

## Privacy Notice

Welcome and thank you for visiting. Newleaf ai, Inc (“we”, “our”, or “us”) provides this Privacy Notice to explain our privacy and information practices for our websites that link to this Privacy Notice, and our social media pages and events (the “services”). This Privacy Notice describes the types of personal data we collect, how that personal data is used and disclosed, and your rights and choices regarding your personal data.

This Privacy Notice does not apply to the extent we process personal data in the role of a processor or service provider on behalf of our customers and our customer’s patients. Please directly contact the relevant controller for more information about their privacy practices. If you have any further questions, please contact [privacy@newleaf.ai](mailto:privacy@newleaf.ai).

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### Personal Data We Collect

Use of Personal Data

Sharing of Personal Data

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1. **PERSONAL DATA WE COLLECT.** “Personal data” is defined as any information that can identify, relate to, describe, be associated with, or be reasonably capable of being associated with a particular individual or household. Personal data does not include anonymous, de-identified, or non-personal data. We collect the following types of personal data:

- **Personal Data You Provide to Us.** We collect personal data that you provide directly for a business or commercial purpose, such as when you access our website, enter into a contract, establish a user account with us, register for an event or our services, through social media outlets, in connection with a potential business relationship with us, or by giving us your contact information at various events or online. This personal data may include your name, business name, email and physical address, telephone number, activity and performance information, payment information, and when necessary, government ID or other tax related information.
- **What We Get From Other Third Parties, Affiliates, and Subsidiaries.** In certain circumstances, we collect personal data about you from certain third party partners, affiliates, and subsidiaries for a business and commercial purpose. We may combine this information with personal data provided by you. This helps us update, expand, and analyze our records, identify new customers, and create more tailored advertising to provide services that may be of interest to you. This personal data may include your contact information, professional or social media information, commercial information, and inferences and preferences related to your behavior.
- **What We Automatically Collect from You.** We collect the following information for a business and commercial purpose from you when you use the services:
  - **General System Information.** Through your use of the services, we collect certain hardware and software information from you and your device such as your device id, device type, network information, time zone, operating system version, order printing information, device id location, IP address, and other general system information.
  - **Cookies.** We use cookies, web beacons, and similar technologies when you use our services. For more information, including how to manage your cookie preferences, see our Cookies Policy described below.

2. **USE OF PERSONAL DATA.** Our primary purpose in collecting personal data is to facilitate and provide the services or information that you have selected to receive. Where required by law, we obtain your consent to use and process your personal data for these purposes. Otherwise, we rely on another authorized legal basis (including but not limited to the performance of a contract or legitimate interest) to collect and process your personal data. We use personal data for the following purposes:

- To Provide Your Requested Services. Our primary business and commercial purpose in collecting personal data is to facilitate and provide the services or information that you have selected to receive through either your consent or through entering a contract with us. For example, if you provide personal data to us through our website, we will use your data to respond to the request. We also use it to send administrative information, such as notices related to products and services, or to policy changes.
- To Manage User Registrations. If you have registered for an account with us, we process your personal data for a business purpose by managing your user account for the purpose of performing our contract with you according to applicable terms of service.
- To Contact You. With your consent or, in some cases for our legitimate interest, we use your personal data for our business and commercial purpose to contact you for marketing purposes, including telemarketing calls, and to send marketing emails that we believe may be of interest to you, such as product announcements, newsletters, informational materials, and details on upcoming events.
- To Manage Payments. If you have provided financial information to us, we process your personal data to verify that information and to collect payments to the extent that doing so is necessary for our business purpose to complete a transaction and perform our contract with you.
- To Plan, Manage, and Facilitate Events. With your consent, we use your personal data for our business and commercial purpose in event planning and management, including registration, billing, and connecting with other event attendees, or to contact you further about relevant products and services.
- For Security, Legal Obligations, and Investigations. We use your personal data for our business purpose and legitimate interest to prevent, detect, mitigate, and investigate potential security issues, as well as fraudulent or illegal activity. We may also use your personal data for a legitimate interest to comply with and enforce applicable legal requirements or to protect our interests or the interests of other third parties. This also includes sharing personal data with others in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company.
- For Improvements to Our Services and Products. We use your personal data for our business and commercial purpose and legitimate interest in connection with our products and services to diagnose technical problems, track and analyze usage, and make updates or improvements. For example, we may use your comments to improve or help guide future enhancements to our products and services.
- To Personalize Your Experience. We may also use your personal data for our business and commercial purpose and our legitimate interest to personalize your experience on our websites. We and/or our services providers use website tracking technologies to display products or features that are tailored to your interests and to present advertising on other sites. For more information on these technologies see our Cookies Policy linked below.

3. **SHARING OF PERSONAL DATA.**

- Affiliates and Service Providers. We share personal data with our affiliates and like most businesses, we also share personal data with third-party service providers or vendors contracted to provide services on our behalf. Our service providers assist us by handling tasks such as IT services, data management, email distribution, or information analytics.
- Advertisers. We may share personal data with our advertisers. Our advertisers may use your information to display advertisements to you through the services and advertisements for us on third party websites.
- Law Enforcement. We may share personal data with law enforcement agencies if we reasonably believe unlawful activities have occurred or the personal data may aid in an ongoing investigation.

We may also share personal data with law enforcement agencies if we determine, in our sole judgment, that you have violated our agreements or policies or that the release of your personal data may protect the rights, property, interests, or safety of us, our affiliates or any other third party.

- **Legal Processes.** We may share personal data as required by, or permitted by, law, whether in response to subpoenas, court orders, other legal processes, or as we believe is necessary to exercise our legal rights, including defending against legal claims that have been or might be brought against us.
- **Business Transfers.** Your personal data may be transferred to a third party as a part of a potential sale, merger, reorganization or other similar transaction. In accordance with applicable laws, we will use reasonable efforts to notify you of any transfer of personal data to an unaffiliated third party.
- **Consent.** With your consent, we may disclose personal data about you to certain third parties.

#### 4. DATA PROTECTION RIGHTS.

- **Individual Rights.** Subject to applicable privacy laws, you may have certain legal rights over the personal data we hold about you. These rights may include the right to access and to obtain a copy of your personal data processed by us, the right to restrict (including any withdrawal or objection rights) the processing of your personal data, or the right to access, correct, delete your personal data. However, please note that such rights are not absolute. They do not always apply and exemptions may be applicable. In response to any such request, you may be asked to verify your identity and/or provide information that helps us to better understand your request. If we are unable to comply with your request, we will explain why.
- **Exercise of Such Rights.** To exercise your individual rights, you may send an email to [privacy@newleaf.ai](mailto:privacy@newleaf.ai). If you are not satisfied with how we process your personal data, please let us know and we will take reasonable steps to investigate your concern. If you are not satisfied with our response, you have the right to make a complaint to the data protection authority in the jurisdiction where you live or work, or in the place where you think an issue in relation to your data has arisen. The contact details of each Data Protection Authority can be found at the following website: [https://www.edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://www.edpb.europa.eu/about-edpb/about-edpb/members_en) and <https://ico.org.uk/global/contact-us/> (for the United Kingdom).

5. **DATA TRANSFER.** Your personal data may be stored and processed in the United States and in any other country where we or our affiliates, subsidiaries, or third-party service providers maintain facilities or personnel. When you provide personal data to us, we may process and transfer your data within the United States and around the world. We follow applicable data protection laws when transferring personal data, including EU standard contractual clauses. Please contact us at [privacy@newleaf.ai](mailto:privacy@newleaf.ai) if you have any questions.
6. **DATA RETENTION.** We will retain your personal data for as long as legally permitted in light of the purpose(s) for which it was obtained and as outlined in this Privacy Notice. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you and provide the services to you; (ii) whether there is a legal obligation to which we are subject; or (iii) whether retention is advisable in light of our legal position.
7. **SECURITY.** We have technical and physical safeguards in place to help protect your personal data. However, no method of storage or transmission is 100% secure. We therefore urge you to exercise caution when conveying any personal data over the Internet. As when disclosing any information on the Internet, you should remain mindful that such information might be accessible by the public and, consequently, may be collected and used by others without your consent. You should also recognize that your use of the Internet and any other means of communication with us is solely at your own risk.
8. **ADDITIONAL TERMS.**

- This Privacy Notice does not apply to websites or applications offered by other organizations or individuals that may be displayed as content on our website, including point of sale systems or

any delivery platforms. We encourage you to read the Privacy Notice of any third-party website or applications before transmitting personal data.

- The services are not directed to individuals under the age of 16 and we do not knowingly collect personal data from individuals under the age of 16.
- We reserve the right, at any time, to modify this Privacy Notice. You should review this Privacy Notice periodically so that you keep up to date on our most current policies and practices. We will note the effective date of the latest version of our Privacy Notice at the end of this Privacy Notice.

9. **COMMUNICATIONS.** If you have any additional questions or concerns about our Privacy Notice or any other privacy or security issue, please contact us at:

Attn: Legal & Compliance

[Privacy@newleaf.ai](mailto:Privacy@newleaf.ai)

If we need, or are required, to contact you concerning any event that involves information about you, we may do so by email, telephone, mail, or as otherwise required by law.

10. **STATE SPECIFIC DISCLOSURES.**

- **State Privacy Laws** This section contains terms that reflect our commitment to comply with the California Consumer Privacy Act of 2018, as amended (the “CCPA”) and other US state privacy laws (together with the CCPA, “State Privacy Laws”). For the purposes of this section, “personal data” is defined as any information that can identify, relate to, describe, be associated with, or be reasonably capable of being associated with a particular individual or household.

- **Information we collect, use, and disclose.** We have collected the following categories of personal data from consumers within the last twelve (12) months:

- a) Identifiers – Such as the personal data you provide us and the personal data that we receive from third parties in the form of your name, business name, email, address, and telephone number.
- b) Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) – Such as the personal data you provide us related to your payment details, signature, address, phone number, or other contact information.
- c) Commercial Information – Such as the personal data you provide us, the information we automatically collect from you, and information we receive from third parties. This personal data may be in the form of your contact information, cookies, and certain professional or social media information.
- d) Internet or Other Similar Network Activity – Such as the personal data we automatically collect in the form of cookies and general system information as well as other personal data collected from third parties including professional and social media information.
- e) Inferences – We may draw inferences through the personal data you provide us, the information we automatically collect from you, and the information we receive from third parties.

We have disclosed to service providers and to third parties for a business purpose items a to e. We have collected and used for a business purpose items a to e and items a to e for a commercial purpose. Please visit the *Personal Data We Collect* and *Sharing of Personal Data* sections of the Privacy Notice for more information on what personal data we collect and disclose. Please visit the section on *Use of Personal Data* for additional information on how we use personal data.

- **Your rights and choices.** With exceptions, certain State Privacy Laws may provide you with specific rights regarding their personal data. This section describes the rights that you may have under applicable State Privacy Laws.
  - f) Access to information and data portability rights. Certain State Privacy Laws provide consumers with the right to request a business disclose what personal data (and the categories) it collects, uses, discloses, and sells. Once we receive and confirm your verifiable consumer request, we will disclose to you the specific pieces of personal data we have collected from you. In that disclosure, you will also receive information that describes the following:
    - The categories of personal data that we have collected in the preceding 12 months
    - The categories of sources from which the personal data is collected
    - The categories of personal data that we have disclosed for a business purpose
    - The categories of third parties to whom the personal data was disclosed for a business purpose
    - The business or commercial purpose for collecting personal data
  - g) Deletion request rights. Certain State Privacy Laws provide you with the right to request that we delete all of the personal data that we collected and retained from you, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal data from our records, unless an exception applies.
  - h) Data correction rights. Certain State Privacy Laws may provide you with the right to correct inaccuracies in your personal data, taking into account the nature of the personal data and the purposes of the processing of the personal data.
  - i) Exercising your rights. To exercise your rights, please visit the section above on *Your Data Protection Rights*. In order for us to honor your request, we must verify your identity. In your request, please provide us with your email address and name. We will then send you a verification email for you to respond to. Once verified, we will confirm receipt of the request within 10 days and provide information on how the business will process the request. We endeavor to respond to verifiable consumer requests within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. You may only make a verifiable consumer request for your personal data twice within a 12-month period. The response we provide will also explain the reasons we cannot comply with a request, if applicable. We will select a format to provide your personal data that is readily usable. Please note that we cannot respond to your request or provide you with personal data if we cannot verify your identity or your authority to make the request and confirm the personal data that relates to you. Only you, or a person you authorized in writing or registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal data. You may also make a verifiable consumer request on behalf of your minor.
  - j) Non-discrimination and financial incentives. We will not discriminate against you for exercising any of your State Privacy Law rights. In addition, the services we provide may include the implementation of a loyalty program and

other services that are operated by the various merchants but intended to provide benefits to you. Please refer to the merchant's terms and/or privacy notice for more information.

- k) **Profiling**. Presently, we do not profile based on applicable State Privacy Laws in furtherance of decisions that produce legal or similarly significant impact on consumers in scope of applicable State Privacy Laws.
- l) **Deidentified personal data**. In certain circumstances, we may process personal data to create deidentified information that can no longer reasonably be used to infer information about, or otherwise be linked to, a particular individual or household. In addition, where required by State Privacy Laws, we will maintain the use of the deidentified information in deidentified form and not attempt to reidentify the information.
  - **Sale of personal data**. We have not sold (as defined under the CCPA) any personal data of any consumers (including any consumers under 16 years old) to any third parties in the preceding 12 months. We do not “sell” personal data under the traditional sense of the word. However, we use advertising cookies with your consent.
  - **Sensitive personal data**. Depending on the service provided, sensitive forms of personal data may include (i) information that may be interpreted to be “health data” under State Privacy Laws to the extent you voluntarily include allergy or dietary restrictions), or (ii) account login details needed in order to sign up for a loyalty program or user account.
- **Shine the Light**. Under California Civil Code sections 1798.83-1798.84, California residents who have an established business relationship with us are entitled to ask us for a notice describing what categories of personal data we share with third parties for their direct marketing purposes. This notice will identify the categories of information shared with third parties and will include a list of the third parties with which it is shared, along with their names and addresses. If you are a California resident and would like a copy of this notice, please submit a written request to us at the addresses listed below.
- **Do not track**. Some web browsers and devices permit you to broadcast a preference that you not be “tracked” online. At this time, we do not modify your experience based upon whether such a signal is broadcast.

*Effective as of 10/18/24*

*Last Revised 10/18/24*

## **Cookies Policy**

This Cookies Policy describes how Newleaf ai (“we”, “us” and/or “our”) uses cookies and similar technologies to collect and store information when you visit, use or interact with our website, products, and services. For more information about our privacy practices as a data controller, review our Privacy Notice above.

### **Cookies and other similar technologies**

We use technologies such as web beacons, pixels, tags, and JavaScript, alone or in conjunction with cookies, to gather information about the use of our websites and how people interact with our emails. When you visit our websites, we, or an authorized third party, may place a cookie on your device that collects information, including personal data, about your online activities over time and across different sites. Cookies allow us to track use, infer browsing preferences, and improve and customize your browsing experience.

We also use web beacons and pixels on our websites and in emails. For example, we may place a pixel in marketing emails that notify us when you click on a link in the email. We use these technologies to operate and improve our websites and marketing emails.

The following describes how we use different categories of cookies and similar technologies and your options for managing the data collection settings of these technologies:

- **Strictly necessary:** These cookies are necessary to operate our services. You can set your browser to block or alert you about these cookies, but our services will not work properly without these cookies.
- **Analytics:** These cookies collect information in an anonymous manner about how visitors use our services and how our services perform. These cookies allow us to recognize and count the number of visitors and help us understand which pages are the most popular and where visitors spend most of their time.
- **Personalization:** These cookies enable the services to provide enhanced functionality and personalization, such as remembering choices you make or information you provide, what region you are in, your login information, or the pages you have viewed. These may be set by us or by third-party providers whose services we have added to our pages. If you do not allow these cookies then some or all of these services may not function properly.
- **Marketing:** These cookies allow us and our advertisers to deliver advertisements that are relevant to you and your interests. They may be used by us and our advertisers to build a profile of your interests and show you relevant advertisements on other sites. These cookies may track whether you clicked on an advertisement in order to limit the number of times you see a particular advertisement and help us understand the efficacy of our advertising campaigns. If you do not allow these cookies, you will experience less targeted advertising.

### **Disabling, deleting, or opting out of cookies**

Before using our website you will be asked to consent to the use of certain cookies. You can disable and/or delete cookies at any time using the tools available to you in your particular web browser(s) or otherwise change your preferences by clicking here. For more information about the tools available for your particular browser, please visit the relevant support and information pages for your particular browser via, for example, the following websites:

- Chrome: <https://support.google.com>
- Explorer/Edge: <https://support.microsoft.com/> <https://support.microsoft.com/>
- Safari: <https://support.apple.com/>
- Firefox: <https://support.mozilla.org>
- Opera: <https://help.opera.com/>

If you disable, delete or otherwise have opted-out of cookies, please note that you may not be able to use the full functionality of our website, products and/or services. In particular, you may have limited access, features and/or functionality. Please also note that disabling cookies will not prevent you from potentially receiving generic, untargeted advertising.

### **Contact Us**

Attn: Legal & Compliance  
[privacy@newleaf.ai](mailto:privacy@newleaf.ai)

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