

Privacy Policy

CorVent Medical, Inc. (“**CorVent**” “**we**,” “**our**,” or “**us**”) values your privacy. This Privacy Policy (“**Policy**”) describes how CorVent collects, uses, discloses, and otherwise processes personal information on our own behalf, as a “controller” or “business” under applicable privacy laws, as well as the rights and choices individuals may have regarding such personal information.

For additional information about the privacy choices you may have regarding your personal information, please review Section 6. Your Privacy Choices below. If you are a resident of California, please refer to the Section 12. California Privacy Notice below for information about the categories of personal information we may collect, and your rights under California privacy laws.

By using our Services (as defined below), you agree that your personal information will be handled as described in this Policy. Your use of our Services and any dispute over privacy, is subject to this Policy as well as the applicable terms governing your use of our Services, including their applicable terms governing limitations on damages.

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1. Scope

CorVent provides solutions for healthcare service providers, including our CorVision device management platform, which includes the CorVision VSS (virtual screenshare) and the other CorVision features and services (the “**CorVision Services**”).

Except as otherwise described below, this Policy applies, to our online and offline personal information processing activities (as a controller or business) including, but not limited to: visitors to our website where this Policy is posted, including <https://www.corventmedical.com> (the “**Site**”); individuals who sign up for, or create an account with us to access and use certain features of our services; individuals who subscribe to receive news, information, and marketing communications and materials from us; and current, former, and prospective healthcare service

providers who communicate or otherwise interact or engage with us or the services available through our Site and/or the App or other online services (collectively referred to as the “**Services**”).

Not in Scope. The Policy does not apply to our processing of personal information as a “processor” or “service provider” on behalf of our customers who use our products and services to perform their healthcare services. In such cases, we act strictly under the instructions of the customer, who is controller of such personal information. In addition, this Policy does not apply to the personal information we collect and process about job applicants and candidates for employment with CorVent, or to employees or contractors with whom we work.

Additional Notices. In some cases, we may provide additional or supplemental privacy notices, for certain Services. For example, our CorVision Privacy Notice describes the personal information we collect and process related to our CorVision Services. These supplement notices apply in addition to this Policy and are intended to provide additional information to users of the relevant Services. In the event of a conflict with this Policy, the supplemental notice will control with respect to the personal information covered by that supplemental notice.

2. Personal Information Collected

We collect personal information about you directly from you, automatically through the use of our Services, and from others (e.g., healthcare administrators or LTACH supervisors). The personal information we collect varies depending upon your use of our Services and our interactions with you.

Personal Information Collected Directly. We may collect the following personal information directly from you:

- **Communications and Interactions.** When you communicate or interact with us or our Services, including if you sign up for our newsletter, complete forms on our Site, contact our support team, interact with our social media pages, post a product review or testimonial, or otherwise engage with us or our sponsored content, we may collect your name, email address, phone number, or other similar identifiers, as well as your message, the nature of your inquiry and any other information you choose to provide.
- **Other Information.** We may also collect other information that you provide or submit to us.

Personal Information Collected Automatically. We may automatically collect or derive personal information related to your use of our Site, including through the use of cookies, pixel tags, and other similar technologies. This may include:

- **Device and Browsing Information.** When you use our Site, we may collect browser type, domain name, page views, access times, date/time stamps, operating system, language, device type, unique ID, Internet service provider, referring and exiting URLs, clickstream data, and other similar device and browsing information.
- **Activities and Usage.** We also may collect activity information related to your use of the Services, such as information about the links clicked, searches, features used, items viewed, time spent within the Site, your interactions with us within the Site, and other similar activity and usage information.

For more information about our use of cookies and other similar technologies, please see the [Cookies and Other Tracking Mechanisms](#) section below.

Personal Information Collected from Other Sources.

We may receive name and contact information from administrators and other users of our Services. For example, as further described in our CorVision Privacy Policy, users of our CorVision Services can designate recipients to remotely view CorVision display information. We may also receive name and business contact details for customers and prospective customers from third party partners and distributors.

3. How We May Use Personal Information

We may collect, use, disclose and otherwise process personal information for the following purposes:

- **Services and Support.** To enable our Services, communicate with you about your use of the Services, provide troubleshooting, technical support, and for similar support purposes, respond to your inquiries, fulfill your requests, and to otherwise run our day-to-day operations.
- **Analytics and Improvement.** To better understand how users access and use the Services, and for other research and analytical purposes, such as to evaluate, develop, and improve our Services and business operations, and for internal quality control and training purposes.
- **Communicating With You.** To respond to your questions, send you requested materials and newsletters, as well as information and materials regarding our Services and our offerings. We may also use this information to send administrative information to you, for example, information regarding the Services and changes to our terms and policies.
- **Marketing and Advertising.** For marketing, advertising, and promotional purposes. For example, to send you promotional information about our Services, including information about sales, discounts, and new offerings, as well any other information that you sign up to receive.
- **Security and Protection of Rights.** To protect the Services and our business operations, and to protect our rights or those of our stakeholders; to prevent and detect fraud, unauthorized activities and access, and other misuse; where we believe necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety or legal rights of any person or third party, or violations of our terms of use.
- **Compliance and Legal Process.** To comply with applicable legal or regulatory obligations, including as part of a judicial proceeding, to respond to a subpoena, warrant, court order, or other legal process, or as part of an investigation or request, whether formal or informal, from law enforcement or a governmental authority.

- **Auditing, Reporting, and Other Internal Operations.** To conduct financial, tax and accounting audits, audits and assessments of our operations, including our privacy, security and financial controls, as well as for risk and compliance purposes. We may also use personal information to maintain appropriate business records and enforce our policies and procedures.
- **General Business and Operational Support.** To assess and implement mergers, acquisitions, reorganizations, bankruptcies, and other business transactions such as financings, and to administer our business, accounting, auditing, compliance, recordkeeping, and legal functions.

4. Disclosures of Personal Information

We may disclose the personal information we collect for the purposes described above and as follows:

- **Clients.** Any information that we collect and process on behalf of a business client will be disclosed to the business client and otherwise shared as directed by that business client.
- **Service Providers.** We may share information with third-party service providers who help us operate our Services or provide other business and operational support to us, such as analytics providers, cloud storage providers, and marketing platforms.
- **Compliance and Legal Obligations.** We may disclose personal information to third parties to comply with our legal and compliance obligations and to respond to legal process. For example, we may disclose information in response to subpoenas, court orders, and other lawful requests by regulators and law enforcement, including responding to national security or law enforcement disclosure requirements. This may include regulators, government entities, and law enforcement as required by law or legal process. Additionally, it may include certain disclosures that we are required to make under applicable laws, such as the names of sweepstakes and contest winners.
- **Security and Protection of Rights.** We may disclose personal information where we believe it is necessary to protect the Services, our rights and property, or the rights, property and safety of others. For example, we may disclose personal information in order to (i) prevent, detect, investigate and respond to fraud, unauthorized activities and access, illegal activities, and misuse of the Services, (ii) situations involving potential threats to the health, safety, or legal rights of any person or third party, or (iii) enforce, and detect, investigate and take action in response to violations of, our <https://oforce.com/terms-conditions>. We may also disclose information, including personal information, related to litigation and other legal claims or proceedings in which we are involved, as well as for our internal accounting, auditing, compliance, recordkeeping, and legal functions.
- **In Support of Business Transfers.** If we, or our affiliates are, or may be acquired by, merged with, or invested in by another company, or if any of our assets are, or may be, transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may transfer the information we have collected from you to the other company. We may also share certain personal information as necessary prior to the

completion of such a transaction or corporate transactions such as financings or restructurings, to lenders, auditors, and third-party advisors, including attorneys and consultants, as part of due diligence or as necessary to plan for a transaction.

- **Aggregate and Deidentified Information.** Notwithstanding anything else in this Policy, we may use, disclose, and otherwise process aggregate and de-identified information related to our business and the Services with third parties for quality control, analytics, research, development, and other purposes.
- **Other Disclosures.** We may disclose personal information in other ways not described above, but will notify you and, if necessary, obtain your consent.

5. Cookies and Other Tracking Mechanisms

We may use cookies, pixels, local storage objects, log files, APIs, and other mechanisms on our Site to automatically collect browsing, activity, device, and similar information within our Site and to target advertising and content. Some of these are provided by third parties. For example:

- **Cookies:** Browser (or HTTP) cookies are alphanumeric identifiers that we transfer to your device's hard drive through your web browser for record-keeping purposes. We use these on our Site to, for example, make it easier for you to navigate our Site, enable a faster log-in process, support the security and performance of the Services, or allow us to track activity and usage data.
- **Pixels:** Pixels (sometime called web beacons, pixel tags, or clear GIFs) are tiny graphics with a unique identifier, similar in function to cookies. While cookies are stored locally on your device, pixel tags are embedded invisibly within web pages and online content. We may use these in connection with our Site to, for example, track the activities of users, help us manage content, and collect usage information. We may also use these in HTML e-mails we send, to help us track e-mail response rates, identify when our e-mails are viewed, and track whether our e-mails are forwarded.

In addition to cookies and pixels, we may also use other technologies (which may be provided by third parties), including embedded scripts, browser fingerprinting, eTags, plug-ins, mobile SDKs, APIs, and location detection and other recognition technologies, for similar purposes.

How We Use Cookies and other Technologies. We and our third-party providers use these to automatically collect user data and browsing, activity, device, and similar information within our Site (including our HTML emails). This information may, for example, help us to: analyze and understand how users access, use and interact with our Site and content; measure and deliver targeted advertising on third party sites and services; detect and remember user preferences and settings; personalize user experiences; identify and resolve bugs and errors; and evaluate, secure, optimize and improve the performance of our Site. We also use these to provide certain features and functionality within the Site (e.g., login, reCAPTCHA), enable third party services (e.g., social media features and chat functionality), protect against fraud, and misuse, and otherwise secure the Site (e.g., detect and prevent bots and other malicious activity). You have certain choices about the use of cookies and tracking technologies on our Site, as described below in this section.

Third-Party Analytics and Tools. We use third party tools, such as Google Analytics, which are operated by third party companies. These third-party analytics companies may collect usage data (using cookies, pixels, and similar tools) about our Site in order to provide us with reports and metrics that help us to evaluate usage of our Site and improve performance and user experiences. You can find more information about Google Analytics privacy practices [here](#); you can also download the Google Analytics Opt-out Browser Add-on to prevent your data from being used by Google Analytics [here](#).

Targeted Advertising. We work with third parties, such as ad networks, channel partners, mobile ad networks, analytics and measurement services and others (“third-party ad companies”) to personalize content on our Site, and to deliver and measure our targeted advertising and content on third-party sites and services. We may disclose or make available certain information to these third-party ad companies, such as IP address, location information, device ID, cookie and advertising IDs, and other identifiers, as well as browsing and activity information. This information may be used to deliver more relevant ads and content (on behalf of us and other third parties) across third party sites and online services, to evaluate the success of such ads and content, and to personalize content and experiences within our Site.

Manage Your Cookie Preferences. You can review or change your cookie preferences for our Site and opt-out of targeted advertising and third-party cookies, by clicking “Manage Consent” in the bottom of our Site to access our preferences page. You can opt-out of most types of cookies on our Site, other than those that are important to operate, secure and optimize our Site and related services. Your cookie settings are browser and device specific, which means that you need to set the preference for each browser and device you use to access our Site; in addition, if you delete or block cookies, you may need to reapply your preferences.

You may also be able to control how participating third-party ad companies use the information that they collect about your visits to our Site as well as to third party sites and services, in order to display more relevant targeted advertising to you. If you are in the U.S., you can obtain more information and opt out of receiving targeted ads from participating third-party ad networks at aboutads.info/choices (Digital Advertising Alliance). You may also download the DAA AppChoices tool to help control interest-based advertising on apps on your mobile device (<https://youradchoices.com/appchoices>).

6. Your Privacy Choices

Subject to certain limitations under applicable privacy laws, you may have the following rights regarding your personal information under privacy laws in your jurisdiction:

- **Access, Review, Update and Delete your personal information:** to access, review, update, and delete your personal information. To exercise one of these rights, please submit a request via our privacy request webform [here](#).
- **Opting Out.** You may also opt out of certain marketing and advertising from us:
 - *Emails and marketing communications:* If you no longer wish to receive marketing emails or other marketing communications from us, you may unsubscribe at any

time by clicking the “unsubscribe” link in the emails you receive from us. Please note that even if you opt out of receiving marketing communications from us, we may continue to send you non-promotional communications regarding your order, your account, other transactions with us, or notices consistent with our legal rights and obligations.

- *Targeted Advertising and Cookies:* You can opt out of certain third-party cookies and tracking technologies on our Site (i.e., via cookies and other automated technologies on our Site), by enabling Global Privacy Control (“GPC”) signals for your browser (find more about GPC [here](#)). If we recognize that your browser is transmitting GPC signals when you access our website, you will be opted out of sales and sharing via cookies and automated technologies on our Site. You can also opt out of these cookies using the preference manager for our site, which you can access by clicking the “Manage Consent” tab, which appears in the bottom right-site of our Site, and then clicking the “opt-out preferences” link. On the preferences page, scroll to Section 4.1 Manage Your Opt Out Preferences, and uncheck the boxes for Marketing cookies, which will turn OFF targeted advertising cookies. Your opt-out is browser and device specific. So, you should enable GPC or set your preference for each browser and device you use to access our Site. Keep in mind that even if you opt out, you may continue to receive generic or “contextual” ads from us and others.

California Residents. If you are a California resident, please be sure to review Section 12. California Privacy Notice below, for specific information about your California privacy rights and how to exercise them.

7. External Links and Features

Our Site may contain links to third-party websites or features or provide certain third-party connections or integrated services. Any access to and use of such linked websites, features, or third-party services is not governed by this Policy. We are not responsible for the information practices of such third parties, including their collection, use, and disclosure of your personal information. You should review the privacy policies and terms for any third parties before proceeding to those websites or using those third-party features or services.

8. Children’s Privacy

We do not knowingly collect personal information from minors under 18. If you are a parent or legal guardian and you believe we have collected your child’s information in violation of applicable law, please contact us using the contact information in the Contact Us section below.

9. Security

We have implemented safeguards intended to protect personal information from loss, misuse, unauthorized access, disclosure, alteration, or destruction. Please be aware that despite our efforts, no data security measures can guarantee security.

10. Changes to this Policy

This Policy is current as of the effective date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any updates to this Policy on this page. If we make material changes to how we collect, use, or disclose the personal information we have previously collected, we will endeavor to provide you with prior notice as required by applicable law, such as by emailing you or posting prominent notice on our website or within the Services.

11. Contact Us

If you have any questions or concerns regarding this Policy or our privacy practices, you may contact us at info@corventmedical.com.

12. California Privacy Notice

This section of the Policy provides additional information for California residents and describes our information practices pursuant to the California Consumer Privacy Act and, as amended, and its implementing regulations (collectively, the “CCPA”). Depending on how you interact or engage with us, we may provide you with other privacy notices with additional details about our privacy practices.

This section applies to “personal information” as defined in the CCPA, whether collected online or offline. This section does not address or apply to our handling of personal information that is exempt under the CCPA.

Categories of Personal Information That We Collect and Disclose. Our collection, use, and disclosure of personal information will vary depending upon the circumstances, such as the Services you access (e.g., the Site or our App) and your interactions with CorVent. The table below sets out, generally, the categories of personal information (as defined by the CCPA) that we may collect (and have collected in the prior twelve months) about California residents.

Categories	Description
Identifiers	Such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, and other government identifiers.
Categories of Personal Information Described in Cal. Civ. Code § 1798.80.	Records containing Personal Information, such as name, signature, photo, contact information, education and employment history, Social Security number and other government identifiers, financial or payment information, medical information.

Internet and Other Electronic Network Activity Information	Such as internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with an internet website or application, as well as physical and network access logs and other network activity information related to your use of any business device, network or other information resource.
Characteristics of Protected Classifications Under California and Federal Law	Such as race/ethnicity, gender, sex, veteran status, disability, and other characteristics of protected classifications under California or federal law. (Note: generally, this information is collected only a voluntary basis and/or where required by applicable law.)
Audio, Electronic, Visual, Thermal, or Similar Information	Audio, electronic, visual, or similar information, such as CCTV/video footage, photographs, call recordings, and other audio recording (e.g., recorded webinars).
Professional or Employment-related Information	Such as performance information, professional membership records, references, and other details provided by to us by a healthcare admin for your organization.
Education Information	Such as degrees earned, educational institutions attended, transcripts, training records and other information about your educational history or background that is not publicly available personally identifiable information as defined under the Family Educational Rights and Privacy Act.
Inferences and Profiling Information	Such as inferences drawn from the other personal information that we collect to create a profile about your preferences and characteristics.
Sensitive Personal Information	Such as: (a) Social Security number and other government identifiers; and (b) health or disability information (e.g., as necessary to provide reasonable accommodations to you if you attend our events).

Sources of Personal Information. In general, we may collect the categories of personal information identified in the table above directly from you, and from third parties. This may include:

- Our clients (hospitals, health care providers) and their administrators
- Our distributors and business partners
- Third-party platforms, ad companies, and analytics providers
- Operating systems and platforms
- Our vendors and service providers
- Publicly available information
- Our affiliates and subsidiaries
- Our suppliers and service providers

Purposes for Collecting and Processing. As described in more detail above under [Section 3. How We May Use Personal Information](#), in general, we collect, use, disclose and otherwise process the categories of personal information we collect (listed in the table above) for the following purposes:

- Services and Support
- Analytics and Improvement
- Communicating With You
- Marketing and Advertising
- Security and Protection of Rights
- Compliance and Legal Process
- Auditing, Reporting, and Other Internal Operations
- General Business and Operational Support

Disclosures of Personal Information. We may disclose the categories of personal information that we collect to service providers, contractors and others acting on our behalf, as well as to our subsidiaries and affiliates, for the purposes listed above. We also disclose relevant personal information to healthcare admins and customers. In addition, as further described in [Section 4. Disclosures of Personal Information](#), we may disclose the personal information that we collect to other third-party recipients (i) as directed or agreed to by you, (ii) where necessary to comply with applicable legal obligations, (iii) in response to legal process, (iv) in order to protect or defend our rights and the rights of others, and (v) in order to evaluate, plan or implement mergers, acquisitions or similar business transactions.

"Sales" and "Sharing." We do not "sell" or "share" any sensitive personal information, nor do we knowingly sell or share any personal information about consumers under sixteen years old. However, our Site uses cookies, pixels and other tracking technologies, which share Identifiers, Internet and other Electronic Network Activity Information, and Inferences and Profiling Information about Site visitors with third party data analytics providers and advertising and marketing providers, which may be considered "sales" or "sharing" under the CCPA.

Sensitive Personal Information. Notwithstanding any of the purposes described above, we do not use or disclose sensitive personal information (as defined by the CCPA) about California residents (including any residents that we know are under 16 years old) beyond the purposes authorized by the CCPA (pursuant to Cal Civ. Code § 1798.121 and § 7027(m) of the CCPA Regulations, Cal. Admin. Code, title 11, div. 6, ch. 1). Accordingly, we only use and disclose sensitive personal information about California residents as reasonably necessary and proportionate: (i) to perform our services requested by you; (ii) to help ensure security and integrity, including to prevent, detect, and investigate security incidents; (iii) to detect, prevent and respond to malicious, fraudulent, deceptive, or illegal conduct; (iv) to verify or maintain the quality and safety of our services; (v) for compliance with our legal obligations; (vi) to our service providers who perform services on our behalf; and (vii) for purposes other than inferring characteristics about you. As such, we do not process sensitive personal information in a manner for which your right to limit the use and disclosure of sensitive personal information applies.

Retention. We will retain your personal information as long as necessary for the purposes for which the personal information was collected and is used by us, as stated in this Privacy Policy. Further, to the extent permitted by law, we will retain and use your personal information as

necessary to comply with our legal obligations, resolve disputes, maintain appropriate business records, enforce our agreements, and protect and defend rights and safety.

California Residents' Rights. The CCPA grants California residents the following rights, in each case subject to certain exceptions:

- *Know/Access:* the right to know what personal information we have collected about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about you.
- *Correction:* the right to correct inaccuracies in your personal information.
- *Deletion:* the right to delete your personal information, subject to certain exceptions.
- *Opt-out:* the right to opt-out of the use of automated decision-making technologies (ADMT), if any, as well as to opt out of sales and sharing of your personal information.
- *Limit use or disclosure of sensitive personal information:* the right to limit the use or disclosure of sensitive personal information to those uses specifically authorized by the CCPA. However, as noted under "Sensitive Personal Information" above, we do not use or disclose sensitive personal information beyond the purposes specifically authorized by the CCPA.
- *Non-discrimination:* the right not to be retaliated against for exercising privacy rights conferred by the CCPA.

Exercising Your CCPA Rights to Know/Access, Correct, or Delete. If you are a California resident and would like to exercise one of these rights, you may do so via any of the methods described below:

- Email us at info@corventmedical.com
- Submit your request using our webform [here](#)

Verification. Before responding to your request, we must first verify your identity using the personal information you recently provided to us. You must provide us with your full name and email address. We will take steps to verify your request by matching the information provided by you with the information we have in our records. In some cases, we may request additional information in order to verify your identity, or where necessary to process your request. If we are unable to verify your identity after a good faith attempt, we may deny the request and, if so, will explain the basis for the denial.

Authorized Agents. You may designate someone as an authorized agent to submit requests and act on your behalf. Authorized agents will be required to provide proof of their authorization in their first communication with us, and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent.

Request to Opt Out of Sales and Sharing. If you would like to opt out of sales and sharing (i.e., via cookies and other automated technologies on our Site), you can enable Global Privacy Control (“GPC”) signals for your browser (find more about GPC [here](#)). If we recognize that your browser is transmitting GPC signals when you access our website, you will be opted out of ‘sales’ and ‘sharing’ cookies and automated technologies on our Site. You can also opt out of sales and sharing cookies using the preference manager for our site, which you can access by clicking the “Manage Consent” tab, which appears in the bottom right-site of our Site, and clicking the “opt-out preferences” link. On the preferences page, scroll to Section 4.1 Manage Your Opt Out Preferences, and uncheck the boxes for both Marketing and Statistics cookies, which will turn OFF sharing/sales cookies. Your opt-out is browser and device specific. So, you should enable GPC or set your preference for each browser and device you use to access our Site.

California Shine the Light Law. Under California’s “Shine the Light” law (Cal. Civ. Code § 1798.83), California residents who provide us certain personal information are entitled to request and obtain from us, free of charge, information about the personal information (if any) we have shared with third parties for their own direct marketing use. Such requests may be made once per calendar year for information about any relevant third-party sharing in the prior calendar year. To submit a “Shine the Light” request, email us at info@corventmedical.com, and include with your request a current California address and your attestation that you are a California resident.

More Information. For more information about our privacy practices, you may contact us at info@corventmedical.com.