

## Privacy Policy

Tetragram, Inc. (“**Tetragram**” “**we**”, “**our**” or “**us**”) is committed to protecting and respecting your privacy. This Privacy Policy sets out how we collect, store, process, transfer, share and use data that identifies or is associated with you (“**personal information**”). Tetragram provides a platform for the tracking, rating, collecting, recording, and sharing product choices, preferences, efficacy, and other information via the Tetragram mobile application that is available for download on your device (the “**App**”). This Privacy Policy applies to your use of the App and our website (available at [www.tetragramapp.com](http://www.tetragramapp.com)) (our “**Site**”) (together the “**Service**”). Please ensure that you have read this Privacy Policy and understood how we collect, store, use and disclose your personal information before accessing or using the Service.

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### 1. Who is responsible for the use of your personal information

Tetragram is the controller of the personal information we hold about you in connection with your use of the Service. This means that we determine and are responsible for how your personal information is used. To establish an account, you will not be asked to provide anything but a username and email address.

### 2. Personal information we collect from you and how we use it

2.1. **Information you provide to us directly.** We collect personal information that you voluntarily submit directly to us when you use the Service. This can include information you provide to us through the Site, when you download and set up an account on the App, correspond with us by e-mail or otherwise, subscribe to our mailing lists or other forms of marketing communications, when you report a problem with the Service or use some other feature of the Service.

2.2. We also collect information and content you choose to post to the Service, such as photos and other media, each of which you present through technology available through the Service, including but not limited to our in-app community. Much of this information is deidentified and aggregated data which does not include any personally identifiable information.

2.3. If you choose not to provide such personal information, we may not be able to provide those parts of the Service to you or respond to your other requests.

2.4. The table at **Annex 1** sets out in detail the categories of personal information we collect about you and how we use that information when you use the Service.

2.5. **Information we collect automatically.** We also automatically collect personal information indirectly about how you access and use the Service, and information about the device you use to access the Service. For example, we may collect:

- (a) information about the features you use and the pages you view;
- (b) information about your device (such as your IP address, device identifier, device type, model and manufacturer); and

(c) information about your usage patterns (such as how often you use the Service and your language settings).

2.6. We use this information to provide you the features and functionality of the Service, to monitor and improve the Service and to develop new products and services.

2.7. We may link or combine the personal information we collect about you and the information we collect automatically. This allows us to provide you with a personalized experience regardless of how you interact with us.

2.8. We may anonymize and aggregate any of the personal information we collect (so that it does not directly identify you). We may use anonymized information for purposes that include testing our IT systems, research, data analysis, improving the Service and developing new products and features. We may also share such anonymized and aggregated information with others.

### 3. How long will we store your personal information

3.1. We will usually store the personal information we collect about you for no longer than necessary for the purposes set out in **Annex 1**, in accordance with our legal obligations and legitimate business interests.

3.2. We may, however, need to retain your personal information for longer if we are required to do so by law.

### 4. Recipients of personal information

4.1. We may also share your personal information with the following (as required in accordance with the uses set out in **Annex 1**):

(a) **Other service providers and advisors:** we may share your personal information with third party vendors and other service providers that perform services for us or on our behalf, which may include providing professional services, such as legal and accounting services, mailing, email or chat services, fraud prevention, cloud or web hosting, or providing analytic services. In such cases, your personal information will be deidentified and aggregated with other user data.

(b) **Third parties at your request:** For example, you may have the option to share your content with other users of the Service.

(c) **Affiliates:** Other companies owned by or under common ownership as Tetragram, Inc., including our subsidiaries (i.e., any organization we own or control) ultimate holding company (i.e., any organization that owns or controls us) and any subsidiaries it owns. These companies will use your personal information in the same way as we can under this Privacy Policy.

(d) **Purchasers and third parties in connection with a business transaction:** your personal information may be disclosed to third parties in connection with a transaction, such as a merger, sale of assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business.

(e) **Law enforcement, regulators and other parties for legal reasons:** we may share your personal information with third parties as required by law or if we reasonably believe that such action is necessary to (i) comply with the law and the reasonable requests of law enforcement; (ii) detect and investigate illegal activities and breaches of agreements, including our Terms of Use; and/or (iii) exercise or protect the rights, property, or personal safety of Tetragram, its users or others.

### 5. Marketing and advertising

5.1. From time to time we may contact you (by email or via push notifications) with information about our products and services, including sending you marketing messages and asking for your feedback on our products and services.

5.2. For some marketing messages, we may use personal information we collect about you to help us determine the most relevant marketing information to share with you.

5.3. You can withdraw your consent at a later date by clicking on the unsubscribe link at the bottom of our marketing emails or by updating your preferences via the App settings. You can also disable push notifications via the App settings.

## 6. Protecting, storing and transferring your personal information

6.1. **Keeping Your Information Safe.** We implement appropriate technical and organizational measures to protect your personal information against accidental or unlawful destruction, loss, change or damage. All personal information we collect will be stored by our cloud hosting provider on secure servers. We will never send you unsolicited emails or contact you by phone requesting your account ID, password, credit or debit card information or national identification numbers.

6.2. Tetragram does not ask for, nor access, any medical record information nor do we store any protected health information, nor are we a “Covered Entity” as defined under the Health Insurance Portability and Accountability Act (HIPAA).

## 7. Your control over your information

7.1. **Profile and Data Sharing Settings.** You may update your profile information, such as your username and profile photo and may change some of your data sharing preferences (e.g., your visibility settings) by accessing the “Settings” in the App.

7.2. **Access to your Device Information.** You may control the App’s access to your device information through your “Settings” on your device.

7.3. **How to control your communications preferences.** You can stop receiving promotional email communications from us by clicking on the “unsubscribe link” provided in such communications. We make every effort to promptly process all unsubscribe requests. You may not opt out of service-related communications (e.g., account verification, transactional communications, changes/updates to features of the Service, technical and security notices).

7.4. **Modifying or deleting your information.** If you have any questions about reviewing, modifying, or deleting your information, you can contact us directly at [dmca@tetragramapp.com](mailto:dmca@tetragramapp.com) We may not be able to modify or delete your information in all circumstances.

## 8. Links to third party sites

8.1. The Service may, from time to time, contain links to and from third party websites, including those of other users, our partner networks, advertisers, partner merchants, news publications, retailers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. Please check the individual policies before you submit any information to those websites.

## 9. Our policy towards minors

9.1. The Service is not directed at persons under 21 and we do not knowingly collect personal information from any persons under 21. If you become aware that your minor has provided us with personal information, without your consent, then please contact us using the details below so that we can take steps to remove such information and terminate any account your minor has created with us.

## 10. Changes to this policy

10.1. We may update this Privacy Policy from time to time and so you should review this page periodically. When we change this Privacy Policy in a material way, we will update the “last modified” date at the end of this Privacy Policy. Changes to this Privacy Policy are effective when they are posted on this page.

## 11. Notice to you

11.1. If we need to provide you with information about something, whether for legal, marketing or other business-related purposes, we will select what we believe is the best way to get in contact with you. We will usually do this through email or by a notification within the App. The fact that we may send notices to you will not stop you from being able to opt out of certain types of contact as described in this Privacy Policy.

## 12. Contacting us

12.1. Please contact, [contact@tetragramapp.com](mailto:contact@tetragramapp.com) if you have any questions, comments, and requests regarding this Privacy Policy.

12.2. This Privacy Policy was last modified on June 21, 2023.

## 13. Annex

13.1. ANNEX 1.