

# NOTALONE, INC.

## PRIVACY POLICY

Effective: January 19, 2022

(Version 4.0)

This Privacy Policy explains how NOTALONE, INC. (“NOTALONE”, or “we”, “us” or “our”) collects, uses and shares your personal information when you visit and access the NOTALONE mobile app (the “NOTALONE APP”). References in the Privacy Policy to the NOTALONE APP, along with information and services made available to you through the NOTALONE APP are considered the “Services.”

NOTALONE’s mission is to help teenagers and young adults identify and manage emotional needs and mental health issues. By their very nature, some of the Services will need to collect “sensitive” or “special categories” of personal information, such as health-related information, both physical and mental. Accordingly, we take special care to hold this personal information in the strictest confidence and protect it from unauthorized access, disclosure or use by NOTALONE or third parties. We are committed to full transparency in how we collect, use and share your personal information. If you have any questions or concerns about your personal information or this Privacy Policy, email us at [support@notalone.app](mailto:support@notalone.app).

This Privacy Policy applies to personal information and other information we collect:

- On the NOTALONE APP.
- In emails, text, and other electronic messages between you and the NOTALONE APP.
- By your access to and use of the Services offered in the NOTALONE APP.

Please read this Privacy Policy carefully to understand our policies and practices regarding your personal information and how we will treat it. By accessing or using the Services, you agree to the terms and conditions described in the Privacy Policy. If you do not agree with these terms and conditions, your choice is not to access and use our Services. By accessing or using the Services, you agree to the terms and conditions described in the Privacy Policy. Please also refer to our End User License Agreement regarding the terms of use for the operation of the NOTALONE APP and the Services, into which this Privacy Policy is incorporated.

### **BE ADVISED: THE NOTALONE APP AND ASSOCIATED SERVICES DO NOT CONSTITUTE MEDICAL ADVICE.**

All contents of the NOTALONE APP and the Services, such as text, graphics, images, and other material and information contained on the NOTALONE APP (“Content”) are for informational purposes only. The Content is not intended to be a substitute for professional medical advice, diagnosis, or treatment. Always seek the advice of your physician or other qualified health provider with any questions you may have regarding a medical or mental health condition. Never disregard professional medical advice or delay in seeking it because of something you may have read in the NOTALONE APP.

### **IF YOU THINK YOU MAY HAVE A MEDICAL EMERGENCY, CALL YOUR DOCTOR OR YOUR LOCAL EMERGENCY NUMBER FOR IMMEDIATE MEDICAL ASSISTANCE.**

NOTALONE does not recommend or endorse any specific tests, physicians, products, procedures, opinions, or other information that may be mentioned on the NOTALONE APP. Any reliance on any

information provided by NOTALONE, NOTALONE employees, others appearing on the NOTALONE APP or Services at the invitation of NOTALONE, or other visitors to the NOTALONE APP, is solely at your own risk.

### **Information Collected About You**

To access some of our Services it is not necessary to provide your personal information, while other Services require that you register with us, which includes providing certain personal information as described in this Privacy Policy. Even if you do not register with or provide any personal information, we collect information about your use of the NOTALONE APP and the Services. We may also acquire certain information about our users on an anonymous and aggregate basis from external sources to improve the functionality of the NOTALONE APP and the enhance the user experience.

*Information we collect automatically.* Our servers may automatically record certain information about how you when you access the NOTALONE APP or use certain Services. This information may include your Internet Protocol (IP) address, device and browser type, operating system, the pages or features of the NOTALONE APP or particular Service that you viewed and the time spent on those pages or features or Service, the frequency with which you use access the NOTALONE APP or Service, search terms, the links that you click on or use, and other statistics. We collect this information in server logs and by using cookies and similar tracking technologies to analyze trends, administer the NOTALONE APP or Services, track users' movements across the NOTALONE APP or Services, and gather demographic information about our user base as a whole.

We may also collect device-specific information when you install and use our NOTALONE APP, including your device model, operating system information, advertising ID (which is a unique, user-resettable identification number for advertising associated with a mobile device) and NOTALONE APP version and usage information. If you opt in, we collect your location information provided by your mobile device, which you may disable at any time through the device settings.

*Social Media.* When users connect to the NOTALONE APP from a social media platform, such as Facebook, we collect the personal information you have provided to that social media platform in accordance with its privacy practices, and we add the information to your registration profile.

*Downloading the NOTALONE APP.* When you download and install the NOTALONE APP onto your mobile device, we assign a random number for the installation, but this number cannot be used to identify you personally. We use this random number in a manner similar to our use of cookies as described in this Privacy Policy. Unlike cookies, however, the random number cannot be removed through settings. If you do not want us to use the random number for this purpose, please do not use the NOTALONE APP. You do not need to register with NOTALONE to download the NOTALONE APP. However, if you subsequently register with us, we will associate the NOTALONE APP installation number with you.

*Information you provide voluntarily.* In order to access certain features of the NOTALONE APP or some Services, it is necessary that you register with us. Registering requires that you provide certain personal information, including name, email address, telephone number and country of location. You may also be asked to provide certain basic physical, medical and mental health information, as well as your age and gender. You can always terminate your registration at any time and for any reason.

Certain Services will request that you provide “sensitive” or “special categories” of personal information, such as health-related information (physical and/or mental). At any point where this type of information is needed for the requested Service, you will be advised of this need and asked to provide your express consent.

*Passwords.* When you register to access the Services, you will be asked to provide a unique log-in ID and password. You are responsible for taking reasonable precautions to protect your login data. You should not share your password with anyone. NOTALONE cannot be held responsible for breach that results from a lost or stolen login or password information.

*Interactive Services.* Some of the available Services are “Interactive” Services, meaning that you may interact in real time with a medical, mental health or other professionals, who may ask you to provide certain additional personal information to assist you, but which you are free to decline to provide. Any information disclosed during these “Interactive” Services is held in the strictest confidence. These professionals are bound by ethical, legal or other requirements to maintain the confidentiality of this information. To appear on the NOTALONE APP and Services, these professionals also agree to abide by this Privacy Policy and to maintain the confidentiality of any user information they may be provided.

*Geolocation:* You may be asked to provide your geolocation information, which may be needed to improve the operations of the NOTALONE APP. You may decline to provide this information.

*Message Boards and Other Public Forums.* The NOTALONE APP includes message boards and other public forums where users can share information, connect with other users or where users can post questions for experts to answer. We also offer online discussions moderated by healthcare experts. These forums are open to the public and should not be considered private. Your use of the messages boards and other public forums is governed by our End User License Agreement.

In addition, the NOTALONE APP includes Peer Chat and Group Chat Services in which users can interact directly with one another. Users need not identify themselves to participate; however, per the applicable rules, users are required to maintain the strict confidentiality of information that may be disclosed in these Services. These Services may also be monitored by a moderator to facilitate the discussion and ensure compliance with the participation rules, and who is similarly required to maintain the strict confidentiality any information disclosed by the users.

**Any information (including personal information) you share in any online message board or other public forum is by its nature open to the public and is not private. Please carefully consider before posting any personal information in any public forum. If you mistakenly post personal information in our message board or other public forums and would like it removed, you can send us an email to [support@notalone.app](mailto:support@notalone.app) to request that we remove it; however, in some cases, be advised that we may not be able to remove your personal information.**

### **How Information Collected About You Is Used**

Information about your use of the NOTALONE APP and Services may be used for the following purposes:

- To provide, improve and create new Services.
- To respond to your inquiries and to send you administrative communications about your registration, your activity using the Services.

- To obtain your feedback about your experience using the Services.
- To advise you regarding new services, offers or promotions that may be of interest to you based on your use of the Services, including news, announcements, reminders and opportunities from NOTALONE.
- To statistically analyze trends and user behavior and activity including how frequently areas of the NOTALONE APP are visited, how the Services are being used and how many messages are received and opened.
- To protect our legitimate business interests.
- To detect and defend against fraud and other threats to the Services and our users.
- To identify and resolve problems with the Services.
- To conduct research and measurement activities, including those described below.
- To administer your registration.

With your consent, we may also use your personal information, such as an email address you provided, to send you offers or promotions about other goods and services from us that may be of interest to you. If you do not want us to use your personal information in this way, you can opt out at any time and at no cost. How to opt out is described in the section below, “Your Choices and Rights.” Be advised that you cannot opt out of transactional or administrative emails or texts, such as regarding your registration status or Services you have accessed or requested. **We do not provide any personal information to third parties for their marketing purposes.**

*Automatic processing.* Certain Services, such as “Kristi,” our “Virtual Friend”, uses machine-logic algorithms to engage users and identify potential mental or emotional concerns they may be facing, without human intervention. NOTALONE does not access or use this information for any other purposes. This automatic processing does not implicate your legal rights, obligations or status.

### **How We Share Your Information**

We may disclose personal information that we collect or you provide as described in this Privacy Policy:

- To fulfill the purpose for which you provided your personal information.
- To our subsidiaries and affiliates.
- To contractors, vendors, 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.
- To medical or mental health professionals that
  - 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 NOTALONE’s assets, including the lists of our users.
- For any other purpose disclosed by us when you provide your personal information.
- With your consent.

However, we reserve the right to disclose aggregated or anonymous information (i.e., information that does not identify you) about our users without restriction. For example, we may share aggregated or anonymous information with universities or colleges about their students’ uses of the NOTALONE APP.

**We do not disclose your email or any personal information to any third party for their marketing purposes.**

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our End User License Agreement and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of NOTALONE, our users, or others. This may include exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

We may also include social widgets on the NOTALONE APP, which enable you to interact with the associated social media platforms. These widgets may collect browsing data which may be received by the third party that provided the widget and are controlled by these third parties. You may be able to manage your privacy preferences directly with the applicable social network platform.

### **How Your Information is Secured and Retained**

We have implemented reasonable and appropriate technical, physical and administrative measures to protect the security of your personal information on our servers and systems. Be advised, however, that the transmission of information via the internet or wireless communications technologies is not completely secure. Although we do our best to protect your personal information when you enter your personal information on the NOTALONE APP, for example by encrypting the transmission of personal information or using SSL connections (SSL) technology, we nonetheless cannot guarantee the security of your personal information transmitted to the NOTALONE APP etc. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the NOTALONE APP and the Services.

We will retain your personal information as long as your registration is active or as needed to provide you the requested Services. When you terminate your registration, we will take steps to remove your personal information, but be aware that it is not technologically possible to remove each and every record of the information you have provided from our servers. In addition, see the section, “Your Choices and Rights”, below for more information on how you can update or remove your personal information. We will also retain your personal information as necessary to comply with legal obligations, resolve disputes, prevent fraud and enforce our agreements.

### **Your Choices and Rights**

You can correct, update or review personal information you have previously submitted by going back to the specific Service, logging-in with your registration information and making the desired change. You can also update any personal information you have submitted by contacting us at support@notalone.app.

If you have registered and desire to delete any of your registration information you have provided to us from our systems, please contact us also at support@notalone.app. Upon your request, we will delete your registration information from our active databases and where feasible from our back-up media. You should be aware that it is not technologically possible to remove each and every record of the information you have provided to us from our servers.

When you sign up to receive email communications from us, you can choose to opt out from receiving them at any time. You can unsubscribe from our emails by:

- Following the directions included at the bottom of the email by clicking on the “Unsubscribe” link.
- Sending us an email at support@notalone.app requesting that you be removed from our communications.

Be advised, however, that you cannot opt out of transactional or administrative emails, such regarding your registration status or status of Services you have accessed or requested.

### **Links to Third Parties**

The NOTALONE APP may contain links to other web sites and services. We do not control such third-party web sites and services and are not responsible for their actions or privacy practices. The existence of a link does not mean that we endorse or have vetted such third-party website or service. You are encouraged to carefully review the policies and practices of every website and service that you visit or use.

### **For Users Outside the United States**

NOTALONE is located in the United States and the NOTALONE APP and Services are maintained in the United States. Your personal and other information will be stored, processed and accessed on servers located in the United States. If you are located outside the United States, you understand and agree that NOTALONE may transfer, collect, use, disclose, and otherwise process the personal information you provide in the United States as described in this Privacy Policy. We also may transfer your information outside the United States to service providers under contract with us with operations in other countries. By using the NOTALONE APP and Services, you consent to such collection, storage and processing in the United States and elsewhere, though the United States and other jurisdictions may not afford the same level of data protection as considered adequate in your own country. We take reasonable steps to protect your personal information. Note that your personal information may be available to the United States government or its agencies under legal process in the United States.

### **Users in the European Economic Area (EEA), UK and Switzerland**

For residents of the European Economic Area (EEA), UK and Switzerland, we advise that your personal information will be transferred to and processed in the United States, which has data protection laws that are different than those in your country and may not be as protective. The United States has not sought or received a finding of “adequacy” from the European Union under Article 45 of the General Data Protection Regulation (“GDPR”). Our legal basis for collecting and using your personal information is to do so with your consent; where we need the personal information for performance of a contract or requested service, or where the collection and use is in our or another’s legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect the personal information in question. If we collected your personal information with your consent, you may withdraw your consent at any time.

Residents of the EEA and Switzerland have the right to:

- Access your personal information;

- Delete, or request deletion of, your personal information;
- Object to or restrict processing of your personal information;
- Request portability of your personal information;
- Complain to your local data protection authority at any time;
- Object to automated decision making; and
- Update your personal Data.

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.

If we ask you to provide personal information to us to comply with a legal requirement or enter into a contract, we will inform you of this and let you know whether providing us with your personal information is required and if not, the consequences of not sharing your personal data with us.

Similarly, if we collect and use your personal information in reliance on our or a third party's legitimate interests and those interests are not already described above, we will let you know what those legitimate interests are.

We endeavor to apply suitable safeguards to protect the privacy and security of your personal information and to use it only consistent with your relationship with us and the practices described in this Privacy Policy.

To withdraw consent or exercise these rights, please:

- Contact us via email at [support@notalone.app](mailto:support@notalone.app); or
- Adjust your preferences through the Account preferences (if available).

### **Users in Canada**

For users in Canada, we take appropriate steps to comply with applicable Canadian data privacy requirements, including Canada's Anti-Spam Legislation (CASL) and the Personal Information Protection and Electronic Documents Act (PIPEDA). Note, however, personal information stored or processed outside of Canada, including in the US or another foreign country, may not be subject to the PIPEDA. In addition, personal information stored or processed outside of Canada is subject to the laws of that other country and may be available to the government of the country in which the personal information or the entity controlling it is located pursuant to a lawful order in that jurisdiction. This Privacy Policy is intended to provide the required notices regarding our collection and use of personal information, including transfer to the United States.

Residents of Canada may request access to their personal information. To make a request, please contact us via email at [support@notalone.app](mailto:support@notalone.app).

### **Users in Australia**

For users in Australia, the collection and processing of your personal information is governed by the Australian Privacy Act of 1988 ("Privacy Act") and the Australian Privacy Principles ("APPs"). Be advised that:

- Our service providers, if any, assume the same obligations, where relevant, under the Privacy Act as apply to us.
- We will not use or disclose personal information to third parties for the purpose of our direct marketing to you unless you have consented to receive direct marketing. You may opt out of any marketing materials we send to you through the unsubscribe mechanism or by contacting us directly. If you have requested not to receive further direct marketing messages, we may continue to provide you with messages that are not regarded as "direct marketing" under the Privacy Act or Spam Act, including changes to our terms, system alerts, and other information related to your account.
- Our servers are located in the United States. In addition, we or our service providers may use cloud technology to store or process personal information, which also may result in the storage of data outside Australia.
- As an entity located outside Australia, we are not required to take steps to ensure we do not breach the APPs, although the notices and actions regarding personal information described in this Privacy Policy are intended to be generally consistent with the APPs.
- If you think the personal information we hold about you is inaccurate, out of date, incomplete, irrelevant, or misleading, we will take reasonable steps, consistent with our obligations under the Privacy Act, to correct that information upon your request. You can contact us at as provided below.
- If you are unsatisfied with our response to a privacy matter, then you may file a complaint with the Office of the Australian Information Commissioner (at <https://www.oaic.gov.au/privacy/privacy-complaints/>).

### **Users in New Zealand**

For users in New Zealand, we take appropriate steps to comply with the Privacy Act of 1993 and including the 12 Information Privacy Principles, as applicable. It is our intent that this Privacy Policy provide the required notice regarding what personal information we collect, the purposes for the collection, who is collecting it, and how it may be used and disclosed. In accordance with Principles 6 and 7, you can request access to and correct your personal information, among other rights. To do so, you can contact us via email at [support@notalone.app](mailto:support@notalone.app). If you have a question about how we process your personal information, please contact us. If we are unable to resolve the issue, you may submit a complaint to the New Zealand Privacy Commission at <https://www.privacy.org.nz/your-rights/making-a-complaint/>.

### **Users in South Africa**

For users in South Africa, we take appropriate steps to comply with Protection of Personal Information Act of 2013 (POPIA). This Privacy Policy is intended to provide the required notices regarding the nature of the personal information being collected, the responsible party (Notalone), the purpose of the collection and transfer to the United States. Under POPIA, users in South Africa have the right to request that we correct or delete personal information that is inaccurate, irrelevant or excessive. To make these requests, you can contact us via email at [support@notalone.app](mailto:support@notalone.app). Users in South African may also submit a complaint under POPIA to the information regulator, InfoRegSA (<https://justice.gov.za/inforeq/>)

### **Do-Not-Track**

The NOTALONE APP currently does not honor browser-based Do-Not-Track signals.

### **Children's Privacy**

We are committed to protecting the privacy of children. You should be aware that the NOTALONE APP are not intended or designed to attract children under the age of 13. We do not knowingly collect personally identifiable information from any person we actually know is a child under the age of 13. If a child under the age of 13 has provided NOTALONE with their personal information, we ask that their parent or guardian contact us as provided below to inform us of that fact. We will use reasonable efforts to delete such information from our systems and servers.

### **Changes to This Privacy Policy**

The Effective Date of the current version of the Privacy Policy is provided above. From time to time we may modify this Privacy Policy. We will notify you of any material change by sending a notice to the e-mail address you provided to us or by placing a prominent notice on the NOTALONE APP. You can view the most recent version of the Privacy Policy at any time by clicking the "Privacy Policy" link provided in the NOTALONE APP. Your continued use of the NOTALONE APP or Services after any modification indicates your agreement to the new terms and conditions.

### **Comments and Questions**

If you have comments or questions about our Privacy Policy or your personal information, you may email us at [support@notalone.app](mailto:support@notalone.app).

### **NOTALONE, INC.**

US Registered Office at:  
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Wilmington, DE 19810 USA