



## Vulcan Healthcare Technologies Privacy Policy

Last updated: September 21, 2022

Vulcan Healthcare Technologies, LLC (“us”, “we”, “our,” or the "Company" operates the <https://vulcanhct.com/> website (the “Website”) and any Vulcan Healthcare Technologies mobile application and related services (collectively, the “Site”). Your privacy is important to us, and this Privacy Policy describes how we process personal information, including the types of personal information that we collect, the purposes for which we use it, the types of third parties with whom we share it, and your rights and responsibilities you may have with respect to such personal information. This Privacy Policy applies to the personal information provided to us through any type of engagement or interaction with the Company, such as when you access or use our online Site. By accessing or using the Site or otherwise providing us with personal information, you are consenting and agreeing to the terms and conditions set forth in this Privacy Policy.

### 1. Whose Personal Information Do We Collect

The Company collects personal information from a range of individuals in the context of our business activities, including from the following: consumers and customers; individuals that use, or otherwise access, our Site; individuals who visit our premises or facilities; representatives of our suppliers, customers and other business contacts; contractors and similar types of workers; individuals related to, or otherwise affiliated with, our Company’s employees; and, individuals who contact us by any means.

### 2. The Types and Categories of Personal Information We Collect

We may collect personal information under a broad range of circumstances. Generally, we collect the following types of information directly from you:

- **Identity data**, such as your name, title, company/organization name, e-mail address, telephone and fax numbers, and physical address (including street, city, state, postal code, and/or country).
- **Registration data**, such as information provided by you when you register for an account to use our Site, including user names and passwords.
- **Business contact data**, such as information related to other employees, owners, directors, officers, or contractors of a third-party organization (e.g., business, company, partnership, sole proprietorship, nonprofit, or government agency) with whom we may conduct, or possibly conduct, business activities.
- **Marketing and communications data**, including your marketing preferences and your subscriptions to our publications.
- **Transaction data**, including orders for our products and services and details of payments to and from you, including purchase history and preferences and payment card information.
- **Job Applicant data**, such as contact information (including name, title, residential or postal

address, telephone number, and personal email address); information in a curriculum vitae, resume, cover letter, or similar documentation; details regarding the type of employment sought, willingness to relocate, job compensation and benefit preferences; information related to your background, criminal record, credit history and similar data; information provided about or by your references or other third parties related to your employment history, skills, or qualifications; information related to previous applications to, or previous employment history with us; and, potentially sensitive information including information about your race, ethnicity, national origin, health (e.g., medical condition), and data about your criminal convictions and offenses.

- **Your feedback**, including feedback from you about our Site as well as our products and services generally, which may include data gathered from any Company surveys in which you participate.
- **Usage data**, we automatically collect from individuals who visit or access use our Site, such as a user's Internet Protocol ("IP") address, browser and computer type, access time, the webpage from which you came, and the specific webpage(s) that you access during your visit. For more information pertaining to our use of cookies, see below.

When you do not provide personal information that the Company requests, we may not be able to provide you the requested service or complete a transaction, and you agree that the Company will not be liable or otherwise responsible for any actions resulting therefrom.

### 3. How We Collect Personal Information

Most often, we obtain personal information directly from the individual. For example, when individuals undertake the following activities, we generally collect their personal information or data:

- Use or access our Site and/or complete one of our web forms.
- Contact our customer service centers or request information from us in any other way.
- Visit one of our premises.
- Submit an order to, or make a purchase with, the Company.
- Provide us personal or business contact information via a business card or through similar communications.
- Complete a survey or otherwise provide us feedback.
- Communicate with us via social networking websites, third party applications, or similar technologies.
- Visit one of our trade counters at an exhibition.

In accordance with applicable law, we may collect personal information about you from third parties, such as social media websites/applications, former employers, background check providers and others, which we may combine with the information we already hold about you in order to promote our legal or business interests, such as to help us improve and customize our Site to your preferences and for other purposes set forth in this Privacy Policy. We may also collect your business contact information from your employer or other third parties, which we will use to facilitate or otherwise engage in traditional business activities and similar administrative matters. We may also ask you to provide personal information about third parties to use as references, answer questions about your employment, refer a friend to our products and services, or for other reasons. If you provide personal information about a third party you expressly represent and warrant to the Company that you have the full right and lawful authority

to provide the Company with the information.

#### 4. How We Use your Information

The Company may use personal information for several business and administrative purposes, or to further our legal or other business interests. Generally, we use personal information for the following reasons:

- **Services and transactions.** We may use your personal information to deliver services to you or carry out transactions you have requested, including, but not limited to, providing information on the Company's products or services you have purchased or otherwise use, processing product orders, handling warranty claims, answering customer service requests, and facilitating the use of our Site.
- **Improving our Business.** We may use your personal information to perform business analyses or for other purposes that help us to develop and improve the quality of our business, Site, and products and services. We may use your personal information to conduct research, analyze your purchasing preferences, identify the products and services that best meet your requirements, and measure the effectiveness of the advertising we serve you. Where permitted by law, we may combine the information that we collect via our Site with other information we hold about you (such as information about your use of our products and services) in order to offer you an improved and consistent customer experience when interacting with us or for other purposes set forth in this Privacy Policy.
- **Marketing.** In accordance with applicable laws and regulations, we may use your personal information to inform you of our products or services which may be of interest to you, and to otherwise communicate with you about offerings, events, news, surveys, special offers, and related topics.
- **Job Applicants.** We use information submitted as part of a job application or inquiry to the Company for the following purposes: to identify and evaluate job applicants, including assessing skills, qualifications, and interests; to verify your information and completing employment, background and reference checks, which may be subject to your consent where required by applicable law; to communicate with you about the recruitment process and your application; to comply with our legal, judicial, regulatory, administrative, or other corporate requirements; to analyze and improve our application and recruitment process; to accommodate individuals who may have specialized needs during the employment process; and, to protect the rights, interests, and property of the Company, other job applicants, employees, or the public, as required, or permitted, by law.
- **Enforcement and Business Interests.** We may use the personal information we collect in order to detect, prevent and respond to fraud, intellectual property infringement, violations of our terms and conditions, violations of law or other misuse of our Site, products, or facilities. We may use personal information to administer and protect our business and our Site, including system maintenance, support, reporting and hosting of data. We may, in our sole discretion, use personal information to promote, defend or protect our legal, regulatory, or business interests.

#### 5. Sharing Information

The Company does not sell, rent, or otherwise share your personal information for any profit or other valuable consideration. However, we do disclose your personal information with selected

third parties in accordance with applicable law, including as set out below.

- **Service Providers.** We may share your personal information with other companies with whom we have contracted to provide services on our behalf, such as hosting websites, conducting surveys, processing transactions, facilitating our marketing activities, analyzing our Site, and performing analyses to improve the quality of our business, Site, products and services. We may also disclose your personal information to our designated agents, or third-party service providers, who require such information to assist us with administering our employment application and recruitment process, including, but not limited to, obtaining employment verification and background checks.
- **Distributors and Business Partners.** We may share your personal information with third parties that distribute our products to you and engage in similar routine business functions.
- **Business Restructuring.** Circumstances may arise where the Company decides to sell, buy, divest, merge or otherwise reorganize our business in some countries. We may disclose information we maintain about you to the extent reasonably necessary to proceed with the negotiation or completion of a merger, acquisition, divestiture or sale of all or a portion of the Company's assets.
- **Disclosure for Other Reasons.** We may disclose personal information if required or authorized to do so by law or in the good-faith belief that such action is necessary to comply with legal requirements or with legal process served on us, to protect and defend our rights or property or, in urgent circumstances, to protect the personal safety of any individual. We may share your personal information with any third party when we believe such disclosure is necessary to defend or protect our legal, regulatory, and business interests. We may also disclose your information upon your express consent.

In the event that you facilitate a transaction with the Company, or request information from, or otherwise engage with us, and such activities require the Company (in our reasonable judgment) to share your personal information with a service provider or other third party, you hereby direct the Company to intentionally disclose your personal information to the service provider or third party as described herein provided the service provider or third party does not, in its reasonable judgment, sell the personal information, unless that disclosure would be consistent with the law.

## 6. Links to Other Websites

The Company may include on our Site certain links to other websites, including websites operated by unaffiliated third parties. Each such third-party website has its own privacy policies and practices, which may be different than the policies and practices described herein; we urge you to read any privacy policy posted on a third-party website carefully. Additionally, to the extent that you follow a link to a website operated by an independent third party, please be aware that the Company exercises no authority or control over that third-party and we cannot be, and are not, responsible for any information that you may submit at that website or how it is used.

## 7. Data Retention and Localization

The information that the Company collects and processes is stored in the United States. If you are located outside of the United States, please be aware that information you provide to the Company will be transferred to the United States, and that the United States may not provide

the same level of protections as the laws in your country. By continuing to provide us such information you hereby consent to your personal information being transferred to, and stored in, the United States. The period during which the Company's retains your personal information varies depending on the purpose for the processing. For example, we retain personal information needed to provide you with products and services, to facilitate transactions you have requested, or to engage in marketing activities, in accordance with applicable law and for so long as necessary to defend our legal or business interests. In all other cases, we retain your personal information for as long as is needed to fulfill the purposes outlined in this Privacy Policy.

## **8. Security**

We are committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use or disclosure. However, no information system can be fully secure, so we cannot guarantee the absolute security of your personal information. Moreover, we are not responsible for the security of information you transmit to the Site over networks that we do not control, including the Internet and wireless networks, and you provide us with any information and data at your own risk. You hereby agree that the Company shall not be liable or otherwise responsible for any data incidents that compromise the confidentiality, integrity, or security of your personal information. The safety and security of your personal information also depends on you. Where we have given you (or where you have chosen) a user ID and password to access the Site, or our services, you are responsible for maintaining the security and confidentiality of those log-on credentials and not revealing them to others. You must contact us immediately if you have to reason to believe that your user ID or password to our Site have been compromised.

## **9. No Data Collected from Children**

Our Site is not directed at, nor intended for use by, children. As a result, we will not knowingly collect information from children under sixteen (16) years of age with or without consent from their parents or guardians. If you are under the age of sixteen you are prohibited from using our Site or with providing us with your personal information, unless you can demonstrate affirmative authorization from your parent or legal guardian to do so.

## **10. Cookies**

The Company does not use any advertising or analytical cookies on our Site.

Cookies are small files sent to your computer as you access the internet. They store useful information about how you interact with any websites you visit. Generally, cookies do not collect any information stored on your computer or device or in your files, and do not contain any information that would directly identify you as a person. You can set your browser to disable certain non-essential cookies. However, if you choose not to accept cookies, we may not be able to provide you with as good of an experience as one that is specifically tailored to your needs by utilizing the cookie and you may not be able to utilize some features of the Site. You can find more information about cookies, behavioral advertising, and privacy at <http://www.allaboutcookies.org/>.

## 11. Your Rights and Responsibilities

You are permitted, and hereby agree, to only provide personal information to the Company if such personal information is accurate, reliable, and relevant to our relationship and only to the extent such disclosure will not violate any applicable data protection law, statute, or regulation or infringe upon any individual's data privacy rights or privileges. If you provide the Company with any personal information about a third party, you expressly represent that you have that person's consent or the full right and authority to submit the personal information to the Company.

Depending on the jurisdiction in which you reside or the Company operates, you may have certain data protection rights. To exercise any of these data privacy rights, please contact us, or have your authorized agent contact us, in accordance with the "Contact Us" section listed below. In the event you submit, or your authorized agent submits on your behalf, a data request, you (and your authorized agent) hereby acknowledge and agree, under penalty of perjury, that you are (or the authorized agent of) the consumer whose personal information is the subject of the request. We will respond to any data requests within the timeframes required by law, and we may charge a fee to facilitate your request, where permitted by law. The rights afforded under data protection laws are not absolute, and the Company may be permitted to refrain from undertaking any action or changing its data processing activities, in response to a data request you submit to us.

**Marketing.** You have the right to opt-out of receiving electronic direct marketing communications from us. All electronic direct marketing communications that you may receive from us, such as e-mail messages, will give you an option of not receiving such communications from us in the future. California residents have the right to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. We do not share personal information with third parties with whom we have reason to believe use such information for their own direct marketing purposes.

**California Privacy Rights.** Pursuant to the California Consumer Privacy Act of 2018, as amended ("CCPA"), certain California residents may have additional data privacy rights, such as the right to be notified about what personal information is collected about you, and our intended use and purpose for collecting your personal information. In some circumstances, California residents have the right to know and access the categories or specific pieces of personal information we have collected, used, disclosed, or sold about you over the past twelve (12) months; the categories of sources from which the personal information is collected; and, the business or commercial purpose for which your personal information was collected, used, disclosed, or sold. In addition, certain California residents have the right to request the Company transfer, to the extent feasible, personal information in certain forms and formats. California residents have the right to request that we (and any applicable service provider) delete/erase your personal information under certain circumstances. In some circumstances, certain California residents have the right to opt-out of the sale of their personal information. The Company does not sell, rent, or share any personal information to third parties for profit or other valuable consideration. California residents have the right not to be subject to discrimination for asserting their rights under the CCPA. If you make, or an authorized agent on your behalf makes, any request related to your personal information under the CCPA, the Company will ascertain your identity (and the identity of the authorized agent, to the extent applicable) to the degree of certainty required under the law before addressing your request. The Company may

require you to match at least two or three pieces of personal information we have previously collected from you before granting you access to, or erasing, specific pieces, or categories of, personal information, or otherwise responding to your request. We may require written documentation that demonstrates a third party is authorized to serve as your agent for the purposes of submitting the requests set forth herein.

***Do Not Track.*** Some web browsers may transmit “Do Not Track” signals to the website with which the user communicates. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. We currently do not take action in response to these signals.

***Persons with Disabilities.*** The Company strives to ensure that every person has access to information related to our products and services, including this Privacy Policy. Please contact us if you would like this Privacy Policy provided in an alternative format and we will seek to meet your needs

## **12. Changes to the Policy**

We reserve the right to change or update this Privacy Policy at any time and please see the Effective and Amendment date to determine whether there have been changes made to this Privacy Policy since the last time you visited our Site or engaged with the Company.

## **13. Contact Us**

If you have questions regarding this Privacy Policy or our handling of your personal information, would like to request more information from us, or would like to exercise a data privacy right, please contact us at any of the following:

- Email: [info@vulcanhct.com](mailto:info@vulcanhct.com)
- Interactive Web Form: [https://vulcanhct.com/?page\\_id=319](https://vulcanhct.com/?page_id=319)

## **14. Effective and Amendment Date**

This Privacy Policy was last amended September 21, 2022.