

## Cognoa Privacy Policy

*Last Updated: July 14, 2022*

This privacy policy (the “Privacy Policy”) explains how we collect, use, and share information from or about users of Cognoa’s website or services, or the devices they use when accessing our website or services. Our services include our AI-based diagnosis aid, Canvas Dx, our other services such as Cognoa Connect customer service, and our websites and other online offerings and communications (collectively, our “Services”). By using our Services, you agree to the collection, use, disclosure, and procedures this Privacy Policy describes. Beyond the Privacy Policy, your use of our Services is also subject to our [Terms of Service](#).

### **I. Information We Collect**

We may collect a variety of information from or about you or your devices from various sources, as described below. We collect information from those parents or caregivers who use Canvas Dx or express an interest in Canvas Dx or Cognoa (“Caregivers”), from those health care providers who use our Services (“HCPs”), and from any other users of our Services (collectively “Individuals”).

#### **A. Information You Provide to Us.**

**Using Canvas Dx.** For Caregivers, when you use Canvas Dx, we may ask you to confirm or provide information, including health-related information, about yourself, including your name, phone number or email address, and about your child, including your child’s name, date of birth, or gender.

**Caregiver Questionnaire and Videos.** For Caregivers, when you use Canvas Dx, we will ask you to answer questions regarding your child to support our assessment of your child’s cognitive development. For example, you may be asked questions such as whether your child understands words and phrases. We will also request that you provide us with video content of your child, which we view in order to help us assess your child’s cognitive development. We may store the answers to the questionnaire and the videos and use them to provide and improve our Services, such as for quality assurance efforts to enhance our scoring, correlation, and other modeling and data analysis activities, and provide training, reference materials, and demonstrations. For more information, see Section II, How We Use the Information We Collect.

**Health Care Provider (HCP) Portal.** For HCPs or any other Individuals who use our HCP Portal, we may ask you to confirm or provide information, including your name, phone number, business address, or email address. For HCPs who complete a health care provider questionnaire based on their assessment of a child, we will store your answers to the questionnaire and use them to provide, and with the Caregiver’s authorization, to improve our Services, such as for quality assurance efforts to enhance our scoring, correlation, and other modeling and data analysis activities, and provide training, reference materials, and

demonstrations. For more information, see Section II, How We Use the Information We Collect. **Communications.** When you communicate with us, we may receive additional information about you.

- For example, for any Individual who communicates with our Cognoa Connect Customer Support Team, we may receive your name, email address, zip code, the contents of a message or attachments that you may send to us, and other information you choose to provide.
- For Caregivers, if you are in contact with our Cognoa Connect Customer Support Team about next steps after receiving a prescription for Canvas Dx, we may receive additional information from you, including your name, phone number, email address, insurance information, and the name and contact information of your health care provider.
- For all Individuals, if you request information from us, for example by filling in a form on our website, then we will collect certain information from you, such as your name and email address. When we send you emails, we may track whether you open them to learn how to deliver a better customer experience and improve our Services.

**Careers.** If you decide that you wish to apply for a job with us, you may submit your contact information and your resume online. We will collect the information you choose to provide on your resume, such as your education and employment experience. **B. Information We**

#### **Receive from Third Parties.**

**Health Care Providers and Specialty Pharmacy.** For Caregivers whose child is prescribed Canvas Dx, we will collect any information provided to us by your child's health care provider(s). For example, your child's health care provider will provide your child's prescription information to a specialty pharmacy, which will share that information with us, so that we may provide you with access to Canvas Dx and other Services. As part of your use of Canvas Dx, your child will be assessed by a health care provider - either your own health care provider or a contracted telemedicine provider to whom we connect you - who will complete a questionnaire based on their assessment and provide that questionnaire to us to support our assessment of your child's cognitive development. We store the health care provider's answers to the questionnaire and use them to provide and, with your authorization, to improve our Services, such as for quality assurance efforts to enhance our scoring, correlation, and other modeling and data analysis activities, and provide training, reference materials, and demonstrations. For more information, see Section II, How We Use the Information We Collect.

#### **C. Information We Collect When You Use Our Services.**

**Device Information.** We receive information about the device and software you use to access our Services, including internet protocol (IP) address, web browser type, operating system version, phone carrier and manufacturer, application installations, device identifiers, mobile advertising identifiers, and push notification tokens.

**Usage Information.** To help us understand how you use our Services and to help us improve them, we automatically receive information about your interactions with our Services, like the pages or other content you view, the searches you conduct, and the dates and times of your visits.

**Information from Cookies and Similar Technologies.** We and third party partners collect information using cookies, pixel tags, or similar technologies. Our third party partners, such as analytics and advertising partners, may use these technologies to collect information about your online activities over time and across different services. Cookies are small text files containing a string of alphanumeric characters. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to our Services.

Please review your web browser's "Help" file to learn the proper way to modify your cookie settings. Please note that if you delete or choose not to accept cookies from the Service, you may not be able to utilize the features of the Service to their fullest potential.

## **II. How We Use the Information We Collect**

We use the information we collect (including Information You Provide to Us, Information We Receive from Third Parties, and Information We Collect When You Use Our Services):

- To provide, maintain, improve, and enhance Canvas Dx and our other Services;
- To understand and analyze usage trends and preferences of our users and train our scoring technicians;
- To communicate with you, provide you with updates and other information relating to our Services, provide information that you request, respond to comments and questions, and otherwise provide customer support;
- For marketing purposes, such as developing and providing promotional and advertising materials that may be useful, relevant, valuable or otherwise of interest to you;
- To personalize your experience on our Services such as presenting tailored content;
- To de-identify and aggregate information we collect and use it for any lawful purpose (this means we may redact or remove the personal information that could be used to identify you like your name and contact information, and use the remaining non-personal, de-identified data to aggregate and analyze for business and other legitimate purposes such as product and service improvements, research and development, publications and documents, and to help us better understand pediatric behavioral health issues and patient populations; any resulting research or analyses will be de-identified and aggregated in a form that is designed to prevent anyone from identifying you);
- To find and prevent fraud, and respond to trust and safety issues that may arise;

- For compliance purposes, including enforcing our Terms of Service or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency; and
- For other purposes for which we provide specific notice at the time the information is collected.

### III. How We Share the Information We Collect

We share information with the following categories of third parties.

**Affiliates.** We may share any information we receive with our corporate affiliates for any of the purposes described in this Privacy Policy.

**Vendors and Service Providers.** We may share any information we receive with vendors and service providers retained to provide services on our behalf, including video analysts, health plans and third-party payers, and technical support vendors. For example, we are using a vendor to provide an SMS text messaging program for Canvas Dx. Any data obtained or processed through this program by this vendor may be used to provide the SMS text messaging program but will not be used by the vendor for any marketing reasons or purposes, or otherwise shared by the vendor to any third parties for marketing reasons or purposes. We will also not share this data with any affiliates for marketing reasons or purposes.

**Contracted Telemedicine Providers.** For Caregivers, if you choose to have your child assessed by a contracted telemedicine provider to whom we connect you, we will share information, such as your name, email, and phone number, your child's name and birthdate, and your child's health care provider's name, national provider ID (NPI) and fax number, with the telemedicine provider and the telemedicine management company for the purpose of enabling your child's appointment with that provider.

**Health Care Provider.** For Caregivers who use Canvas Dx, we will generate a report based on the information about your child we receive from you and from the health care provider who conducted an assessment of your child, including your and the provider's questionnaire responses and your video content. We will share this report with your child's prescribing physician to aid in diagnosing or ruling out autism and directing appropriate next-steps-in-care.

**Regulators.** We may share any information we receive with the U.S. Food and Drug Administration (FDA) and similar agencies in the U.S. and other countries and the U.S. Department of Health and Human Services, with the Institutional Review Board (IRB) and other groups that review research studies to help protect people who join these studies.

**Analytics Partners.** We use analytics services such as Google Analytics to collect and process certain analytics data. These services may also collect information about your use of other websites, apps, and online resources. You can learn about Google's practices by going to <https://www.google.com/policies/privacy/partners/>, and opt-out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

**Sharing De-Identified and Aggregated Data.** As described above, we may de-identify and aggregate information we collect and use it for any lawful purpose. This means we may redact or remove the personal information that could be used to identify you like your name and contact information, and use the remaining non-personal, de-identified data to aggregate and analyze it for business and other legitimate purposes such as product and service improvements, research and development, publications and documents, and to help us better understand pediatric behavioral health issues and patient populations. Before sharing this information with third parties, any resulting research or analyses will be de-identified and aggregated in a form that is designed to prevent anyone from identifying you.

**As Required By Law and Similar Disclosures.** We may access, preserve, and disclose your information if we believe doing so is required or appropriate to: (a) comply with law enforcement requests and legal process, such as a court order or subpoena; (b) respond to your requests; or (c) protect your, our, or others' rights, property, or safety. For the avoidance of doubt, the disclosure of your information may occur if you post any objectionable content on or through the Services.

**Merger, Sale, or Other Asset Transfers.** We may disclose and transfer your information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another Cognoa or we sell, liquidate, or transfer all or a portion of our business or assets.

**Consent.** We may also disclose information from or about you or your devices with your permission.

#### **IV. Your Choices**

**Marketing Communications.** You can unsubscribe from our promotional emails via the link provided in the emails. Even if you opt-out of receiving promotional messages from us, you will continue to receive administrative messages from us.

#### **V. Third Parties**

Our Services may contain links to other websites, products, or services that we do not own or operate. We are not responsible for the privacy practices of these third parties. Please be aware that this Privacy Policy does not apply to your activities on these third party services or any information you disclose to these third parties. We encourage you to read their privacy policies before providing any information to them.

## **VI. Security**

We make reasonable efforts to protect your information by using physical and electronic safeguards designed to improve the security of the information we maintain. However, as our Services are hosted electronically, we can make no guarantees as to the security or privacy of your information.

## **VII. Children's Privacy**

We do not knowingly collect, maintain, or use personal information from children under 13 years of age, and no part of our Services are directed to children. If you learn that a child has provided us with personal information in violation of this Privacy Policy, then you may alert us at [support@cognoa.com](mailto:support@cognoa.com).

## **VIII. International Visitors**

Our Services are hosted in the United States and intended for visitors located within the United States. If you choose to use the Services from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your personal information outside of those regions to the United States for storage and processing. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Services. By providing any information, including personal information, on or to the Services, you consent to such transfer, storage, and processing.

## **IX. Update Your Information or Pose a Question**

You can update your account and profile information or close your account by contacting us. If you have questions about your privacy on the Services or this privacy policy, please contact us at [support@cognoa.com](mailto:support@cognoa.com).

## **X. Changes to this Privacy Policy**

We will post any adjustments to the Privacy Policy on this page, and the revised version will be effective when it is posted. If we materially change the ways in which we use or share personal information previously collected from you through the Services, we will notify you through the Services, by email, or other communication.

## **XI. Contact Information**

If you have any questions, comments, or concerns about our processing activities, please email us at [support@cognoa.com](mailto:support@cognoa.com) or write to us at 2185 Park Blvd., Palo Alto, CA 94306.