

## FELT LLC PRIVACY NOTICE

**Last Updated:** March 17, 2024

This Privacy Notice applies to the processing of personal information by Felt LLC (“Felt,” “we,” “us,” or “our”) including on our website available at feltclinic.com and our other online or offline offerings which link to, or are otherwise subject to, this Privacy Notice (collectively, the “Services”).

**Special Note to Users of Healthcare Services:** If you use or seek to be connected to a telehealth provider (i.e., healthcare provider, mental health provider, lactation or other post-partum specialist), please note that this Privacy Notice is distinct from such telehealth providers’ [HIPAA Notice of Privacy Practices](#), which describes how your individually identifiable health information is collected, used, and shared by our telehealth provider partner, OpenLoop Healthcare Partners.

**Disclosure Regarding Customer Data.** This Privacy Notice does not apply to the personal information that we process on behalf of our customers pursuant to a written agreement we have entered into with such customers (“Customer Data”). Our customers’ respective privacy notices or policies govern their collection and use of Customer Data. Our processing of Customer Data is governed by the contracts that we have in place with our customers, not this Privacy Notice. Any questions or requests relating to Customer Data should be directed to our customer.

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### 1. UPDATES TO THIS PRIVACY NOTICE

We may update this Privacy Notice from time to time in our sole discretion. If we do, we’ll let you know by posting the updated Privacy Notice on our website, and/or we may also send other communications.

### 2. PERSONAL INFORMATION WE COLLECT

We collect personal information that you provide to us, personal information we collect automatically when you use the Services, and personal information from third-party sources, as described below.

#### A. Personal Information You Provide to Us Directly

We may collect personal information that you provide to us.

- **Account Information.** We may collect personal information in connection with the creation or administration of your account. This personal information may include, but is not limited to, your name, email address, phone number, and other information you store with your account.
- **Purchases.** We may collect personal information and details associated with your purchases, including payment information. Any payments made via our Services are processed by third-party payment processors. We do not directly collect or store any payment card information entered through our

Services, but we may receive information associated with your payment card information (e.g., your billing details).

- **Your Communications with Us.** We, and our service providers, may collect the information you communicate to us, such as through email or our web chat tool.
- **Surveys.** We may contact you to participate in surveys. If you decide to participate, we may collect personal information from you in connection with the survey.
- **Interactive Features.** We and others who use our Services may collect personal information that you submit or make available through our interactive features (e.g., messaging features, commenting functionalities, forums, blogs, and social media pages). Any information you provide using the public sharing features of the Services will be considered “public.”
- **Sweepstakes or Contests.** We may collect personal information you provide for any sweepstakes or contests that we offer. In some jurisdictions, we are required to publicly share information of sweepstakes and contest winners.
- **Conferences, Trade Shows, and Other Events.** We may collect personal information from individuals when we attend or host conferences, trade shows, and other events.
- **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.
- **Job Applications.** If you apply for a job with us, we will collect any personal information you provide in connection with your application, such as your contact information and CV.

## **B. Personal Information Collected Automatically**

We may collect personal information automatically when you use the Services.

- **Device Information.** We may collect personal information about your device, such as your Internet protocol (IP) address, user settings, cookie identifiers, other unique identifiers, browser or device information, Internet service provider, and location information (including, as applicable, approximate location derived from IP address and precise geo-location information).
- **Usage Information.** We may collect personal information about your use of the Services, such as the pages that you visit, items that you search for, the types of content you interact with, information about the links you click, the frequency and duration of your activities, and other information about how you use the Services.
- **Cookie Notice (and Other Technologies).** We, as well as third parties, may use cookies, pixel tags, and other technologies (“**Technologies**”) to automatically collect personal information through your use of the Services.
  - **Cookies.** Cookies are small text files stored in device browsers.
  - **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in the Services that collects personal information about use of or engagement with the Services. The use of a pixel tag allows us to record, for example, that a user has visited, a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

See [“Your Privacy Choices and Rights”](#) below to understand your choices regarding these Technologies.

- **Biometric Information.** If you consent to our collection of biometric information or if our collection of biometric information is otherwise permitted, we may collect such information (e.g., heart rate, oxygen saturation, weight, blood pressure, temperature, etc.) to perform our contractual obligations to our customers. Your biometric information may be shared with third parties (e.g., service providers, healthcare professionals, payers, other Felt partners). Where required by law, your biometric information will be stored for no more than three (3) years from your last interaction with our Services.

### C. Personal Information Collected from Third Parties

We may collect personal information about you from third parties. For example, if you access the Services using a Third-Party Service (defined below), we may collect personal information about you from that Third-Party Service that you have made available via your privacy settings.

## 3. HOW WE USE PERSONAL INFORMATION

We use personal information for a variety of business purposes, including to provide the Services, for administrative purposes, and to provide you with marketing materials, as described below.

### A. Provide the Services

We use personal information to fulfill our contract with you and provide the Services, such as:

- Managing your information;
- Providing access to certain areas, functionalities, and features of the Services;
- Answering requests for support;
- Communicating with you;
- Sharing personal information with third parties as needed to provide the Services;
- Processing your financial information and other payment methods for products and Services purchased;
- Allowing you to register for events; and
- Processing applications if you apply for a job we post on our Services.

### B. Administrative Purposes

We use personal information for various administrative purposes, such as:

- Measuring interest and engagement in the Services;
- Improving, upgrading, or enhancing the Services;
- Developing new products and services;
- Ensuring internal quality control and safety;
- Pursuing our legitimate interests such as direct marketing, research and development (including market research), network and information security, and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Carrying out analytics;
- Creating de-identified and/or aggregated information. If we create or receive de-identified information, we will not attempt to reidentify such information, unless permitted by, or required to comply with, applicable laws;
- Authenticating and verifying individual identities, including requests to exercise your rights under this Privacy Notice;
- Debugging to identify and repair errors with the Services;
- Auditing relating to interactions, transactions, and other compliance activities;

- Enforcing our agreements and policies; and
- Carrying out activities that are required to comply with our legal obligations.

#### C. **Marketing**

We may use personal information to tailor and provide you with marketing and other content. We may provide you with these materials as permitted by applicable law. Some of our marketing activities may be considered a “sale” or “targeted advertising” under applicable privacy laws.

California Shine the Light: If you are a California resident, you may annually submit a request to us to find out whether we have shared your Personal Information with third parties for the third parties’ direct marketing purposes. If you would like to submit such a request, please “[Contact Us](#).”

If you have any questions about our marketing practices, you may contact us at any time as set forth in “[Contact Us](#)” below.

#### D. **With Your Consent or Direction**

We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information, with your consent, or as otherwise directed by you.

#### E. **Automated Decision Making**

We may engage in automated decision making, including profiling. Felt’s processing of your personal information will not result in a decision based solely on automated processing that has a legal or other similarly significant effect on you unless such a decision is necessary as part of a contract we have with you, we have your consent, or we are permitted by law to engage in such automated decision making.

If you have questions about our automated decision making, you may contact us as set forth in “[Contact Us](#)” below.

### 4. **HOW WE DISCLOSE PERSONAL INFORMATION**

We disclose personal information to third parties for a variety of business purposes, including to provide the Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

#### A. **Disclosures to Provide the Services**

We may disclose any of the personal information we collect to the categories of third parties described below.

- **Service Providers.** We may disclose personal information to third-party service providers that assist us with the provision of the Services. This may include, but is not limited to, service providers that provide us with hosting, customer service, analytics, marketing services, IT support, and related services. In addition, personal information and chat communications may be disclosed to service providers that help provide our chat features.

Some of the service providers we may use include:

- **Google Analytics.** For more information about how Google uses your personal information, please visit [Google Analytics’ Privacy Policy](#). To learn more about how to opt-out of Google Analytics’ use of your personal information, please click [here](#).

- o **LinkedIn Analytics.** For more information about how LinkedIn uses your personal information, please visit [LinkedIn Analytics' Privacy Policy](#). To learn more about how to opt-out of LinkedIn's use of your information, please click [here](#).
- o **Hotjar (Session Replay Analytics).** We use Hotjar's session replay analytics services. This allows us to record and replay an individual's interaction with the Services. For more information about how Hotjar uses your personal information, please visit the "Personal Data collected from a visitor of a Hotjar Enabled Site" section of [Hotjar's Privacy Policy](#). To learn more about how to opt-out of Hotjar's use of your information, please click [here](#).
- o **FullStory (Session Replay Analytics).** We use FullStory's session replay analytics services. This allows us to record and replay an individual's interaction with the Services. For more information about how FullStory uses your personal information, please visit FullStory's [Privacy Policy](#). To learn more about how to opt out of FullStory's use of your information, please click [here](#).
- **Other Users You Share or Interact With.** The Services may allow Felt users to share personal information or interact with other users of the Services.
- **Third-Party Services You Share or Interact With.** The Services may link to or allow you to interface, interact, share information with, direct us to share information with, access and/or use third-party websites, applications, services, products, and technology (each a "**Third-Party Service**").

Any personal information shared with a Third-Party Service will be subject to the Third-Party Service's privacy policy. We are not responsible for the processing of personal information by Third-Party Services.

- **Business Partners.** We may share your personal information with business partners, such as OpenLoop, to provide you with a product or service you have requested. We may also share your personal information with business partners, such as Owlet, with whom we jointly offer products or services.

Once your personal information is shared with our business partner, it will also be subject to our business partner's privacy policy. We are not responsible for the processing of personal information by our business partners.

- **Felt Partners (Authorized Users Only).** In cases where you use our Services as an employee, contractor, or other authorized user of a Felt partner, that customer may access information associated with your use of the Services including usage data and the contents of the communications and files associated with your account. Your personal information may also be subject to the Felt customer's privacy policy. We are not responsible for the Felt customer's processing of your personal information.
- **Affiliates.** We may share your personal information with our corporate affiliates.
- **Advertising Partners.** We may share your personal information with third-party advertising partners. These third-party advertising partners may set Technologies and other tracking tools on our Services to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks. This practice is commonly referred to as "interest-based advertising", "personalized advertising", or "targeted advertising."

Some of the advertising Technologies we may use include:

- o **Facebook Connect.** For more information about Facebook's use of your personal information, please visit [Facebook's Data Policy](#). To learn more about how to opt-out of Facebook's use of your

information, please click [here](#) while logged in to your Facebook account.

#### B. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

#### C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing, reorganization, bankruptcy, receivership, purchase or sale of assets, transition of service to another provider, or other similar corporate transaction, your personal information may be disclosed, sold, or transferred as part of such a transaction.

### 5. YOUR PRIVACY CHOICES AND RIGHTS

A. **Your Privacy Choices.** The privacy choices you may have about your personal information are described below.

- **Email Communications.** If you receive an unwanted email from us, you can use the unsubscribe functionality found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails. We may also send you certain non-promotional communications regarding us and the Services, and you will not be able to opt out of those communications (e.g., communications regarding the Services or updates to this Privacy Notice).
- **Text Messages.** If you receive an unwanted text message from us, you may opt out of receiving future text messages from us by following the instructions in the text message you have received from us or by otherwise contacting us as set forth in "[Contact Us](#)" below.
- **Mobile Devices.** We may send you push notifications through our mobile application. You may opt out from receiving these push notifications by changing the settings on your mobile device. With your consent, we may also collect precise location-based information via our mobile application. You may opt out of this collection by changing the settings on your mobile device. To request deletion of your account, please use the standard deletion functionality available via the Services, or contact us using the information set forth in "[Contact Us](#)" below.
- **Do Not Track signals and Global Privacy Control.** Certain web browsers and other programs may transmit "do-not-track" "opt-out" signals, also called a Global Privacy Control (or "GPC") signal (we refer to these as "GPC Signals"), to websites with which the browser communicates. In most cases you will need to change your web browser's settings or add an application to your web browser to enable your browser to send a GPC Signal. Our websites will recognize GPC Signals for website users differently, based on the location of the user when they access our websites. For users that access our websites from U.S. states that have laws requiring recognition of GPC Signals, we will recognize and apply the GPC Signal to inactivate all of the cookies for that website, except for cookies that are necessary for the website to operate. Additionally, if you are accessing our websites from one of these states, you can determine if your browser GPC Signal has been recognized by clicking on the "Do Not Sell or Share My Personal Information" link in the footer of the website and checking that appropriate cookies have been turned off. For users from states not currently requiring recognition of the GPC Signal, our website servers may recognize and apply the GPC Signal for only advertising and social media cookies, but will not apply the GPC Signal to functional or performance cookies. You can always check and adjust your cookie settings by going to the "Do Not Sell or Share My Personal Information" link in the footer of this website.

Some web browsers incorporate other "do-not-track" ("DNT") or similar features that signals to websites with which the browser communicates that a visitor does not want to have their online activity tracked. As of the Effective Date, not all browsers offer a DNT option and DNT signals are not yet uniform. For this reason, we along with many other digital service operators do not respond to all DNT signals. We recognize GPC signals as required under certain state privacy laws, but we do not currently recognize other DNT signals. For more information about the Global Privacy Control, please visit <https://globalprivacycontrol.org>.

- **Cookies.** You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, the Services may not work properly.

Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of certain tracking on some mobile applications by following the instructions for [Android](#), [iOS](#), and [others](#).

The online advertising industry also provides mechanisms that may allow you to opt out of receiving targeted ads from organizations that participate in self-regulatory programs. To learn more, visit the [Network Advertising Initiative](#), [the Digital Advertising Alliance](#), and [the European Digital Advertising Alliance](#).

Please note you must separately opt out in each browser and on each device.

B. **Your Privacy Rights.** In accordance with applicable law, you may have the right to:

- **Confirm Whether We Are Processing Your Personal Information;**
- **Request Access to or Portability of Your Personal Information;**
- **Request Correction of Your Personal Information;**
- **Request Deletion of Your Personal Information;**
- **Request Restriction of or Object to our Processing of Your Personal Information;**
- **Request to Opt-Out of Certain Processing Activities** including, as applicable, if we process your personal information for "targeted advertising" (as "targeted advertising" is defined by applicable privacy laws), if we "sell" your personal information (as "sell" is defined by applicable privacy laws), or if we engage in "profiling" in furtherance of certain "decisions that produce legal or similarly significant effects" concerning you (as such terms are defined by applicable privacy laws); and
- **Withdraw Your Consent to our Processing of Your Personal Information.** Please note that your withdrawal will only take effect for future processing, and will not affect the lawfulness of processing before the withdrawal.

If you would like to exercise any of these rights, please contact us as set forth in "[Contact Us](#)" below. We will process such requests in accordance with applicable laws.

Only you, or someone legally authorized to act on your behalf in certain jurisdictions, may make a request to exercise the rights listed above regarding your personal information. If your personal information is subject to a law that allows an authorized agent to act on your behalf in exercising your privacy rights and you wish to designate an

authorized agent, please provide written authorization signed by you and your designated agent using the information found in "[Contact Us](#)" below and ask us for additional instructions.

To protect your privacy, we will take steps to verify your identity before fulfilling requests submitted under applicable privacy laws. These steps may involve asking you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. Examples of our verification process may include asking you to confirm the email address we have associated with you.

Some laws may allow you to appeal our decision if we decline to process your request. If applicable laws grant you an appeal right, and you would like to appeal our decision with respect to your request, you may do so by informing us of this and providing us with information supporting your appeal.

## **6. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION**

All personal information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. These countries may or may not have adequate data protection laws as defined by the data protection authority in your country.

For more information about the safeguards we use for international transfers of your personal information, please contact us as set forth below.

## **7. CHILDREN'S PERSONAL INFORMATION**

The Services are not directed to children under 18 (or other age as required by local law outside the United States), and we do not knowingly collect personal information directly from children.

If you are a parent or guardian and believe your child has uploaded personal information to the Services in violation of applicable law, you may contact us as described in "[Contact Us](#)" below.

## **8. THIRD-PARTY WEBSITES/APPLICATIONS**

The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen, or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

## **9. CONTACT US**

If you would like to exercise your rights as detailed in this Privacy Notice or have any questions about our privacy practices or this Privacy Notice, please contact us at: hello (at) felt.clinic