

# **Privacy Policy**

Synthium Health, Inc (Synthium) knows the importance of and values the privacy of all its customers. We understand that you care about how your personal information is collected, used and shared, and we take this responsibility seriously. Our primary goal is to provide you with exceptional service, and we understand that you may have questions or concerns regarding your personal information and how it will be used. You may also email us at [admin@synthiumhealth.com](mailto:admin@synthiumhealth.com) with any privacy-related questions.

## **APPLICABILITY OF PRIVACY POLICY**

This privacy policy applies to all information we collect through our websites and mobile applications from Synthium users, including you. By using or accessing our websites and mobile application (“Synthium Platform/Services”), you acknowledge that you accept the practices and policies delineated in this Privacy Policy, and you hereby consent that we will collect, use, and share your information in the ways defined. This Privacy Policy, or its future variation, will continue to apply if your use of our Services is discontinued by either you or us. This policy only applies to the Synthium Service(s) and does not apply to the practices of any other partner or third-party provider.

In this policy, the term “personal information” is used to describe information that can be associated with a specific individual and can be used to identify that person. We do not consider personal information to include information that has been anonymized so that it does not identify a specific user.

## **THE INFORMATION WE COLLECT**

When you visit our websites or use one of our mobile applications, we collect your IP address, and standardized information provided by your computer or browser, such as your browser type and the pages you accessed on our website. We also may collect certain geo-location information. If you do not agree to our collection of this information, you may not be able to use our platform.

We receive and store any information you knowingly provide to us. For example, you will provide information while setting up your profile, such as by providing business name, addresses, business identification numbers, etc. You may also provide information through the registration process or save information on your device or account settings such as your name, email address, and phone number. Certain information may be required to register with us or to take advantage of some of our features. If you choose to use Synthium, we may collect the following information from you:

Account Information – text-enabled cellular/wireless telephone number, machine or mobile device ID and other similar information.

Identification Information – your name, street address, email address, etc.

Device Information – device type

We also may obtain information about you: (a) from your mobile device such as your device type, machine or mobile device identification number, geo-location, time zone, language setting, browser type, and IP address, and (b) from third parties for purposes of transaction processing, identity verification, fraud detection or prevention and other similar purposes.

Financial Information – bank account and routing numbers and credit cards may be linked to your Synthium account. Synthium does not share financial information with third-party social networking services such as those listed in the prior bullet.

We are committed to providing a safe, secure and all-around great service. Therefore, before permitting you to use our Platform/Service, we may require additional information from you we can use to verify your identity, address or other information or to manage risk and compliance throughout our relationship.

When you are using the Synthium Platform/Service, we collect information about your account transactions and trust relationships and we may collect information about your computer or other access device for fraud prevention and other similar purposes.

Finally, we may collect additional information from or about you in other ways not specifically described here. For example, we may collect information related to your contact with our customer support team or store results when you respond to a survey.

### **INFORMATION FROM CHILDREN**

As noted in the Terms and Conditions, we do not knowingly solicit or collect information from any individuals under the age of 21. If we learn that we have collected personal information from a child under age 21, we will delete that information as quickly as possible.

### **HOW WE USE COOKIES**

When you access our websites, we, or companies we hire to track how our website is used, may place small data files called “cookies” on your computer.

For example, we send a “session cookie” to your computer any time you log in to your Synthium account. This type of cookie helps us to recognize you if you visit multiple pages on our site during the same session so that we don’t need to ask you for your password on each page.

You are free to decline Synthium cookies if your browser permits, but doing so may interfere with your use of the website.

### **HOW WE PROTECT & STORE PERSONAL INFORMATION**

We store and process your personal information using third party servers located in secure data centers in the United States. The information is protected by physical, electronic and procedural safeguards in compliance with applicable US federal and state regulations. We employ electronic safeguards such as firewalls and data encryption and we enforce physical access controls to our office and files. We authorize access to personal information only for those employees who require it to fulfill their job responsibilities.

We make reasonable efforts to ensure security on our systems. Despite our efforts, we cannot guarantee that personal information may not be accessed, disclosed, altered or destroyed by breach of our administrative, managerial and technical safeguards. Therefore, we urge you to take adequate precautions to protect your personal data as well, including never sharing your Synthium password with anyone.

If Synthium learns of a systems security breach, we may attempt to notify you electronically so that you can take appropriate protective steps. By using the Synthium Platform/Service, you agree that Synthium may communicate with you electronically. Synthium may post a notice on our website if a security breach occurs. We may also send an email to you at the email address you have provided to us. Depending on where you live, you may have a legal right to receive notice of a security breach in writing. To receive free written notice of a security breach (or to withdraw your consent from receiving electronic notice of a security breach) you should notify us.

## **HOW WE USE THE PERSONAL INFORMATION WE COLLECT**

Our primary purpose in collecting personal information is to provide you with a safe, smooth, efficient, fun and customized experience. We may use your personal information to:

- provide the services and customer support you request;
- process transactions and send notices about your transactions or your network activity;
- prevent potentially fraudulent, prohibited or illegal activities, and enforce our User Agreement;
- customize, personalize, measure, and improve our services and the content and layout of our website;
- send you updates about new products and services that we are offering to customers
- compare information for accuracy and verify it with third parties;
- perform other duties as required by law.

## **HOW WE SHARE PERSONAL INFORMATION WITHIN THE SYNTHIUM HEALTH PLATFORM**

To process payments on Synthium, we need to share some of your personal information with the person or company that you are paying or is paying you. Your contact information, date of sign-up, the number of payments you have received and other verification metrics like social graph activity may be provided to users or companies when you transact with, on, or through Synthium.

We work with vendors to enable them to accept payments from you using Synthium. In doing so, a vendor may share information about you with us, such as your mobile phone number or Synthium username, when you attempt to pay that vendor. We use this information to confirm to that vendor that you are a Synthium customer and that the vendor should enable Synthium as a form of payment for your purchase.

Regardless, we will not disclose your credit card number or bank account number to anyone you have paid or who has paid you through Synthium, except with your express permission or if we are required to do so to comply with a subpoena or other legal process.

## **HOW WE SHARE PERSONAL INFORMATION WITH OTHER PARTIES**

Synthium does not share your personal information with third parties for promotional or marketing purposes.

We may share your personal information with: Law enforcement, government officials, or other third parties if compelled to do so by a subpoena, court order or similar legal procedure, when it is necessary to do so to comply with law, or where the disclosure of personal information is reasonably necessary to

prevent physical harm or financial loss, to report suspected illegal activity, or to investigate violations of the Synthium User Agreement, or as otherwise required by law.

Third party service providers who assist us in providing services to you or who provide fraud detection or similar services on our behalf.

Service providers under contract who help with parts of our business operations (for example, fraud prevention, payment processing, or technology services); Our contracts dictate that these service providers only use your information in connection with the services they perform for us and not for their own benefit.

Other third parties with your consent or at your direction to do so.

Except as permitted by law, Vermont is an opt-in state and we cannot share consumer information with third parties without permission from the consumer.

### **HOW YOU CAN ACCESS OR CHANGE YOUR PERSONAL INFORMATION**

You can review and update your personal information in your account settings at any time by logging into your account.

### **LINKS TO OTHER SITES**

The website application and mobile application may contain links to other sites. Synthium does not control the information collection of sites that can be reached through links from our products. We encourage our users to be aware when they are leaving the applications and to read the privacy statements of any site that collects personally identifiable information.

### **CHANGES TO OUR PRIVACY POLICY**

Synthium is always improving. As the Synthium service evolves, we may occasionally update this privacy policy. If we modify this privacy policy, we will post the revised privacy policy to the website, and we will also revise the “last updated date” stated above. If we make material changes in the way we use personal information, we will notify you by posting an announcement on our service or by sending you an e-mail. It is your responsibility to periodically review this privacy policy; users are bound by any changes to the privacy policy by using the service after such changes have been first posted.

### **HOW TO CONTACT US**

If you have questions or concerns regarding this privacy policy, or any feedback pertaining to your privacy and the Synthium service that you would like us to consider, please email us at [admin@synthiumhealth.com](mailto:admin@synthiumhealth.com)