

Privacy Notice

At **Lifelines Neuro Company, LLC**, (**Lifelines Neuro Company, LLC**, ("**Lifelines Neuro**," "**we**," "**us**," or "**our**") we are committed to protecting your privacy. This Privacy Notice explains how we collect, use, and protect personal information that we obtain through your use of our corporate websites and other services.

Who We Are

Lifelines Neuro is a neurodiagnostic medical device company that seeks to further our mission to create neurodiagnostics without boundaries. We maintain a publicly accessible website at <https://www.lifelinesneuro.com> ("**Site**"). Through our Site, we provide information about our companies, products and services, provide industry news and information, and allow customers and users of our Site to contact us ("**Services**").

We understand that privacy is exceptionally important to the individuals that use our Site and Services. The purpose of this Privacy Policy is to plainly and transparently disclose to you how we collect, use and share information, and how we attempt to safeguard the data you provide to us.

We are committed to securing data that we collect concerning you ("**you**") and complying with applicable data protection and privacy laws throughout the world. We take steps to safeguard your information and communications from unauthorized intrusions and access.

How to Contact Us

Please contact our Privacy Officer at any time with any questions or concerns about this Privacy Policy, or to exercise any of your rights under this Privacy Policy or applicable law.

Email us at: privacyofficer@lifelinesneuro.com

Mail us or call us at:
Lifelines Neuro Company
411 Edwardsville Road
Troy, IL 62294
Tel: 866.889.6505

Why We Collect Your Personal Information

The personal information we collect and how we use it, depends on the context of your interactions with us, the choices you make, and the Services and features you use. You provide this personal information directly when you submit inquiry forms, subscribe to receive topical materials and newsletters; inquire about our services or capabilities; apply to participate in our clinical research studies; or apply for a job with us. You may choose not to provide personal information, but in not doing so, we may be unable to complete your request. We collect a certain amount of technical information from our website users about your access and how you interact with the Services. We use this information to improve your experience and help us to manage and protect the Services.

We collect and process the following information about you:

Information you give to us	Information we collect from you	Information we collect from you with third-party processors
<p>You provide information to us when you affirmatively provide it to us. For example, you provide information each time you: (a) participate in a clinical trial or research program; (b) request, obtain or purchase products or Services from us; (c) download any information from our Site; (d) fill in a form on our Site to contact us with an inquiry; (e) correspond with us by phone, e-mail or otherwise; (e) provide us with information requested by us for the verification of your identity; and (f) when you report a problem with our Site. We may also collect information about you when you when you participate in or register for one of our promotions, events or surveys.</p> <p>The type of information you give us may include your:</p> <ol style="list-style-type: none"> 1. Contact information (name, company name, title, mailing address, telephone, electronic mail address, facsimile address); 2. Shipping information; 3. Order information; 4. Inquiry information; 5. Date of birth; 6. Order history; 	<p>Each time you visit our Site, we may automatically collect the following information:</p> <ol style="list-style-type: none"> 1. technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, location information, time zone setting, browser plug-in types and versions, operating system and platform; and 2. information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), pages you looked at or searched for, and the products and services you have viewed, ordered or searched including, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call us. <p>More information on our use of cookies is provided below. More use of third</p>	<p>We also collect information about you using the following third-party sources:</p> <p>We use this information to conduct research, process our orders, improve our sales process and communications with our customers and prospective customers. We also use this information to improve your experience on our Site.</p>

<p>7. Communications to and from you. 8. Any data required for the participation in a clinical trial or research trial.</p> <p>This information will be used in accordance with the purposes described in this Privacy Policy and in any applicable privacy notice provided to you at the time at which it was collected.</p>	<p>party tools used to collect information is provided in the column to the right.</p> <p>Lifelines Neuro records and compiles aggregate demographic data related to our users in order to manage the Services offered. Lifelines collects and analyses data about the use of the Site to improve service and to improve user experience. As set forth in the section on Cookies below, we also use externally hosted services (e.g. Google Analytics) to collect data.</p>	
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How We Share Personal Information

We do not rent or sell your personal information.

In the course of our business operations and where required, we share your personal information with relevant Lifelines Neuro employees in subsidiary companies within our group.

We share your personal information with selected third parties relating to your interactions with us. You will be provided with more specific information about those recipients of your personal information at the point of collection.

We also share certain information with service providers that carry out functions or services on our behalf that enable our business operations. This will include our IT applications and systems, website analytics and search engine providers. It also incorporates the protection and securing of our systems and services.

Access to any personal information we collect and store is generally restricted to those employees and/or contractors who require it to perform a job or other contracted function. We require vendors and contractors we work with to use reasonable, industry-standard protocols to maintain the confidentiality, security, and integrity of information.

We share your personal information where required by applicable laws and regulations.

We share your personal information with your consent; as necessary to complete any contract, transaction, action authorized by your or to fulfill your request.

Cookies and Similar Technologies

Our Services use cookies (small text files containing a string of alphanumeric characters that we put on your computer) and other similar tracking technologies (like web beacons, tags, and scripts) to provide the Services and to help collect information that we use to administer the Services, to analyze your use of the Services, and to assist with our promotional and marketing efforts.

The Options/Settings section of most internet browsers will tell you how to manage cookies and

other technologies that may be transferred to your device, including how to disable such technologies. **Instructions for blocking or allowing cookies in common web browsers are provided at the links below:**

- [Internet Explorer 7 and 8](#)
- [Firefox](#)
- [Google Chrome](#)
- [Apple Safari](#)
- [AboutCookies.org](#)

We use the following cookies:

- **Analytical/performance cookies.** They allow us to recognize and count the number of visitors and to see how visitors move around our websites when they are using it. This helps us to improve the way our websites works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognize you when you return to our websites. This enables us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our websites, the pages you have visited and the links you have followed. We will use this information to make our websites and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Some third parties may also collect data from you through cookies and other related scripts. The use of third-party cookies is not covered by our Privacy Policy, as we do not have access or control over these cookies.

How to Exercise Your Privacy Rights

We recognize that privacy rights differ across the world. Our business, systems and Site are designed to comply with all relevant and appropriate national and international legislation with regards to data protection and user privacy, including (without limitation) the General Data Protection Regulation (“GDPR”).

We also understand that the obligations of Services may make the exercise of rights difficult to fulfill, for example in order to maintain the integrity of clinical trials data. **If you are a patient in a clinical trial, you should contact the Doctor who is treating you at the clinical trial site. Your identity will not be known to Lifelines Neuro, as your Doctor encoded enrollment data about you with a random patient number. Lifelines Neuro only has the random patient number. For this reason, we are unable to activate an exercise of rights request from you via this process.**

You can submit a request to exercise your privacy rights at any time, free of charge, through the “Exercise Your Rights” form. Our privacy team will review your request and respond to you within a reasonable time frame as required by applicable law.

Your Communication Preferences

You can opt-out of receiving promotional or marketing communications from us at any time by using the unsubscribe link in the email communications we send. If you or your organization are a Lifelines Neuro client or business partner, we will still send you non-promotional communications. Where an application that we provide enables you to directly manage your preferences and the personal information you are providing, we will make this readily available to you for you to exercise choice. You can also contact us at any time. The supplemental information notice provided to you for specific Services may provide contact points or instructions on preference election for that Service.

Your Rights if You Reside in the European Economic Area

If you reside in the European Economic Area, the General Data Protection Regulation (“GDPR”) may apply to our use, collection, processing and storage of your personal data. The GDPR allows us to collect and use personal information from residents within the European Economic Area only for one or more of the following reasons:

1. To fulfill a contract we have with you;
2. When we have a legal duty;
3. When it is in our legitimate interest; or
4. When you provide consent.

If you reside in the European Economic Area, you have a number of rights under data protection laws in relation to the way we process your personal data. These are set out **below**. You may contact us directly to exercise any of these rights, and we will respond to any request received from you within one month from the date of the request. In very exceptional circumstances, we may need to extend this timescale, but we will always tell you in advance if we do, and our reasons why.

Number	Description of your right
Right 1	A right to access personal data held by us about you, as well as information about how we are using your data.
Right 2	A right to require us to rectify any inaccurate personal data held by us about you.
Right 3	A right to require us to erase personal data held by us about you, and where the personal data has been made public, for other controllers processing the personal data to also erase links to, or copy or replication of, such personal data. This right will only apply where (for example): we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with Right 6 below).
Right 4	A right to restrict our processing of personal data held by us about you. This right will only apply where (for example): you dispute the accuracy of the

	personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but you require the data for the purposes of dealing with legal claims.
Right 5	A right to receive personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to require us to transfer this personal data to another organisation, at your request.
Right 6	A right to object to our processing of personal data held by us about you (including for the purposes of sending marketing materials to you).
Right 7	<p>A right to withdraw your consent, where we are relying on it to use your personal data (for example, to provide you with marketing information about our services or products).</p> <p>If you have consented to receive communications from us, you can contact us at any time to have your details removed from lists used by us or to update your marketing preferences. Please email privacyofficer@lifelinesneuro.com and provide your name, email/telephone number/account number in the body of the email, telling us what you would like us to do. You can also click "unsubscribe" on any of our emails, and we will ensure we don't send you any communications of this nature in the future.</p>

If you have any concerns regarding our processing of your personal information, or are not satisfied with our handling of any request by you in relation to your rights, please get in touch with our team through the contact information provided in Section 2 of this Privacy Policy. You also have the right to make a complaint to the Information Commissioner's Office ("ICO"). The ICO is the UK's independent body set up to uphold information rights. You can find out more about the ICO on its website (<https://ico.org.uk/>). Their address is:

First Contact Team
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF

Your Rights if You are a California Resident

Except as expressly set forth in this Privacy Notice, we do not disclose personal information to any third-party for such third-party's direct marketing purposes. Thus, until December 31, 2019, pursuant to California Civil Code Sections 1798.80-1798.84, Lifelines Neuro has no obligation to

a California resident to provide further information regarding our use of the California resident's personal data. Effective on January 1, 2020, all California residents have the following rights with regard to their personal data:

Number	Description of your right
Right 1	The right to know what personal information we collect about you.
Right 2	The right to know whether we sell or disclose your personal information, and if so, to whom.
Right 3	The right to say no to the sale of personal information.
Right 4	The right to access your personal information.
Right 5	The right to receive equal service and pricing from us, even if you exercise your privacy rights.

You may exercise any of the above rights on or after January 1, 2020, if you are a California resident and you provide us with a verifiable request to exercise any of the above rights. For more information, please see California Civil Code Sections 1798.80-1798.198. To submit a request, please see Section 2 for our contact information.

Notice to Utah Residents

We do not disclose a user's personal data to any third-party for such third-party's direct marketing purposes.

Consent to Receive Electronic Notifications

Electronic communication is the most effective and timely way to provide the users of our Site with any optional or required notifications and disclosures. In some circumstances, however, applicable laws may require us to send you disclosures or communications in paper format unless you have affirmatively consented to receiving electronic notifications only in advance of the notification. Through this Privacy Policy, pursuant to 15 U.S.C. § 7001, you hereby affirmatively consent to receive electronic notifications and disclosures from us only (without requiring a paper copy) and you represent that, to date, you have not withdrawn such consent. You have the right to change your mind and withdraw your consent at any time. If you would like to withdraw your consent to receive electronic notifications and/or would like to request paper copies of any electronic notifications you receive, please contact: privacyofficer@lifelinesneuro.com. To receive electronic records, you will need access to a smart phone, tablet, laptop or computer with Internet

access and either email software (such as Microsoft Outlook) or access to a web-based electronic mail software platform, such as Gmail, Yahoo or other electronic mail provider.

DISCLAIMER OF WARRANTIES

YOU EXPRESSLY AGREE THAT YOUR USE OF THE SITE AND SERVICES IS AT YOUR SOLE RISK. THE SITES AND SERVICES ARE PROVIDED TO YOU ON AN "AS IS" AND "AS AVAILABLE" BASIS. WE EXPRESSLY DISCLAIM ALL WARRANTIES OF ANY KIND, WHETHER EXPRESS OR IMPLIED, INCLUDING, BUT NOT LIMITED TO, ANY WARRANTIES REGARDING DATA PRIVACY OR DATA SECURITY.

Limitation of Liability

TO THE FULLEST EXTENT PERMITTED BY LAW, YOU EXPRESSLY AGREE THAT LIFELINES SHALL NOT BE LIABLE FOR ANY INDIRECT, INCIDENTAL, SPECIAL OR CONSEQUENTIAL DAMAGES, INCLUDING, BUT NOT LIMITED TO, DAMAGES FOR LOSS OF DATA, DATA BREACH, OR DISCLOSURE OF PERSONAL INFORMATION, EVEN IF LIFELINES HAS BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES. YOU SPECIFICALLY AGREE THAT LIFELINES IS NOT RESPONSIBLE OR LIABLE TO YOU OR ANYONE ELSE FOR ANY VIOLATION OF YOUR RIGHTS OR THE RIGHTS OF ANY OTHER PARTY, INCLUDING, BUT NOT LIMITED TO, INTELLECTUAL PROPERTY RIGHTS, RIGHTS OF PUBLICITY, OR RIGHTS OF PRIVACY. SOME JURISDICTIONS DO NOT ALLOW THE LIMITATION OR EXCLUSION OF LIABILITY FOR INCIDENTAL OR CONSEQUENTIAL DAMAGES, THEREFORE SOME OF THE ABOVE LIMITATIONS MAY NOT APPLY TO YOU. IN ANY EVENT, IF LIFELINES IS FOUND TO HAVE VIOLATED ANY OF YOUR RIGHTS, YOU ACKNOWLEDGE AND AGREE THAT ANY DAMAGES RECOVERABLE AGAINST LIFELINES ARE LIMITED TO YOUR ACTUAL, PROVEN DAMAGES.

Governing Law & Jurisdiction

This Privacy Policy, and Lifeline's collection and use of customer information, shall be governed and interpreted in accordance with the laws of the United States and the State of Illinois. Any disputes arising out of this Policy shall be adjudicated in Madison County, Illinois or federal court of competent jurisdiction in the United States District Court for the Southern District of Illinois.

Other Important Information

- ◆ *International Transfer, Processing, and Storage of Personal Information*

Lifelines Neuro is a United States headquartered global organization. The personal information we collect through the Services will be transferred, processed, and stored on servers in the United States, St. Ghislain, Belgium, Silkeborg, Denmark.

- ◆ *Retention and Deletion of Personal Information*

Lifelines Neuro will retain your personal information for as long as needed for the purposes described in this Privacy Notice and more specifically any supplemental notices relating to individual Services; as necessary to comply with our legal obligations (such as to honor the exercise of rights), resolve disputes, and enforce our agreements; or to the extent otherwise permitted by applicable law. At the end of the retention period, Lifelines Neuro will delete your personal information in a manner designed to ensure that it cannot be reconstructed or read.

◆ *Links to Third-Party Websites and Services*

The Site and/or Services may provide links to or the ability to connect with websites, services or applications that are owned and operated by third-parties. Clicking on those links or otherwise enabling connections with those services may allow the third party to collect or share information about you. Those third-party websites or services are beyond our control and are not subject to this Privacy Notice. We encourage you to check the privacy policies and terms of use of any third-party websites or services before using them and providing your personal information to them.

◆ *Children*

The Site and Services are not designed or directed toward anyone under the age of 16. We do not knowingly collect or solicit personal information from anyone under the age of 16. If you are under 16, please do not use the Site or Services or send any personal information about yourself to us. If we discover any personal information of children under sixteen has been collected without verifiable parental consent, we will immediately delete the information.

◆ *Changes to This Privacy Notice*

We update this Privacy Notice from time to time. When we post changes, we will revise the “Last Updated” date at the end of this Privacy Notice. If there are material changes to this Privacy Notice or to the ways we will use your personal information, we will notify you either by prominently posting a notice of the changes in the Site or Services before they take effect or by directly sending you a notification. We encourage you to review this Privacy Notice periodically to be informed of how we are using your information and to be aware of any change to the Privacy Notice.

◆ *Questions About Our Privacy Practices*

If you have any questions or concerns about our privacy practices or this Privacy Notice, please send us a detailed message by email to privacyofficer@lifelinesneuro.com; or write to us at the following address:

Privacy Officer, Lifelines Neuro Company

411 Edwardsville Road

Troy, IL, 62294 USA

Last Updated: DD-MMM-YYYY

Exercise Your Rights Form

Our organization is fully committed to protecting the privacy and security of all data entrusted to it by customers, employees, and others. This “Exercise Your Rights” form will allow you to exercise the rights afforded to you under EU GDPR Articles 15-11 while LNSI maintains the appropriate internal records related to such requests. Once submitted, we will process and respond to your request as soon as possible in accordance with applicable regulations. Please be aware that prior to processing or providing any information we will verify and may request proof of your identity. Please complete the form below and submit to our Data Privacy Officer at privacyofficer@lifelinesneuro.com or by mailing the completed form to:

Privacy Officer, Lifelines

411 Edwardsville Road

Troy, IL 62294 USA

I am a Job Applicant Former Employee Other

Which rights are covered by this request?

Access Rectification Erasure Restrict Processing

Data Portability Object Withdraw Consent

First Name: _____ Last Name: _____

If you are submitting this request on behalf of someone else, provide your name and relationship to that person. _____

Email: _____

Country: _____

Request Details of Rights: _____

Date range of information impacted by this request: _____

Have you made a previous request about this data? Yes No

Any additional information you would like to provide? _____

Document Approval

Date	Name and Title	Role	Signature
	Kelly L. Chain Clinical Research Project Manager	Author	
	Tyler Martin Director of Quality Assurance	Approver	

Version History

Version Date	Version #	Purpose for Change	Revised By & Title
06-May-2019	1.0	Initial Release.	Kelly Chain