



Privacy Policy

Neural Health© Privacy Policy

This Privacy Policy was last updated on March 10, 2022.

1. INTRODUCTION

1.1 In this Privacy Policy, “our” “we” “us” or “**Neural Health**” means Neural Health© and its affiliates and subsidiaries.

1.2 We respect the privacy of our users (“you” or “user”) who interact with our “**Services**” (which include our website, web portal, mobile application, cloud platform, hardware/equipment, other products or services we offer, online services which link to this Privacy Policy, and the scenario described in Section 5) and are committed to protecting your privacy and complying with applicable privacy laws.

1.3 ***By accessing or using our Services, you agree to be bound by our Terms of Use and this Privacy Policy.***

2. THE PURPOSE OF THIS PRIVACY POLICY

2.1 This Privacy Policy explains what types and why we collect your Personal Information, what we do with it, and with your rights with respect to your Personal Information. Please read it carefully as it gives you an understanding of our privacy practices.

2.2 We are bound by applicable data privacy laws governing how we collect and use your Personal Information, and we may review and update this Privacy Policy periodically. The most up-to-date version of our Privacy Policy can always be found on our website <https://www.neural-health.com/neural-health-privacy-policy>



3. PERSONAL INFORMATION

3.1 For the purposes of this Privacy Policy, “**Personal Information**” means information that identifies you or could be used to identify you alone, or in combination with other information.

4. TYPES OF PERSONAL INFORMATION WE MAY COLLECT

4.1 The types of Personal Information we collect may include:

- (a) identifying information such as name, date of birth and employment details;
- (b) identification information for identity verification, which may include your driver’s license;
- (c) contact and demographic information such as home address, home and mobile phone numbers and email address, password, marital status, gender and in some cases your work contact details;
- (d) government-issued identifiers numbers;
- (e) financial information, such as bank account and credit card details;
- (f) health information, including:
- (g) information about your health;
- (gg) information about your symptoms or diagnosis; prescriptions and other pharmaceutical purchases; your wishes about future health services and appointment and billing details;
- (ggg) lifestyle, diet, exercise and health related information that you choose to provide us
- (h) information about your activities, including sporting and other lifestyle interests;
- (i) biometric information, such as brainwaves recognition information and eye-recognition information;



- (j) information about your physical movements and performance when using the hardware or equipment associated with our Services
- (k) information about your employment and education history;
- (l) your device information and location information; and
- (m) technical, analytical and behavioral information generated from tracking technologies which may be embedded within certain components of our Services such as:
 - Cookies, which are small data files stored on your device's hard drive either for the duration of your visit ("session cookies") or for a fixed period of time ("persistent cookies"), in order to collect and store your preferences and other types of information. You may set your browser to reject cookies and to let you know when a cookie is being placed on your computer.
 - Technologies deployed by our third party service providers such as Google Analytics, which collects information such as time of visit, pages visited, time spent on each page, and type of operating system used to access the Services. By downloading and using a browser plugin provided by Google (available here: <https://tools.google.com/dlpage/gaoptout>), you can choose to opt out of Google Analytics.

5. COLLECTING YOUR PERSONAL INFORMATION

5.1 We may collect Personal Information from you in various ways, at various times, and from various sources in connection with our Services, including:

- (a) when you open and begin an enrollment form, survey, or other type of intake form;
- (b) when you interact with us through third-party accounts, such as Google+, LinkedIn, Facebook and Instagram;
- (c) when you contact us in person, by phone, mail, email or online;
- (d) when you wear and use our hardware or equipment;
- (e) when you make an appointment;



- (f) when you use any other component or portion of our Services;
- (g) From a third party or other authorized individual who provides us with information on your behalf (e.g., your health care provider);
- (h) From our third party service providers who help us to operate, maintain and host the Services; and
- (i) Derived from the use of cookies and other types of tracking technologies, including those operated by our third party service providers.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

6.1 We may disclose Personal Information to the following parties:

- (a) Our employees, agents, trusted business partners and service providers;
- (b) our professional and legal advisors;
- (c) potential or actual buyers of our assets or business, such as by means of merger, acquisition or purchase of all or substantially all of the assets of Neural Health®, so long as such potential or actual buyer maintains the same privacy terms hereunder;
- (d) government, regulatory and law enforcement agencies as required, or as otherwise authorized or permitted by law; and/or
- (e) other parties who you explicitly provide your consent to.

7. WHY WE PROCESS YOUR PERSONAL INFORMATION

7.1 We may process your Personal Information for various purposes, such as to:

- (a) provide you with the Services;
- (b) manage our relationship and communicate with you;
- (c) verify your identity;
- (d) personalize and enhance your experience while using the Services;



- (e) respond to any inquiries or questions you submit to us;
- (f) provide you with commercial materials, updates about Neural Health's developments, new offerings, news regarding the Services and other services/products that may be of an interest to you;
- (g) enable payment for our Services through third party payment processors;
- (h) send you marketing communications or to advertise to you, e.g., via emails or advertisements on websites and social media platforms to promote and market our Services to you, and keep you informed of special offers or updates. You can opt out of marketing communications at any time by using the unsubscribe information within the message you receive or by reaching out to us using the contact information below;
- (i) enable you to use social features on our Services;
- (j) to protect the rights, property, or personal safety of Neural Health©, its users or the general public and to keep the Services safe and secure to prevent fraud and crime;
- (k) for internal operations such as record keeping, database management, data analytics or training;
- (l) comply with our legal obligations or enforce our legal rights;
- (m) as otherwise required or authorized by law;
- (n) use it for statistical, analytical and research purposes and for customization, developing and improvement of our Services; and
- (o) to contact you regarding our Services, and so you can let us know your preferences in relation to such contact.

8. CHILDREN'S

8.1 The Neural Health© content and platform is not intended for use by children. But don't worry, with our medical and development team we are already working on special content for children.



9. SECURITY OF YOUR PERSONAL INFORMATION

9.1 We take reasonable measures to maintain the security and integrity of our Services and prevent unauthorized access or use through generally accepted industry standard technologies and internal procedures. We utilize third parties to assist us in providing the Services who are also bound by contractual and legal privacy protections. In addition, we employ highly secure services design and implementation using state of the art encryption and architecture mechanisms. Furthermore, we implement a secure permission management and auditing system using specific and proprietary firewall and network access filtering as well as security group mechanisms. Please note, however, that there are inherent risks in transmission of information over the Internet or other methods of electronic storage and we cannot guarantee that unauthorized access or use will never occur.

9.2 Certain laws require us to indicate whether we honor “Do Not Track” settings in your browser. We do not currently respond to these signals, but we adhere to the standards set out in this Privacy Policy.

10. HOW WE RETAIN OF YOUR PERSONAL INFORMATION

We seek to keep your Personal Information for only as long as it is required in order to provide you with products and Services or to comply with our business and legal obligations and requirements.

11. YOUR PERSONAL INFORMATION RIGHTS

11.1 Depending on your jurisdiction and what type of user you are, you may have specific rights with respect to your Personal Information. If you are a patient, please consult our Notice of Privacy Practices. If you are not a user, please contact us using the information below to exercise your personal information rights. It would assist us to ensure we properly understand your request, and allow us to respond more promptly, if requests are made in writing and include as much detail as possible.

Neural Health© Marketing Disclaimer: Neural Health© Technologies SPA is committed to protecting and respecting your privacy, and we will only use your personal information for the administration of your account and to provide you information about products and services which you have requested. By agreeing, you consent to allow Neural Health© Technologies SPA to store and process the personal information submitted in this form.



12. CLOSING YOUR ACCOUNT

12.1 In the event that you wish to cancel your Services with us, you may do so through your settings or by sending us an e-mail using the contact details below.

13. IF YOU HAVE QUESTIONS OR CONCERNS ABOUT YOUR PERSONAL INFORMATION

13.1 Neural Health© has a designated Privacy Officer. If at any time you have a privacy related issue, or question about this Privacy Policy, please contact our Privacy Officer using the details below.

13.2 You should put any complaint you have in writing and give as much detail as you can about the nature of your complaint and the information affected.

13.3 The Privacy Officer will manage the investigation of your complaint or concern and will respond to you within a reasonable time frame.

14. CHANGES TO OUR PRIVACY POLICY

We may change this Policy from time to time and if we do, we will post any changes on this page. If you continue to use our Services after those changes are in effect, you agree to the new Privacy Policy. If the changes are significant, we may provide a more prominent notice or get your consent, as required by law.

15. NEURAL HEALTH CONTACT DETAILS

If you have any questions or concerns about this Privacy Policy, your personal information, or our information management practices, you can contact our Privacy Officer at:

Privacy Officer: Jorge Reinoso

Email: compliance@neural-health.com

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