

ONDUO PRIVACY POLICY

Last Modified: June 1, 2021

Prior Version of Privacy Policy:

IF YOU ARE EXPERIENCING A MEDICAL EMERGENCY, CALL 911 IMMEDIATELY.

PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING OUR SERVICES, OUR WEBSITE, OR OUR MOBILE APPLICATION. CALIFORNIA RESIDENTS HAVE ADDITIONAL RIGHTS, PLEASE VISIT SECTION IX OF THE PRIVACY POLICY.

IMPORTANT NOTE – Our Notice of Privacy Practices is a separate document that governs how we use and disclose your health information in connection with the Health Care Services in accordance with the Health Insurance Portability and Accountability Act (“HIPAA”). The Notice of Privacy Practices governs our use of your “protected health information” (as defined under HIPAA) and supplements this Privacy Policy.

I. INTRODUCTION

Onduo LLC, including certain affiliated professional entities, (collectively, “Onduo”, “we”, “our”, or “us”) aims to help people with certain chronic conditions live full, healthy lives by developing comprehensive solutions that combine devices, software, non-clinical health coaching, telemedicine, and other professional care to enable value-oriented and consumer-focused disease management, helping patients and members of their care team better understand, coordinate, and manage the care process.

This Privacy Policy describes the types of information Onduo may collect from you or that you may provide when you use our platform, the Onduo website (“website”), or the Onduo mobile application (“mobile app” and collectively the “Service”). This Privacy Policy also describes our practices for collecting, using, maintaining, protecting, and disclosing that information. This Privacy Policy is incorporated into our Terms of Use. Capitalized terms in this Privacy Policy that are defined here have the meanings assigned to them in the Terms of Use.

By accessing or using the Service, you acknowledge that you have read, understood, and agreed to be legally bound by and comply with this Privacy Policy and our Terms of Use. If any term in this Privacy Policy is unacceptable to you, please do not use the Service or provide any Personal Information.

This Privacy Policy may change from time to time (see Section X “Revisions to Our Privacy” Policy below) and your use of the Service after we make changes is deemed to be acceptance of those changes, so please check this Privacy Policy periodically for updates.

This Privacy Policy does not apply to information collected by any third party, including through any application or content (including advertising) that may link to, be embedded on, or otherwise be accessible from or on the Service. Also, you may be subject to different privacy policies or terms of service for other websites or applications.

In this Privacy Policy, “user” or “you” means any individual or enterprise using the Service, whether as the customer purchasing the Service or an authorized user of the Service.

Onduo is committed to protecting the privacy of your Personal Information. We provide this Privacy Policy to explain the type of information we collect and to inform you of the specific practices and guidelines that protect the security and confidentiality of Personal Information. When we combine or otherwise include your Personal Information collected under this Privacy Policy in your patient health record, such information will be treated as “protected health information” and subject to our Notice of Privacy Practices.

II. INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

Information About You and Your Health Care Treatment and Payment

We collect certain types of information from and about users of our Service, including:

- Information by which you may be personally identified, such as name, date of birth, email address, information related to your eligibility (e.g., insurance member ID), account information (e.g., username and password), or any other information collected in connection with your use of the Service that is defined as Personal Information under applicable law.
- We also collect health-related clinical and patient information in connection with your subscription to the Service. This may include health information to initiate the Services such as clinical history and condition, vital sign measures, blood pressure, mental state, food intake, activity patterns, prescription history, laboratory information, mental health data, and any other information exchanged in emails, chats, or calls between you and Onduo or your care providers and Onduo. This can include information to process and respond to your inquiries related to requests for treatment, payment, customer service, and when you provide feedback on the Service. We may receive this information directly or indirectly from third parties that we work with to provide our Services, including, without limitation, Surescripts.
- Information about your Internet connection, the equipment you use to access our Service, and usage details.
- Information about you that does not identify you individually, such as whether you are a current user, product interests, location or demographics, or information related to your inquiry or request.
- Any other information we specifically request.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through and use the Service (e.g., usage details, IP address, and information collected through cookies, web beacons, and other tracking technologies).
- From third-party intermediaries, for example, the physicians, medical professionals, laboratories, and pharmacies with whom we partner to provide you with services.

Information You Give to Us

The information we collect on or through our Service may include:

- Information that we collect when you browse our website or download the mobile app. Even without creating an account or enrolling in our Service, we still collect certain information from you including your Internet connection, the equipment you use to access our Service, and usage details.
- Information that you provide in connection with your use of the Service, including information provided when you enroll, sign in, or register for an account for the Service or for services provided by one of our affiliates or through communications with you about the Service or as a result of any healthcare services you receive. For example, you may upload photos and videos to be reviewed in connection with the healthcare services.
- Information to process or respond to your inquiries related to requests for treatment, payment, customer service; and when you provide feedback about our Service, including payment processing information that may include billing information, such as a name, address, email address, and payment card information. When you provide or update your payment processing information, we transmit your payment via a secure connection to a third-party credit card processor. Onduo does not collect your full credit card details except to provide that information to the third-party payment processor. Onduo does not store your credit card detail.
- Records and copies of your correspondence (including email addresses) if you contact us, such as when you report an issue with our Service or other services.
- Your search queries on our website and mobile application.

Automated Information We Collect About You

As you navigate through, interact, and use our Service, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- **Details of referring websites (URL).** We may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).
- **Usage Details.** When you access and use the Service, we automatically collect certain details of your access to and use of the website and mobile app, including traffic data, location data, logs, search history and content you visited, date and time of your visit; general (coarse) location data; website (such as google.com or bing.com) and website referral source (such as email notice or social media site) that connected you to the Service; and other communication data and the resources that you access and use on or through the website or mobile app.
- **Device Information.** We collect information about your mobile device and internet connection, including the device's unique device identifier, IP address, operating system, browser type, mobile network information, and the device's telephone number.
- **Location Information.** Our mobile app may collect general (coarse) location information (information that describes the location of a user or device with the same or greater resolution as a latitude and longitude with three or more decimal places) about your device.
- We may collect the following types of information about your visit to our website including: the domain from which you access the Internet.

The information we collect automatically includes statistical data and we may associate it with Personal Information you provide to us or that we collect in other ways or receive from third parties. It helps us to improve our Service and deliver a better and more personalized service, including by enabling us to:

- Estimate how individuals access and use our Service;
- Store information about your preferences;
- Speed up your searches;
- Recognize you when you return to and use our Service;
- Identify user preferences and use patterns on our Services; and
- Develop and manage digital marketing campaigns related to our Services (e.g., re-engage potential members who are eligible but have not enrolled yet).

How We Use Cookies

Our Service uses cookies or other data tracking technologies to help us deliver content specific to your interests, process your requests, and/or analyze your visiting patterns.

Our Service uses two types of cookies: single-session (temporary) and multi-session (persistent). Temporary cookies last only as long as your web browser is open and are used for technical purposes such as enabling better navigation through our Service. Persistent cookies are stored on your computer for longer periods and are used for purposes including tracking the number of unique visitors to our Service and information such as the number of views a page gets, how much time a user spends on a page, and other pertinent web statistics.

We also use different types of first- and third-party cookies on our website. For example, we use cookies to track user trends and patterns. This helps us better understand and improve areas of the Service that our users find valuable. We use cookies to personalize content and ads, to provide social media features, and to analyze our traffic. We also share information about your browser's use of our Service with our social media, advertising, and analytics partners. We use the information from cookies to provide services better tailored to our users' needs.

We may collect data by using "pixel tags," "web beacons," "clear GIFs," or similar means (collectively, "pixel tags") that allow us to know when you visit and use our Service. Through pixel tags, we collect non-Personal Information or aggregate information that can be used to enhance your online experience and understand traffic patterns.

Information We Receive from Other Sources

We obtain information from such third parties with whom we work to provide you with certain services (including, for example, analytics providers, advertising networks, and search information providers) or third parties who share your information to provide healthcare services to you (such as a medical provider including your information when they message or communicate with other medical providers or Onduo).

In addition, we may use third-party providers to serve or track interactions on other websites. You may link to or access our Service using other third-party websites. Use of such third-party websites is subject to the terms of service and privacy policies of those third parties. Onduo does not control the use of third-party technology or the resulting information and is not responsible for any actions or policies of such third parties.

Where permitted by applicable law, we may receive information from third-party sources (e.g., lead generators) to identify customers (e.g., health plans, employers) that may be interested in Onduo offerings, or to determine whether a product or service is right for you and to send promotional emails.

We may combine information we receive from other sources with information you give to us and information we collect about you. Depending on the types of information received, we will use the information received from other sources or the combined information for the purposes described in Section III (“How We Use Your Information”).

III. HOW WE USE YOUR INFORMATION

We may use information collected about you, including Personal Information, in the following ways:

- To complete any enrollment, registration, or other transactions or actions you request online, such as payment processing, including determining eligibility, use, and other benefits.
- For treatment, payment, or health care operations purposes.
- To communicate with you about our healthcare services and information, products, and services that you request from us (which may include telephone, text, voicemail, email, or notifications within the Service).
- To contact you if you receive healthcare services resulting from your use of the Service.
- To administer your account, including processing payments and fulfilling your orders if you receive health care services resulting from your use of the Service.
- To facilitate and manage your application for employment with us, evaluate your credentials and interview you, communicate with you regarding your candidacy, or to otherwise respond to your questions about careers at Onduo.
- To operate the Service and perform any services associated with the Service, including providing you with technical support and to improve the Service and our products and services.
- To provide you with information that you have requested or to respond to your inquiries.
- To create de-identified information that cannot be used to personally identify you, such as aggregate statistics relating to the use of our Service.
- To measure or understand the effectiveness of communications (including advertising) that we send to you and others, and to deliver relevant communications to you and to provide you with communications from Onduo, surveys, newsletters, and other information.
- To better understand our audience.
- To enhance the safety and security or performance of our products and services. This includes verifying your identity, preventing or detecting fraud or other unauthorized or illegal activities.
- To design, develop, and communicate with you about our features, products, and services, or, subject to any consents or authorizations that are required by applicable law, those of our subsidiaries, affiliates, and parent companies and any of their related businesses and those of our third-party partners.
- To notify you about changes to our services.
- To enforce this Privacy Policy and any other terms that you have agreed to, including to protect the rights, property, or safety of us or any other person, or the copyright-protected content of the Service.
- For any purpose where you have given your consent (where legally required).
- To comply with applicable federal, state, and other laws and regulations.

IV. DISCLOSURE OF YOUR INFORMATION

We may disclose Personal Information that we collect or that you provide as described in this Privacy Policy as follows:

- For treatment, payment, or health care operations purposes.
- To anyone authorized under this Privacy Policy or pursuant to any other consent or authorization that you may provide.
- To service providers that assist us in the maintenance, improvement, and optimization of our Service, such as service providers that help us run and maintain the technology and security infrastructure that support our Service or that provide services such as email delivery, auditing, and similar services.
- To medical providers, including without limitation, physicians, healthcare facilities and organizations, pharmacies, and laboratories, that provide any services to you, including medical providers with whom you communicate and/or medical providers who review your information in providing health care services to you. You acknowledge and agree that when medical providers provide services to you, the medical providers and all personnel of their professional entities may see any information you provide.
- To Onduo's and its affiliated professional entities' employees, or other third parties who provide services to Onduo or an affiliated professional entity.
- To our affiliates and their employees, including for the purpose of posting information or notifications about health care services in your account.
- To other business associates, vendors, or third-party administrators of your health plan or employer for the purpose of transmitting your data to facilitate the Service.
- To third-party data aggregators that we use to administer emails or gather information so that we can send marketing materials about the Service.
- To fulfill the purpose for which you provide it. For example, if you sign up for certain services, we may share your information in order to provide those services.
- To third-party credit card processors via an encrypted connection so that they can process any payments by you.
- To any third party we believe necessary or appropriate to comply with applicable laws.
- To entities that assist us with marketing and advertising.
- For any other purpose disclosed by us when you provide the information or with your consent.
- If we are under a duty to disclose or share your Personal Information to comply with any legal obligation, or in order to enforce or apply our Terms of Use and other agreements; or to protect the rights, property, or safety of Onduo, our customers, or others. This may include exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
- With respect to de-identified information, for any purpose without restriction.
- In the event of a sale, merger, consolidation, change in control, transfer of substantial assets, reorganization, or liquidation, we may transfer, sell, or assign to third parties information concerning your relationship with us, including, without limitation, Personal Information that you provide and other information concerning your relationship with us.
- For any purpose related to our use of information as set forth in Section III ("How We Use Your Information").

V. CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

We strive to provide you with choices regarding the Personal Information you provide to us. We have created mechanisms to provide you with control over your information:

Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies. You also can use our “Cookie Preferences” tool to manage and adjust your cookie preferences. If you disable or refuse cookies, please note that some parts of our Service may then be inaccessible or may not function properly.

Do Not Track. We do not currently respond to “do not track” signals.

Promotional Offers from Onduo, its affiliates, or third-party partners. If you receive email from Onduo or from one of our third-party partners and you do not wish to have your email used by Onduo for marketing purposes, you can unsubscribe in the bottom of the email. If you are not able to unsubscribe via the link in the email, please contact us at the contact information provided in Section XI (“Contact Information”) and we can handle your request. You also can always exercise your right to ask us not to process your Personal Information for marketing purposes by contacting us at the address in Section XI (“Contact Information”). If we have sent you a promotional email, you may unsubscribe by clicking in the unsubscribe link in the bottom of the email.

Location Information. You can choose whether to allow the mobile app to collect and use real-time information about your device’s location through your device’s privacy settings. If you block the use of location information, some parts of the mobile app may become inaccessible or not function properly.

VI. DATA SECURITY

We have implemented measures designed to reasonably secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Service, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. The information you share in public areas may be viewed by any user of the Service.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your Personal Information, we cannot guarantee the security of your data transmitted to our Service; any transmission is at your own risk.

When you use our Service, there is a risk that your health information will be stored unencrypted on your mobile device. We undertake a variety of technical safeguards so that your health information does not leak onto your mobile device, but we cannot guarantee that these safeguards work.

VII. THIRD-PARTY WEBSITES

Our Service may contain links or references to other websites outside of our control. This Privacy Policy does not apply to third-party websites. Onduo encourages you to read the privacy statements and terms

and conditions of linked or referenced websites you enter. These third-party websites may send their own cookies and other tracking devices to you, log your IP address, and otherwise collect data or solicit Personal Information.

ONDUO DOES NOT CONTROL AND IS NOT RESPONSIBLE FOR WHAT THIRD PARTIES DO IN CONNECTION WITH THEIR WEBSITES, OR HOW THEY HANDLE YOUR PERSONAL INFORMATION. CONSULT THE PRIVACY POLICIES POSTED ON EACH THIRD-PARTY WEBSITE FOR FURTHER INFORMATION.

Third-Party Service Providers; Additional Terms

As described in the related Onduo Terms of Use, Onduo relies on services from Verily Life Sciences LLC (“Verily”) to deliver certain components of the Services, which may include the smartphone application and/or web-based coach console, provided by Onduo in conjunction with the Services. In addition to this Privacy Policy, your use of such components of the Services is subject to the Verily Privacy Policy set forth at <https://verily.com/privacy/>.

VIII. NO SERVICES TO CHILDREN UNDER THE AGE OF 18

Onduo does not provide services to anyone under the age of 18.

IX. CALIFORNIA RESIDENT PRIVACY RIGHTS

If you are a resident of California, the California Consumer Privacy Act (“CCPA”) provides you with additional rights regarding your Personal Information. This section describes the Personal Information we collect about you, how we use and disclose it, and how you can exercise your privacy rights under the CCPA.

Your privacy rights under the CCPA do not apply to all information that we might collect, use, or disclose. For example, the CCPA does not apply to “protected health information” governed by HIPAA, “medical information” governed by the California Confidentiality of Medical Information Act, or other patient information we maintain in the same manner as PHI or “medical information.” The CCPA also excludes other categories of information.

When we collect, use, or disclose information not covered by the CCPA, we do so as described in this Privacy Policy (excluding this Section IX) and our Notice of Privacy Practices. If you would like to learn more about how we collect, process, or disclose your information that is not covered by the CCPA, or to exercise the rights that may be available to you under HIPAA and other laws, please review this Privacy Policy (excluding this Section IX) and our Notice of Privacy Practices.

For your Personal Information covered by the CCPA, your rights are described below.

Personal Information Disclosures

In the last twelve (12) months, we have collected the following categories of Personal Information about you:

- Identifiers (e.g., name, mailing address, email address, and telephone number, as well as unique identifiers such as your IP address, account login information, cookies, or similar data)
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) (e.g., name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information)
- Characteristics of protected classifications under California or Federal law (e.g., your gender or age, or, in connection with an application for employment, your race or disability if you voluntarily provide such information)
- Internet or Other Electronic Network Activity Information (e.g., browsing history, activity, and service pages visited to help you get started, and information regarding your interactions with our Service)
- Sensory data (e.g., audio, such as recordings of calls when you contact Onduo by telephone, or similar electronic information)
- Geolocation Data (e.g., general (coarse) location information collected from our mobile app)
- Professional or employment-related information (e.g., your occupation, resume or CV, employment history, educational institutions, professional certifications, or other information you provide in connection with an employment application initiated through the Service)
- Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)) (e.g., education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records)
- Financial Information (e.g., financial account or payment information) Onduo engages third-party service providers who collect, process, and maintain your Financial Information. Therefore, Onduo does not have your full credit card details should you make a request to us under the CCPA.
- Inferences drawn from the information identified above.

We collect this Personal Information directly from you when you provide it to us; automatically as you navigate through and use the Service; or from third-party sources (e.g., data analytics providers, advertising networks, lead generators) to help us determine whether an Onduo product or service is right for you and to send promotional emails to customers and prospective customers. We may receive your Personal Information from sub-contractors, physicians, medical professionals, laboratories, and pharmacies with whom we engage or partner to provide you with our services. For more information about the sources from which we collect your Personal Information, please see Section II above ("Information We Collect About You and How We Collect It").

We collect and use your Personal Information for our own operational purposes to provide services to you; audit interactions and transactions on the Service; determine your eligibility for enrollment; secure our Service and detect, protect, and investigate against security incidents; and improve our Service (e.g., identify bugs, repair errors, and ensure that services function as intended). For more information about

the purposes for which we use your Personal Information, please see Section III (“How We Use Your Personal Information”) above.

The Personal Information we disclose is described in Section IV (“Disclosure of Your Personal Information”) above. In the last twelve (12) months, we have disclosed certain categories of information set out below to third parties (such as our service providers) for a business or operational purpose:

Categories of Personal Information	Categories of Third Parties
Identifiers	<ul style="list-style-type: none"> • Service providers that provide professional or technical support functions; • Professional service organizations; • Affiliates in their capacities as business associates or business associate subcontractors of Onduo; • Analytics providers for our website.
California Customer Records personal information categories	<ul style="list-style-type: none"> • Service providers that provide professional or technical support functions; • Affiliates in their capacities as business associates or business associate subcontractors of Onduo.
Protected classification characteristics under California or federal law	<ul style="list-style-type: none"> • Service providers that provide professional or technical support functions; • Affiliates in their capacities as business associates or business associate subcontractors of Onduo.
Internet or other similar network activity	<ul style="list-style-type: none"> • Service providers that provide professional or technical support functions; • Affiliates in their capacities as business associates or business associate subcontractors of Onduo; • Analytics providers for our website and platforms.
Sensory data	<ul style="list-style-type: none"> • Service providers that provide professional or technical support functions; • Affiliates in their capacities as business associates or business associate subcontractors of Onduo.
Geolocation data (general (coarse) location data)	<ul style="list-style-type: none"> • Service providers that provide professional or technical support functions; • Affiliates in their capacities as business associates or business associate subcontractors of Onduo; • Analytics providers for our website and platforms.
Professional or employment-related information	<ul style="list-style-type: none"> • Service providers that provide professional or technical support functions; • Affiliates in their capacities as business associates or business associate subcontractors of Onduo.
Non-public education information	<ul style="list-style-type: none"> • Service providers that provide professional or technical support functions; • Affiliates in their capacities as business associates or business associate subcontractors of Onduo.
Financial information	<ul style="list-style-type: none"> • Service providers that provide professional or technical support functions;

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| | <ul style="list-style-type: none">• Affiliates in their capacities as business associates or business associate subcontractors of Onduo. |
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Like many organizations, we engage third parties to help deliver interest-based advertisements to you and use of third-party tracking technologies or other online marketing services. In doing so, we may make available or transfer your Personal Information (e.g., identifiers such as your IP address, geolocation data, and Internet or other similar network activity) to third parties, such as advertising agencies or services, analytics providers, sponsored content providers, social media platforms, and other similar technology companies. In certain cases, sharing data with these providers could be considered a “sale” under CCPA even though it is not a sale in the traditional sense. Making such data available to these entities may constitute a “sale” of data under the CCPA. In the prior twelve (12) months, we may have sold or disclosed for valuable consideration certain categories of your Personal Information. We do not have actual knowledge that we sell the Personal Information of consumers under sixteen (16) years of age.

You may request to opt-out of these services on this website by clicking on our “CCPA Do Not Sell My Personal Information” link in the footer of our website or by contacting us at compliance@onduo.com. Please note that we collect Personal Information on both our mobile app and our website. To opt-out of the advertising and online marketing services in our mobile app, you may contact us at [NOTE: Insert email] or click the “CCPA: Do Not Sell My Personal Information” link on the mobile app services landing page. You also may use our “Cookie Preferences” tool to manage and adjust your cookie preferences, or you may] or adjust your device or browser’s settings to limit how your online usage data and device data is shared with third parties. Please refer to Section V (“Information We Collect About You and How We Collect It”) for more information about other choices you may have for managing the collection of your Personal Information for analytics and advertising purposes.

Deidentified Patient Information

We do not sell deidentified patient information exempt from the CCPA to third parties.

California Resident Privacy Rights

If you are a California resident, you have the following rights:

Right to Know: You have the right to know about the Personal Information we collect, use, and disclose about you in the twelve (12) months preceding your request.

Right to Deletion: You have the right to request that we delete the Personal Information we collect about you. We will honor your request unless an exception applies, such as when the information is necessary to complete the transaction or contract for which it was collected.

Right to Opt-out of the Sale: You have the right to request that we do not sell your Personal Information to third parties. While we do not “sell” your data in the traditional sense, the CCPA defines this term broadly to include our use of certain third-party advertising and marketing services as described above.

Right to Non-Discrimination: We do not discriminate against you for exercising any of your privacy rights under CCPA or applicable law.

How to Exercise Your Privacy Rights

Email us at compliance@onduo.com.

For “Right to Know” and “Right to Deletion” requests, we must verify your identity or authority to make the request and confirm the Personal Information relates to you or others. To do so, we collect your name, e-mail address, and phone number to verify your identity. We may contact you by e-mail or by telephone to verify your identity and ask you additional questions so that we can match your identity with the data we have about you. In some instances, we may ask you to declare under penalty of perjury that you are the consumer whose Personal Information is the subject of the request.

You may designate an authorized agent to make a request for you. To use an authorized agent, you or your authorized agent must:

- Submit proof that the authorized agent is registered with the California Secretary of State and that you have authorized them to be able to act on your behalf;
- Submit evidence that you have provided the authorized agent with power of attorney pursuant to the California Probate Code; or
- Provide the authorized agent written and signed permission to act on your behalf, verify your identity with us, and directly confirm with us that you have provided the authorized agent permission to submit the request.

We may deny a request from an authorized agent who does not submit sufficient proof to act on your behalf.

X. REVISIONS TO OUR PRIVACY POLICY

We reserve the right to change this Privacy Policy at any time, and we post changes we make to our Privacy Policy on this page. The date this Privacy Policy was last modified is indicated at the top of the page. You are responsible for ensuring we have an up-to-date, active, and deliverable email address for you, and for periodically monitoring and reviewing any updates to this Privacy Policy. Your continued use of our Service after such amendments will be deemed your acknowledgement of these changes to this Privacy Policy.

XI. CONTACT INFORMATION

If you have any questions or comments about this Privacy Policy and our privacy practices, please message us through the Service or contact us at:

Onduo LLC
55 Chapel Street, Suite 300
Newton, MA 02458
Attn: Privacy Officer
Email: privacy@onduo.com

For California Residents with questions or comments about this Privacy Policy and the CCPA, please contact us at:

Onduo LLC
55 Chapel Street, Suite 300
Newton, MA 02458
Attn: Privacy Officer
Email: privacy@onduo.com

If you have a complaint, you must submit your complaint in writing to:

Onduo LLC
55 Chapel Street, Suite 300
Newton, MA 02458
Attn: Compliance Officer
Email: compliance@onduo.com