

Virtual Smart Health Privacy Policy

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Virtual Smart Health (“Virtual Smart Health”, “we”, “our” or “us”) is committed to protecting the privacy of those who entrust us with their personal information. “Personal information” means any information pertaining to an identified or identifiable individual and may include, for example, email addresses, contact details and any similar information provided to us in the course of our business operations. Personal information that is de-identified or anonymized is not considered personal information. This Privacy Policy details our commitment to your privacy.

1. What does this Privacy Policy cover?

This Privacy Policy applies to our websites, mobile applications, and other online and mobile services, that link to or post this Privacy Notice (collectively, the "Services"), and explains how we collect, use, and disclose information through the Services.

By using or visiting the Services or otherwise interacting with us, you are accepting the practices described in this Privacy Policy. We recommend that you review this Privacy Policy periodically, as it may be updated from time-to-time.

2. What information does Virtual Smart Health collect, and how is it used and shared?

We explain here what categories of personal information we collect, where we get it from, and with whom we share it:

Category of Personal Information Collected	Source	Purpose for Collection	Categories of Recipients
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<p>Contact information: such as name, address, email address, phone number, and bank account information.</p> <p>Access frequency, Logs, Likes/ dislikes behaviors, Comments & behaviors, Profile data.</p>	<p>Users of our Services. https://clinicaltrials.gov/ https://pubmed.ncbi.nlm.nih.gov/ And other public sources.</p>	<p>To allow our users to access various aspects of our Services, to tune the content on our Services, to communicate with and respond to our users about our Services, or to meet legal obligations, and provide you with the products, promotions, services, newsletters, and information you request.</p>	<p>We may share this information with our affiliates and select marketing or other service providers and partners that perform services for us (such as for hosting the Services, or providing other customer service functions).</p>
<p>Browsing information: such as your IP address, MAC address or other device identifier, your device type or mobile carrier, standard server log information, the kind of browser or computer you use, pages and content that you visit on our Services, what you click on, the state and country from which you access the Services, date and time of your visit, and web pages you linked to our Services from.</p>	<p>Our Services and your interactions with the Services, including through the use of cookies and other tracking technologies explained further below.</p>	<p>To evaluate usage of the Services and improve performance; to protect the security and integrity of the Services and our business, such as preventing fraud, hacking, and other criminal activity or to meet legal obligations.</p>	<p>Our service providers who help us with fraud protection and service analytics.</p>
<p>Recruitment and Job Application information: such as name, address, and phone number, or information on a resume or a curriculum vitae.</p>	<p>Job applicants.</p>	<p>To consider you for an employment position or to respond to an employment inquiry.</p>	<p>Our service providers who help us with employee matters or job fulfillment.</p>

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Virtual Smart Health will only use personal information for the purposes identified in this Privacy Policy. In some jurisdictions, individuals may have the right to withdraw consent from certain uses. If you reside in such jurisdictions, you may have additional rights that are detailed in sections 8 and 9. We may use service providers to provide some of our services. In all cases, any service providers will be contractually limited in the way they may use personal information maintained by Virtual Smart Health, including requirements that such information be maintained in a confidential and secure manner.

In Connection with Business Transfers: In the event that a division, a service, or all of Virtual Smart Health is bought, sold or otherwise transferred, or is in the process of a potential transaction, personal information will likely be shared for evaluation purposes and included among the transferred business assets, subject to client contractual requirements and applicable law.

To Comply with Laws: Virtual Smart Health may also disclose specific personal information when such disclosure appears necessary to comply with applicable law, a subpoena in the course of managing a dispute, governmental inquiry or other litigation process. We may also disclose personal information to our accountants, auditors, agents, lawyers and other advisors in connection with the enforcement or protection of our legal rights or to protect the interests or safety of our clients, our clients' customers or employees or others, in accordance with or as authorized by law.

3. What are cookies and how do we use them and other technologies?

The Services use certain technologies such as cookies, beacons, tags and scripts. A cookie is a small piece of information that a website, online application, or email may save to your browser or your computer's hard drive for use in subsequent visits to the website or online application. The "help" portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive new cookies or how to disable cookies altogether. If you reject cookies, you may not be able to participate in certain activities or receive a promotion tailored to you. Virtual Smart Health does not control and does not guarantee the effectiveness of browser-based tools for managing cookies.

Virtual Smart Health may use Google Analytics or other analytics providers to evaluate use of the Services for our internal purposes such as evaluating usages of the Services. To learn how Google Analytics collects and processes data, please visit: "How Google uses data when you use our partners' sites or apps" located at www.google.com/policies/privacy/partners.

Any and all personal information collected on the Services will be kept strictly confidential and will not be sold, reused, rented, disclosed, or loaned to third parties, except as otherwise described in this Privacy Policy.

Do Not Track (DNT): This is a privacy preference that users can set in some web browsers, allowing users to opt out of tracking by websites and online services. At the present time, the World Wide Web Consortium, or W3C, has not yet established universal standards for recognizable DNT signals, and therefore Virtual Smart Health and the Services do not recognize DNT.

4. How does Virtual Smart Health protect Personal Information?

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Where applicable, Virtual Smart Health uses reasonable and appropriate technology in connection with the Services to help protect personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction. However, you should know that no website operator, including Virtual Smart Health, can fully eliminate security risks associated with personal information. While Virtual Smart Health has endeavored to create a secure and reliable website for users, the confidentiality of any communication or material transmitted to/from the Services or via e-mail cannot be guaranteed.

5. How long does Virtual Smart Health retain my Personal Information?

Personal information that we collect, access or process will be retained only as long as necessary for the fulfilment of the purposes for which it was collected, unless otherwise authorized or required by law. Personal information that is no longer required to fulfil the identified purposes will be destroyed, erased or de-identified.

6. What are my choices concerning my personal information?

Virtual Smart Health may, subject to applicable laws, use personal information from users of our Services to contact them about our Services, including to provide them with information on additional products or services from Virtual Smart Health that may be of interest to them. You may exercise choices regarding these communications as follows:

- Mail marketing, Telephone marketing, Surveys and Quality control communications. You may decide that you prefer Virtual Smart Health not to use your personal information to promote new and/or additional products and/or services which may be of interest to you and refuse that we contact you by mail or telephone for marketing purposes or by email or telephone for quality control purposes. If this is the case, you may advise us by contacting us using the information detailed in the Contacting Us section below.

- Emails/Commercial Electronic Communications. You can always limit the communications that Virtual Smart Health sends to you. To opt-out of commercial emails, simply click the link labeled “unsubscribe” or “opt-out” at the bottom of any commercial electronic communication we send you. Please note that even if you opt-out of promotional communications, we may still need to contact you with important information about your account.

7. What is Virtual Smart Health’s policy on children’s privacy?

Under Age 13

Our Services are not directed toward children and we do not knowingly solicit or collect personal information online from children under the age of 13 without prior verifiable parental consent. If Virtual Smart Health learns that a child under the age of 13 has submitted personal information online without parental consent, we will take all reasonable measures to delete such information from our databases and to not use such information for any purpose (except where necessary to protect the safety of the child or others as required or allowed by law). If you become aware of any personal information we have collected from children under age 13 without verifiable parental consent, please contact us using the information detailed in the Contacting Us section below.

Under Age 18

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Minors under 18 years of age may have the personal information that they have provided to Virtual Smart Health through the Services deleted by sending an email to the email address in the [Contacting Us](#) section below requesting deletion. Please note that, while we make reasonable efforts to comply with such requests, deletion of your personal information does not ensure complete and comprehensive removal of that data from all systems.

8. Access, Objection, Correction and Deletion

In certain jurisdictions, you may have the right to obtain confirmation as to whether your personal information is being processed, information about the purposes of that processing, and information about the recipients to whom your personal data have been or will be disclosed. You may also have the right to receive a copy of the personal data you have provided and/or request its deletion.

9. Your California Privacy Rights

California law permits our customers who are California residents to request certain information about our disclosure of personal information to third parties for their own direct marketing purposes during the preceding calendar year. This request is free and may be made once a year. Currently, however, we do not disclose personal information to third parties for their own direct marketing. Virtual Smart Health is not required to comply with the California Consumer Privacy Act. However, we are happy to answer questions that California residents may have about our privacy practices and can be reached as described below, in the [Contacting Us](#) section.

10. Cross-border transfer of personal information

In some cases, personal information that we process of users located in various countries, including in Canada, the EU and Switzerland or relative to queries or visitors to the Services may be transferred to the United States or other countries that may not have data privacy laws that provide the same protection as the countries where you reside. You understand and expressly agree that your personal information may therefore be transferred, processed and stored outside of your country of residence, and therefore may be available to government authorities under lawful orders and laws applicable in such foreign jurisdictions.

11. Right to Lodge Complaints

We are transparent about the ways in which we collect and use personal information, and welcome your questions and concerns. If you have any concern or complaint about the way we handle your personal information, please contact us as described below. To the extent you believe we have not addressed your concerns or otherwise choose to do so, you have the right to lodge a complaint with a supervisory authority in the country where you reside and/or in the United States. For information on how you can file a privacy complaint with the Federal Trade Commission, please visit:

<https://www.ftccomplaintassistant.gov/>.

12. Changes to our Privacy Policy

Virtual Smart Health will review and update its Privacy Policy as required to keep current with rules and regulations, new technologies and security standards. We will post those changes on the Services and/or

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update the Privacy Policy modification date below. In certain cases and if the changes are material, we will provide written notice to users directly by email or otherwise.

This policy is effective March 1st, 2021.

13. Links to Third Party Websites

As a convenience to our users, the Services may contain links to other sites that we believe may offer useful information. As stated in more detail in the Terms of Use for our Services, the privacy policies, terms of usage and other conditions of use posted on those sites, and not the policies and procedures we described here, apply to those sites. Your linking to any other websites is at your own risk, and you are responsible for learning about and complying with the terms of usage and other conditions posted on those websites even if our Services refer you to such websites.

14. Contacting Us

If there are any questions regarding this Privacy Policy or to request a copy of this Privacy Policy in another format you may contact us using the information below.

Virtual Smart Health Inc.

Rm #270, 125 University Avenue, Palo Alto, CA 94301, USA

support@v-smart.health