

# Dragonfly Privacy Policy

## Contents

PART ONE: INTRODUCTION	2
PART TWO: POLICY SUMMARY	3
PART THREE: FULL PRIVACY POLICY	6

## PART ONE: INTRODUCTION

WE AT DRAGONFLY DATA INC. VALUE YOUR PRIVACY AND ARE COMMITTED TO KEEPING YOUR PERSONAL DATA CONFIDENTIAL. WE USE YOUR DATA SOLELY IN THE CONTEXT OF PROVIDING YOU PLATFORM ALLOWING (1) **PATIENTS and EMPLOYEES** TO EASILY SCHEDULE LAB APPOINTMENTS, PROVIDE ADDITIONAL INFORMATION TO HELP WITH DIAGNOSES, REVIEW LAB RESULTS, AND SECURELY SHARE SUCH RESULTS WITH THIRD PARTIES, (2) **PROVIDERS** TO REVIEW LAB TESTING SCHEDULES OF ALL PATIENTS, MANAGE RELEVANT PATIENT INFORMATION SUCH AS PATIENT-REPORTED HEALTH INFORMATION AND INSURANCE COVERAGE, AND REVIEW LAB RESULTS OF ALL PATIENTS; AND (3) **EMPLOYERS** TO REVIEW EMPLOYEES SCHEDULED FOR LAB TESTING AND REVIEW LAB RESULTS OF EMPLOYEES.

THIS PRIVACY POLICY APPLIES TO PERSONAL DATA DRAGONFLY COLLECTS FROM USERS OF THE DRAGONFLYPHD.COM WEBSITE (THE "PLATFORM"). **"PERSONAL DATA" INCLUDES ANY INFORMATION THAT CAN BE USED ON ITS OWN OR WITH OTHER INFORMATION IN COMBINATION TO IDENTIFY OR CONTACT ONE OF OUR USERS.** WE BELIEVE THAT TRANSPARENCY ABOUT THE USE OF YOUR PERSONAL DATA IS OF UTMOST IMPORTANCE. IN THIS PRIVACY POLICY, WE PROVIDE YOU DETAILED INFORMATION ABOUT OUR COLLECTION, USE, MAINTENANCE, AND DISCLOSURE OF YOUR PERSONAL DATA. THE POLICY EXPLAINS WHAT KIND OF INFORMATION WE COLLECT, WHEN AND HOW WE MIGHT USE THAT INFORMATION, HOW WE PROTECT THE INFORMATION, AND YOUR RIGHTS REGARDING YOUR PERSONAL DATA.

Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it.

**BY SUBMITTING YOUR PERSONAL DATA THROUGH THIS PLATFORM, YOU ARE ACKNOWLEDGING THAT YOU HAVE READ AND AGREE TO THE TERMS OF THIS POLICY.** IF YOU DO NOT AGREE, PLEASE DO NOT LOG INTO OR ACCESS THE PLATFORM AND DO NOT SUBMIT ANY PERSONAL DATA TO US.

PLEASE NOTE THAT **WE OCCASIONALLY UPDATE THIS PRIVACY POLICY AND THAT IT IS YOUR RESPONSIBILITY TO STAY UP TO DATE** WITH ANY AMENDED VERSIONS. IF WE MODIFY THE PRIVACY POLICY, WE WILL POST A LINK TO THE MODIFIED TERMS ON OUR WEBSITE AND NOTIFY YOU VIA THE EMAIL ADDRESS YOU HAVE PROVIDED TO US. YOU CAN STORE THIS POLICY AND/OR ANY AMENDED VERSION(S) DIGITALLY, PRINT IT, OR SAVE IT IN ANY OTHER WAY. ANY CHANGES TO THIS PRIVACY POLICY WILL BE EFFECTIVE IMMEDIATELY UPON PROVIDING NOTICE, AND SHALL APPLY TO ALL INFORMATION WE MAINTAIN, USE, AND DISCLOSE. IF YOU CONTINUE TO USE THE PLATFORM FOLLOWING SUCH NOTICE, YOU ARE AGREEING TO THOSE CHANGES.

In case you have any questions or concerns after reading this Privacy Policy, please do not hesitate to contact us at [support@dragonflyphd.com](mailto:support@dragonflyphd.com). We appreciate your feedback.

## PART TWO: POLICY SUMMARY

For your convenience, we have summarized the key takeaways from our Privacy Policy, below. You may access our full Privacy Policy [HERE](#).

### **Responsible Entity**

Dragonfly Data Inc. (“We”, “Us”, “the Company”) is the controller of your Personal Data and may process this data in accordance with the Privacy Policy. If we are processing Personal Data on behalf of a third party, the terms of this Privacy Policy do not apply—instead, the terms of that third party’s privacy policy will apply. You can contact Us with any questions about our Privacy Policy at [support@dragonflyphd.com](mailto:support@dragonflyphd.com).

### **What information do We collect and why?**

We collect “PERSONAL DATA”, which includes any information that can be used on its own or with other information in combination to identify or contact one of our users. For a description of the types of Personal Data we collect, review this section in the full [Privacy Policy](#). In some cases, this Personal Data may be or may include healthcare information or “protected health information”.

We may use Personal Data to (1) provide you with the Platform; (2) communicate with you about and manage your User Account; (3) store data; (4) comply with the law; (5) respond to requests from public and government authorities; (6) to enforce our terms and conditions; (7) manage and improve our operations and applications; (8) provide additional functionality; (9) protect our rights, privacy, safety or property, and/or that of you or others; and (10) allow us to pursue available remedies or limit the damages that we may sustain. Additional uses are described in this section of the full [Privacy Policy](#).

We only use or disclose your Personal Data when it is legally mandated or where it is necessary to fulfill the purposes described above (and in the full [Privacy Policy](#)). Where required by law, we will ask for your prior consent before doing so.

*Failure to Provide Data.* Providing your Personal Data is not statutorily or contractually mandated. However, if you choose not to provide certain information, we may not be able to create a User Account, and you may be unable to use some parts of our Platform.

### **Will We share your Personal Data with anyone else?**

- If you are a patient or employee, then Yes, with the healthcare provider(s) with whom you choose to share your Personal Data via the Platform, your employer, and/or other third parties that you designate
- Yes, with third parties that help us power our Platform
- Yes, with third parties and the government when legal or enforcement issues arise
- Yes, with third parties in the event of a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of Dragonfly’s corporate entity, assets, or stock (including in connection with any bankruptcy or similar proceedings).

For more details regarding the above, review this section in the full [Privacy Policy](#).

## **Where is your Personal Data stored, transmitted and/or maintained?**

Personal Data Dragonfly collects through the Platform will be stored on secure servers in the United States. Some Personal Data may be transmitted to third parties, which parties may store or maintain the data on their secure servers. These third parties are not permitted to transfer your Personal Data outside of the United States.

## **How long will We maintain your Personal Data?**

We store your Personal Data for as long as you maintain a User Account and, if your healthcare provider is using Dragonfly as a system of record, then in accordance with medical record retention requirements in the healthcare provider's state. For more information on Personal Data retention, review this section of the full [Privacy Policy](#).

## **How do We protect your Personal Data?**

Dragonfly uses a combination of reasonable physical, technical, and administrative security controls to maintain the security and integrity of your Personal Data, to protect against any anticipated threats or hazards to the security or integrity of such information, and to protect against unauthorized access to or use of such information in our possession or control that could result in substantial harm or inconvenience to you. However, Internet data transmissions, whether wired or wireless, cannot be guaranteed to be 100% secure. As a result, we cannot ensure the security of information you transmit to us. By using the Platform, you are assuming this risk. For more information on the safeguards We have in place to protect your Personal Data, review this section of the full Privacy Policy.

## **Your rights**

You have certain rights relating to your Personal Data, subject to local data protection laws. These rights may include:

- to access your Personal Data held by us
- to erase/delete your Personal Data (which may be accomplished by anonymization), to the extent permitted by applicable data protection laws
- to receive communications related to the processing of your personal data that are concise, transparent, intelligible and easily accessible;
- to restrict the processing of your Personal Data to the extent permitted by law (while we verify or investigate your concerns with this information, for example);
- to object to the further processing of your Personal Data, including the right to object to marketing;
- to request that your Personal Data be transferred to a third party, if possible;
- to receive your Personal Data in a structured, commonly used and machine-readable format
- to lodge a complaint with a supervisory authority
- to rectify inaccurate Personal Data and, considering the purpose of processing the Personal Data, ensure it is complete
- to not be subject to a decision based solely on automated processing, including profiling, which produces legal effects ("Automated Decision-Making"); and

- to the extent we base the collection, processing and sharing of your Personal Data on your consent, to withdraw your consent at any time, without affecting the lawfulness of the processing based on such consent before its withdrawal.

For more details on your rights and choices and how to exercise them, please review the full [Privacy Policy](#).

#### **How do you contact Us with questions or concerns?**

If you have any questions about this Privacy Policy, please contact us by email at [support@dragonflyphd.com](mailto:support@dragonflyphd.com) or please write to: Dragonfly Data Inc. at P.O. Box 677, Armonk, NY 10504. Please note that email communications are not always secure; so please do not include sensitive information in your emails to us.

## PART THREE: FULL PRIVACY POLICY

Version 1

Last Updated: August 2020

WE AT DRAGONFLY VALUE YOUR PRIVACY AND ARE COMMITTED TO KEEPING YOUR PERSONAL DATA CONFIDENTIAL. WE USE YOUR DATA SOLELY IN THE CONTEXT OF PROVIDING YOU PLATFORM ALLOWING (1) **PATIENTS and EMPLOYEES** TO EASILY SCHEDULE LAB APPOINTMENTS, PROVIDE ADDITIONAL INFORMATION TO HELP WITH DIAGNOSES, REVIEW LAB RESULTS, AND SECURELY SHARE SUCH RESULTS WITH THIRD PARTIES, (2) **PROVIDERS** TO REVIEW LAB TESTING SCHEDULES OF ALL PATIENTS, MANAGE RELEVANT PATIENT INFORMATION SUCH AS PATIENT-REPORTED HEALTH INFORMATION AND INSURANCE COVERAGE, AND REVIEW LAB RESULTS OF ALL PATIENTS; AND (3) **EMPLOYERS** TO REVIEW EMPLOYEES SCHEDULED FOR LAB TESTING AND REVIEW LAB RESULTS OF EMPLOYEES.

THIS PRIVACY POLICY APPLIES TO PERSONAL DATA DRAGONFLY COLLECTS FROM USERS OF THE DRAGONFLYPHD.COM WEBSITE (THE "PLATFORM"). **"PERSONAL DATA" INCLUDES ANY INFORMATION THAT CAN BE USED ON ITS OWN OR WITH OTHER INFORMATION IN COMBINATION TO IDENTIFY OR CONTACT ONE OF OUR USERS.** WE BELIEVE THAT TRANSPARENCY ABOUT THE USE OF YOUR PERSONAL INFORMATION IS OF UTMOST IMPORTANCE. IN THIS PRIVACY POLICY, WE PROVIDE YOU DETAILED INFORMATION ABOUT OUR COLLECTION, USE, MAINTENANCE, AND DISCLOSURE OF YOUR PERSONAL DATA. THE POLICY EXPLAINS WHAT KIND OF INFORMATION WE COLLECT, WHEN AND HOW WE MIGHT USE THAT INFORMATION, HOW WE PROTECT THE INFORMATION, AND YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION.

SOME OF THE PERSONAL DATA WE COLLECT AND TRANSMIT WILL, IN SOME CIRCUMSTANCES, BE CONSIDERED "HEALTH DATA" (data related to a user's physical or mental health) or "Protected Health Information" (information that relates to the past, present, or future physical or mental health or condition of a user; the provision of health care to a user; or the past, present, or future payment for the provision of health care to user). THEREFORE, OUR PRIVACY PRACTICES ARE INTENDED TO COMPLY WITH BOTH THE HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT ("HIPAA") AND THE GENERAL DATA PROCESSING REGULATION ("GDPR") PROVISIONS REGARDING SENSITIVE PERSONAL DATA. IN ADDITION, WE INTEND TO COMPLY WITH STATE LAW RELATED TO HEALTH DATA, WHERE APPLICABLE. FOR ADDITIONAL INFORMATION RELATED TO YOUR HEALTHCARE INFORMATION, PLEASE CONTACT OUR PRIVACY OFFICER, Julie Eskay Eagle, at [je@dragonflyphd.com](mailto:je@dragonflyphd.com).

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PLEASE NOTE THAT **WE OCCASIONALLY UPDATE THIS PRIVACY POLICY AND THAT IT IS YOUR RESPONSIBILITY TO STAY UP TO DATE** WITH ANY AMENDED VERSIONS. IF WE MODIFY THE PRIVACY POLICY, WE WILL POST A LINK TO THE MODIFIED TERMS ON THE PLATFORM AND WILL ALSO NOTIFY YOU VIA EMAIL. YOU CAN STORE THIS POLICY AND/OR ANY AMENDED VERSION(S) DIGITALLY, PRINT IT, OR SAVE IT IN ANY OTHER WAY. ANY CHANGES TO THIS PRIVACY POLICY WILL BE EFFECTIVE IMMEDIATELY UPON PROVIDING NOTICE, AND SHALL APPLY TO ALL INFORMATION WE MAINTAIN, USE, AND DISCLOSE. IF YOU CONTINUE TO USE THE PLATFORM FOLLOWING SUCH NOTICE, YOU ARE AGREEING TO THOSE CHANGES.

In case you have any questions or concerns after reading this Privacy Policy, please do not hesitate to contact us at [support@dragonflyphd.com](mailto:support@dragonflyphd.com). We appreciate your feedback. If you do not agree or no longer agree to the processing of Personal Data as described in this Privacy Policy, you can delete your account by notifying us by email at [support@dragonflyphd.com](mailto:support@dragonflyphd.com).

## **Responsible Entity**

Dragonfly Data Inc. (“We”, “Us”, “the Company”) is the controller of your Personal Data and may process this data in accordance with the Privacy Policy. If we are processing Personal Data on behalf of a third party that is not an agent or affiliate of Company, the terms of this Privacy Policy do not apply—instead, the terms of that third party’s privacy policy will apply. You can contact Us with any questions about our Privacy Policy at [support@dragonflyphd.com](mailto:support@dragonflyphd.com).

## Links to Other Sites

Our Platform may contain links to websites and services that are owned or operated by third parties (each, a “Third-party Service”). Any information that you provide on or to a Third-party Service or that is collected by a Third-party Service is provided directly to the owner or operator of the Third-party Service and is subject to the owner’s or operator’s privacy policy. We are not responsible for the content, privacy or security practices and policies of any Third-party Service. To protect your information, we recommend that you carefully review the privacy policies of all Third-party Services that you access.

## **What Personal Data do we collect?**

We collect Personal Data, which includes the following types of data we and may include healthcare information or “protected health information”. The types of Personal Data we collect are described below.

### Demographic Data

We collect demographic information, such as your name, birth year, gender, phone number, physical address, and email address. Primarily, the collection of your Personal Data assists us in creating your User Account, which you can use to securely to receive the Services.

### Support Data

If you contact Dragonfly for support or to lodge a complaint, We may collect technical or other information from you through log files and other technologies, some of which may qualify as Personal Data. (e.g., IP address). Such information will be used for the purposes of troubleshooting, customer support, software updates, and improvement of the Platform and related services in accordance with this Privacy Policy. Calls with Dragonfly may be recorded or monitored for training, quality assurance, customer service, and reference purposes.

### Device, Telephone, and ISP Data

We use common information-gathering tools, such as log files, cookies, web beacons, and similar technologies to automatically collect information, which may contain Personal Data, from Your computer or mobile device as you navigate our Platform, or interact with emails We have sent You. The information we collect may include your Internet Protocol (IP) address (or proxy server), device and Platform identification numbers, location, browser type, Internet service provider and/or mobile carrier, the pages and files you viewed, Your searches, Your operating system and system configuration information, and

date/time stamps associated with Your usage. This information is used to analyze overall trends, to help us provide and improve our Platform and to guarantee their security and continued proper functioning.

#### Health and Device Data

If you are a patient or employee, in addition to demographic information, We will collect information regarding your health conditions, age, gender, weight, height, medical history, symptoms, pre-existing conditions, lab results. We collect this information to provide You with the Platform functionality, to provide Your healthcare provider you have approved through the Platform with the information required to provide diagnoses, and if you are an employee, to provide your employer with accurate lab results.

#### **How will We use Your Personal Data?**

We process your Personal Data for purposes based on legitimate business interests, the fulfillment of our Services to You, compliance with Our legal obligations, and/or Your consent. We only use or disclose Your Personal Data when it is legally mandated or where it is necessary to fulfill the purposes described herein. Where required by law, we will ask for your prior consent before doing so.

Specifically, we process Your Personal Data for the following legitimate business purposes:

- To fulfill our obligations to You under the Terms of Use
- To communicate with You about and manage Your User Account
- To properly store and track Your data within our system
- To respond to lawful requests from public and government authorities, and to comply with applicable state/federal law, including cooperation with judicial proceedings or court orders.
- To protect our rights, privacy, safety or property, and/or that of you or others by providing proper notices, pursuing available legal remedies, and acting to limit Our damages
- To handle technical support and other requests from You
- To enforce and ensure your compliance with our Terms of Use or the terms of any other applicable services agreement We have with You
- To manage and improve our operations and the Platform, including the development of additional functionality
- To manage payment processing
- To evaluate the quality of service You receive, identify usage trends, and thereby improve Your user experience
- To keep our Platform safe and secure for You and for Us
- To send You information about changes to our terms, conditions, and policies
- To allow us to pursue available remedies or limit the damages that we may sustain
- To provide access to the authorized healthcare provider or employer (with your consent) to enable that individual to monitor your results and to follow up with you, as they deem appropriate.

#### **Where is your Personal Data processed?**

Personal Data Dragonfly collects through the Platform will be stored on secure servers in the United States. Personal Data may be transmitted to third parties, which parties may store or maintain the data on their secure servers. These third parties are not permitted to transfer your Personal Data outside of the United States.

## **Will We share your Personal Data with anyone else?**

If you are a Patient or Employee, then, Yes, with the healthcare provider(s) (“Provider”) with whom You connect via the Platform, your employer, and/or other third parties that you designate.

We will share information you enter into the Platform, as well as any lab results and reports generated by the Platform, with the Provider or Employer with whom connect via the Platform. If, at any point, you want to deny access to one or more Providers, you can do so by emailing support@dragonflyphd.com.

Yes, with third parties that help us power our Platform

Dragonfly has a limited number of service providers and other third parties (“Business Partners”) that help us run various aspects of our business. These Business Partners are contractually bound to protect your Personal Data and to use it only for the limited purpose(s) for which it is shared. Business Partners’ use of Personal Data may include, but is not limited to, the provision of services such as data hosting, IT services, customer service, and payment processing.

Yes, with third parties and the government when legal or enforcement issues arise

We may share your Personal Data, if reasonable and necessary, to (i) comply with legal processes or enforceable governmental requests, or as otherwise required by law; (ii) cooperate with third parties in investigating acts in violation of this Agreement; or (iii) bring legal action against someone who may be violating the Terms of Use or who may be causing intentional or unintentional injury or interference to the rights or property of Dragonfly or any third party, including other users.

Yes, with third parties that provide advisory services

We may share your Personal Data with Our lawyers, auditors, accountants, or banks, when we have a legitimate business interest in doing so.

Yes, with third parties in the event of a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of Dragonfly’s corporate entity, assets, or stock (including in connection with any bankruptcy or similar proceedings)

If We share Your Personal Data with a third party other than as provided above, You will be notified at the time of data collection or transfer, and You will have the option of not permitting the transfer.

## **How long do We retain Personal Data?**

We store your Personal Data for as long as you maintain a User Account and, if your healthcare provider is using Dragonfly as a system of record, then in accordance with medical record retention requirements in the healthcare provider’s state. At the end of the applicable retention period, We will remove your Personal Data from our databases and will request that our Business Partners remove your Personal Data from their databases. If there is any data that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing of such data. Your healthcare provider may retain your Personal Data separately from Dragonfly, and You should make any additional requests for deletion directly to Your healthcare provider. We retain anonymized data indefinitely.

NOTE: Once we disclose your Personal Data to third parties, we may not be able to access that Personal Data any longer and cannot force the deletion or modification of any such information by the parties to whom we have made those disclosures. Written requests for deletion of Personal Data other than as described should be directed to support@dragonflyphd.com.

## What is Our Cookie Policy?

Cookies are small files that a web server sends to your computer or device when you visit a web site that uses cookies to keep track of your activity on that site. They hold a small amount of data specific to that web site, which can later be used to help remember information you enter into the site (like your email or other contact info), preferences selected, and movement within the site. If you return to the previously visited web site (and your browser has cookies enabled), the web browser sends the small file to the web server, which tells it what activity you engaged in the last time you used the site, and the server can use the cookie to do things like expedite logging in and retrieving user data and keeping your browser session secure.

We use cookies and other technologies to, among other things, better serve you with more tailored information, and to facilitate efficient and secure access to the Platform. We only use essential cookies. Essential cookies are those necessary for use to provide services to you. We have provided, below, a full list of our cookies, categorized as described above. We have described the purpose of each, whether they are Dragonfly or Third-Party cookies, and how to withdraw consent to their use. We have also indicated which cookies are “session cookies” (which last for as long as you keep your browser open) and “persistent cookies” (which remain on your hard drive until you delete them or they expire).

We may also collect information using pixel tags, web beacons, clear GIFs or other similar technologies. These may be used in connection with some Site pages and HTMLformatted email messages to, among other things, track the actions of Site users and email recipients, and compile statistics about Site usage and response rates.

### Essential Cookies:

<i>Cookie Name, Who Controls It, and Duration</i>	<i>Purpose</i>	<i>Information Collected</i>	<i>How to Withdraw Consent</i>
<b>EAP.AppTitle</b> [Company] During active session	Displays application title on each page	_____	Do not use our Platform if you do not want to receive this cookie.
<b>EAP.LOGOUT</b> [Company] During active session	Takes you to Platform landing page after logout	_____	Do not use our Platform if you do not want to receive this cookie.
<b>EAP.CULTURE</b> [Company] Expires after 30 days	Allows user to select language culture	Preferred language and location	Do not use our Platform if you do not want to receive this cookie.
<b>EAP.Root</b> [Company] During active session	Takes you to Login Page after logout		Do not use our Platform if you do not

			want to receive this cookie.
<b>EAP.AppKey</b> [Company] During active session	Identifies the name of the application in metadata and web.config file		Do not use our Platform if you do not want to receive this cookie.
<b>EAP.CREDCACHE</b> [Company] Expires after 30 days	Identifies the user and allows authentication to the server	A generated token that lets you log in.	Do not use our Platform if you do not want to receive this cookie.
<b>EAP.UTKN</b> [Company] During active session	Allows short session timeouts without requiring user to log back in	A generated token that allows short session timeouts without requiring user to log back in	Do not use our Platform if you do not want to receive this cookie.
<b>EAP.InitDst</b> [Company] Expires after 30 days	Takes user to destination page after login through a request (such as email)	A generated token that takes the user from email request through to login and destination page	Do not use our Platform if you do not want to receive this cookie.
<b>ASP.NET_SessionId</b> ASP.Net During active session			Do not use our Platform if you do not want to receive this cookie.
<b>EAP.USERID</b> [Company] Expires after 30 days	Retains user's User ID in browser for next login	A generated token that stores the User ID for future login attempts	Do not use our Platform if you do not want to receive this cookie.
<b>EAP.2FA</b> [Company] Expires after 7 days	Stores user 2-factor credentials in browser to speed login	A generated token that stores a user's 2-factor login credentials in their browser cache for future login attempts.	If you choose not to allow this cookie, you will be asked to validate your credentials for each login attempt.

**Non-Essential Cookies:**

<i>Cookie Name, Who Controls It, and Duration</i>	<i>Purpose</i>	<i>Information Collected</i>	<i>How to Withdraw Consent</i>

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**How can You “Opt Out” of Cookies?**

If you prefer, you can usually choose to set your browser to remove cookies and reject cookies. If you enable a do not track (DNT) signal or otherwise configure your browser to prevent Dragonfly from collecting cookies, You will need to reenter your username each time you visit the login page.

**How do We protect Your Personal Data?**

Dragonfly is committed to protecting the security and confidentiality of your Personal Data. We use a combination of reasonable physical, technical, and administrative security controls to maintain the security and integrity of your Personal Data, to protect against any anticipated threats or hazards to the security or integrity of such information, and to protect against unauthorized access to or use of such information in our possession or control that could result in substantial harm or inconvenience to you. However, Internet data transmissions, whether wired or wireless, cannot be guaranteed to be 100% secure. As a result, we cannot ensure the security of information you transmit to us. By using the Platform, you are assuming this risk.

Safeguards

The information collected by Dragonfly and stored on secure servers, is protected by a combination of technical, administrative, and physical security safeguards, such as authentication, encryption, backups, and access controls. If Dragonfly learns of a security concern, We may attempt to notify You and provide information on protective steps, if available, through the email address that You have provided to Us or by a notification in the Portal. Depending on where You live, You may have a legal right to receive such notices in writing.

You are solely responsible for protecting information entered or generated via the Platform that is stored on Your device. Dragonfly has no access to or control over Your device’s security settings, and it is up to You to implement any devicelevel security features and protections You feel are appropriate (e.g., password protection, encryption, remote wipe capability, etc.). We recommend that You take any and all appropriate steps to secure any device that You use to access Our Platform.

NOTWITHSTANDING ANY OF THE STEPS TAKEN BY US, IT IS NOT POSSIBLE TO GUARANTEE THE SECURITY OR INTEGRITY OF DATA TRANSMITTED OVER THE INTERNET. THERE IS NO GUARANTEE THAT YOUR PERSONAL DATA WILL NOT BE ACCESSED, DISCLOSED, ALTERED, OR DESTROYED BY BREACH OF ANY OF OUR PHYSICAL, TECHNICAL, OR ADMINISTRATIVE SAFEGUARDS. THEREFORE, WE DO NOT AND CANNOT ENSURE OR WARRANT THE SECURITY OR INTEGRITY OF ANY PERSONAL DATA YOU TRANSMIT TO US AND YOU TRANSMIT SUCH PERSONAL DATA AT YOUR OWN RISK.

**How can You Protect Your Personal Data?**

In addition to securing Your device, as discussed above, We will NEVER send you an email requesting confidential information such as account numbers, usernames, passwords, or social security numbers, and You should NEVER respond to any email requesting such information. If You receive such an email purportedly from Dragonfly, DO NOT RESPOND to the email and DO NOT click on any links and/or open any attachments in the email, and notify Dragonfly support at support@dragonflyphd.com.

You are responsible for taking reasonable precautions to protect Your user ID, password, and other User Account information from disclosure to third parties, and You are not permitted to circumvent the use of required encryption technologies. You should immediately notify Dragonfly at support@dragonflyphd.com if You know of or suspect any unauthorized use or disclosure of Your user ID, password, and/or other User Account information, or any other security concern.

### **Your rights**

You have certain rights relating to your Personal Data, subject to local data protection laws. These rights may include:

- to access your Personal Data held by us
- to erase/delete your Personal Data (which may be accomplished by anonymization), to the extent permitted by applicable data protection laws
- to receive communications related to the processing of your personal data that are concise, transparent, intelligible and easily accessible;
- to restrict the processing of your Personal Data to the extent permitted by law (while we verify or investigate your concerns with this information, for example);
- to object to the further processing of your Personal Data, including the right to object to marketing;
- to request that your Personal Data be transferred to a third party, if possible;
- to receive your Personal Data in a structured, commonly used and machine-readable format
- to lodge a complaint with a supervisory authority
- to rectify inaccurate Personal Data and, considering the purpose of processing the Personal Data, ensure it is complete
- to not be subject to a decision based solely on automated processing, including profiling, which produces legal effects ("Automated Decision-Making"); and

Where the processing of Your Personal Data by Dragonfly is based on consent, You have the right to withdraw that consent without detriment at any time or to exercise any of the rights listed above by emailing Dragonfly at support@dragonflyphd.com.

### **How can You update, correct, or delete Personal Data?**

You can change your email address and other information by emailing us at support@dragonflyphd.com. Please note that in order to comply with certain requests to limit use of Your Personal Data, we may need to terminate your account and Your ability to access and use the Platform, and You agree that We will not be liable to you for such termination or for any refunds of prepaid fees paid by You. You can deactivate your account by emailing us at support@dragonflyphd.com

Although We will use reasonable efforts to do so, You understand that it may not be technologically possible to remove from our systems every record of your Personal Data. The need to back up our systems to protect information from inadvertent loss means a copy of your Personal Data may exist in a nonerasable form that will be difficult or impossible for us to locate or remove.

### **Can You "OPTOUT" of receiving communications from Us?**

We pledge not to market third party services to You without Your consent. We only send emails and SMS text messages to You regarding Your Dragonfly account and services. You can choose to filter these account emails using Your email client settings, but We do not provide an option for You to opt out of these emails. You can opt-out of receiving SMS text messages by replying “STOP” to the SMS text message.

### **Information submission by minors**

We do not knowingly collect Personal Data from individuals under the age of 18 and the Platform is not directed to individuals under the age of 13. We request that these individuals not provide Personal Data to Us. If we learn that Personal Data from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you are aware of a user under the age of 13 using the Platform, please contact us at support@dragonflyphd.com.

If You are a resident of California, under the age of 18 and have registered for an account with Us, You may ask Us to remove content or information that You have posted to Our Platform.

### **California Residents**

California residents may request and obtain from Us, once a year, free of charge, a list of third parties, if any, to which We disclosed their Personal Data for direct marketing purposes during the preceding calendar year and the categories of Personal Data shared with those third parties. If You are a California resident and wish to obtain that information, please submit Your request by sending Us an email at support@dragonflyphd.com with “California Privacy Rights” in the subject line.

### **Contact Us**

If You have any questions about this Privacy Policy, please contact Us by email at support@dragonflyphd.com or please write to: Dragonfly Data Inc. at P.O. Box 677, Armonk, NY 10504. Please note that email communications are not always secure; so please do not include sensitive information in Your emails to Us.