#### **PRIVACY NOTICE**

Effective Date: September, 2023

This Privacy Notice describes what information Pettable, Inc. ("Pettable", "we", or "us") collects, uses, and shares when you interact with our website (pettable.com), emails we send, or otherwise interact or communicate with us (our "Services").

This Privacy Notice explains the following:

- HIPAA
- The Personal Information We Collect
- Cookies and Other Tracking Technologies
- How We Use Your Personal Information
- How We Share Your Personal Information
- How We Protect and Store Your Personal Information
- Retention of Your Personal Information
- Your Privacy Options
- Children's Information
- Updates To This Privacy Notice
- Additional Notice for California Residents

Please note that this Privacy Notice does not apply to non-Pettable websites or services that state that they are offered under a different privacy notice. Please review the privacy policies on those websites and applications directly to understand their privacy practices.

For questions about our privacy practices, contact us at support@pettable.com or write to us at:

Pettable, Inc 810 N Church St, Suite 67131 Wilmington, DE 19802

# 1. HIPAA

Pettable refers individuals to mental health professionals for the purpose of receiving emotional support animal (ESA) and psychiatric service dog (PSD) training evaluation and recommendation. In providing these Services, Pettable may collect, share, and store protected health information, as defined by the Health Insurance Portability and Accountability Act ("HIPAA"), as a business associate to the relevant mental health professional. As a business associate, Pettable cannot use or disclose protected health information in any way that the mental health professional itself may not. For information on how your mental health professional collects, uses, and shares your protected health information, please refer to their notice of privacy practices.

## 2. The Information We Collect

Depending on the nature of your interaction with Pettable we may collect information as follows:

- <u>Directly from you</u>, when you provide information to us or interact with us:
  - Contact information and any other information you choose to include when you communicate with us via email, mail, telephone, or chat.

- Account information, such as your name, email address, telephone number, and password.
- Transactional information including payment information and payment history if you engage in transactions through the Services.
- Photograph of you if you apply for a Pettable scholarship.
- Health-related information, including information on your mental health, if you complete a questionnaire for PSD training and/or ESA letter services.
- Demographic information, including your age, sex, race, ethnicity, if required by a mental health professional for your participation in the PSD training and/or ESA letter services.
- Employment and educational information, if relevant to your scholarship application, ESA letter, or PSD training.
- <u>Automatically from you</u>, *device information and online user activity* when you utilize our interact with our online Services, as described in the next section.

## From third parties:

- Health-related information collected during your meeting with a mental health professional to facilitate your participation in the ESA letter and/or PSD training services.
- Information about the marketing and advertisements you have seen or clicked on and your email address from online advertising companies to send you information that may be of interest to you.

Some of this information may be collected by external parties on our behalf. For example, we use a payment processor when you engage in a transaction on our Services and Pettable itself does not collect or store payment card information.

# 3. Cookies and Other Tracking Technologies

When you interact with our online Services, certain information about your use of our online Services is automatically collected via cookies and other tracking technologies. This includes:

- Usage details about your interaction with our online Services, such as the date, time, and length
  of visits, and specific pages or content accessed during the visits, search terms, frequency of the
  visits, referring website address.
- Device information about the device you use to connect with our online Services, such as IP address, device type, unique device identifier, operating system, browser type, mobile network information, and the device's telephone number.
- Location information where you choose to provide our online Services with access to information about your device's location.
- Website usage and session information about your interaction with our online Services, including the resources that you access, pages viewed, how much time you spent on a page, and how you

reached our online Services. We also log the details of your visits to our online Services and information generated in the course of using our online Services, such as mouse movements, clicks, page visits, text entered, how long you spent on a page, and other details of your actions on our online Services.

Much of this information is collected through cookies, web beacons, and other tracking technologies, which may be operated by our partners who assist us in collect information about usage of the online Services, serving ads, or providing other services to you. For example, we use Google Analytics to conduct website analytics and collect usage details. You can learn more about privacy and Google Analytics by visiting <a href="https://support.google.com/analytics/answer/6004245">https://support.google.com/analytics/answer/6004245</a>, and opt out of collection of your data by using the Google Analytics Opt Out Browser Add-on, available at <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>. We also use Google Ads and Facebook Pixel to customize out advertising and to serve you ads based on your browsing behavior. These partners use cookies to serve you ads based on your prior visit to our online Services and other websites on the internet. These cookies allow your behavior to be tracked after you have been redirected to our online Services by clicking on an ad. You can learn more about Google Ads at <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a> and Facebook Pixel here <a href="https://www.facebook.com/privacy/policy">https://www.facebook.com/privacy/policy</a>. You can opt out of personalized advertising through Google's Ad Settings here <a href="https://www.facebook.com/settings.google.com/">https://www.facebook.com/settings.google.com/</a> and Facebook's Ad Settings here <a href="https://www.facebook.com/settings.google.com/">https://www.facebook.com/settings.google.com/</a> and Facebook's Ad Settings here <a href="https://www.facebook.com/settings.google.com/">https://www.facebook.com/settings.google.com/</a> and Facebook's Ad Settings here

We also use an advertising partner that may associate your actions on our online Services with information they or others have about you, including your email address. We may then receive this information to send you marketing communications. You can opt out of this sharing by visiting <a href="https://app.retention.com/optout">https://app.retention.com/optout</a>.

Please note we may use other cookies set by other third-party partners for the above-described purposes. You may be able to opt out tracking by cookies or control how information collected by cookies is used via a number of means, as described below.

#### 4. How We Use Your Personal Information

We may use the personal information we collect from you to:

- Provide our Services to you, including to facilitate your communication with a mental health professional, maintain your account, manage any purchases, and provide important notices.
- Respond to your inquiries, questions and comments and provide support.
- Maintain and improve the Services, diagnose or fix technology problems, monitor the
  performance of our Services, and grow our business through understanding our consumer base
  and the effectiveness of our marketing, events, promotional campaigns, and publications.
- Market to you, design and administer marketing campaigns, and tailor the content we display to you on our Services and communications, including advertising.
- Comply with legal requirements and industry standards, detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal, and protect the rights of Pettable, you, or others.

• Create and manage relationships with mental health professionals, fulfill contractual requirements, and perform other business activities as necessary.

We may use and share information in an aggregated or de-identified manner data at our discretion, including for research, analysis, modeling, marketing, and improvement of our Services.

#### 5. How We Share Your Personal Information

We may share the personal information we collect in the following instances:

- With service providers that we believe need the information to perform a technology, business, or other professional function for us such as IT services, maintenance and hosting of our Services, payment processors, accounting, auditing, and tax services, and other professional services.
- With selected mental health professionals to facilitation your participation in our ESA letter and/ or PSD training services.
- With analytics partners who collect information via cookies on our online Services to assist us
  with measuring visits and traffic so we can measure and improve the performance of the online
  Services.
- With advertising partners who assist us in serving advertising regarding the Services to others who may be interested in the Services, or who use cookies to display interest-based advertising to you on the online Services. These third parties may use cookies to collect or receive information from the Services and elsewhere on the internet and use that information to provide measurement services and target ads. Third parties may allow other companies to access information about you so that they may market other products you may be interested in.
- With our affiliates, for purposes consistent with this Privacy Notice, to carry out our Services, and to the extent permitted by law.
- In the event of a corporation event, we reserve the right to transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information the same as described in this Privacy Notice.
- For legal purposes, where necessary to comply with the law, in response to court orders, law
  enforcement or legal process, including for national security purposes, to establish, protect, or
  exercise our legal rights, as required to enforce our terms of use or other contracts, to defend
  against legal claims or demands, or to detect, investigate, prevent, or take action against illegal
  activities, fraud, or situations involving potential threats to the rights, property, or personal
  safety of any person.

## 6. How We Protect and Store Your Personal Information

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

#### 7. Retention of Your Personal Information

We will retain your personal information for as long as is necessary to complete the purposes for which it was collected, or as may be required by law. California law requires us to provide information regarding the criteria we use to determine the length of time for which we retain personal information.

We utilize the following criteria to determine the length of time for which we retain information:

- The business purposes for which the information is used, and the length of time for which the information is required to achieve those purposes;
- Whether we are required to retain the information type in order to comply with legal obligations
  or contractual commitments, to defend against potential legal claims, or as otherwise necessary
  to investigate theft or other activities potentially in violation of our policies and procedures
  applicable to you or against the law, to ensure a secure online environment, or to protect health
  and safety;
- The privacy impact of ongoing retention on the consumer; and
- The manner in which information is maintained and flows through our systems, and how best to manage the lifecycle of information in light of the volume and complexity of the systems in our infrastructure.

Individual pieces of personal information may exist in different systems that are used for different business or legal purposes. A different maximum retention period may apply to each use case of the information. Certain individual pieces of information may also be stored in combination with other individual pieces of information, and the maximum retention period may be determined by the purpose for which that information set is used.

# 8. Your Privacy Options

You may have certain choices when it comes to how we collect and use your personal information:

- Account information: Please visit your Pettable account to view and update certain personal information associated with your account, such as your contact information.
- *Email marketing*: If at any time you no longer wish to receive marketing communications from us, you can click the unsubscribe link at the bottom of any email.
- Online activity tracking and interest-based advertising: You have several options to either
  prevent our collection of information regarding your online activity, or prevent third parties from
  using such information from being used for interest-based advertisements:
  - You can opt out or set preferences regarding cookies when a device you utilize visits our online Services, by visiting pettable.com/cookie-management to access our cookie

management tool. Please note that you will need to set preferences on each device you use to visit the Services

- Your browser or device may include "Do Not Track" functionality; please note that we do not respond to such signals. However, our online Services are designed to honor Global Privacy Control signals.
- You also modify your browser setting to disable or reject cookies across the internet; but if you do so, some features of our online Services may not function properly or be available. If you are visiting the online Services from a mobile device, the operating system of the device may offer you options regarding how the device collects and uses your information for interest-based advertising. Please visit <a href="https://thenai.org/opt-out/mobile-opt-out/">https://thenai.org/opt-out/mobile-opt-out/</a> for more information.
- You may be able to prevent third parties from using your information for interest-based advertisements across the internet by visiting <a href="http://www.networkadvertising.org">http://www.networkadvertising.org</a> or <a href="http://www.aboutads.info">http://www.networkadvertising.org</a> or <a href="http://www.aboutads.info">http://www.networkadvertising.org</a> or <a href="http://www.aboutads.info">http://www.aboutads.info</a>. Please note this does not opt you out of being served ads, nor will it prevent the receipt of interest-based advertising from other companies that do not participate in these programs

#### 9. Children's Information

We do not knowingly or intentionally gather Personal information about children. If we have inadvertently collected the personal information of a child, a parent or guardian of that child may contact us at support@pettable.com to request that we delete the information from our records or otherwise cease the use of that information.

#### 10. Updates to This Privacy Notice

We may make changes to this Privacy Notice from time to time. The "Effective Date" at the top of this page indicates when this Privacy Notice was last revised. We may also notify you in other ways from time to time about the collection, use, and disclosure of your personal information described in this Privacy Notice.

## 11. Additional Notice for California Residents

The California Consumer Privacy Act (CCPA) provides California residents with the right to receive certain disclosures regarding the collection, use, and sharing of their personal information, as well as the right to access, delete, correct, opt-out, and limit the use of sensitive personal information. These rights apply to all residents of California, regardless of whether you are a consumer, website visitor, or business contact. Please note our processing of protected health information is not covered by the CCPA.

#### Collection, Use, and Retention

You have the right to receive notice of the categories of personal information we collect, and the purposes for which those categories of personal information will be used. The following chart describes our practices with regard to the collection, use, and retention of your personal information. Certain personal information may fall into multiple categories, and in some circumstances, how we use and how long we keep the information within each category will vary. Please note the categories we use below to

describe the information are those enumerated in the CCPA and the examples of personal information are illustrative and do not represent a complete description of the information we process.

Category	Required Information
Personal identifiers	Examples of what we collect: Name, email address, phone number, unique identifiers (such as those assigned in cookies).  Sources: Directly from you; analytics and advertising partners.  Purpose of collection and use: All purposes listed in How We Use Your Personal Information.  Retention Considerations: Certain identifiers are maintained throughout our relationship with you in order to provide the Services. When we are no longer providing you with Services, we may still need this information for a period of time for business and legal requirements.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Examples of what we collect: Telephone number, credit card number, debit card number.  Sources: Directly from you.  Purpose of collection and use: All purposes listed in How We Use Your Personal Information.  Retention Considerations: Certain information is maintained throughout our relationship with you in order to provide the Services. When we are no longer providing you with Services, we may still need this information for a period of time for business and legal requirements, such as to calculate taxes and protect against fraud.
Protected classification characteristics under California or federal law	Examples of what we collect: Race, gender, ethnic origin.  Sources: Directly from you.  Purpose of collection and use: All purposes listed in How We Use Your Personal Information.  Retention Considerations: Demographic information is maintained throughout the life of our relationship in order to provide the ESA letter and PSD training services.
Commercial information	Examples of what we collect: Transaction information, order history, payment records.  Sources: Directly from you.  Purpose of collection and use: All purposes listed in How We Use Your Personal Information.  Retention Considerations: The law requires us to maintain purchase records for a period of time, which varies by state.
Professional or employed related information	Examples of what we collect: Occupation, place of work.  Sources: Directly from you.  Purpose of collection and use: All purposes listed in How We Use Your Personal Information.  Retention Considerations: Professional or employment related information is maintained throughout the life of our relationship in order to provide the ESA letter and PSD training services.

Education information	Examples of what we collect: Educational institution.  Sources: Directly from you.  Purpose of collection and use: All purposes listed in How We Use Your Personal Information.  Retention Considerations: Education information is maintained throughout the life of our relationship in order to provide the ESA letter and PSD training services.
Internet or other similar network activity	Examples of what we collect: Unique numerical identifier, cookie or tracking pixel information, device ID, browsing history, search history, IP address, interaction with a website, or interaction with advertisement.  Sources: Automatically from you; analytics and advertising partners.  Purpose of collection and use: All purposes listed in How We Use Your Personal Information.  Retention Considerations: Internet or other similar network activity is typically deleted at regular intervals when the information is no longer necessary for the purpose for which it was collected.
Inferences drawn from other personal information	Examples of what we collect: Interests, preferences.  Sources: Advertising partners; created about you based on information we receive from advertising partners.  Purpose of collection and use: All purposes listed in How We Use Your Personal Information.  Retention Considerations: The retention period for this type of personal information will vary depending on the nature of the underlying information from which the inference is created.
Sensitive information	Examples of what we collect: Password or credentials allowing access to an account, racial or ethnic origin.  Sources: Directly from you.  Purpose of collection and use: All purposes listed in How We Use Your Personal Information.  Retention Considerations: Certain information about you is maintained throughout the life of our relationship to provide the ESA letter and PSD training services.
Audio, electronic, visual, thermal, olfactory, or similar information.	Examples of what we collect: Photograph of you.  Sources: Directly from you.  Purpose of collection and use: All purposes listed in How We Use Your Personal Information.  Retention Considerations: Certain information about you is maintained throughout the life of our relationship with you in order to provide the requested Services.

We do not collect the following categories of personal information: biometric information and geolocation data.

# Sale, Sharing, and Other Disclosure of Personal Information

Any category of personal information listed in the chart above may be disclosed for a business purpose to service providers, which are companies or individuals that we engage to conduct activities on our

behalf. Service providers are restricted from using personal information for any purpose not related to our engagement.

California law also requires us to provide you with information regarding the parties to whom we sell (disclosing personal information for monetary or other benefit) or share (disclosing personal information for purposes of cross-contextual behavioral advertising) your information. We sell and share your identifiers and internet or other similar network activity information via cookies to analytics and advertising partners.

We may disclose your information in other ways that are not considered sales under the law. Please see "How We Share Personal Information" above for more information about how we share your information.

#### **Rights**

You have the right to access, delete, and correct certain personal information collected about you. You or your authorized agent may submit a request to access, delete, or correct your personal information by emailing <a href="mailto:support@pettable.com">support@pettable.com</a> or visiting <a href="mailto:pettable.com">pettable.com</a>/personal-information-rights-request</a>. In order to process your request, we must verify your identity. We do this by asking you to provide information we can match against information we may have collected from you previously and confirm your request using the email account stated in the request. If you are requesting access on behalf of someone else, we will require verification of your identity, as well as proof of authorization by the individual whose personal information you wish to access. We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

You also have the right to *opt out* of the sale or sharing of your personal information to third parties. To opt out, please visit our Do Not Sell or Share My Personal Information page at pettable.com/cookie-management. Please note that your right to opt out does not apply to our sharing of personal information with service providers, as described above.

While the CCPA provides you the right to *limit use of sensitive personal information*, we only process sensitive personal information for purposes permitted by the CCPA and therefore do not offer an option to limit further processing of your sensitive personal information.