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## ***Privacy Policy***

*Last Modified: November 7<sup>th</sup>, 2023*

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### **Introduction**

PONTRX ("we," "us," "our") respects the privacy rights of our users and is committed to protecting the information collected through our website and application (collectively referred to as "Services"). This Privacy Policy describes how we collect, store, use, and manage the information you provide in connection with our Services. By using our Services, you agree to the collection and use of your personal information as outlined in this Privacy Policy.

### **2. Information We Collect**

We collect information in several ways, including when you:

- Register for an account
- Use or otherwise interact with our Services
- Contact us for help

The types of information we collect may include:

- Contact information, such as name, email address and telephone number
- Prescription details
- Health conditions

We may also collect other information, including personal information outside of the listed types through instances where you interact with us online, by phone, or by mail in the context of:

- Facilitation of the delivery of our Services and to respond to your inquiries.

With the exception of certain health and prescription information which may be necessary to facilitate the Services in certain circumstances, the Services are not intended for the processing

of sensitive information. You, as the user of the Services, are responsible for ensuring that nothing you enter into or upload to the Services contains sensitive information.

### **3. Use of Your Information**

We may use the information we collect for purposes such as:

- Providing, maintaining, and improving our Services
- To develop new services
- To prevent fraud, criminal activity, or misuses of our Services, and to protect the security of our IT systems
- Sending technical notices, updates, and support messages
- Responding to your comments, questions, and requests

One function that we may use information that we collect or you share with us for is as training data for natural language processing model training. While we do not actively seek out personal information to train our models, through our interactions with you we may incidentally receive personal information that may be used as training data. We use training data only to help our models learn about language and how to understand and respond to it. We do not and will not use any personal information in training data to build profiles about you, to contact you, to advertise to you, to try to sell you anything, or to sell the information itself.

### **4. Aggregated or De-Identified Information.**

We may aggregate or de-identify personal information so that it may no longer be used to identify you and use such information. Such anonymous or aggregate data may be used by us to analyze the effectiveness of our Services, to improve and add features to our Services, to conduct research, and other similar purposes and provided to third parties for any lawful purpose, including but not limited to reporting health plan member product usage for purposes of calculating manufacturer discounts or rebates. In addition, from time to time, we may analyze the general behavior and characteristics of users of our Services and share aggregated information like general user statistics with third parties, publish such aggregated information or make such aggregated information generally available. We may collect aggregated information through the Services, through cookies, and through other means described in this Privacy Policy. We will maintain and use de-identified information in anonymous or de-identified form and we will not attempt to reidentify the information, unless required by law.

## **5. Cookies and Tracking Technologies**

We may use cookies and similar tracking technologies to improve and personalize your experience of our Services, to collect data about interactions and usage, and to provide relevant advertising. You can set your browser to accept all cookies, to reject all cookies, or to notify you whenever a cookie is offered so that you can decide each time whether to accept it. However, refusing a cookie may in some cases preclude you from using, or negatively affect the display or function of, a website or certain areas or features of a website.

## **6. Sharing of Your Information**

In certain circumstances we may provide your personal information to third parties without further notice to you, unless required by applicable law:

- To vendors and service providers to assist us in meeting business operations needs and to perform certain services and functions
- as part of or in connection with a business transfer, including any merger, acquisition, sale of company assets, financing.

In addition, we may use and disclose information, including personal contact information, in accordance with the terms of any written consent or authorization given by you, and as permissible by applicable law, including but not limited to using such data for our own marketing purposes. We don't "sell" or "share" personal information for cross-contextual behavioral advertising (as those terms are defined under applicable local law). We also do not process sensitive personal information for the purposes of inferring characteristics about a consumer. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

## **7. User's Rights**

We take data security seriously and employ commercially reasonable technical, administrative, and organizational measures to protect your personal information from loss, theft, misuse, unauthorized access, disclosure, alteration, and destruction. Our Services are built on the secure infrastructure provided by Amazon Web Services (AWS), a leading provider of secure cloud services. We have comprehensive insurance coverage, including cyber liability insurance, to protect against potential risks and liabilities associated with a data breach or cyber threat.

## 8. Users Rights

Your Rights - Depending on location, some individuals using the Services have certain statutory rights in relation to their personal information. For example, you may have the right to:

- Access your personal information and information relating to how it is processed;
- Correct or update your personal information;
- Restrict how we process your personal information, or
- request deletion of your personal information.

You can exercise the rights that apply to you at any time by sending a request to [support@pontrx.com](mailto:support@pontrx.com).

**Verification Process** - Upon receiving a request from you regarding information in our system, we may be required to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g., phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

**Appeals** - Depending on where you live, you may have the right to appeal a decision we make relating to requests to exercise your rights under applicable local law. If you wish to appeal our decision, please email us at [support@pontrx.com](mailto:support@pontrx.com).

## 9. International Data Transfers

We may transfer and store your data outside of your home country for the purpose of providing our Services to you.

## 10. Data Retention

We retain your personal information for as long as is necessary to provide the Services to you, for other legitimate business purposes, or to comply with our legal obligations. How long we retain personal information will depend on a number of factors, such as the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure, our purpose for processing the information, and any legal requirements.

## **11. Information Collected from Minors**

In compliance with legal and regulatory frameworks such as HIPAA, our Services are not specifically designed for individuals under the age of 18. We recognize that minors, defined as individuals under 18, are not legally permitted to give their consent for the processing of their personal information without parental or guardian authorization. Accordingly, we do not knowingly collect or solicit personal information from minors without explicit parental or guardian consent. If we become aware that a minor has provided us with personal information without appropriate consent, we will take steps to remove such information from our servers. When parental or guardian consent is given, it enables the adult, as the minor's "personal representative," to exercise the rights of the minor in accordance with HIPAA. This includes access to the minor's personal health information (PHI), receiving notifications related to the minor's PHI, authorizing PHI disclosures to third parties, and making healthcare decisions on the minor's behalf. We stringently limit the collection and use of minor's personal information to the necessary scope defined by our Services. All communication pertaining to the minor's use of our Services, including updates and promotional messages, will be directed to the consenting adult or guardian. Consenting adults or guardians retain the right to review, alter, or delete the minor's personal information at any time, and to refuse further collection or use of the information. If you believe we might have information from or about a minor without consent, please contact us immediately. We understand that state laws may provide additional provisions regarding the privacy and consent rights of minors. In some jurisdictions, minors may have the ability to independently consent to certain types of medical treatments or prescriptions without parental or guardian notification. We fully comply with applicable state laws and regulations concerning minors' rights to consent for specific treatments or prescriptions. In such cases, where a minor is granted the legal authority to consent on their own behalf, we will respect their privacy rights and not disclose treatment or prescription details to their parent or guardian unless required by law or authorized by the minor. It is important to note that the specific laws and regulations regarding minors' consent rights can vary by jurisdiction. We encourage users to familiarize themselves with the relevant legislation in their state to understand their rights and obligations. If you have any questions or concerns regarding the application of state laws and

minors' consent, please consult with legal counsel or appropriate authorities for guidance in your specific jurisdiction.

## **12. Third-Party Services**

Our Services may contain links to other websites or services that are not operated by us. These third parties may have their own privacy policies, which we recommend you review if you visit any linked websites.

## **13. Changes to This Policy**

We may revise this Privacy Policy from time to time. The most current version will always be posted on our website. By continuing to access or use our Services after those changes become effective, you agree to be bound by the revised Privacy Policy.

## **14. Complaint Resolution**

If you have a complaint about our handling of your personal information, you may contact us by email at [support@pontrx.com](mailto:support@pontrx.com) or by post at 25 SE 2<sup>nd</sup> Ave, Suite 550, Miami, FL 33131. We will do our best to resolve your complaint.