#### **PRIVACY POLICY**

Last Updated: October 24, 2023

This Privacy Policy describes the privacy practices of Nessle, Inc. ("Nessle," "we", "us", or "our"), and how we handle personal information that we collect through our website at https://www.nessle.com, our mobile application, and any other website or service that we own or control and that links to this Privacy Policy (collectively, the "Service" or "Services").

#### **Personal Information We Collect**

We collect the following categories of personal information about you:

### Information you provide to us:

- **Contact information**, such as your first and last name, email and mailing addresses, phone number, company name, and professional title.
- **Account information**, such as the username and password you use to access our Services as well as a profile picture.
- Payment information needed to complete your transactions with us, including name, payment
  card information, and billing information. This information is processed by our payment service
  provider, Stripe, which may handle your payment information in accordance with its own privacy
  policy (https://stripe.com/privacy). We do not have access to your full payment card
  information.
- **Communications** that we exchange with you, including when you contact us with questions, feedback, or otherwise.
- **Health information**, such as information about physical and mental health conditions, treatments for medical conditions, family medical history, and medications an individual may take.
- **Biographical and demographic information**, such as date of birth, age, gender/pronouns, the stage of your parenting journey, special interest groups with which you associate, and information you share about sex life or sexual orientation.
- Professional information and expertise qualifications for health care professionals, such as licensure details, education, employment history, years of experience in a particular field, industry affiliations, etc.
- Usage information, such as information about how you use the Services and interact with us, including information associated with any content you upload to the Services or otherwise submit to us, and information you provide automatically when you use any interactive features of the Services.

- Marketing information such as your preferences for receiving our marketing communications and details about your engagement with them.
- Other information not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

**Automatic data collection.** We and our service providers may automatically log and combine information about you, your computer or mobile device, and your interactions over time with the Services, online resources, and our communications, such as:

- Device data, including your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, device type (e.g., phone, tablet), IP address, unique identifiers, language settings, and general location information such as city, state, or geographic area.
- Online activity data, including pages, screens and/or features you viewed, accessed and/or used, how long you spent on a page, screen and/or feature, the website you visited before browsing to the Services, navigation paths between pages or screens, information about your activity on a page, screen and/or feature, access times, duration of access, and whether you have opened or otherwise engaged with our communications, such as our marketing emails, or clicked links or files within them.
- Geolocation Information from your device via your browser or mobile device location services.
   Please consult your browser or device documentation regarding how to turn off location services. If you disable location services, you may not be able to use the full array of features and functionalities available through our Services.

#### We use the following tools for automatic data collection:

- Cookies, which are text files that websites store on a visitor's device to uniquely identify the
  visitor's browser or to store information or settings in the browser for the purpose of helping
  you navigate between pages efficiently, remembering your preferences, enabling
  functionality, and helping us understand user activity and patterns.
- Local storage technologies, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

### Information we obtain from other sources:

• **Social media.** We may maintain pages on social media platforms, such as LinkedIn, Instagram, and other third-party platforms. When you visit or interact with our pages on those platforms, the platform provider's privacy policy will apply to your interactions and their collection, use and processing of your personal information. You or the platforms may provide us with information through the platform, and we will treat such information in accordance with this Privacy Policy.

• Other sources. We may obtain personal information from other third parties, such as marketing partners, publicly-available sources, and data providers.

#### **How We Use Personal Information**

We use personal information for the following purposes or as otherwise described at the time of collection:

**To provide our Services.** We use personal information to operate, maintain, and provide you with our Services. In particular, we use personal information to perform our contractual obligations under our terms of service.

**To communicate with you about our Services**. It is in our legitimate business interests to use personal information to respond to your requests, provide customer support, and communicate with you about our Services, including by sending announcements, updates, security alerts, and support and administrative messages.

**To improve, monitor, personalize, and protect our Services**. It is in our legitimate business interests to improve and keep our Services safe for our users, which includes:

- Understanding your needs and interests, and personalizing your experience with the Services and our communications.
- Troubleshooting, testing and researching, and keeping the Services secure.
- Investigating and protecting against fraudulent, harmful, unauthorized, or illegal activity.

For research and development. We may use personal information for research and development purposes where it is in our legitimate business interests, including to analyze and improve the Services and our business. As part of these activities, we may create or use aggregated, de-identified, or other anonymized data from personal information we collect. We make personal information into anonymized data by removing information that makes the data personally identifiable to you. We may use this anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Services and promote our business.

**Direct marketing.** We may send you direct marketing communications as permitted by law, including by email. You may opt out of our marketing communications as described in the "Opt-out of marketing communications" section below. Except where consent is required, we undertake such marketing on the basis of our legitimate business interests. Where we seek your consent, you may withdraw your consent at any time.

**For compliance and protection.** We may use personal information to comply with legal obligations, and it is in our legitimate business interests to enforce our terms of service and to defend our business against legal claims or disputes, including to:

 Protect our, your, or others' rights, privacy, safety, or property (including by making and defending legal claims).

- Audit our internal processes for compliance with legal and contractual requirements and internal policies.
- Enforce the terms and conditions that govern the Services.
- Prevent, identify, investigate, and deter fraudulent, harmful, unauthorized, unethical, or illegal activity, including cyberattacks and identity theft.
- Comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.

#### **How We Disclose Personal Information**

We may share personal information with the following individuals or entities and as otherwise described in this Privacy Policy or at the time of collection:

**Other Nessle users.** You may choose to share certain personal information with the Nessle community, such as with experts on our Services. This information may include your name, bio, username, and any other content that you chose to share.

**Service providers.** Companies and individuals that provide services on our behalf or help us operate the Services or our business (such as hosting, information technology, customer support, email delivery, and website analytics services).

**Professional advisors.** Professional advisors, such as lawyers, auditors, bankers, and insurers, where necessary in the course of the professional services that they render to us.

**Authorities and others.** Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the compliance and protection purposes described above.

**Business transferees.** Acquirers and other relevant participants in business transactions (or negotiations for such transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, or equity interests in, our business (including, in connection with a bankruptcy or similar proceedings).

Please note that we do not sell your information or share your information for interest-based advertising purposes. We may at times, though, share aggregated and/or anonymized data with third party advertisers to give clarity on the needs and interests of our users broadly.

## **Privacy Rights and Choices**

**Opt out of marketing communications.** You may opt out of marketing-related emails and other communications by following the opt-out or unsubscribe instructions in the communications you receive from us or by contacting us as provided in the "How to Contact Us" section below. You may continue to receive Services-related and other non-marketing emails.

**Cookies.** Most browser settings let you delete and reject cookies placed by websites. Many browsers accept cookies by default until you change your settings. If you do not accept cookies, you may not be able to use all functionality of the Service and it may not work properly. For more information about

cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit www.allaboutcookies.org.

**Personal information requests.** We also offer you choices that affect how we handle the personal information that we control. Depending on your location and the nature of your interactions with our Services, you may request the following in relation to personal information:

- **Information** about how we have collected and used personal information. We have made this information available to you without having to request it by including it in this Privacy Policy.
- Access to a copy of the personal information that we have collected about you. Where applicable, we will provide the information in a portable, machine-readable, readily usable format.
- **Correction** of personal information that is inaccurate or out of date.
- Deletion of personal information that we no longer need to provide the Services or for other lawful purposes.
- Withdrawal of consent, where we have collected and processed your personal information with your consent. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- Additional rights, such as to object to and request that we restrict our use of personal information.

To make a request, please email us or write to us as provided in the "<u>How to Contact Us</u>" section below. We may ask for specific information from you to help us confirm your identity. Depending on where you reside, you may be entitled to empower an authorized agent to submit requests on your behalf. We will require authorized agents to confirm their identity and authority, in accordance with applicable laws. You are entitled to exercise the rights described above free from discrimination.

Limits on your privacy rights and choices. In some instances, your choices may be limited, such as where fulfilling your request would impair the rights of others, our ability to provide a service you have requested, or our ability to comply with our legal obligations and enforce our legal rights. If you are not satisfied with how we address your request, you may submit a complaint by contacting us as provided in the "How to Contact Us" section below. Depending on where you reside, you may have the right to complain to a data protection regulator where you live or work, or where you feel a violation has occurred.

**Do Not Track.** Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <a href="http://www.allaboutdnt.com">http://www.allaboutdnt.com</a>.

#### Other Sites and Services

Our Services may contain links to websites and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated

with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites or online services operated by third parties, and we are not responsible for their actions. This Privacy Policy does not apply to such third-party sites or services.

# Security

We use reasonable organizational, technical, and administrative measures designed to protect against unauthorized access, misuse, loss, disclosure, alteration, and destruction of personal information we maintain. Unfortunately, data transmission over the Internet cannot be guaranteed as completely secure. Therefore, while we strive to protect your personal information, we cannot guarantee the security of personal information.

## **Children's Privacy**

Our Services are not intended for use by children under 16 years of age. If we learn that we have collected personal information through our services from a child under 16 without the consent of the child's parent or guardian as required by law, we will delete it.

#### **Jurisdiction of Services**

You will provide personal information directly to our Services in the United States. We may also transfer information to our affiliates and service providers in the United States, and/or other jurisdictions. Please note that such jurisdictions may not provide the same protections as the data protection laws in your home country.

## **Retention of Personal Information**

Where required under applicable laws, we retain personal information only for as long as is necessary to fulfil the purposes for which it was collected and processed, in accordance with our retention policies, and in accordance with applicable laws and regulatory obligations or until you withdraw your consent (where applicable).

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of personal information, the purposes for which we use personal information and whether we can achieve those purposes through other means, and the applicable legal and regulatory requirements.

### Job Applicants

When you visit the careers portion of our websites, we collect the information that you provide to us in connection with your job application. This includes but is not limited to business and personal contact information, professional credentials and skills, educational and work history, and other information of the type that may be included in a resumé. This may also include diversity information that you voluntarily provide and that we process on the basis of your consent. We use this information on the basis of our legitimate business interests to facilitate our recruitment activities and process employment applications, such as by evaluating a job candidate for an employment activity, to monitor recruitment statistics, and to respond to surveys. We may also use this information to provide improved administration of the Services and as otherwise necessary (i) to comply with relevant laws or to respond

to subpoenas or warrants served on us, (ii) to protect and defend our or others' rights or property, (iii) in connection with a legal investigation and (iv) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy or our terms.

# **Changes to This Privacy Policy**

We reserve the right to modify this Privacy Policy at any time. Where we do so, we will update the date of this Privacy Policy and post it on the website. If we make material changes to this Privacy Policy, we will let you know.

#### **How to Contact Us**

**Responsible entity**. Nessle, Inc. is the entity responsible for the processing of personal information under this Privacy Policy.

**Contact us**. If you have any questions or comments about this Privacy Policy, our privacy practices, or if you would like to exercise your rights with respect to your personal information, please email us at privacy@nessle.com or write to us at:

Nessle, Inc. 1717 E Cary St Richmond, VA 23223 United States