

# Privacy Policy

Last Updated: November 2, 2022

Please read this Privacy Policy (this “**Privacy Policy**”) carefully. To use the Services that Syntrillo, Inc. and its affiliates (collectively, “**Syntrillo**”, “**we**,” “**us**,” or “**our**”) provide, you as a user of the Services must accept this Privacy Policy (“**User**”, “**you**”, “**your**”). If you do not consent to the terms of the Privacy Policy, please do not access or use the Services.

Each User’s participation is also governed by the [Terms and Conditions](#), which are entered into and agreed to by each User prior to using the Circle.so platform, Website and the Mobile App (collectively, our “Services”). Unless we define a term in this Privacy Policy, all capitalized terms used in this Privacy Policy have the same meanings set forth in our Terms & Conditions. This Privacy Policy also applies to User’s use of interactive features or downloads that: (i) Syntrillo owns or controls; (ii) are available through the Website or the Mobile App; or (iii) interact with the Website (including through social media) and/or the Mobile App.

This Privacy Policy applies to our Services operated in the United States and we provide this Privacy Policy explaining our online information practices and the choices you can make about the way information is collected and used in connection with the Service. By using our Services, User acknowledges and accepts this Privacy Policy.

We operate in accordance with applicable data protection legislation and regulations. We recognize the importance of protecting the privacy of Personal Information collected from our users.

## 1. PROTECTED HEALTH INFORMATION

Syntrillo is committed to protecting the privacy of your protected health information (“**Protected Health Information**”, or **PHI**). Protected Health Information is a subset of Personal Information that is information about you, including demographic information, that may identify you and that relates to your past, present or future physical or mental

health or condition; related health care services; or related to the past, present, or future payment for the provision of health care to you.

## **2. PERSONALLY IDENTIFIABLE INFORMATION**

Your privacy is important to Syntrillo, and Syntrillo is committed to carefully managing your individually identifiable information (“**Personally Identifiable Information**”, or **PII**) in connection with the Services that Syntrillo provides. Personally Identifiable Information means any information that may be used, either alone or in combination with other information, to personally identify an individual. This information includes, but is not limited to, a first and last name, age, a personal profile picture, an email address or other contact information.

## **3. USER-GENERATED CONTENT, OR (“USER CONTENT”)**

Please think carefully before deciding what information User shares, including Personally Identifiable Information, in connection with User’s User Content. Be aware that public postings, including profiles, bios, and community posts and private postings, such as postings in private discussion areas with individuals, or group messaging with other Users, are not confidential. Please note that the Syntrillo does not control who will have access to the information that User chooses to make public, and cannot ensure that parties who have access to such publicly available information will respect User’s privacy or keep it secure. Syntrillo is not responsible for the privacy or security of any information that User makes publicly available on the Services. Syntrillo is not responsible for the accuracy, use or misuse of any User Content that User discloses or receives from third-parties through the Service. Private messages with Syntrillo wellness coaches are accessible to authenticated Syntrillo personnel with Syntrillo policies in place with the aim to protect your data to access only by those personnel with a valid and reasonable need to access and process your data.

## **4. DATA COLLECTION**

**a. Information that Syntrillo Collects.** Syntrillo gathers various components of Protected Health Information, Personal Information and User Content (collectively, “Data”) in the course of our business to provide you a valuable service. Elements of Protected Health Information that we gather includes, but is not limited to, information and details regarding your health, your risk factors, and your stroke history. Personal Information that we collect includes, but is not limited to, your first and last name, email address, profile picture, and age. User Content includes, but is not limited to, posts in a public forum and direct messages between users or stroke experts. Data includes, but is not limited to : User provided data, metadata, system data and statistical information that will be published such as descriptive statistics, coefficients and visualizations.

**b. Receipt and Collection of Data.** Syntrillo may collect and process Data when User registers for or uses the Services, interacts with the Services, uses any aspect of our Services or otherwise contacts Syntrillo. Specifically, we receive and/or collect Data from you when we receive survey or assessment responses, when you interact with a health coach or stroke expert, and when you comment or reply to a comment in a public forum. Data is collected to provide personalized plans, but also to conduct research on Syntrillo products and other products. In each case, you will only be required to provide the Data that we need in order to be able to provide the services you have requested.

**c. Consent and Modification.** By using the Service, you consent to the terms of this Privacy Policy and to our processing of Data for the purposes set forth herein. If you do not agree to this Privacy Policy, please do not use the Service. We reserve the right, at our discretion, to change this Privacy Policy at any time, which change shall become effective upon posting by the Company on the Website, the Mobile App, via the Service or sending you an email or other notification. You will be deemed to have agreed to Additional Terms (as defined in the Terms & Conditions) by your decision to continue accessing the Services following the date in which such Additional Terms become effective.

## **5. HOW SYNTRILLO USES YOUR DATA**

Syntrillo uses the Users' Data that Syntrillo collects for the following general purposes: to fulfill User's request for use of certain features of the Website and/or the Mobile App, to conduct surveys, perform product research, and for Syntrillo's billing purposes. Syntrillo will collect only as much Data as Syntrillo needs for the purposes specified in this Privacy Policy, for purposes specified at the time of collection of the Personal Information, or for other purposes that you consent to in the future.

Syntrillo aims to protect personal information using technical controls and staff policies with the aim of preventing Syntrillo personnel from identifying individuals when not necessary and only for the provision of services to User. Except as set forth in this Privacy Policy or as specifically agreed to by User, Syntrillo will not disclose any information Syntrillo gathers from User on Syntrillo's Website, Mobile App and Services. Except as set forth in this Privacy Policy, Syntrillo does not share User's Personal Information with third parties for those third parties' direct marketing purposes. Syntrillo may transmit personally identifiable information to third parties about Users that is stored on third-party platforms. Syntrillo might inform third parties about aggregated de-identified data regarding the number of unique users who visit and/or use Syntrillo's Services, the demographic breakdown of the registered users of Syntrillo's Services, or the activities that users engage in while on Syntrillo's Website and/or Mobile App.

Your User specific Data will be used to provide your personalized plans. Your Data will also be combined with data from other Users. This will allow Syntrillo to conduct research on this product and other products developed by Syntrillo in the future. There will be a need to follow individual users, and aggregate their data, across several Syntrillo products. Mathematical, statistical and Artificial Intelligence tools and methods will be applied to this combined data set. The objectives are, but are not limited, to develop clinical and marketing algorithms in the field of Stroke Prevention.

## **6. USE OF THIRD-PARTY TECHNOLOGY**

Syntrillo utilizes custom-built software and third-party commercial software to provide the Services. While employing a number of security technologies and approaches, all

Services have not been through the full Secure Development Lifecycle process and have not been fully tested. Therefore, there are residual risks that the platform may not be fully secure at this stage.

Syntrillo may use third-party platforms for communication between you and Syntrillo (e.g. email platforms, the Circle.so website or other similar websites, etc), and automation of data collection, transfer and processing (such as, but not limited to, . TypeForm, Zapier). Where platforms that are not under the control of Syntrillo are used, this will be made apparent to you when you leave Syntrillo's app or Website. When using a third-party managed technology environment or service, your information is subject to their safety and security procedures. Syntrillo cannot warrant the security of these third-party services and as a user you should be mindful not to share personal information that you are not comfortable to share via these platforms that are outside of Syntrillo control.

## **7. PERSONAL DATA ACCESS REQUESTS**

Users can at any time request details of data held by Syntrillo. Requests will be handled within 28 days. Users can also request that Personal Data held about themselves be permanently deleted from systems directly managed by Syntrillo. Syntrillo will respond to such requests within 28 days and subject to the needs to comply with any State or Federal law preventing the deletion shall provide confirmation of data deletion.

## **8. NOTICE TO CALIFORNIA RESIDENTS**

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information.

## **9. MORE INFORMATION**

### **How can I get more information about the Privacy Policy?**

If User has questions or concerns about the Privacy Policy, User can contact Syntrillo at [privacy@syntrillo.com](mailto:privacy@syntrillo.com).

**Updates/Modifications**

Syntrillo reserves the right to amend this Privacy Policy at any time as needed with notice provided to User. Changes will take effect upon User's acceptance of the modified terms and User's continued use of the Website, Mobile App and/or Services.