# Med Flow<sup>™</sup> Privacy Policy: Last Updated July 1, 2020

Thank you for using the Med Flow<sup>™</sup> mobile app and web portal (the "App"). The App is an application of Safe Camp, LLC. (referred to as "Med Flow<sup>™</sup>," "we" or "us"). This Med Flow<sup>™</sup> Privacy Policy ("Privacy Policy") sets out how we use, share, and protect Personal Information (as hereinafter defined) and other information that we collect when you subscribe to the App or otherwise access or use the App or use any Med Flow<sup>™</sup> Services. Capitalized terms not defined herein shall have the meaning set forth in the Med Flow<sup>™</sup> Terms of Use ("Terms of Use") located at <a href="http://www.gosafecamp.com/TandC">http://www.gosafecamp.com/TandC</a>

Statements in this Privacy Policy with respect to the App and Med Flow<sup>TM</sup> Services apply to all Med Flow<sup>TM</sup> mobile device applications for any mobile device running the iOS operating system, the Android operating system, or a Windows operating system. In addition, this policy will also cover any Web-based solution used in conjunction with the mobile application or as a stand-alone service.

YOU MUST AFFIRMATIVELY CONSENT TO USE OUR MOBILE APP AND OFFERINGS, AND, BY DOING SO, YOU CONSENT TO THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY IN THEIR ENTIRETY, YOU MAY NOT ACCESS OR OTHERWISE USE THE MOBILE APP OR THE MED FLOW™ SERVICES.

We will only process your Personal Information (as defined below) in accordance with applicable data protection and privacy laws. For the purposes of UK and EU data protection legislation, the data controller is Safe Camp, LLC, 3516 Ocean View Blvd. Glendale, CA 91208 UNITED STATES OF AMERICA.

## **1.Information We May Collect**

For the purposes of this Privacy Policy, Personal Information shall mean individually identifiable information from or about an individual. We may collect Personal Information from users when they subscribe to the Med Flow<sup>™</sup> Services or otherwise access or use the App.

In addition, when you use the App and Med Flow<sup>TM</sup> Services, we may collect certain usage data, such as: (a) the number of times that you visit the App; (b) the third-party apps you are accessing and using where available, how you are using third-party apps and the frequency and duration of use associated with them; and (c) other analyses and data associated with your access to, and use of, the App and third-party apps, and all Med Flow<sup>TM</sup> Services (collectively, "Usage Data"). We also may collect information and responses you provide when participating in activities on the App, which may include activity postings, survey responses, assessment responses and any other data you generate in using the App and/or Med Flow<sup>TM</sup> Services ("User Responses").

# 2.App Registration

The Personal Information that you must supply on the App in order to obtain access to the Med Flow<sup>TM</sup> Services may include, without limitation: (a) your full name; (b) your address; (c) your telephone number; and (d) your photograph (collectively, "App Registration Data").

# **3.Use of Personal Information**

We may use your Usage Data: (a) to assist us in studying, evaluating and improving the App and Med Flow<sup>TM</sup> Services; (b) to determine your preferences and tailor the App and Med Flow<sup>TM</sup> Services to your needs; and (c) so that we can promote the App and Med Flow<sup>TM</sup> Services to third parties (using Usage Data on an aggregate and anonymous basis in that instance).

Other than in connection with the limited use of Usage Data and Personal Information as specified above, Med Flow<sup>TM</sup> will never sell, rent, exchange or barter your Personal Information to or with any third party for financial gain or marketing purposes. When you register to use the App, we use the Personal Information that you make available to personalize your experience with the App, facilitate the delivery of the applicable Med Flow<sup>TM</sup> Services to you and for verification purposes. You also agree that we may contact you at any time with updates and any other information that we may deem appropriate for you to receive in connection with your continued use of the App and Med Flow<sup>TM</sup> Services, and to keep you informed of our other products and services. In addition, if you identify yourself to us by sending us an email or some other communication with questions or comments, we may use such information (including Personal Information) to respond to your questions or comments, and we may retain your questions or comments for future reference.

The Personal Information that you submit to Med Flow<sup>TM</sup> remains your property, but by making the Personal Information available to Med Flow<sup>TM</sup>, you grant Med Flow<sup>TM</sup> the right, subject to applicable law, to use that Personal Information to bring you certain promotional offers from Med Flow<sup>TM</sup> that Med Flow<sup>TM</sup> believes may be of interest to you. If you wish to stop receiving future communications from us, please see the section below entitled "Managing Your Settings."

We may permit our subcontractors (such as vendors and suppliers that provide us with technology, services, advertising and marketing assistance or content in connection with our operation and maintenance of the App and Med Flow<sup>TM</sup> Services) to access Usage Data, but they are only permitted to do so in connection with performing services for us or to operate the App and Med Flow<sup>TM</sup> Services. Third parties are not authorized to use your Personal Information for their own benefit at any time.

We may also supplement the information that we collect with information from other sources to assist us in evaluating and improving the App and Med Flow<sup>TM</sup> Services, and to determine your preferences so that we can tailor the App and Med Flow<sup>TM</sup> Services to your needs.

We reserve the right to release current or past Personal Information: (i) in the event that we believe that the App or Med Flow<sup>TM</sup> Services are being or has/have been used in violation of the Terms of Use or to commit unlawful acts; (ii) if the information is subpoenaed; provided,

however, that, where permitted by applicable law, we shall provide you with email notice, and opportunity to challenge the subpoena, prior to disclosure of any Personal Information pursuant to a subpoena; or (iii) if Med Flow<sup>TM</sup> is sold, merged or acquired; provided, however, that if Med Flow<sup>TM</sup> is involved in a merger, acquisition or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on the App of any change in ownership or uses of your Personal Information, as well as any choices that you may have regarding your Personal Information.

# 4.Interactive Services/Social Media Apps

If you post a comment, activity post or otherwise provide Personal Information by and through the App on or to any third-party app (such as, for example, a social media app), you should be aware that any Personal Information that you submit using such forums can be read, collected or used by other users of these forums (depending on your privacy settings), and could be used to send you unsolicited messages or otherwise contact you without your consent or desire. We are not responsible for the Personal Information that you choose to submit in these forums. The third-party apps (such as social media apps) operate independently from Med Flow<sup>™</sup>, and we are not responsible for such apps' interfaces or privacy or security practices. We encourage you to review the privacy policies and settings on the third-party apps with which you interact to help you understand those third-party apps' privacy practices. If you have questions about the security and privacy settings of any third-party apps that you use, please refer to their applicable privacy notices or policies.

Further, by submitting comments, posts or other material via the App, you: (a) represent and warrant that Med Flow<sup>TM</sup>'s use of your submission does not and will not breach any agreement, violate any law, violate any third-party app's terms of service or infringe upon any third party's rights; (b) agree that Med Flow<sup>TM</sup> is free to use in any manner all or part of the comments, posts or other material on an unrestricted basis without the obligation to notify, identify or compensate you or anyone else; and (c) grant Med Flow<sup>TM</sup> all necessary rights, including a waiver of all copyright, trademark, privacy and moral rights, to use all comments, activity posts and/or other material, in whole or in part, or as a derivative work, without any duty by Med Flow<sup>TM</sup> to anyone whatsoever.

# **5.Non-Personal Information Collection and Use**

We may collect certain non-personally identifiable information about you when you visit our website or use the App, even if you are not a registered user of the App. This non-personally identifiable information includes, without limitation, the type of browser that you use (e.g., Safari, Chrome, Internet Explorer), your IP address, the type of operating system that you use (e.g., Windows or iOS) and the domain name of your Internet service provider (e.g., Verizon, AT&T). We use the non-personally identifiable information that we collect to improve the design and content of the App and to enable us to personalize your Internet experience. We also may use

this information in the aggregate to analyze App usage, as well as to offer you products and services.

## 6. How we may use cookies and other tracking technologies

When providing our Services we may use the following types of cookies and tracking technologies for the purposes set out below.

Cookies and local storage may be set and accessed on your computer or device. Upon your first visit to the Services, a cookie or local storage tags may be sent to your computer or device that uniquely identifies your browser. "Cookies" and local storage are small files containing a string of characters that is sent to your browser and stored on your device when you use our Services. Many major Web services use cookies to provide useful features for their users. Each app can send its own cookie to your browser. Most browsers are initially set up to accept cookies. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent; however, if you reject cookies, you will not be able to sign in to the Services or take full advantage of our Services. Additionally, if you clear all cookies on your browser at any point after setting your browser to refuse all cookies or indicate when a cookie is being sent, you will have to again reset your browser to refuse all cookies or indicate when a cookie is being sent.

Type of Cookie	Purpose
Analytics and Performance Cookies	These cookies are used to collect information about traffic to our Services and how users use our Services. The information gathered does not identify any individual visitor. The information is aggregated and therefore anonymous. It includes the number of visitors to our Services, the apps that referred them to our Services, the pages that they visited on our Services, what time of day they visited our Services, whether they have visited our Services before, and other similar information. We use this information to help operate our Services more efficiently, to gather broad demographic information and to monitor the level of activity on our Services. We use Google Analytics for this purpose. Google Analytics uses its own cookies. It is only used to improve how our Services work. You can find out more information about Google Analytics cookies here: https://developers.google.com/analytics/resources/concepts/ gaConceptsCookies. You can find out more about how Google protects your data here: www.google.com/analytics/learn/privacy.html. You can prevent the use of Google Analytics relating to your use of our Services by downloading and installing the browser plugin available via this link: <a href="https://tools.google.com/dlpage/gaoptout?hl=en-GB">https://tools.google.com/dlpage/gaoptout?hl=en-GB</a>

To support our Services we may use one or more of the following cookies or tags for the purposes set forth below:

Essential Cookies	These cookies are essential to provide you with services available through our Services and to enable you to use some of its features. For example, they allow you to log in to secure areas of our Services and help the content of the pages you request load quickly. Without these cookies, the services that you have asked for cannot be provided, and we only use these cookies to provide you with those services.
Functionality Cookies	These cookies allow our Services to remember choices you make when you use our Services, such as remembering your language preferences, remembering your login details, remembering which polls you have voted in and in some cases, to show you poll results, and remembering the changes you make to other parts of our Services which you can customize. The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you visit our Services.
Social Media Cookies	These cookies are used when you share information using a social media sharing button or "heart" button on our Services.

You can find more information about cookies and how they work, what cookies have been set on your computer or mobile device and how to manage and delete them at http:// www.allaboutcookies.org/ and <u>www.youronlinechoices.com/uk</u>.

We may also use "pixel tags," which are small graphic files that allow us to monitor the use of the Services and collect Usage Data. A pixel tag can collect information such as the IP address of the computer or device that downloaded the page on which the tag appears; the URL of the page on which the pixel tag appears; the time (and length of time) the page containing the pixel tag was viewed; the type of browser that retrieved the pixel tag; and the identification number of any cookie previously placed by that server on your computer or device.

We may use pixel tags, either provided by us or by our third party to collect information about your visit, including the pages you view, the links you click and other actions taken in connection with our App and Services and use them in combination with our cookies to provide offers and information of interest to you.

In addition, we may use a variety of other technologies that collect similar information for security and fraud detection purposes.

## **7.Location Information**

When you use the App or Med Flow<sup>TM</sup> Services, we may collect location information either provided by a mobile device interacting with our App, or associated with your IP address, where we are permitted by law to process this information.

#### 8.Third-Party apps

The App and our website may contain links to third-party owned or operated apps. Med Flow<sup>TM</sup> is not responsible for the privacy practices or the content of such apps. In some cases, you may be able to make a purchase through one of these third-party apps. In these instances, you may be required to provide certain information, such as a credit card number, to register or complete a transaction at such app. These third-party apps have separate privacy and data collection practices and Med Flow<sup>TM</sup> has no responsibility or liability relating to them.

## 9.Security

We endeavor to safeguard and protect our Users' Personal Information. When Users make Personal Information available to us, the Personal Information they shared with us is protected both online and offline (to the extent that we maintain any Personal Information offline). The privacy of your Personal Information is very important to us. When our registration process asks users to submit sensitive Personal Information (if any), and when we transmit such sensitive information, that information is encrypted and is protected with SSL encryption software.

Access to the Personal Information shared with us is strictly limited, and we take reasonable measures to ensure that your Personal Information is not accessible to the public. The servers that we store Personal Information in are kept in a secure physical environment. We also have security measures in place to protect the loss, misuse and alteration of Personal Information under our control. Please be advised, however, that while we take every reasonable precaution available to protect your data, no storage facility, technology, software, security protocols or data transmission over the Internet can be guaranteed to be 100% secure. Computer hackers that circumvent our security measures may gain access to certain portions of your Personal Information, and technological bugs, errors and glitches may cause inadvertent disclosures of your Personal Information, notwithstanding that any attempt to breach the security of the network, our servers, databases or other hardware or software constitutes a crime punishable by law. For the reasons mentioned above, we cannot warrant or guaranty that your Personal Information will be absolutely secure. Any transmission of data at or through the App is at your own risk. In the event of a security breach, we will endeavor to advise the affected users within 72 hours after we learn of the breach, but in any event, as soon as reasonably possible.

All of our Users' Personal Information, not just the sensitive information mentioned above, is access-restricted. Only employees or approved contractors are granted access to Personal Information. Our employees are dedicated to ensuring the security and privacy of all user Personal Information. Employees and contractors not adhering to our firm policies are subject to disciplinary action. In compliance with applicable federal and state laws, or other laws applicable to persons using our Services in foreign countries, we shall notify you and any applicable regulatory agencies in the event that we learn of an information security breach with respect to your Personal Information. You will be notified via email in the event of such a breach. Please be

advised that notice may be delayed in order to address the needs of law enforcement, determine the scope of network damage, and engage in remedial measures.

## 10.Information from users outside the U.S.A. and consent to transfer information

The App and our Services are operated from servers located in the United States of America. If you are located in another jurisdiction, please be aware that information you provide to us may be transferred to, stored and processed in the U.S.A. By using the App and Services or providing us with any information, you consent to this transfer, processing, and storage of your information in the U.S.A., a jurisdiction in which the privacy laws may not be as comprehensive as those in the country where you reside or are a citizen. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

# **11.Managing Your Settings**

Even after consenting to the Privacy Policy and Terms of Use, you may opt out of receiving email advertising from us by following the instructions at the end of the applicable email message or by sending us an email at <u>info@gosafecamp.com</u> and asking us not to send you email advertising.

Notwithstanding the foregoing, we may continue to contact you for the purpose of communicating information relating to your use of the App or request for Med Flow<sup>TM</sup> Services, as well as to respond to any inquiry or request made by you. To opt-out of receiving Med Flow<sup>TM</sup> Services-related and inquiry response-related messages from Med Flow<sup>TM</sup>, you must cease requesting and/or utilizing the Med Flow<sup>TM</sup> Services and cease submitting inquiries to Med Flow<sup>TM</sup>, as applicable.

# 12. Identifying, Deleting and Updating Your Information

At your request, we will inform you of what Personal Information we have on file for you. In addition, at your request, we will update, correct, modify or delete Personal Information that you have provided to us, or that we have collected. You may do so by contacting us via email at info@gosafecamp.com; provided, however, that we ask individual Users to identify themselves and the information requested to be accessed or updated before processing such requests. We will comply with your request as soon as reasonably practicable. However, we may maintain Personal Information whenever we are required to do so by law or regulations or as we believe is reasonably necessary to comply with applicable law or regulations, government requests, to detect or prevent fraud, to resolve disputes, to address problems with the Services, to assist with investigations, or to enforce our terms and conditions or other applicable agreements or policies. We may also need to retain certain information for recordkeeping purposes. We will retain your Personal Information so long as you subscribe to the App and for the period necessary to fulfill the purposes outlined in this Policy unless a longer retention period is required or permitted by law.

# 13.Children

Med Flow<sup>TM</sup> is committed to children's privacy. Med Flow<sup>TM</sup> does not knowingly permit any person less than 13 years of age to register directly for the Med Flow<sup>TM</sup> App. Persons under the age of 13 may only register with the consent of their parent or guardian.

If Med Flow<sup>TM</sup> learns that Personal Information of persons under 13 years of age has been collected on the App or through the Services without parental consent, then Med Flow<sup>TM</sup> will take appropriate steps to delete the information. If you are a parent or guardian and discover that your child under the age of 13 has a registered account with the App without your consent, please alert Med Flow<sup>TM</sup> at info@gosafecamp.com\_and request that Med Flow<sup>TM</sup> delete the child's Personal Information and account from its systems.

## 14. Changes to this Privacy Policy

Med Flow<sup>TM</sup> reserves the right to change or update this Privacy Policy at any time by posting a notice on the App and/or website or sending out an email notification that we are changing our Privacy Policy. If the manner in which we use Personal Information changes, Med Flow<sup>TM</sup> will notify Users by: (a) sending the modified policy to our Users via email; and/or (b) by any other reasonable means acceptable under applicable state and federal law. You will have a choice as to whether or not we use your information in this different manner and can go into the application and opt-out of any collection methods you do not wish to participate in.

## **15.Contact Us**

If you have any questions or comments about this Privacy Policy, please email us at <u>info@gosafecamp.com</u>, or send a letter to: Safe Camp, LLC, 3516 Ocean View Blvd. Glendale, CA 91208 UNITED STATES OF AMERICA.