. We are not responsible for the data protection or privacy policies of any other websites, and accept no responsibility or liability for those policies. Please carefully check the privacy policies, terms of use, and security practices of other websites and services you use before you visit or submit personal information.

### **1. Information We Collect**

1. Information We Collect and Receive. For you to use our Site and Services, we need to collect and process certain types of information. Depending on your use of our Site and Services, this may include examples such as the following:
  - a. Information you provide when you use our Services, such as data you provide to enable personalized insights about your reproductive health status. This information includes

demographic information you provide, health data, and insights we calculate to provide you with these personalized insights.

- b. Information you provide to us by completing forms on our website: For example, your name, contact, and address information, and any other information you may provide in the forms on the Site;
- c. Information you provide to us by contacting us: Any personal information you may provide to us when you email or call us, such as name, phone number, employer, and any other details you provide in your communications. FemVera may also request your contact information for the purposes of having someone contact you for additional information, or in response to your request for information from us;
- d. Transaction information when you purchase Services from us: For example, if you make purchases with your credit card, we may use your credit card information for shipping, billing, and credit card validation purposes;
- e. Information we obtain from third party sources: From time to time, we may receive personal information about you from third party sources, but only where we have received assurances from these third parties that they have either received your consent or are otherwise legally permitted or required to disclose your personal information to us. We use the information we receive from these third parties in order to provide Services to those third parties; and
- f. Information about your activity through our Services, including your device information, such as your IP address, the type of device or browser you use, and your actions on the Site.

We will only use your personal information to provide you with information, or Services you have requested, or for the purposes set out in this Policy. Personal information does not include aggregated information from which individual identities have been removed.

2. Information from Children. FemVera does not knowingly solicit or collect any personal information from anyone under 18 years of age, and children under 18 are not permitted

to register for or use our Site or Services, including by subscribing to receive information from **FemVera**. Parents can contact our customer service department to access, change, or delete the personal information that has been submitted by a child. If we become aware that a child under the age of 18 has provided us with personal information, we will delete it.

3. Cookies, Tracers, and Advertising. We may use cookies and similar technologies (e.g., web beacons, pixels, ad tags and device identifiers) to recognize you and/or your device(s) on, off and across the Site and different Services and devices. A “cookie” is a small file that is placed onto your device (e.g., computer, smartphone or other electronic device) that stores information when you visit a website. Cookies may also enable us, our service providers or other companies we work with to analyze your use of our Services over time to customize your experience. Clear GIFs, pixel tags, and web beacons are typically one-pixel, transparent images located on a webpage or in an email or other message. These, or similar technologies may be used on our Sites and in some of our digital communications (such as email or other marketing messages). They may also be used when you are served advertisements or you otherwise interact with advertisements outside of our online services. These are principally used to help recognize users, assess traffic patterns and measure site or campaign engagement.

However, you can control cookies through your browser settings and other tools. You can also opt-out from our use of cookies and similar technologies that track your behavior on the sites of others for third party advertising. Neither the Site nor the Services respond to Do Not Track signals.

Sometimes cookies are placed by us (“first-party cookies”) and sometimes they are placed by others (“third-party cookies”). The cookies that we place on your device may include:

- **Essential cookies:** these cookies are essential for you to be able to navigate our Site and use its features. Without these cookies, the services you have asked for could not be provided.

- **Analytics cookies:** these cookies collect information about how you use our Site, for example, which pages you go to most often. Much of the information collected by these cookies is aggregated and anonymous, and is only used to improve how our Site works.
- **Functionality cookies:** these cookies enhance your browsing experience and allow our Site to remember the choices you make (such as your user name, language, last action, and search preferences) and provide enhanced, more personal features. The information collected by these cookies is anonymous and cannot track your browsing activity on other websites. Information collected by these cookies may include personal information you have disclosed.
- **Marketing cookies:** also known as advertising cookies, these cookies are used to deliver advertisements more relevant to you and your interests. They are also used to limit the number of times you see an advertisement on our Site and help measure the effectiveness of the advertising campaign. This is sometimes referred to as online behavioral advertising. In some cases, our partners may use cookies to provide us with information about your interactions with their services. These cookies remember that you have visited a website, and this information is shared with other organizations such as advertisers. Those third-party cookies would be subject to the third party service's policies.

### **Use of Cookies:**

FemVera uses cookies and related technologies on our website to help us recognize your device as a repeat visitor, and enable certain website features and functionalities. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually.

Specifically, we use a mix of first-party cookies, third-party cookies, and other similar technologies on this website to:

- Recognize you whenever you visit the Site (this speeds up your access to the website as you do not have to log in each time);
- Support security and any authentication features on our Services;
- Obtain information about your preferences and use of our Services;

- Carry out research and statistical analysis to help improve our content, and Services, and to help us better understand our customers' requirements;
- Improve the speed and performance of our Site and Services;
- Make your online experience more enjoyable and efficient; and

### **Consent and Managing Cookies:**

Your browser may give you the ability to control some types of cookies. If you want to customize the kinds of cookies you can control, you can change your browser settings so that certain types of cookies are not accepted. Please be aware that the cookie selections you make may override your browser or any adblocker settings.

If you turn off any cookies, please be aware that you may lose some of the functionality of this Site. For more information about cookies and how to disable them please check the following resource: <http://www.allaboutcookies.org/>

### **Online advertising**

You may see advertisements when you use some of our online services. These advertisements may be for our own products or services, or for products and services offered by third parties. Which advertisements you see is often determined using the information we, our affiliates, service providers, and other companies that we work with have about you, including information about your relationships with us (e.g., types of accounts held, transactional information, location of activity). To that end, where permitted by applicable law, we may share with others the information we collect from and about you.

If you opt-out of these personalized advertising cookies, your opt-out will be specific to the web browser or mobile device from which you accessed the opt-out. If you use multiple devices or browsers, you will need to opt-out each browser or device that you use.

When opting out, a cookie will be set to let advertisers know not to use your data for targeted advertising purposes. You will still see advertisements, but they will not be tailored to your

interests. If you opt-out of these targeted advertising cookies, your opt-out will be specific to the web browser or mobile device from which you accessed the opt-out. If you use multiple devices or browsers, you will need to opt-out each browser or device that you use.

## **2. How We Use Information**

**FemVera** may use the personal information we collect for the following purposes:

- a. To deliver our Services;
- b. To protect your privacy;
- c. To allow you to access your account and information;
- d. To provide customer service and our support services;
- e. To process any financial transactions you make while registering for or using our Services;
- f. To keep your information secure such as by detecting security incidents, and to be able to verify your identity and contact information;
- g. To alert you about product updates, special offers, updated information, and other news and services from FemVera;
- h. To ensure our Site and Services are relevant to you and your interests;
- i. To help us create and publish content most relevant to you; and
- j. To contact you in response to sign up forms or requests.

## **3. How Information May Be Shared**

FemVera does not sell or rent any of your personal information, and we do not share your personal information publicly without your consent. FemVera also does not disclose sensitive personal information for purposes other than those permitted by applicable law. However, we may disclose your information to certain trusted third-parties to help us provide, improve, promote, or protect our Services. For example, we may share your information with:

- Data storage vendors or partner with other companies to process your payments or to store your personal information when necessary to support delivery of our Services and respond to customer service requests.

- Third parties or affiliates in connection with a corporate transaction, such as a sale, consolidation or merger of FemVera businesses; and
- Other third parties to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third parties.

Whenever we share data with third-party services, we require that they use your information only for the purposes we've authorized, and that they protect your personal information to at least the same standards we do. Where appropriate, we will limit sharing of your information in accordance with the choices you have provided us.

We may share anonymous or aggregated information (such that it does not identify any individual customer, directly or indirectly) with third parties to help deliver products, services, and content that are tailored to the users of our online services and for other purposes. This is also known as de-identified information.

#### **4. Protection of your Personal Information**

We take the security of your personal information seriously, and follow industry-standard practices to protect the data we collect and process. FemVera has therefore put in place commercially reasonable physical, electronic, and managerial procedures to safeguard and secure the personal information that FemVera collects. Access to personal information will be restricted to our authorized personnel who require the information in order to perform their duties properly. In addition, access will be limited to only that information that is strictly necessary for the performance of those duties.

Remember, the safety and security of your information also depends on you. Where you have chosen, or where we have given you a user name and password for access to certain parts of the Services, you are responsible for keeping any of your login credentials confidential. No method of transmission over the internet or electronic storage is completely secure, so FemVera cannot

guarantee its absolute security. We recommend that you do not use unsecure channels to communicate confidential information to us.

## **5. Data Transfers**

Because FemVera is a US-based company, your information may be collected and processed in the United States. Additionally, as part of the Services offered to you through our Site, the information which we collect about you may be transferred to, and stored in, one or more countries other than where you currently reside. For example, this may occur if any of our servers or third-party service providers are located in a country other than yours. These countries may have different data protection laws that are similar to your current residence. However, if we transfer your information in this way, we will put in place appropriate protection to make sure your personal data remains adequately protected and is treated in line with this Privacy Policy.

## **6. Retention**

We will hold your personal information on our systems for as long as is necessary to perform the relevant processing activity for that information, or as long as is set out in any relevant contract you hold with us. The relevant retention period is determined on a case-by-case basis because it depends on things like the nature of the data, why it is collected, why it is processed, and any relevant legal or operational retention needs. For example, we may retain your data for as long as you are a customer of ours so that we may process and complete any orders you may make with us. We may also be required to hold some types of information to fulfill legal purposes. We review our retention periods for personal information on a regular basis. When the relevant processing activity has been completed, we may destroy your data, or alternatively anonymize the data, such that the data is not personally identifiable, either directly or indirectly.

## **7. Your Rights & Options for Handling Personal Information**

Users or website visitors residing in certain states, countries or regions with enhanced data protection laws may be afforded certain additional rights regarding their personal information. Except where an exception or exemption applies, the rights may include those set out below. The



right to request access to the information we have collected about you, as well as the right to review our data collection and sharing practices related to you. Certain U.S. State laws may give you the right to request that we disclose the personal information we have collected about you over the past 12 months, which we only provide after we receive and validate your request;

- The right to request access to or deletion of your personal information that we hold about you. You have the right to request erasure of your personal information, subject to certain exceptions, such as when we have a legal obligation to retain the data in question. After we receive and validate your request, we will correct or delete your personal information, unless an exception applies.
- The right to correct inaccurate data about you that we process. Please note that you may be able to correct and update some of your basic information yourself directly within our Services.
- The right to request receipt of the personal data you have provided to us in a structured and commonly used format.
- The right to request a digital copy of the personal information that we hold about you.
- The right not to be discriminated against due to your exercise of any of the preceding rights. Unless an exception applies, this includes our promise not to: deny you goods or services; charge you different prices or rates for goods or services, including granting discounts or other benefits, or imposing penalties; provide you a different level or quality of goods or services; or suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.
- The right to object to or restrict processing. You have the right to object to or opt out of the processing of your personal data under certain circumstances. You also have the right to request that we restrict processing some types of personal data under certain circumstances.
- The right to withdraw consent.
- You may also have the right to request that we not disclose personal information to third parties for interest-based targeted advertising.

- You have the right to appeal our refusal to take action on a request relating to the above rights. Appeals can be initiated by email to [privacy@femverahealth.com](mailto:privacy@femverahealth.com) and marking your request as an “Appeal”. We will resolve your appeal within the time frames established by applicable law. If your appeal is denied, we will explain why. If you continue to dispute our decision or would like to file a complaint regarding our handling of your personal information, you may contact the regulator in your jurisdiction that handles privacy complaints, such as your state Attorney General.

You may make a request by emailing us at [privacy@femverahealth.com](mailto:privacy@femverahealth.com) to request access to, correction of, or deletion of any personal information that we hold about you. You may also designate an authorized agent to exercise certain privacy rights on their behalf, and should make any such request by contacting the above email address. To protect your privacy and security, FemVera may take reasonable steps to verify your identity before granting access to, correcting, or deleting data. We will generally respond to your request for information within 45 days, unless, for reasons beyond our control, a longer response time is necessary, in which case, you will be advised accordingly. Please note that we may retain certain information as required by law or as necessary for our legitimate business purposes.

## **8. Questions, Comments, or Complaints**

If you have questions or comments about this Privacy Policy, or if you are not completely satisfied with this Privacy Policy or its application by us, we invite you to convey your concerns or suggestions to us at [privacy@femverahealth.com](mailto:privacy@femverahealth.com). If you have an applicable disability, you may also contact us at the above email address to request access to this Privacy Policy in an alternative format. We will reply as quickly as possible and inform you of the steps, if any, that have been or will be taken in order to address your concern or implement the suggestion.

FemVera strives to satisfy our customers' and visitors' privacy concerns. However, if you have contacted FemVera and have further questions about how to protect yourself, or if you have any concerns about how FemVera handles or processes your personal information, you may contact the data protection authority for your area. In the U.S., that authority may include:

- **U.S. Residents:** Visit the Federal Trade Commission Consumer Information website at [www.ftc.gov](http://www.ftc.gov).
- Your state's attorney general or other privacy regulator.

## **9. Updates and Changes to this Privacy Policy**

This Privacy Policy is effective as of [DATE]. We may update this Policy from time to time. If we do, we'll let you know about any material changes, either by notifying you on the Site or by sending you an email. Any updates to this Policy will not apply retroactively. If you keep using our Site or Services after a change, that means you accept this Privacy Policy.