

Medicom Technologies, Inc. Privacy Policy

Medicom Technologies, Inc., a Delaware corporation ("*Medicom*") provides this Privacy Policy to inform you of our policies and procedures regarding the collection, use and disclosure of personal information we receive from users of our publicly available websites at www.medicom.us (collectively, the "*Site*") and/or the services, software, applications, plug-ins, components, functionality and programs provided now or in the future (collectively, the "*Services*") at the Site and/or through our mobile applications ("*Apps*"). Throughout this Privacy Policy, "you" or "your" shall refer to any person or entity using the Site or the Services and, unless otherwise stated, "we," "our" or "us" will refer collectively to Medicom and its subsidiaries, affiliates, directors, officers, members, employees, agents and contractors. At Medicom, we are committed to protecting your privacy online. Because your information may be shared with others in order to accomplish the purposes of the Services, Our pledge is to safeguard any information that we collect on the Site, which is associated with you and your name, in accordance with this Privacy Policy. We will ensure that all personal information disclosed by you and that is held by us will be: (i) processed lawfully, fairly, and in a transparent manner; (ii) collected for specified, explicit, and legitimate business purposes and not further processed in a manner that is incompatible with those legitimate business purposes; (iii) adequate, relevant and limited to what is necessary; (iv) kept in a form which permits identification of data subjects for no longer than is necessary; and (v) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

By accessing the Site and/or using any of the Apps and/or Services, you agree to the terms contained in this Privacy Policy and any documents incorporated by reference, whether you are registered with Medicom (a "*Registered User*") or are simply browsing the Site or Apps. You further agree that this Privacy Policy along with the Acceptable Use Policy forms a legally binding contract between you and Medicom. Please read this Privacy Policy carefully as it affects your rights and liabilities under law. If you disagree with the way we collect and process personal information collected on the Site, please do not use the Site, Apps or Services.

We may update this Privacy Policy at any time. Any changes to the Privacy Policy will become effective upon the date of our posting of the revised Privacy Policy on the Site. We will alert you that changes have been made by updating the Effective Date of the Privacy Policy. We encourage you to review this Privacy Policy from time to time to make sure that you understand how any information you provide to us will be used. If we make a material change to the terms of the Privacy Policy, we will post a notice that it has been revised on the home page of the Site. If you use the Site after that date, you will be deemed to have accepted the Privacy Policy's updated terms.

This Privacy Policy was last updated on February 18, 2021 (the "*Effective Date*").

Scope of this Policy

This Privacy Policy applies to the Site, the Apps and the Services. We collect certain information through the Site, including through the products and services provided at the Site. This Privacy Policy lays out our policies and procedures surrounding the collection and handling of any such information that identifies an individual user or that could be used to contact or locate him or her. Information that we collect may include Personally Identifiable Information ("*PII*"). This Privacy Policy does not apply to any third party site or service linked to our Site or Service or recommended or referred by our Site or Service, through our products or services, or by our staff. It is recommended that you review the privacy policies of any such third-party site or service before providing any of your information to them. Furthermore, this Privacy Policy it does not apply to any other website, product, or service operated by our company, or to any of our offline activities.

A. Information We Collect

We collect the following Personally Identifiable Information from users who buy our products or services: name, e-mail address, telephone number, and address.

We also use “cookies” to collect certain information from all users, including Web visitors who don’t buy anything through our Site. A cookie is a string of data our system sends to your computer and then uses to identify your computer when you return to our Website. Cookies give us usage data, like how often you visit, where you go at the site, and what you do. Such information is “passively” collected from you through browser navigational tools, such as cookies and pixel tags. These types of technologies enable the Site to compile statistics about our daily number of site visitors or specific page requests, while not identifying you personally, other than by your IP address, which is the Internet Protocol address of the computer that you use to access the Site. In some jurisdictions, we are not permitted to send cookies to the browser without the prior consent of the affected user. In this case, we will seek such consent. This section assumes that either the use of cookies is not restricted by applicable law, or if it is restricted that you have expressly consented to the use of the cookies. You can set your browser to accept all cookies, to reject cookies, or to notify you whenever a cookie is offered so that you can decide each time whether to accept it. However, refusing a cookie may in some cases preclude you from using, or negatively affect the display or function of, the Site or certain areas or features of the Site. To learn more about cookies, including how to enable cookies, change your browser settings and find and delete cookies on your hard drive, please refer to your web browser’s help menus.

B. Our Use of Information that we collect

We use your Personally Identifiable Information for the legitimate business purpose of creating your account, communicating with you about products and services you’ve purchased, and internal business purposes. We also use that information to the extent necessary to enforce our Site terms of service, Site acceptable use policy, and to prevent imminent harm to persons or property.

We use cookies and information collected from cookies so that our Site can remember you and provide you with the information you’re most likely to need. For instance, when you return to our Site, cookies identify you and prompt the site to provide your username (not your password), so you can sign in more quickly. Cookies also allow our Site to remind you of your past purchases and to suggest similar products and services. Finally, we use information gained through cookies to compile statistical information about use of our Site, such as the time users spend at the site and the pages they visit most often. Those statistics do not include PII.

We may disclose and transfer such PII to a third party who acquires any or all of Medicom's business units, whether such acquisition is by way of merger, consolidation or purchase of all or a substantial portion of our assets or equity interests. In addition, in the event that Medicom becomes the subject of an insolvency proceeding, whether voluntary or involuntary, Medicom or its liquidator, administrator, receiver or administrative receiver may sell, license or otherwise dispose of such information in a transaction approved by the bankruptcy court. You will be notified of the sale of all or a substantial portion of our business to a third party by email or through a prominent notice posted on the Site. Potential purchasers and their advisors may have access to data as part of the sale process. However, use of your personal information will remain subject to this Privacy Policy. Our customer database could be sold separately from the rest of the business, in whole or in a number of parts. The purchaser's business may not be the same as Medicom's business.

C. Protection, Transfer, and Storage of Information

We maintain commercially reasonable administrative, technical and physical safeguards (which vary depending on the sensitivity of the Personally Identifiable Information). Some of the safeguards that we employ include the following data security tools and measures to protect Personally Identifiable Information: secured servers behind firewalls, encryption using secure socket layer technology, automated and social features, employee training, physical office security measures, and suspension and/or disabling of accounts. Unfortunately, even with these measures, we cannot guarantee the security of PII. By using our Site, you acknowledge and agree that we make no such guarantee, and that you use our Site at your own risk. We cannot ensure or warrant the security of any information you provide to us. We do not accept liability for unintentional disclosure.

We are a United States based entity and our servers are located in the United States. By providing your PII to the Site, you fully understand and expressly and unambiguously consent to the transfer of such PII to, and the collection, retention and processing of such PII in the United States. If you do not wish to transfer your PII to the United States, please contact us using the information in the “Contacting Us” section below.

We will retain PII about you for the period necessary to fulfill the purposes outlined in this Privacy Policy or our data retention policies unless a longer retention period is required by law. When we no longer need PII, we take reasonable steps to destroy the information.

D. Sharing Information

In general, we will not sell, share or rent information about you to third-parties in ways different from what is disclosed in this statement.

We may share PII we collect through the Site in certain circumstances for legitimate business purposes with our affiliates, employees, independent contractors and third-party service providers. When sharing PII, we ensure that it is limited to only those who have a business need for such information. When we give certain independent contractors access to Personally Identifiable Information, all such contractors are required to sign contracts in which they promise to protect PII using procedures reasonably similar to ours. (Users are not third party beneficiaries of those contracts.)

We also may disclose PII to attorneys, collection agencies, or law enforcement authorities to address potential AUP violations, other contract violations, or illegal behavior. And we disclose any information demanded in a court order or otherwise required by law or to prevent imminent harm to persons or property. Finally, we may share PII in connection with a corporate transaction, like a merger or sale of our company, or a sale of all or substantially all of our assets or of the product or service line you received from us, or a bankruptcy.

As noted above, we compile Site usage statistics from data collected through cookies. We may publish those statistics or share them with third parties, but they don’t include PII.

E. European Economic Area Data Subject Rights

If you are a natural person residing within the European Economic Area (“Data Subject”), the following additional rights as expressed under Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 known as the General Data Protection Regulations (“GDPR”) are applicable to you:

Personal Data: For the purposes of this section, “Personal Data” means collectively PII, Unique Identifiers, Advertising Identifiers, and Location Data which you have provided to, or otherwise collected when you use and otherwise access the Site.

Basis for Processing Data: site relies on the consent of the Data Subject to process personal information. Data Subjects must be at least the age of 16 to consent to the processing of their Personal Data. Data Subjects under the age of 16 must obtain their parent's or legal guardian's permission to consent to the processing. On other occasions, we may process information when we need to do so to fulfill a contract, provide services or where we are required by law to do so.

Access/Portability: You may access, correct, or modify the Personal Data you provided to website and associated with your account. Note that we may request to verify your identification before fulfilling your request. You can also request that your personal information is provided to you in a commonly used electronic format so that you can share it with other organizations. You may do so by contacting our privacy team to process your request.

Forgotten: You may request to have your Personal Data erased, or otherwise request that your Personal Data not be processed. Please note that the Service, or parts of the Service, may become inaccessible or otherwise not function properly if you request to have your Personal Data erased or not be processed. You may do so by contacting our privacy team as described below.

Object, Restrict, or Withdraw Consent: You may withdraw consent you previously provided to website or otherwise object to or restrict the processing of your Personal Data. Please note that the Service, or parts of the Service, may become inaccessible or otherwise not function properly if you withdraw certain consents or otherwise object to restrict the processing of your Personal Data. You may do so by contacting our privacy team to process your request.

Supervisory Authority: If you have a concern with the handling of your Personal Information, you have the right to do so with your local Data Protection Authority in the country in which you reside.

If you would like to exercise above EU General Data Protection Regulation (GDPR) rights about your personal information we hold about you, please submit a written request using the information provided in the "Contacting Us" section below. Our privacy team will examine your request and respond to you as quickly as possible.

F. California Residents.

The California Consumer Privacy Act (CCPA) provides California consumers with the right to request access to their personal data, additional details about our information practices and deletion of their personal information (subject to certain exceptions). California consumers also have the right to opt out of sales of personal information, if applicable. We describe how California consumers can exercise their rights under the CCPA below. Please note that you may designate an authorized agent to exercise these rights on your behalf by providing written materials demonstrating that you have granted the authorized agent power of attorney. Please note that if an authorized agent submits a request on your behalf, we may need to contact you to verify your identity and protect the security of your personal information. We will not fulfill your CCPA request unless you have provided sufficient information for us to reasonably verify you are the consumer about whom we collected personal information. We will not discriminate against you if you choose to exercise your rights under the CCPA.

You may request, no more than twice in a twelve (12) month period, access to the specific pieces of personal data we have collected about you in the last twelve (12) months. You may also request additional details about our information practices, including the categories of personal information we have collected about you, the sources of such collection, the categories of personal information we share for a legitimate business or commercial purposes, and the categories of third parties with whom we share your personal information. You may make these requests by contacting using the contact information provided

below in the “Contacting Us” Section below. After submitting your request, please monitor your email for a verification email. We are required by law to verify your identity prior to granting access to your data in order to protect your privacy and security.

You may request, no more than twice in a twelve (12) month period, transportable copies of your personal information that we have collected about you in the last twelve (12) months. You may make these requests by contacting using the contact information provided below in the “Contacting Us” Section. After submitting your request, please monitor your email for a verification email. We are required by law to verify your identity prior to granting access to your data in order to protect your privacy and security.

You may request that we delete the personal information we have collected about you. Please note that we may retain certain information as required or permitted by applicable law. You may make these requests by contacting us using the contact information provided below in the “Contacting Us” Section below. After submitting your request, please monitor your email for a verification email. We are required by law to verify your identity prior to granting access to your data in order to protect your privacy and security.

California residents are entitled to ask us for a notice identifying the categories of personal information which we share with our affiliates and/or third parties for marketing purposes and providing contact information for such affiliates and/or third parties.

If you would like to exercise any data subject right available to you under California Consumer Privacy Act (CCPA), please submit a written request using the information provided in the “Contacting Us” section below. Our privacy team will examine your request and respond to you as quickly as possible.

G. Email, Text, Telephone Communications

You can unsubscribe from email, text and phone communications at any time. To stop receiving our promotional emails, follow the unsubscribe instructions in the email messages you receive from us or contact us as described in the “Contacting Us” Section below. To opt-out of receiving text messages, follow the opt-out instructions in the text messages that you receive from us. We will process your request within a reasonable time after receipt, in accordance with applicable laws. Note that you will continue to receive transaction-related emails regarding products or services you have requested. We may also send you certain non-promotional communications regarding Medicom and, to the extent permitted by law, you will not be able to opt-out of those communications (e.g., communications regarding updates to this Privacy Policy).

H. Contacting Us

If you have any questions or concerns related to this Privacy Policy or the information practices of this Site, please use the following information to contact us:

By Mail: Medicom Technologies, Inc.

434 Fayetteville Street Suite 1650

Raleigh, NC 27601

By Telephone: (919)-390-3014

By Email: privacy@medicom.us