

# Satva Privacy Policy

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Satva, Inc. (“Satva”) operates the website located at [www.satva.ai](http://www.satva.ai), other related websites, and a mobile device application (collectively, the “Site”). Through the Site, we operate various online services that enable members (“Members”) to receive telehealth services from wellness experts located in the United States and internationally (collectively, the “Services”). This privacy policy (“Privacy Policy”) explains Satva’s privacy practices that apply to the Services we offer through our Site.

Please read this Privacy Policy carefully to understand how we collect, use and share your personal information. If you do not agree with this Privacy Policy, your choice is not to use the Services. By accessing the Site or using the Services, you agree to this Privacy Policy. This Privacy Policy may change from time to time. If there are any material changes to how your personal information is used, we will notify you. Your continued use of the Site after we make changes is deemed to be acceptance of those changes, so please check the Privacy Policy periodically for update. If you do not understand any aspect of our Privacy Policy, please feel free to contact us at [hello@satva.ai](mailto:hello@satva.ai).

## HIPAA

The wellness experts that you interact with when using the Services may be subject to the Health Insurance Portability and Accountability Act (“HIPAA”) and required to describe their privacy practices in document called a Notice of Privacy Practices. To the extent your wellness expert is covered by HIPAA, you can access a copy of their Notice of Privacy Practices on the patient portal.

## Third Party Sites

This site contains links to other sites. Satva does not share personal information with those sites, unless specifically authorized by you. Satva is not responsible for the privacy policies of any site linked to this website and not wholly owned and controlled by Satva, its affiliates and subsidiaries. We aim to work with trusted partners and organizations which are also bound by state and federal laws governing privacy and security; however, we encourage users to review any privacy policy of a non-Satva site.

## Types of information we collect:

When we use the term “Personal Information” in this Privacy Policy, we mean information about you that is personally identifiable to you, such as your contact information (e.g., name,

address, email address, or telephone number), personally identifiable health or medical information, including health/lifestyle tracking data (“Health Information”), device IDs, certain cookie and network identifiers, and any other non-public information that is associated with such information (collectively, “Personal Information”). When we use the term “De-Identified Information”, we mean information about you but that does not identify you.

**The Personal Information we collect or maintain may include:**

- Your name, age, email address, username, password, and other registration information.
- Health Information that you provide us, which may include information or records relating to your medical or health history, health status, and other health related information.
- Health information about you prepared by the wellness expert(s) who provide the Services through the Site such as medical records, treatment and examination notes, and other health related information.
- Billing information that you provide us.
- Information about the computer or mobile device you are using, such as what Internet browser you use, the kind of computer or mobile device you use, and other information about how you use the Site.
- Other information you input into the Site or related services, including but not limited to ratings and reviews.

**Your Image, Voice and Likeness.**

We may make audio and video recordings of your sessions with Wellness Experts if you consent to our doing so in the Satva mobile device application. These recordings will be stored by Satva on a temporary basis and may be used to create transcripts and personalize and improve your wellness experience on Satva. You consent to being the subject of any audio or video recordings made by us and grant permission for these to be stored and maintained by us. If you want Satva to delete a recorded session with a wellness expert, please email us at [hello@satva.ai](mailto:hello@satva.ai).

**We may use your Personal Information for the following purposes:**

- To provide you with the Services.
- To improve the Site and Services.
- To verify the legitimacy of reviews and ratings.
- To create De-identified Information such as aggregate statistics relating to the use of the Service.
- To notify you when Site updates are available.
- To market and promote our Site and the Services offered to you through the Site.
- To fulfill any other purpose for which you provide us Personal Information.
- For any other purpose for which you give us authorization.

You can “opt out” of receiving direct marketing or market research information by emailing us at [hello@satva.ai](mailto:hello@satva.ai).

**We may also disclose Personal Information that we collect or you provide as permitted or allowed by law, as follows:**

- To the wellness experts you choose to engage with through the Services.
- To contractors, service providers and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- As required by law, which can include providing information as required by law, regulation, subpoena, court order, legal process or government request.
- When we believe in good faith that disclosure is necessary to protect your safety or the safety of others, to protect our rights, to investigate fraud, or to respond to a government request.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of Satva’s assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which Personal Information maintained by the Site is among the assets transferred.

**Information we collect via technology:**

- **Site Activity Information:** We may keep track of some of the actions you take on the Site, such as the content of searches you perform on the Site.
- **Access Device and Browser Information:** When you access the Site from a computer or other device, we may collect anonymous information from that device, such as your Internet protocol address, browser type, connection speed and access times.
- **Cookies:** A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the Site again, the cookie allows that site to recognize your browser. Cookies may store unique identifiers, user preferences and other information. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some Site features or services may not function properly without cookies. We use cookies to improve the quality of our service, including for storing user preferences, tracking user trends and providing relevant advertising to you.
- **Real-Time Location:** Certain features of the Site use GPS technology to collect real-time information about the location of your device so that the Site can connect you to a wellness expert in the area where you are located.
- **Google Analytics:** We use Google Analytics to help analyze how users use the Site. Google Analytics uses Cookies to collect information such as how often users visit the Site, what pages they visit, and what other sites they used prior to coming to the Site. We use the information we get from Google Analytics only to improve our Site and Services. Google Analytics collects only the IP address assigned to you on the date you visit the Site, rather

than your name or other personally identifying information. Although Google Analytics plants a persistent Cookie on your web browser to identify you as a unique user the next time you visit the Site, the Cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to the Site is restricted by the Google Analytics Terms of Service and the Google Privacy Policy.

### **De-Identified Information**

De-Identified Information includes aggregate statistics about the use of our Site and Personal Information that has been anonymized by removing any personally identifiable information. For example, Satva may collect de-identified lifestyle tracking information you provide us through the mobile device application that is used to train Satva's personalized wellness services. We may use De-Identified Information created by us without restriction.

### **Data Security, Integrity and Access**

The Personal Information you provide and we collect is stored within databases that we control directly or through our service providers. As we deem appropriate and as required by the applicable law, we use security measures appropriate for the sensitivity of the Personal Information and consistent with industry standards, including physical, organizational and technological protections, such as firewalls, to protect your Personal Information. We also use industry standard encryption technology to protect credit card and password information. However, since no security system is impenetrable, we cannot guarantee the security of our databases, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet.

Personal Information may only be accessed by persons within our organization, our third party service providers who require such access to provide you with the services indicated above, or any other party that you have provided us with authorization to share such information with. We retain Personal Information that we collect only as long as reasonably necessary to fulfill the purposes for which it was collected or to otherwise meet any legal requirements.

The Services are intended for users in the United States. If you are located outside the United States and choose to provide information to us, please be aware that we transfer Personal Information to the United States and process and store it there. As a result, this information may be subject to access requests from governments, courts, law enforcement officials and national security authorities in the United States according to its laws. Subject to the applicable laws, we will use reasonable efforts to ensure that appropriate protections are in place to maintain protections on the Personal Information. By submitting your Personal Information, you consent to having your personal data transferred to, processed, and stored in the United States. Satva may assign you a user ID and a password when you as part of your participation and access to the Site and Services. Your user ID and password may only be used by you and the members of your household. You may not share your user ID and password with anyone else,

and you are solely responsible for maintaining and protecting the confidentiality of your user ID and password. You are fully responsible for all activities that occur under your user ID and password. You can access and update your login information on your profile page of the patient portal.

### **Credit Card Information**

We may share credit card information with trusted third parties in order to bill you for the Services. We use third parties for secure credit card transaction processing, and we send billing information to those third parties to process your orders and payments or to validate your credit card information on file. Credit card information is encrypted during transmission and whenever stored within our systems or with our vendors. In addition to utilizing encryption, we take care to store only the amount of information required to bill you for services.

Our credit card processing vendors use security measures to protect your information both during the transaction and after it's complete. Credit card processing vendors are certified as compliant with multiple industry-standard compliance frameworks including the Payment Card Industry (PCI) Service Provider Level 1, the SSAE-16 audit standard.

### **Modification of Personal Information**

Members will be able to update some of their information through the Site. Requests to modify any information may also be submitted to [hello@satva.ai](mailto:hello@satva.ai).

### **Limitations on Deletion of Personal Information**

You may request deletion of your Personal Information by us, however, we may be required (by law or otherwise) to keep this information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). When we delete Personal Information, it will be deleted from the active database, but may remain in our archives and we may also retain De-Identified Information about your use of our services. Once we disclose some of your Personal Information to third parties (such as wellness experts), we may not be able to access that Personal Information any longer and cannot force the deletion or modification of any such information by the parties to whom we have made those disclosures. After we delete Personal Information, we may retain De-Identified Data and will continue to use De-Identified Data as permitted under this Privacy Policy.

### **Report Violations**

You should report any security violations to us by sending an email to [hello@satva.ai](mailto:hello@satva.ai)

### **Children and Minors**

Satva does not knowingly allow individuals under the age of 18 to create accounts that allow access to our Site or use the Services. If you are below the age of 18 you are not permitted to use this Site or the Services.

### **California Privacy Rights**

California Civil Code Section § 1798.83 permits California residents that are users of our Site to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [hello@satva.ai](mailto:hello@satva.ai).

### **Changes to Privacy Policy**

We may change this Privacy Policy from time to time in the future. We will post any revised version of the Privacy Policy on the Site and at other places we deem appropriate. Continued use of our Service following notice of such changes will indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes. By using the Site and Services, you are agreeing to our collection, use and disposal of Personal Information and other data as described in this Privacy Policy, both as it exists now and as it is changed from time to time.

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

If you have any questions, concerns, complaints or suggestions regarding our Privacy Policy or otherwise need to contact us, please email us at [hello@satva.ai](mailto:hello@satva.ai), or contact us by US postal mail at the following address:

Satva, Inc.  
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