

Privacy Policy

If you're here, chances are good that you're a busy parent, guardian, or other caregiver. So let's get right to it then: we respect your privacy — and your child's — and appreciate the trust you have placed in us. This Privacy Policy explains how Cognoa, Inc. (“Cognoa”, “we”, “our”, or “us”) collects, uses, and discloses information we obtain through www.cognoa.com, our development assessment applications, and any additional products, services, or websites operated by us that link to this Privacy Policy (collectively, our “Service”). For your convenience, you can jump to any section by selecting the links below:

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1. Introduction Our Service enables parents, guardians, and other legal caregivers to assess and monitor the cognitive development of their children. By using our Service, you agree to the collection, use, disclosure of your and your child’s information as described in this Privacy Policy. Beyond the Privacy Policy, your use of our Service is also subject to our Terms of Service. Our Service is not directed at children under the age of 13, but is directed to their parents and other legal guardians with the right to provide the information required (we refer to all of these people as caregivers). Children are not eligible to directly use our Service. If you are under the age of 13, please do not attempt to use our Service or provide us any information about yourself. If we learn that we have collected personal information directly from a child under the age of 13, we will delete that information as quickly as possible. If you believe that we might have received information directly from a child under the age of 13, please feel free to contact us at contact@cognoa.com.

2. How We Collect Your Information **Information You Provide.** We will collect and store the following information that you may choose to provide to us.

- Registration and Profile Information. When you register for our Service, we ask that you provide us your contact information, such as name and email address. In addition, we request that you provide information, including health related information, about your child, including date of birth, gender, medical records, and health care provider notes and diagnosis, health background, health status, prescribed and over-the-counter medications, medical ID number, laboratory testing results, and insurance information.
- Questionnaire. To conduct our assessment, we will ask you to provide answers to questions regarding your child. For example, you may be asked questions such as whether your child plays make-believe when left alone.
- Video Content. You may elect to provide us video content of your child, which we view in order to help us assess your child's cognitive development. We may store the video content and use it to provide and improve our Service, such as to for quality assurance efforts to enhance our scoring, correlation, and other modeling and data analysis activities, and provide training, reference materials, and demonstrations. We will not provide access to your video content to any third party other than our subcontractors who are subject to use and confidentiality restrictions.
- Communications. If you contact us directly, we will receive additional information. For example, when you email our Customer Support Team or sign up to receive updates regarding new products or services, we will receive your email address, the contents of a message, and information you choose to provide.
- Health Care Providers. We will collect any information provided to us by your child's health care provider(s) (upon receiving proper authorization from you).

Information We Collect When You Use our Service. As you use our Service, certain information may be collected through cookies, by navigating from page to page, or via third party tracking. This information induces:

- Usage Information. To help us understand how you use our Service and to help us improve it, we automatically receive information about your interactions with our Service, like the pages or other content you view, the searches you conduct, and the dates and times of your visits.
- Device Information. We receive information about the device and software you use to access our Service, including IP address, web browser type, operating system version, and device identifiers.
- Information from Cookies and Similar Technologies. When you use our Service, we collect information from you through automated means, such as cookies, web beacons, and web server logs. We may use both session cookies (which expire once you close your web browser) and persistent cookies to make our Service easier to use, to improve our advertising, and for development activities. The information collected in this manner includes IP address, browser characteristics, device IDs and characteristics, operating system version, language preferences, referring URLs, and information about the usage of our Service. If you do not want information collected through the use of cookies, there is a procedure in most browsers that allows you to automatically decline cookies or be given the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. You may also wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html>. Please be aware that if you disable or reject cookies, some Service features may not work properly.

3. How We Use Your Information We may use the information we collect:

- To operate, provide, maintain our Service.
- To understand and analyze usage trends and preferences of our users, to improve the Service, to train our scoring technicians, and to develop new products, services, features, and functionality.
- To communicate with you, to provide you with updates and other information relating to the Service, to provide information that you request, to respond to comments and questions, and otherwise provide customer support.
- For marketing purposes, such as developing and providing promotional and advertising materials that may be useful, relevant, valuable or otherwise of interest.
- To personalize your experience on the Service such as presenting tailored content.
- For our business purposes, such as audits, security, compliance with applicable laws and regulations, and fraud monitoring and prevention.
- To enforce our Terms of Service or other legal rights.

We may use aggregate or de-identified information that does not identify an individual for any purpose, unless we are prohibited from doing so under applicable law. For example, we may use aggregate or de-identified information to analyze usage patterns so that we can enhance our Service, and improve your experience.

4. How We Share Your Information We may share the information we collect with:

- third party service providers and vendors who help us provide our Service, including scoring technicians, health plans and third-party payers, and technical support vendors.
- the US FDA and similar agencies in the US and other countries and the US Department of Health and Human Services, with the Institutional Review Board (IRB) and other groups that review research studies to help protect people who join these studies.
- third parties to whom you ask us to send such information.
- a parent company, subsidiaries, or other companies under common control with us, which will abide by this Privacy Policy.
- a potential or actual acquirer, successor, or assignee as part of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in bankruptcy or similar proceedings).
- If we believe in good faith that such disclosure is necessary to (i) resolve disputes, investigate problems, or enforce our Terms of Service; (ii) comply with relevant laws or to respond to requests from law enforcement or other government officials relating to investigations or alleged illegal activity, in which case we can (and you authorize us to) disclose personal information

without subpoenas or warrants served on us; or (iii) protect and defend our rights or property or the rights and property of you or third parties.

5. Analytics and Advertising We use third analytic vendors, including Google Analytics, to help analyze how users use our Service. These analytics service providers may set and access their own cookies, pixel tags, and similar technologies on the Service and they may otherwise collect or have access to information about you which they may collect over time and across different websites. The information collected may include things like how often users visit our Service or what pages they view, and what other websites you visited. We use the information from Google Analytics to improve our Service. Google provides some additional privacy options described at www.google.com/policies/privacy/partners. We work with third party advertising partners, which also may set and access their own cookies, pixel tags, and similar technologies on the Service, and they may otherwise collect or have access to information about you which they may collect over time and across different websites.

6. Information You Share With Third Parties This Privacy Policy addresses our use and disclosure of information. We may enable you to share information from our Service with third parties —like your healthcare provider or a teacher— or third-party applications or services. We are not responsible for

how you share this information. These third parties may use or share your information in accordance with their own privacy policies. We strongly suggest you review the third parties' privacy policies if you use the relevant features. Also keep in mind that when you click on certain links, you may leave our Service. We are not responsible for the privacy practices of other sites and we encourage you to read their privacy statements.

7. International Cross-Border Data Transfer Our service is hosted in the United States, and we may transfer your information outside of your region for storage and processing in the United States and around the globe. By using our Service you consent to the transfer of your information to countries outside of your country of residence, including to the United States, which may have data protection rules that are different from those of your country.

8. Your Choices and Rights We offer you certain choices in connection with the information we collect from you, such as how we use it and how we communicate with you. You can choose not to provide us with certain information, but this may limit the functionality of our Service. You can also opt out of receiving certain promotional communications from us such as our newsletters and marketing communications by emailing us at contact@cognoa.com or via the link provided in the emails. Please note that even if you opt out, we may still send you service-related communications. As a registered

user, you can request the correction or deletion of your personal information by contacting us at contact@cognoa.com. Please note that we may be required by law or for liability purposes to keep some information and not delete it. In such a case we will comply with your deletion request only after such requirements have been fulfilled. When we delete personal information, it is deleted from our active database, but may remain in our archives and we may also retain and continue to use de-identified information as permitted under this Privacy Policy. Also, if we shared your information with third parties, we may not be able to access, locate, or force the deletion or modification of any such information by those parties.

9. How We Protect Your Information Your privacy is important to us and we take protecting it very seriously. Cognoa maintains physical, electronic, and administrative safeguards to protect your information against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use. At the same time, no data transmission over the Internet or data storage facility can be guaranteed to be 100% secure and we cannot ensure or warrant the security of any information you provide to us. Also note that the security of the data transmitted may be compromised by the use of jailbroken or rooted smart devices.

10. Do Not Track Disclosure In accordance with the Do-Not-Track amendments to the California Online Privacy Protection Act, we inform you that we do not currently respond to “do not track” signals or similar messages from your browser.

11. Changes to this Privacy Policy We may change this Privacy Policy from time to time. To inform you of any change, we will post revisions on this page and indicated at the bottom of this Privacy Policy when it was updated. If we make any material changes to the way we use or share the information previously collected, we’ll let you know through our Service, by email, or other communication. Please keep in mind that continuing to use our Service means that you understand and agree to the terms of our most up-to-date Privacy Policy.

12. How to 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 and choices, please contact us at

contact@cognoa.com. Because email communications are not always secure, please do not include any sensitive information in your emails to us.

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