



PRIVACY POLICY

Date Last Updated: February 13, 2023

NOTE TO END USERS: CLEARED4's customers ("Institutions") decide how the personal information of their end-users ("End Users") are processed, so we urge them to make full disclosure about their processing activities.

Institutions are advised to, at a minimum, post a privacy policy on their websites that describes how they collect, use, and share the personal information of their users. We do not provide any Institutions with legal advice, and we urge all Institutions to retain competent legal counsel suitable for their businesses and legal needs. **If you are an End User, please contact the entity that instituted our Service for your data collection, deletion, and storage questions.**

WE DO NOT EVER SELL PERSONAL INFORMATION.

1. About Us and This Platform

CLEARED4 Inc., a Delaware corporation ("CLEARED4," "us," "we," or "our"), provides a sophisticated health compliance platform that ensures compliance with business or workplace safety rules by automating the entire process, including the monitoring of users' COVID-19 symptoms, quarantining those at risk, and enabling safe entry to schools and universities, offices, entertainment and sports venues, and manufacturing plants.

CLEARED4 integrates daily health screening, testing services, case management, vaccine status, contact tracing, building access control, HIPAA compliance, reporting, and more to avoid operating disruptions and ensure shared spaces are safe for all.

UNLESS OTHERWISE REQUIRED BY LAW, OUR POLICY IS TO DELETE ALL PERSONAL INFORMATION WHEN INSTRUCTED BY THE INSTITUTION AND NO LATER THAN 90 DAYS AFTER THE INSTITUTION'S CONTRACT TERMINATION. THE INSTITUTION IS THE CONTROLLER OF ALL PERSONAL INFORMATION.

CLEARED4 DOES NOT SELL YOUR PERSONAL INFORMATION.

2. Our Data Values

CLEARED4 respects the privacy concerns of our Institutions, the members of CLEARED4-powered businesses, and all users of our [website](#), applications, and all other products and services (collectively, "Service"). We understand you entrust your personal information to us with utmost confidence, and we assure you it will be used for the purpose it is intended. We will protect and respect your privacy.

Data protection laws vary among countries, with some providing more protection than others. Regardless of where your information is processed, we apply common protections described in this Policy. These protections align with well-known standards such as GDPR, HIPAA, and others.

3. Scope of this Privacy Notice

This Privacy Policy ("Privacy Policy") and any other documents referred to in it sets forth the basis on which any personal data we collect from you, or that you provide to us, in connection with the Service will be processed by us. We provide this Privacy Policy to help you understand how we collect, use, and share information gathered using our Service. This Privacy Policy applies only to the Personal Information collected by CLEARED4's Service both within the platform and when accessing services online, through CLEARED4's website.

We collect and process information about you as described in this Privacy Policy. We are committed to protecting the privacy of those with whom we interact. This Privacy Policy contains details about how we collect, use, and share



Personal Information we obtain from and about you when you interact with us through your use of the platform. Please read this Policy carefully.

Whenever you interact with us on behalf of another individual or entity, such as by providing or accessing Personal Information about another individual, you represent that your interactions and exchanges comply with applicable data protection laws. You shall have sole responsibility for any violation of privacy laws because of a failure to inform the other individual about how their Personal Information will be processed or obtain any necessary consent from such individuals.

We may change provisions of this Policy occasionally and will indicate when changes have been made by revising the date at the top of this Policy. We encourage you to review the Policy for updates whenever you access the Service to make sure that you understand our practices. If we make material changes to this Policy, we will provide you with additional notice, which will be effective when posted. When required under applicable law, we will seek affirmative consent from you before making material changes to the way we handle Personal Information previously collected from you. If you do not provide such consent, Personal Information will continue to be used so it is consistent with the version of this Policy under which it was collected. Please also review the Terms of Service [here](#). If you are an Institution of ours and we are processing personal information on your behalf, please review the accompanying [Data Processing Addendum](#). If you have questions or unresolved privacy concerns, please contact us at legal@CLEARED4.org.

4. Information that We Collect

Personal Information refers to any information relating to an identified or identifiable natural person or household.

We collect information about you and how you interact with us in several ways, including:

- a. Information you provide to us. We may collect information you provide when using our Service, such as when you: (1) create an account; (2) subscribe to our Service; (3) participate in events or promotions; (4) send questions via email; (5) interact with our sales or Institution support team; (6) apply for a job with us online; (7) fill out surveys; or (8) otherwise communicate with us through or about our Service. We collect the information you provide to us directly, including our service providers acting on our behalf. The types of personal information you provide may include your name, email address, telephone number, mailing address, credit card information, and other contact or identifying information you choose to provide. We store, process, and maintain files and content you create and/or upload using our Service, and other data related to your account to provide the Service to you.

We store no credit card information we receive except as necessary to complete and satisfy our rights and obligations regarding such transaction, billing arrangement, and/or as otherwise authorized by you.

- b. Information about use of our Service. Our servers automatically collect usage information collected or inferred about your interaction with us, your use of the Service, including the web pages visited, number of logins, data displayed or clicked on, actions taken, your language preference, and other login information. We may collect automated error reports with software malfunctions, which may contain some or all of the information in your account and content and may be reviewed to help resolve problems with the Service.

If you participate in a video conference with us, we may record the session and retain the recordings. We will notify you first that the session is being recorded so you can choose not to participate. If you participate in a training or product course, we collect completion data.

We collect information from the device and application you use to access our Service. Device data mainly means your IP address, device type, device ID/MAC address, and browser type. If you are on a mobile device, we also collect the UUID for that device.



We use a variety of technologies to collect this information, such as first-party and third-party cookies and tracking services that employ cookies and page tags (also known as web beacons). This data includes usage and user statistics. Emails sent by CLEARED4 or by users through our Service also include page tags that allow the sender to collect information about who opened those emails and clicked on links in them. We provide more information on cookies below and in our Cookie Notice.

Like most websites today, our web servers keep log files that record data each time a device accesses those servers. The log files contain data about the nature of each access, including originating IP addresses, internet service providers, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system versions, device type, and timestamps.

If you arrive at CLEARED4 from an external source (such as a link on another website or in an email), we record information about the source that referred you to us.

- c. Information from third parties and integration partners. We may obtain personal information about you and your interactions with us from third parties such as from entities that use the CLEARED4 platform to issue and read credentials and combine such information with the information we collect through our Service and such information may be used for the purposes described in "How We Use the Information We Collect" section below. For example:
 - You permit those third parties to share your information with us or where you have made that information publicly available online.
 - You create or log into your account through a third-party social networking site or one of our integration partners. We will have access to certain information from that service, such as your name and account information.
 - If you purchase our Service, we may receive information from our third-party payment processors.
 - Sometimes that may include your employer, school, or other location where the CLEARED4 platform is used.
- d. Data from your Institution. We may obtain information about you from the Institution with which you are employed or affiliated to activate and manage your access to and use of the Institution's subscription to the Service, including:
 - Contact details, such as your name and institutional email address, postal address, and phone number;
 - COVID test results;
 - Vaccine, booster, and certain medically related information;
 - Demographics, geolocation, contact tracing data;
 - Other account registration information, such as job location, title, employment status, and/or Institutional user ID.
- e. Information from public sources. This includes government entities from which public records are obtained and information you submit in public forums.

We may combine information we receive from the various sources described in this Notice, including third-party sources and public sources, and use or disclose it for the purposes identified below.

5. Types of Personal Information We Collect

The information we may collect about you are:

- a. Identifiers, such as your name, unique personal identifier, online identifier, internet protocol address, email address, or other similar identifiers.

- b. Personal information protected by Cal. Civ. Code 1798.80(e), such as medical information.
- c. Protected Class and Demographic information, such as age, race, gender, nationality, and health information.
- d. Internet or other electronic network activity information, information regarding your interactions with us (including interacting with us online, by the mobile application, and through advertisements).
- e. Audio, electronic, visual, thermal, olfactory, or similar information, such as video or photograph recordings of your interactions with our devices and related technologies, call center recordings, and customer support chat logs.

6. How We Use the Information We Collect

We may use the personal information collected through our Service:

- To enable interactions between you and us, such as to process account creation and registrations; register and administer your account; provide you with services and support your interactions with us; operate, diagnose, repair, improve, and track our Service and quality issues; provide and deliver the Service and product information or other services you request, process transactions, and send you related information; communicate with you about your account or our data practices; install and configure changes and updates to programs and technologies related to interactions with us; authenticate those who interact with us; respond to your comments, requests, complaints, and inquiries and provide you with requested Institution support; send you advertising or promotional materials; and send you technical notices, updates, security alerts, and support and administrative messages.
- To confirm your health status. Information you provide in response to questionnaires or that you otherwise share may be used to confirm your health status.
- For our own internal business purposes, such as to monitor and evaluate or audit trends, usage, activities and performance in connection with our Service; evaluate and improve the quality of your interactions with us and programs and technologies related to interactions with us; identify usage trends and develop data analysis, including for research, audits, reporting and other business operations, such as to pay royalties and license fees to third-party content providers, evaluate our business performance, or in other ways under an Institution agreement; link or combine with other information we obtain from third parties to help understand your needs and provide you with better service; personalize and improve the Service, and provide content, communications, or features that match users interests; process and catalog your responses to surveys or questionnaires; perform internal research for technological development and demonstration; conduct data analysis and testing; maintain proper business records and other relevant records.
- For legal, safety, or security reasons, such as to comply with legal requirements; protect our safety, our property, or rights of those who interact with us or others; secure our systems, prevent fraud, and help us to protect the security of your account; prevent, detect, investigate, and respond to security incidents or other potentially prohibited, malicious, deceptive, fraudulent, or illegal activities and to enforce our terms and policies; and comply with our legal obligations, resolve disputes and enforce our agreements.
- In a de-identified, anonymized, or aggregated format. When converted to a de-identified, anonymized, or aggregated format, data no longer constitutes Personal Information in certain jurisdictions. We may use this information for any purpose as legally permissible. You grant your Institution and CLEARED4 the right to compile, collect, copy, modify, publish and use anonymous data in aggregate form generated from, or based upon, Institution's use of the Services (including for example, amount of uptime for the service monthly and annually, analysis of which functions within the Cloud Services are more/less frequently used, security threats encountered and handled and/or metrics such as number of Green Passes, Blue Passes, surveys completed, number of Monthly Active Users, number of negative COVID test results, number of



positive COVID test results) ("Aggregate Data"); on condition that: (i) Aggregate Data includes no information that can be used directly, or in connection with other data, to identify, contact or locate an individual; (ii) Aggregate Data is combined with data from other Institutions and cannot be used to identify, directly or indirectly, Institution; and (iii) CLEARED4 uses Aggregate Data solely for data analytics, statistical reporting, product and service improvements, or other lawful business purposes.

- For any other purposes for which you provide consent.

We reserve the right to review your content and information to help resolve problems with our software or Service or to ensure that you remain in compliance with our Terms of Service and other policies.

7. With Whom We Share Your Personal Information

We do not sell your personal information. However, we may share your personal information with third parties as follows:

- **Service Providers:** We may share your Personal Information with third-party service providers performing services on our behalf or to assist us with the provision of services to you to facilitate our interactions with you or request or support our relationship with you. For example, we engage service providers to provide SMS functionality (e.g., we may share your phone number with our outbound telecommunications provider), communications, security, operating systems and platforms, internet service providers, payment processing, infrastructure and IT services, analytics companies, to customize, personalize, and optimize our Service, to process payment transactions, to provide Institution service, and to analyze and enhance data. We may contract with other companies to provide certain services, including identity verification, email distribution, market research, and promotions management. While providing such services, these service providers may have access to your personal information. These service providers have agreed to maintain the confidentiality, security, and integrity of the personal information they obtain from us, and we do not authorize them to use or disclose your personal information except in connection with providing their services. We provide these companies with only the information they need to perform their services and work with them to ensure that your privacy is respected and protected.
- **For legal, security, and safety purposes:** We may share your Personal Information with third parties such as law enforcement or other government agencies to comply with law or legal requirements; to enforce or apply our Terms of Use and other agreements, and to protect our rights and our property or safety of our users or third parties. CLEARED4 and its service providers may disclose and otherwise use your personal information where they or we reasonably believe such disclosure is needed to (i) satisfy any applicable law, regulation, legal process, or governmental request; (ii) enforce applicable terms of use, including investigation of potential violations; (iii) detect, prevent, or otherwise address illegal or suspected illegal activity, security, or technical issues; or (d) protect against harm to the rights, property, safety of CLEARED4, our users, or the public, as required or permitted by law.
- **In connection with a corporate transaction (reorganization, restructuring, merger, or sale, or other transfer of assets):** If we sell some or all of our assets, merge or are acquired by another entity, including through a sale or in connection with a bankruptcy, we will share information, including Personal Information with that entity, provided that the receiving party agrees to respect your privacy, so it follows our Privacy Policy.
- **Affiliates and subsidiaries:** We may share your Personal Information within our group of companies, which includes parents, corporate affiliates, subsidiaries, business units, and other companies that share common ownership for the purposes described above.
- **With Third Parties from Whom You Seek Credentials:** If you seek to obtain credentials from a third party through the Service, we may share your Personal Information with that third party.



- **Other Users:** Content you create, upload, or copy into our Service, may, if you choose, be read, copied, used, and distributed by people you know, your members, or people you don't know. Information you disclose using the chat function of the Service may be read, copied, used, and distributed by people participating in the chat. Use care when including sensitive information, such as home addresses or phone numbers, in content you share or chat sessions.
- **Your Institution:** If you access the Service through a subscription administered by your Institution, your personal information, and certain usage data gathered through the Service, is accessed by, and shared with the administrators authorized by your Institution for the purposes of indicated by the Institution's privacy policy. We may also disclose to your Institution or other third parties non-personally identifiable information, such as anonymous usage data reports and aggregated information, subject to any applicable legal or contractual obligations.
- **With your consent:** We may share your personal information with other third parties with your consent.

We may also de-identify, anonymize, or aggregate Personal Information to share with third parties for any purpose as legally permissible.

Whenever in the course of sharing information, we transfer personal information to countries within the European Economic Area or other regions with comprehensive data protection laws, we will ensure that the information is transferred under this Privacy Policy and as permitted by the applicable laws on data protection.

Advertising and analytics services provider by others. We may allow others to provide analytics services and display advertisements for our Service. These providers (for example, Google Analytics) may use cookies, web beacons, device identifiers, and other tracking technologies that collect information about your use of our Service. This information may be used by us and others to determine the popularity of our Service, deliver advertising and content targeted to your interests in the Service and on other websites, apps, and other services, and to better understand your online activity. You can discover more about this practice or opt-out of your web browsing activity for interest-based advertising purposes by visiting [DAA WebChoices Browser Check](#). You can opt-out of Google Analytics by visiting [Google Analytics Opt-out Browser Add-on](#).

8. Storage, Security, and Retention

Data Storage: If you are in North America, all data you provide to use through our Service is stored on our secure servers in the US Any payment transactions will be encrypted using SSL technology; all payment data is stored by our payment processors and is never stored on our servers. Where we have given you (or where you have chosen) a password that enables you to access your account and the Service, you are responsible for keeping this password confidential. We recommend that you do not share your password and change it frequently.

Data Security: CLEARED4 takes reasonable security procedures and technical and organizational measures to protect your personal information and your content against accidental or unlawful destruction, loss, disclosure, unauthorized access, alteration, or misuse, and to ensure that your content remains protected and available to you. Unfortunately, the transmission of data via the internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of your data transmitted through the Service. All transmissions are at your own risk.

Data Retention: CLEARED4 retains your personal information for no longer than is necessary for the purpose for which it was originally collected to enable you to use the Service unless we need to keep your information to comply with applicable legal, regulatory, or other obligations or the information is required for legitimate business purposes (such as to resolve disputes, provide service and enforce agreements). The retention periods applied by CLEARED4 comply with applicable legislation then in effect, namely:



- For data relating to your account, such data will not be retained beyond your request that your account be deleted.
- For transactional data relating to your purchases, such data is kept for the entire period of our contractual relationship, then under legal obligations and applicable statute of limitations periods. This data does not include payment card information, which is processed by our third-party payment processors and not CLEARED4.
- For data collected based on your consent to receive marketing communications, we will use the data until you withdraw your consent or applicable law requires that such data is no longer used.
- For data collected with your requests or questions, such data is kept for the period necessary to process and reply to your request or question.
- We may retain IP addresses and the like for up to 12 months.

In any event, we will retain your information for the period stated in our retention schedule above mentioned, at which point CLEARED4 will try to dispose of your Personal Information securely and permanently according to applicable laws and regulations.

9. Children's Privacy

CLEARED4's Service is not directed at, marketed to, nor intended for, children under the age of 13. We do not knowingly collect any information, including Personal Information, from children under 13 years of age. IF YOU ARE 13 YEARS OLD OR YOUNGER, THE COMPANY REQUESTS THAT YOU NOT SUBMIT ANY PERSONALLY IDENTIFIABLE INFORMATION TO THE SITE OR TO CLEARED4. If we discover that a child aged 13 or younger has signed up for our Service or provided us with personally identifiable information, we will delete that child's identifiable information from our records. If you believe that we have inadvertently collected Personal Information from a child under the age of 13, please contact us, and we will use reasonable efforts to delete the child's information from our databases. In all cases where we may inadvertently be provided with Personal Information relating to children, the information in the relevant parts of this Notice applies to children, as well as adults.

10. Institution Information

To power our Institutions' businesses, we collect and use personal information about their users. We collect and use this personal information as directed by the Institution. Legally speaking, we are a "data processor" and a "service provider" as these terms are used. We will never use the personal information from our Institutions' users to independently market or advertise to individuals unless such individuals are also using our Services directly. We also will not "sell" your Institutions' information, as that term is defined in the California Consumer Privacy Act.

The Institutions decide how the personal information of their users are processed, so we urge them to make complete disclosure about their processing activities. Institutions are advised to, at a minimum, post a privacy policy on their websites that describes how they collect, use, and share the personal information of their users. We do not provide any Institutions with legal advice, and we urge all of our Institutions to retain competent legal counsel suitable for their businesses and legal needs.

NOTE: IF YOU ARE AN END-USER VERSUS AN INSTITUTION, PLEASE CONTACT THE INSTITUTION VERSUS CLEARED4 FOR ANY PRIVACY QUESTIONS OR CONCERNS. YOU MAY ALSO CONTACT US AS SET FORTH BELOW IN ADDITION TO YOUR INSTITUTION.

11. Third Parties

Third parties who provide and/or publish content via our Service shall be deemed the data controllers for any personal data contained in the content uploaded by any such party to the Service ("Third-Party Content") and any other personal data processed concerning such Third-Party Content. This Privacy Policy only concerns the processing



for which CLEARED4 is the data controller. If you have questions regarding personal data in Third-Party Content, please contact the third-party provider responsible for such Third-Party Content.

12. How We Use “Cookies” and Other Tracking Technologies

We use cookies, which are pieces of information that a website transfers to an individual's computer hard drive for record keeping purposes, and similar tracking technologies on our website and when providing our Service. Cookies make using our website easier by, among other things, saving your passwords and preferences for you. These cookies are restricted for use only on our website and transfer no personal information to any other party. For more information about how we use these technologies, including a list of other companies that place cookies on our website, a list of cookies we place when we power an Institution's business, and an explanation of how you can opt-out of certain types of cookies, please see our Cookie Notice.

13. Terms of Use

The Terms of Use Agreement for interactions with us is incorporated by reference into this Policy and can be found [here](#).

14. Contact Information

We welcome your questions, comments, and requests regarding our Privacy Policy. Please contact us at legal@CLEARED4.org.

15. Your Choices and Rights

You have several options regarding your personal information, as follows:

- You may terminate your use of the Service. However, CLEARED4 may still process your personal information as a service provider to our Institutions if your personal data.
- If you have created an account, you may have the ability to access, edit, or delete some or all of your personal information. Even if you delete information from your account or deactivate your account, we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of your information for a certain period.
- You may opt out of receiving promotional emails, text messages, or mail from CLEARED4 by visiting your user settings via "Edit Your Preferences" or "Completely Unsubscribe" link in any promotional email. If you opt out, we may still send you transactional or relationship messages, such as emails about your account or updates to our Service.
- If you do not have a user account and wish to delete your email address or other personal information you might have provided through your use of our Service and/or any other services, please email us at: legal@CLEARED4.org with the words "Delete My Information" in the subject line. NOTE: IF YOU ARE AN END-USER VERSUS AN INSTITUTION, PLEASE CONTACT THE INSTITUTION IN ADDITION TO CLEARED4.

16. Malware / Spyware / Viruses

We do not knowingly permit the use of malware, spyware, viruses, and/or other similar types of software.

17. Links to External Sites



Our Service may, from time to time, contain links to and from third-party websites, such as partners, affiliates, and advertisers. If you follow a link to any external website, it will have its own privacy policy, and we are not responsible for the content or practices of such third-party websites or their policies. We are also not responsible for any information you might share with such linked websites. Refer to each website's respective privacy policy and practices before you submit any personal information.

18. Transfer of Information Across National Borders

CLEARED4 Website: For users located outside the jurisdiction of the United States, CLEARED4 operates and processes data in the United States. Information we collect from you will be processed in the United States, and by using this website you acknowledge and consent to the processing of your data in the United States. The United States has not received a finding of "adequacy" from the European Union under Article 41 of the GDPR. We collect and transfer to the US personal data only with your consent; to perform a contract with you or fulfill a compelling legitimate interest of ours in a manner that does not outweigh your rights and freedoms. When we transfer your personal information to other countries, we will protect that data as described in this Policy or our agreement with you and take steps, where necessary, to ensure that international transfers comply with applicable laws.

Service: For North American users, CLEARED4 operates and processes your data in the United States. For EU users, CLEARED4 operates and processes your data in the Netherlands and Belgium. For APAC users, CLEARED4 operates and processes your data in India.

Your California Privacy Rights

Pursuant to the California Consumer Privacy Act of 2018 ("CCPA"), below is a summary of the Personal Information we collect from consumers, the sources from which we collect the Personal Information, the business or commercial purpose for which the Personal Information is collected and the categories of third parties with whom we share consumer Personal Information. The section references relate to the sections above in this Policy.

Under the CCPA, you have the right to request what we disclose to you (i) the categories of personal information we collected about you and the categories of sources from which we collected such information; (ii) the specific pieces of personal information we collected about you; (iii) the business or commercial purpose for collecting personal information about you; and (iv) the categories of personal information about you that we shared or disclosed and the categories of third parties with whom we shared or to whom we disclosed such information in the preceding 12 months. You also have the right to not be discriminated against in pricing and services because you exercise any of your rights under the CCPA. CLEARED4 does not sell personal information to third parties within the scope of the application of the CCPA.

Sources of Personal Information

The categories of sources of Personal Information are detailed in Section 4 above and are summarized as follows: (a) directly from you, (b) through automated technologies or interactions, (c) public sources, your Institution, and (d) from third parties and integration partners.

Uses of Personal Information

The business and commercial purposes for which we collect Personal Information are detailed in Section 6 and are part of the following general purposes: (a) performing services, (b) auditing, (c) legal and compliance, (d) quality assurance, (e) security, (f) debugging, (g) short term, transient use, (h) internal research, and (i) corporate transactions.

Sharing Personal Information



The categories of third parties to whom we disclose Personal Information for a business purpose are detailed in the Section 7 and are summarized as follows: (a) affiliates and subsidiaries, (b) third-party service providers, (c) legal, safety, and security, (d) corporate transactions, (e) with third parties from whom you seek credentials, (f) other users, (g) your Institution, and (h) otherwise with your consent.

Our data-sharing practices are detailed in the chart below and align with the categories described in Section 5.

Categories of Personal Information	Categories of Third Parties to Which We Disclose Personal Information for a Business Purpose
Identifiers	<ul style="list-style-type: none">• Affiliates and subsidiaries• Third-party service providers• Third parties from whom you seek credentials• For legal, security, and safety purposes• In connection with a corporate transaction• Entities to which you have consented to the disclosure
Personal information protected by Cal. Civ. Code 1798.80(e)	<ul style="list-style-type: none">• Affiliates and subsidiaries• Third-party service providers• Third parties from whom you seek credentials• For legal, security, and safety purposes• In connection with a corporate transaction• Entities to which you have consented to the disclosure
Protected Class and Demographic information	<ul style="list-style-type: none">• Affiliates and subsidiaries• Third-party service providers• Third parties from whom you seek credentials• For legal, security, and safety purposes• In connection with a corporate transaction• Entities to which you have consented to the disclosure
Internet or other electronic network activity information	<ul style="list-style-type: none">• Affiliates and subsidiaries• Third-party service providers• For legal, security, and safety purposes• In connection with a corporate transaction• Entities to which you have consented to the disclosure
Audio, electronic, visual, thermal, olfactory, or similar information	<ul style="list-style-type: none">• Affiliates and subsidiaries• Third party service providers• For legal, security, and safety purposes• In connection with a corporate transaction• Entities to which you have consented to the disclosure

Subject to legal limitations, certain California residents may exercise the following rights by emailing us at legal@CLEARED4.org.

- Right to Know. You have the right to request information about the categories of Personal Information we have collected about you, the categories of sources from which we collected the Personal Information, the purposes for collecting the Personal Information, the categories of third parties with whom we have shared your Personal Information, and the purpose for which we shared your Personal Information ("Categories



Report"). You may also request information about the specific pieces of Personal Information we have collected about you ("Specific Pieces Report").

- Right to Delete. You have the right to request that we delete Personal Information that we have collected from you.
- Right to Opt-Out. You have the right to opt-out of the sale of your Personal Information. However, we do NOT sell your Personal Information (including the Personal Information of anyone under 13 years of age). Should this change in the future, we will update this Notice, notify you of any changes, and provide you with the appropriate mechanism to exercise your right to opt-out from the sale of your Personal Information.

You may submit a request to exercise your California privacy rights by emailing us at legal@CLEARED4.org. We will not discriminate against you in any manner prohibited by applicable law for exercising these rights.

When making a request, please provide the following information:

- First and Last Name
- Email Address
- Type of request you are making

Verification: To exercise your rights, we will need to obtain information to locate you in our records or verify your identity depending on the nature of the request. If you are submitting a request on behalf of a household, we will need to verify each member of the household independently. For a Specific Pieces Report, we will request Personal Information sufficient to verify your identity to a reasonably high degree of certainty. We will seek a signed declaration that you are who you say you are under penalty of perjury. In most cases, we will seek to match at least two data points to information we already have about you for this verification process. For a Categories Report or a Request to Delete, we will request Personal Information sufficient to verify your identity to a reasonable degree of certainty. In most cases, we will seek to match at least two data points to information we already have about you for this verification process.

In certain circumstances, we may require additional or different data to verify your identity. If you make a request (1) for a Specific Pieces Report, (2) as an authorized agent, or (3) on behalf of a household, we will contact you via email following your initial request to obtain information specifically needed for your type of request.

Authorized Agents: Authorized agents may exercise rights on behalf of consumers. If you are an Authorized Agent, we will request written and signed authorization from the consumer and will seek to verify the consumer as described above, or we will accept a legal Power of Attorney under the California Probate Code. We will also require evidence of your (the agent's) identity and proof of registration with the California Secretary of State.

Timing: We will respond to Requests to Delete and Requests to Know within 45 calendar days, unless we need more time, in which case, we will notify you and may take up to 90 calendar days total to respond to your request.

California Shine the Light: If you are a California resident, you may opt-out of sharing your Personal Information with third parties for the third parties direct marketing purposes. Please contact us at legal@CLEARED4.org if you would like to do so.

Your EU Privacy Rights

We provide the representations and information in this section in compliance with European privacy laws, particularly the European General Data Protection Regulation (GDPR). If you are a visitor from the European



Territories (including the European Economic Area, Switzerland, and the United Kingdom), our legal basis for collecting and using the personal data described above will depend on the personal information concerned and the specific context in which we collect it.

We will collect personal data from you where the processing is in our legitimate interests. Sometimes we may collect, and process personal data based on consent.

EU data subjects have certain rights regarding your personal data we collect and process. We respond to all requests from individuals in the EEA wishing to exercise their data protection rights under applicable data protection laws.

- Access, Correction, or Deletion. You may request access to, correction of, or deletion of your personal data. You can often go directly into the Service under Account Settings to take these actions.
- Objection. You may object to processing of your personal data where we are relying on a legitimate interest (or those of a third party), and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You may also object where we are processing your personal data for direct marketing purposes and may do so using the options provided in this Policy. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Restriction. You may ask us to suspend the processing of your personal data in these scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful, but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- Portability. You may request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw Consent. If we have collected and processed your personal data with your consent, you can withdraw your consent. Withdrawing your consent will not affect the lawfulness of any processing we conducted before your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.
- File a complaint. You may file a complaint with a supervisory authority about our collection and processing of your personal data. To file a request or act on one of your rights, please contact us at legal@CLEARED4.org. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

For the purposes of the EU General Data Protection Regulation (GDPR), either the Institution or CLEARED4 is the controller for the Personal Information we process, unless otherwise stated. For all data protection inquiries and/or concerns in connection with your EU privacy rights please contact your Institution or our Chief Legal Officer at legal@CLEARED4.org.

Pursuant to the GDPR below is specific information which relates to the processing of Personal Information of data subjects who are in the EU. The section references relate to the sections above in this Policy.

Purpose of Processing



The business and/or commercial purposes for which we process Personal Information are detailed in Section 6 and are part of the following general purposes: (a) performing services, (b) auditing, (c) legal and compliance, (d) quality assurance, (e) security, (f) debugging, (g) short term, transient use, (h) internal research, and (i) corporate transactions.

If we intend to process your Personal Information for any additional purpose(s), we will provide you with information on the other purpose(s) and seek your prior consent.

Legal Basis

The legal basis for the processing of your personal data is one of the following:

- consent, or
- to provide the service for which you entered into a contract with us when you accepted the terms and conditions of the Terms of Use when you downloaded the Service or
- to comply with a legal obligation to which we are subject.

The legal basis for the processing of your Protected Class Information is as follows:

- Health data on the basis of your consent obtained when you uploaded the data into the Service and accepted the privacy policy; or
- Processing is necessary for reason of public interest in the area of public health

Please note that the provision of Personal Information is a requirement of the contract you entered into with us when downloading the Service and is necessary to enable us to provide our services to you through the Service. Where you have provided your consent for us to process your Personal Information, you have the right to withdraw your consent at any time.

Sharing Personal Information

The categories of third parties to whom we disclose Personal Information for a business purpose are detailed in the Section 7 and are summarized as follows: (a) affiliates and subsidiaries, (b) third-party service providers, (c) legal, safety, and security, (d) corporate transactions, (e) with third parties from whom you seek credentials, (f) other users, (g) your Institution, and (h) otherwise with your consent.

Transfer of Personal Information

For EU clients and events, the information is stored in Switzerland. For services purposes, we may share your information with affiliates located outside the European Union, including in countries that may not have equivalent privacy and data protection laws to EU regulations on data protection. In this case, we process your information following standard contractual clauses on data protection, whose terms have been approved by the European Commission, to safeguard the transfer of information we collect from the European Economic Area and Switzerland. We can provide further information upon request.

Data Retention

We will retain your Personal Information for no longer than is necessary to enable you to use the Service, and to comply with our legal obligations, resolve disputes, and enforce our agreements, but in any event, no longer than 1 year after the last time you interacted with or used the Service.

Data Subject Rights



If you wish to access, correct, delete, or update your Personal Information, restrict or object to processing or exercise a right to data portability (where technically feasible) please refer to the functionality available within the Service on the user profile page or email us at legal@CLEARED4.org. We will respond to reasonable requests following relevant data protection laws.

Compliance

We work to high standards when it comes to processing your Personal Information. If you have any queries or concerns about our approach to protecting your information, we welcome the opportunity to make things right for you and encourage you to contact us by emailing to the email address found in Section 14.

If you are not satisfied with our response, you have the right to lodge a complaint with your national data protection authority.

Your EMEA (Non-EU) Privacy Rights

For the purposes of relevant data protection laws and regulations applicable across Europe, Middle East, and Africa (EMEA) region excluding the European Union (EU), below is specific information which relates to the processing of Personal Information of data subjects located in EMEA countries where the Service is available. The section references relate to the sections above in this Policy. The information provided at **Your EU Privacy Rights** section above applies to individuals in EMEA unless otherwise specified with respect to named countries below.

Israel

Pursuant to the Protection of Privacy Law and associated Regulations the privacy rights outlined at *Your EU Privacy Rights* section above apply to individuals in Israel subject to the specific information below, which exclusively relates to the processing of personal information of data subjects who are in Israel. The section references relate to the sections above in this Policy.

Legal Basis

The legal basis for the processing of your Personal Information is one of the following:

- consent, or
- appropriate notice has been provided to or made available to the data subject; or
- the Personal Information is necessary to comply with a legal obligation.

The legal basis for the processing of your Protected Class Information is as follows:

- Health data based on your explicit consent obtained when you uploaded the data into the Service and accepted the privacy policy and consent form;
- Processing is necessary for reason of public interest in the area of public health.

Data Subject Rights

If you wish to access or correct your personal information, please refer to the functionality available within the Service on the user profile page or email us at legal@CLEARED4.org. We will respond to reasonable requests in accordance with relevant data protection laws.

Transfer of Personal Information



We store your data within the European Economic Area/European Union. Personal information of Israeli Citizens may be processed by CLEARED4 to provide customer service and support and to enable us to provide our services to you through the Service.

Appropriate safeguards are in place via derogations such as obtaining your consent or relying on contractual performance or necessity to establish, exercise or defend legal claims or other legal mechanisms designed to protect your personal data to standards equivalent to Israeli data protection law, such as entering into a data processing agreement with the recipient of your data abroad.

Switzerland

Under the Federal Act on Data Protection (FADP) and the Ordinance to the Federal Act on Data Protection applicable in Switzerland at the time of writing, *Your EU Privacy Rights* section applies to Swiss data subjects in its entirety subject to the following provision.

Data Subject Rights

If you wish to access, correct, delete, or update your personal information, or restrict or object to processing please refer to the functionality available within the Service on the user profile page or email us at legal@CLEARED4.org. We will respond to reasonable requests under relevant data protection laws.

Your Canadian Privacy Rights

Under the Personal Information Protection and Electronic Documents Act (PIPEDA) the privacy rights outlined at ***Your EU Privacy Rights*** section above apply to individuals in Canada subject to the specific information below which exclusively relates to the processing of Personal Information of data subjects who are in Canada. This section references relate to the sections above in this Policy.

Legal Basis

In addition to *Your EU Privacy Rights* section, we may rely on the following legal basis for the processing of your Personal Information:

- Appropriate notice has been provided or made available to you.

The legal basis for the processing of your Protected Class Information is as follows:

- Health data based on your explicit consent obtained when you uploaded the data into the Service and accepted the privacy policy and consent form.

Data Subject Rights

If you wish to access, correct, delete, or update your personal information, or restrict or object to processing please refer to the functionality available within the Service on the user profile page or email us at legal@CLEARED4.org. We will respond to reasonable requests under relevant data protection laws.

Transfer of Personal Information

We store your data within the European Economic Area/European Union.



Personal information of Canadian individuals may be processed by CLEARED4 to provide customer service and support and to enable us to provide our services to you through the Service.

Appropriate safeguards are in place via standard data protection clauses adopted by the EU Commission signed by CLEARED4, which will be provided on request. If we share your personal data with external third parties outside of the EEA, we use specific contracts with external third parties approved by the European Commission for transferring personal data to third countries to ensure equivalent levels of protection of your personal information.

Compliance

We work to high standards when it comes to processing your personal information. If you have any queries or concerns about our approach to protecting your information, we welcome the opportunity to make things right for you and encourage you to contact us through the email address provided in Section 14.

If you are not satisfied with our response, you may lodge a complaint with the relevant national data protection authority depending on the province where you are located, including the Office of the Privacy Commissioner of Canada, the Office of the Information and Privacy Commissioner of Alberta, Office of the Information and Privacy Commissioner for British Columbia, and the Quebec Information Access Commission.

Your APAC Privacy Rights

Under applicable laws and regulations across the countries in the Asia-Pacific (APAC) region where the Service is available, the privacy rights outlined at ***Your EU Privacy Rights*** section above apply to individuals in these countries subject to the specific information below which exclusively relates to the processing of personal information of data subjects who are in APAC. This section references relate to the sections above in this Notice. The Service is not currently available in, and our interactions are not directed at, marketed to, nor intended for citizens of, China or South Korea. The primary applicable laws and regulations for countries where the Service is available in APAC include, but are not limited to:

- Australia – The Privacy Act 1988, Spam Act 2003, and Do Not Call Register Act 2006;
- New Zealand – The Privacy Act 1993;
- Hong Kong – The Personal Data Privacy Ordinance (PDPO);
- Japan – The Act on the Protection of Personal Information (APPI), Supplementary Rules under the Act on the Protection of Personal Information for Handling of Personal Data Transferred from the EU based on an Adequacy Decision, Basic Policy for protecting Personal Information, and the Enforcement Regulation and Order.

Legal Basis

The legal basis for the processing of your Personal Information is one of the following, depending on the purpose of processing it under applicable laws and regulations in the respective countries where the Service is available in the APAC region:

- consent, or
- appropriate notice has been provided or made available to you, or
- to provide the service for which you entered into a contract with us when you accepted the terms and conditions of the Terms of Use when you downloaded the Service, or
- to comply with a legal obligation to which we are subject.



The provision of personal information is a requirement of the contract you entered into with us when downloading the Service and is necessary to enable us to provide our services to you through the Service. Where you have provided your consent for us to process your personal information, you may withdraw your consent.

Where the specific country where you are located recognizes the concept of Protected Class Information or equivalent, the legal basis for processing such information about you is one of the following, under applicable laws and regulations:

- Health data based on your (explicit or implied) consent obtained when you uploaded the data into the Service, and accepted the privacy policy and/or consent form; or
- Processing is necessary for reason of public interest in the area of public health.

Transfer of Personal Information

We store your data within the European Economic Area/European Union and may need to disclose your personal information to data processors under Section 7 above.

We store your data within the European Economic Area/European Union. Personal Information of individuals located in the APAC region may be processed by CLEARED4 to provide customer service and support and to enable us to provide our services to you through the Service.

Appropriate safeguards are in place via standard data protection clauses adopted by the EU Commission signed by CLEARED4 which will be provided on request. If we share your personal data with external third parties outside of the EEA, we use specific contracts with external third parties approved by the European Commission for transferring personal data to third countries to ensure equivalent levels of protection of your personal information.

Data Subject Rights

Depending on the specific APAC country where you are located, you may be able to exercise a range of rights in connection with your personal information. The privacy rights available to you under applicable laws and regulations are listed below for each country within the APAC region where the Service is available.

If you wish to exercise your privacy rights, please email us at legal@CLEARED4.org. We will respond to reasonable requests under relevant data protection laws.

APAC Country	Data Protection Rights Available
Australia	<ul style="list-style-type: none">• Right to access personal data• Right to rectify inaccurate or incomplete personal data• Right to withdraw consent• Control access to and request erasure of health records regulated by the My Health Record Act• Right to lodge a complaint with data protection authorities
New Zealand	<ul style="list-style-type: none">• Right to access personal data• Right to rectify inaccurate or incomplete personal data

	<ul style="list-style-type: none">• Right to lodge a complaint with data protection authorities
Hong Kong	<ul style="list-style-type: none">• Right to access personal data• Right to rectify inaccurate or incomplete personal data• Right to lodge a complaint with data protection authorities
Japan	<ul style="list-style-type: none">• Right to access personal data• Right to rectify inaccurate or incomplete personal data• Limited right to erasure of personal data• Limited right to restrict data processing• Limited right to lodge a complaint with data protection authorities regarding 'My Number' social security and tax identification data
Please note that data subjects can only request erasure of personal information, discontinuation of data processing, or discontinuation of transfer of personal information when its processing by the organization is found to be unlawful.	

Your Privacy Rights: Latin America and the Caribbean

Under applicable laws and regulations across Latin American and Caribbean countries and territories where the Service is available, the privacy rights outlined at **Your EU Privacy Rights** section above apply to individuals located in these countries or territories, subject to the specific information below which exclusively relates to the processing of personal information of data subjects who are present in Latin America, including Central and South America and the Caribbean regions. This section references relate to the sections above in this Policy.

Legal Basis

The legal basis for the processing of your personal data is one of the following:

- consent, or
- to provide the Service for which you entered into a contract with us when you accepted the terms of the Terms of Use when you downloaded the Service, or
- to comply with a legal obligation to which we are subject.

The provision of personal information is a requirement of the contract you entered into with us when downloading the Service and is necessary to enable us to provide our services to you through the Service. Where you have provided your consent for us to process your personal information, you may withdraw your consent.

The legal basis for the processing of your Protected Class Information is as following:

- Health data based on your (explicit or implied) consent obtained when you uploaded the data into the Service and accepted the privacy policy and/or consent form; or
- Processing is necessary for reason of public interest in the area of public health.

Transfer of Personal Information



We store your data within the United States. Personal Information of individuals located in Latin America, or the Caribbean may be processed by CLEARED4 to provide customer service and support and enable us to provide our services to you through the Service.

Appropriate safeguards are in place via standard data protection clauses adopted by the EU Commission signed by CLEARED4, which will be provided on request. If we share your personal data with external third parties outside of the EEA, we use specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries in order to ensure equivalent levels of protection of your personal information. Where mandated by applicable laws and regulations, we will request you to expressly provide your consent before effecting a transfer of your personal information outside the country where you are located.

Data Subject Rights

Depending on the specific country or territory in Latin America or the Caribbean you may exercise a range of rights in connection with your personal information. The privacy rights available to you under applicable laws and regulations are listed below for each country within Latin America and the Caribbean where the Service is accessible.

If you wish to exercise your privacy rights, please refer to the functionality available within the Service on the user profile page or email us at legal@CLEARED4.org. We will respond to reasonable requests under relevant data protection laws.

Country	Data Protection Rights Available
Costa Rica	<ul style="list-style-type: none">• Right to access personal data• Right to rectify inaccurate or incomplete personal data• Right to erasure of personal data
Guatemala	<ul style="list-style-type: none">• Right to grant consent before the transfer or commercialization of data subjects' personal data• Right to consent regarding the use of data subjects' personal data• Right to rectify inaccurate or incomplete personal data• Other rights that the Constitutional Court deems worthy of protection
Honduras	n/a
Mexico	<ul style="list-style-type: none">• Right to access personal data• Right to rectify inaccurate or incomplete personal data• Right to erasure of personal data• Right to object to/opt-out of processing personal data• Right to withdraw consent• Right to restrict processing
Nicaragua	<ul style="list-style-type: none">• Right to request information about personal data

	<ul style="list-style-type: none"> • Right to rectify, modify, complement, or update personal data • Right to erasure of personal data
Panama	<ul style="list-style-type: none"> • Right to access personal data • Right to rectify inaccurate or incomplete personal data • Right to erasure of personal data • Right to data portability • Right to object to/opt-out of processing personal data
El Salvador	<ul style="list-style-type: none"> • Right to access personal data • Right to reasonable control of the transmission or distribution of personal information
Argentina	<ul style="list-style-type: none"> • Right to access personal data • Right to rectify inaccurate or incomplete personal data • Right to erasure of personal data • Right to withdraw consent
Brazil	<ul style="list-style-type: none"> • Right to access the data subject's own personal data • Right to rectify/correct the data subject's own personal data where inaccurate or incomplete • Right to erasure of personal data • Right to restrict data processing • Right to data portability • Right to object to the processing of personal data • Right to withdraw consent • Right to request that personal data be anonymized • Right to lodge a complaint with the data protection authority
Chile	<ul style="list-style-type: none"> • Right to access the data subject's own personal data • Right to rectify/correct the data subject's own personal data where inaccurate or incomplete • Right to erasure of personal data • Right to restrict data processing • Right to withdraw consent • Right to object to the processing of personal data

Colombia	<ul style="list-style-type: none"> • Right to access the data subject's own personal data • Right to rectify/correct the data subject's own personal data where inaccurate or incomplete • Right to erasure of personal data • Right to restrict data processing • Right to withdraw consent • Right to object to the processing of personal data
Ecuador	<ul style="list-style-type: none"> • Constitutional right to privacy • Constitutional right to access personal information • Right to confidentiality of health data per sector- specific laws
Guadeloupe	n/a
Guyana	n/a
Peru	<ul style="list-style-type: none"> • Right to access the data subject's own personal data • Right to rectify/correct the data subject's own personal data where inaccurate or incomplete • Right to erasure of personal data • Right to restrict data processing • Right to withdraw consent • Right to object to the processing of personal data
Uruguay	<ul style="list-style-type: none"> • Right to access the data subject's own personal data • Right to rectify/correct the data subject's own personal data where inaccurate or incomplete • Right to erasure of personal data • Right to withdraw consent
Antigua	<ul style="list-style-type: none"> • Right to access the data subject's own personal data • Right to rectify/correct the data subject's own personal data where inaccurate or incomplete
Aruba	<ul style="list-style-type: none"> • Right to access the data subject's own personal data • Right to rectify/correct the data subject's own personal data where inaccurate or incomplete

Bahamas	<ul style="list-style-type: none"> • Right to access the data subject's own personal data • Right to rectify/correct the data subject's own personal data where inaccurate or incomplete • Right to erasure of personal data • Right to restrict or object to processing for direct marketing purposes
Barbados	n/a
Bermuda	<ul style="list-style-type: none"> • Right to access the data subject's own personal data • Right to rectify/correct the data subject's own personal data where inaccurate or incomplete • Right to erasure of personal data • Right to 'block' (restrict) processing
Cayman Islands	<ul style="list-style-type: none"> • Right to access the data subject's own personal data • Right to rectify/correct the data subject's own personal data where inaccurate or incomplete • Right to erasure of personal data • Right to 'block' and 'stop' (i.e. restrict and object to) processing • Right to compensation for failure to comply
Cuba	n/a
Curaçao	<ul style="list-style-type: none"> • Right to access the data subject's own personal data • Right to rectify/correct the data subject's own personal data where inaccurate or incomplete • Right to erasure of personal data
Dominican Republic	<ul style="list-style-type: none"> • Right to access the data subject's own personal data • Right to rectify/correct the data subject's own personal data where inaccurate or incomplete • Right to erasure of personal data • Right to object to/opt-out of processing for direct marketing purposes
Grenada	n/a
Haiti	n/a
Jamaica	n/a
Martinique	n/a
Puerto Rico	n/a

St. Kitts & Nevis	n/a
St. Lucia	<ul style="list-style-type: none">• Right to access the data subject's own personal data• Right to rectify/correct the data subject's own personal data where inaccurate or incomplete• Right to prohibit processing of personal data for direct marketing purposes
St. Martin	<ul style="list-style-type: none">• Right to access the data subject's own personal data
St. Vincent	n/a
Trinidad & Tobago	<ul style="list-style-type: none">• Right to not have personal information collected, used or disclosed unless the data subject has provided consent;• Right to access their information and challenge any organization on compliance with the privacy Principles;• Right to challenge an organization's compliance with the Principles and receive timely and appropriate engagement from the organization; and• Right to lodge a complaint with the Commissioner if their request for access to their personal information is denied.
Turks & Caicos	n/a

Note that the countries marked by "n/a" as 'not applicable' have not implemented data protection legislation that has entered into force at the time of writing.

19. Do Not Track Disclosure

Regulatory agencies such as the US Federal Trade Commission have promoted Do Not Track as a mechanism to permit Internet users to control online tracking activity across websites through their browser settings. Since no industry standard has been adopted, we currently do not process or comply with any web browser's "do-not-track" signal or another similar mechanism that indicates a request to disable online tracking of individual users who visit the CLEARED4 website or use our Service.

20. Changes to Our Privacy Policy

We may update this Privacy Policy to reflect changes to our data practices. If we make any material changes, we will notify you by email (sent to the email address specified in your account) or with a notice on our website or in the Service before becoming effective. We encourage you to periodically review this page for the latest data on our privacy practices.

21. Your Acceptance of These Terms

By using our website or Service, you accept the policies and restrictions in this Privacy Policy. If you do not agree to this Policy, please do not use the website or the Service.