

Meomind Listener User Privacy Policy

Version 1.1

Last Update: May 2022

This notice describes how Personal Data (defined below) and/or medical information about you may be used and disclosed and how you can obtain access to this information. Please review it carefully.

INTRODUCTION

We at Meomind, Inc. (“we”, “us”, the “Company”, or “Meomind”) value your privacy and are committed to keeping your personal data confidential. We use your data solely in the context of providing the Meomind application (“App”) to connect you (the “Listener User”) with a library of pre-recorded, simulated audio therapy sessions (“Simulated Sessions”), including all relevant content and functionality associated with the App and Simulated Sessions (collectively, the “Services”).

Privacy Policy Applicability

This Listener User Privacy Policy applies to personal data that Meomind collects from Listener Users of the Meomind App and the Services (“Personal Data”). ***The term “Personal Data” includes any information that can be used on its own or with other information in combination to identify or contact one of our users.***

We believe that privacy and transparency about the use of your Personal Data are of utmost importance. Therefore, our privacy practices are intended to comply with relevant state law. Additionally, in this Listener User Privacy Policy, we provide you with detailed information about our collection, use, maintenance, and disclosure of your Personal Data. The Listener User Privacy Policy explains what kind of information we collect, when and how we might use your Personal Data, how we protect Personal Data, and your rights regarding your Personal Data.

For additional information related to how we use and disclose your Personal Data, ***please contact us at team@meomind.com.***

Note regarding third-party sites: Our Services may contain links to other sites that are not operated by Meomind. If you click a third-party link, you will be directed to that third party’s site. We strongly advise you to review the privacy policy(ies) of every site you visit. Meomind has no control over and assumes no responsibility for the content, privacy policies, or practices of any third-party sites or services. ***This Privacy Policy does not apply to your use of or access to any third-party sites or services.***

Agreement to Privacy Policy Terms

BY ACCESSING AND/OR USING THE SERVICES AND APP, **YOU ARE ACKNOWLEDGING THAT YOU HAVE READ AND AGREE TO THE TERMS OF THIS PRIVACY POLICY.** IF YOU DO NOT AGREE, YOU MUST IMMEDIATELY CEASE USING THE SERVICES AND APP.

Listener User Privacy Policy Updates

Please note that ***we occasionally update this Listener User Privacy Policy, and it is your responsibility to stay up to date with any amended versions.*** Any revisions to the Listener User Privacy Policy will be posted in the profile page of the App. Any changes to the Listener User Privacy Policy will be effective immediately upon providing notice via the login page(s) and will apply to all Personal Data that we maintain, use, and disclose. If you continue to use the Services and App following such notice, you are agreeing to those changes.

Account Deletion

If at any point you no longer agree to the use and disclosure of Personal Data, as described in this Listener User Privacy Policy, you can delete your user account on the App (“**User Account**”) or by sending a deletion request to team@meomind.com with the following information:

- Your login email address; and
- A statement that you are requesting account deletion.

Questions or Concerns

If you have any questions or concerns after reading this Privacy Policy, please do not hesitate to contact us at team@meomind.com. We appreciate your feedback.

COLLECTION AND USE OF PERSONAL DATA

What Personal Data Does Meomind Collect?

We collect four types of information from our Users: (i) demographic data; (ii) user-generated content; (iii) support data; and (iv) technology data. Each category of data is explained in depth below.

Demographic Data: Meomind collects demographic data from Users, which may include, but not be limited to, your name, gender, birth date, phone number, and e-mail address. The collection of this demographic data is primarily used to create your User Account, which you can use to securely receive the Services.

User-Generated Content: Some Services allow Listener Users to input original content, such as written journal entries, which may contain Personal Data. User-Generated Content that you enter into the App is only visible to you.

Support Data: If you contact us for support or to lodge a complaint, we may collect technical or other information from you through log files and other technologies, some of which may qualify as Personal Data (e.g., IP address). Such information will be used for the purposes of troubleshooting, customer support, software updates, and improvement of the App and related Services in accordance with this Listener User Privacy Policy.

Technology Data: We use common information-gathering tools, such as log files, cookies, web beacons, and similar technologies to automatically collect information, which may contain

Personal Data from your device as you navigate our App or interact with emails or other communications we have sent you. The information we collect may include your IP address (or proxy server), device and application identification numbers, location, browser type, Internet service provider and/or mobile carrier, the pages and files you viewed, your searches, your operating system and system configuration information, and date/time stamps associated with your usage. This information is used to analyze overall trends, help us provide and improve our Services, and ensure the proper functioning and security of the App and Services.

How Will Meomind Use Your Personal Data?

Meomind processes your Personal Data based on legitimate business interests, the fulfillment of our Services to you, compliance with our legal obligations, and/or your consent. We only use or disclose your Personal Data when it is legally mandated or where it is necessary to fulfill those purposes described in this Listener User Privacy Policy. Where required by law, we will ask for your prior consent before disclosing your Personal Data to a third party.

More specifically, Meomind processes your Personal Data for the following legitimate business purposes:

- To provide Services;
- To fulfill our obligations to you under the Listener User Terms of Use;
- To communicate with you about and manage your User Account;
- To properly store and track your data within our system;
- To respond to lawful requests from public and government authorities, and to comply with applicable state/federal law, including cooperation with judicial proceedings and court orders;
- To protect our rights, privacy, safety, or property, and/or that of you or others by providing proper notices, pursuing available legal remedies, and acting to limit our damages;
- To handle technical support and other requests from you;
- To enforce and ensure your compliance with our Listener User Terms of Use or the terms of any other applicable services agreement we have with you;
- To manage and improve our operations and the App, including the development of additional functionality;
- To evaluate the quality of service you receive, identify usage trends, and improve your user experience;
- To keep our App and Services safe and secure;
- To send you information about changes to our terms, conditions, and policies; and
- To allow us to pursue available remedies or limit the damages that we may sustain.

Does Meomind Use Personal Data for Analytics?

Meomind uses third-party service providers to monitor or analyze the use of the App as part of our Services.

Where Is Personal Data Processed?

The Personal Data we collect through the App will be stored on secure servers in the United States. Personal Data may be transmitted to third parties, which parties may store or maintain the data on their secure servers. These third parties are not permitted to transfer your Personal Data outside of the United

States. The App is “native” to your device, meaning information you enter into the App may also be stored directly on the device that you use to access and enter information into the App.

With Whom Does Meomind Share Personal Data?

We may share your personal information with the following categories of individuals/entities:

Business Partners and Vendors: We share Personal Data with a limited number of partners, service providers, and other persons/entities who help run our business (“**Business Partners**”). Specifically, we may employ third-party companies and individuals to facilitate our Services, provide Services on our behalf, perform Service-related functions, or assist us in analyzing how our Services are used. Our Business Partners are contractually bound to protect your Personal Data and to use it only for the limited purpose(s) for which it is shared. Business Partners’ use of Personal Data may include, but is not limited to, the provision of services such as data hosting, IT services, customer services, and payment processing.

Our Advisors: We may share your Personal Data with third parties that provide advisory services to Meomind, including, but not limited to, our lawyers, auditors, accountants, and banks (collectively, “**Advisors**”). Personal Data will only be shared with Advisors if Meomind has a legitimate business interest in the sharing of such data.

Third Parties Upon Your Direction or Consent: You may direct Meomind to share your Personal Data with third parties. Upon your request and consent, we may share such Personal Data with those third parties that you identify.

Third Parties Pursuant to Business Transfers: In the event of a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of Meomind’s corporate entity, assets, or stock (including in connection with any bankruptcy or similar proceedings), we may share your Personal Data with a third party without your consent.

Government and Law Enforcement Authorities: If reasonable and necessary, we may share your Personal Data to (i) comply with legal processes or enforceable governmental requests, or as otherwise required by law; (ii) cooperate with third parties in investigating acts or omissions that violate this Listener User Privacy Policy or the Listener User Terms of Use; or (iii) bring legal action against someone who may be violating the Listener User Terms of Use or who may be causing intentional or unintentional injury or interference to the rights or property of Meomind or any third party, including other users of our Services.

How Long Does Meomind Retain Personal Data?

Meomind retains your Personal Data only as long as necessary and as required for our business operations, the provision of Services, archival purposes, and/or to satisfy legal requirements. The exact period of retention will depend on: (i) the amount, nature, and sensitivity of the Personal Data; (ii) the personal risk of harm for unauthorized use or disclosure; (iii) the purposes for which we process your Personal Data, including whether those purposes can be achieved through other means; and (iv) business operations and legal requirements. In general, Meomind strives to retain your data for no longer than 12 months after your Account is closed (the “**Retention Period**”); however, the above factors may extend or decrease this Retention Period.

At the end of the applicable Retention Period, we will remove your Personal Data from our databases and will require that our Business Partners remove any identifiable Personal Data from their databases. If there is any data that we are unable to delete entirely from our systems for technical reasons, we will put in place appropriate measures to prevent any further processing of such data. ***Please note that once we disclose your Personal Data to third parties, we may not be able to access that Personal Data and we cannot force the deletion or modification of such information by third parties.***

Meomind and its Business Partners reserve the right to continue using de-identified data indefinitely, even after Personal Data has been removed from Meomind's databases. We may continue to disclose de-identified data to third parties in a manner that does not reveal personal information, as described in this Listener User Privacy Policy. Our continued use of de-identified data will comport with applicable law.

What Happens to Personal Data Submitted by Minors?

Meomind does not knowingly collect Personal Data from individuals under the age of 18. Additionally, our Services are not directed to individuals under the age of 18. We request that these individuals not provide Personal Data to us. If we learn that Personal Data from users under the age of 18 has been collected, we will deactivate the User Account associated with that data and take reasonable measures to promptly delete such data from our records. If you are aware of a user under the age of 18 accessing the Services or App, please contact us at team@meomind.com.

If you are a resident of California under the age of 18 and have registered for a User Account with us, you may ask us to remove content or information that you have posted to our App.

LISTENER USER RIGHTS

What Rights Do Listener Users Have Concerning Their Personal Data?

As a user of Meomind's Services and App, you have certain rights relating to your Personal Data. These rights are subject to local data protection and privacy laws, and may include the right to:

- Access Personal Data held by Meomind;
- Erase/delete your Personal Data, to the extent permitted by applicable data protection and privacy laws and to the extent technologically feasible;
- Receive communications related to the processing of your Personal Data;
- Restrict the processing of your Personal Data to the extent permitted by law;
- Object to the further processing of your Personal Data, including the right to object to marketing;
- Request that your Personal Data be transferred to a third party, if possible;
- Receive your Personal Data in a structured, commonly used, and machine-readable format; and/or
- Rectify inaccurate personal information and, taking into account the purpose of processing the Personal Data, ensure it is complete.

Where the processing of your Personal Data by Meomind is based on consent, you have the right to withdraw that consent at any time. If you would like to withdraw your consent or exercise any of the above rights, please contact us at team@meomind.com.

How Can Listener Users Update, Correct, or Delete Personal Data or Their User Account?

You have the right to request restrictions on uses and disclosures of your Personal Data. While we are not required to agree to all restriction requests, we will attempt to accommodate reasonable requests when appropriate.

You may change your email address and other contact information by accessing your Meomind User Account. If you need to make changes or corrections to other information, you may contact us at team@meomind.com. In order to comply with certain requests to limit use of your Personal Data, we may need to terminate your ability to access and/or use some or all of the Services. BY REQUESTING TO LIMIT USE OF YOUR PERSONAL DATA OR DELETE PERSONAL DATA, YOU ACKNOWLEDGE AND AGREE THAT MEOMIND WILL NOT BE LIABLE TO YOU FOR ANY CORRESPONDING LIMITATION IN THE SCOPE OF SERVICES OR TERMINATION OF SERVICES AS NECESSARY TO COMPLY WITH YOUR REQUEST.

You have the right to request deletion of any Personal Data from your User Account and the Meomind App. To request deletion of your Personal Data, please email us at team@meomind.com and include a description of the Personal Data you would like removed. We will respond to all requests for data deletion as soon as reasonably possible.

Should you decide to delete your User Account entirely, you may do so through your Meomind User Account dashboard or by emailing team@meomind.com. By terminating your User Account, you agree that you will not be able to access any information previously contained in your User Account. You further understand that it may not be technologically possible to remove all of your Personal Data from our systems. While we will use reasonable efforts to remove your Personal Data, the need to back up our systems to protect information from inadvertent loss means a copy of your Personal Data may exist in a non-erasable form that will be difficult or impossible for us to locate or remove.

PROTECTION OF PERSONAL DATA

Is Personal Data Secure?

Meomind understands the importance of data confidentiality and security. We use a combination of reasonable physical, technical, and administrative security controls to: (i) maintain the security and integrity of your Personal Data; (ii) protect against any threats or hazards to the security or integrity of your Personal Data; and (iii) protect against unauthorized access to or use of such information in our possession or control that could result in substantial harm to you.

While Meomind uses reasonable security controls, WE CANNOT GUARANTEE OR WARRANT THAT SUCH TECHNIQUES WILL PREVENT UNAUTHORIZED ACCESS TO YOUR PERSONAL DATA. MEOMIND IS UNABLE TO GUARANTEE THE SECURITY OR INTEGRITY OF PERSONAL DATA TRANSMITTED OVER THE INTERNET, AND THERE IS NO GUARANTEE THAT YOUR PERSONAL DATA WILL NOT BE ACCESSED, DISCLOSED, ALTERED, OR DESTROYED BY BREACH OF ANY OF OUR PHYSICAL, TECHNICAL, OR ADMINISTRATIVE SAFEGUARDS. ACCORDINGLY, WE DO NOT AND CANNOT ENSURE OR WARRANT THE SECURITY OR

INTEGRITY OF ANY PERSONAL DATA YOU TRANSMIT TO US. **YOU ASSUME THE RISK THAT UNAUTHORIZED ENTRY OR USE, HARDWARE OR SOFTWARE FAILURE, AND OTHER FACTORS MAY COMPROMISE THE SECURITY OF YOUR PERSONAL DATA AT ANY TIME.**

What Safeguards Does Meomind Have in Place to Secure Personal Data?

Meomind stores Personal Data on secured servers and uses a combination of technical, administrative, and physical safeguards to protect your personal information. Such safeguards include, but are not limited to, authentication, encryption, backups, and access controls.

How Can Listener Users Protect Their Personal Data?

You are solely responsible for preventing unauthorized access to your devices and your User Account by protecting your account credentials and limiting access to your devices. Meomind has no access to or control over your device's security settings, and it is your responsibility to implement any device-level security features and protections you feel are appropriate (e.g., password protection, encryption, remote wipe capability). We recommend that you take all appropriate steps to secure any device that you use to access our Services and App.

Please note that Meomind will never send you an email requesting confidential information, such as account numbers, usernames, passwords, or Social Security Numbers. If you receive a suspicious email from Meomind, please notify us at team@meomind.com.

Further, if you know of or suspect any unauthorized use or disclosure of your User Account information or any other security concern, please notify Meomind immediately.

What If Meomind Experiences a Data or Security Breach?

Meomind takes the security of your Personal Data seriously. In the event of a data or security breach, Meomind will take the following actions: (i) promptly investigate the security incident, validate the root cause, and, where applicable, remediate any vulnerabilities within Meomind's control which may have given rise to the security incident; (ii) comply with laws and regulations directly applicable to Meomind in connection with such security incident; (iii) as applicable, cooperate with any affected Meomind user or client in accordance with the terms of Meomind's contract with such user or client; and (iv) document and record actions taken by Meomind in connection with the security incident and conduct a post-incident review of the circumstances related to the incident and actions/recommendations taken to prevent similar security incidents in the future. Meomind will notify you of any data or security breaches as required by and in accordance with applicable law.

ADVERTISING, MARKETING, AND TRACKING

Does Meomind Send Marketing or Advertisement Materials?

Meomind may use your Personal Data to contact you with newsletters, marketing, or promotion materials and other information that may be of interest to you. You may opt out of receiving any marketing or advertisement materials from Meomind at any time by following the unsubscribe link or by emailing us at team@meomind.com.

Can Listener Users Opt Out of Receiving Communications from Meomind?

We may send communications, including emails, to you regarding your User Account and the Services or App. You can choose to filter any User Account, Services, and App emails using your email settings, but we do not provide an option for you to opt out of these communications.

If you consent to receive marketing or other communications not related to your User Account or the Services/App, we will provide you with the option to opt out of such marketing communications within the applicable message.

What Is Meomind's Cookie Policy?

Cookies are small files that a web server sends to your computer or device when you visit a web application that uses cookies to keep track of your activity on that site. Cookies also exist within applications when a browser is needed to view or display certain content within the application. Cookies hold a small amount of data specific to a web application, which can later be used to help remember information you entered in the application (like your email or username), preferences selected, and movement within the application. We use cookies and other technologies to, among other things, better serve you with more tailored information, and to facilitate efficient and secure access to the Services.

Our cookies do not, by themselves, contain Personal Data. Further, we do not combine the general information collected through cookies with any other Personal Data to identify you. However, we do use cookies to identify that your web browser has accessed aspects of the Services and may associate that information with your User Account (if one exists).

Meomind may also collect information using pixel tags, web beacons, clear GIFs, or other similar technologies. This information may be used in connection with website pages and HTML formatted email messages to, among other things, track the actions of users and email recipients and compile statistics about usage and response rates.

How Can Listener Users Opt Out of Cookies?

If you prefer, you can usually choose to set your browser to remove cookies and reject cookies. If you enable a do not track signal or otherwise configure your browsers to prevent us from collecting cookies, you may be unable to take advantage of some of the Services.

Do Not Track Disclosure

Some web browsers may transmit do not track (“DNT”) signals to websites with which the user communicates. To date, there is no industry standard for DNT and users cannot know how a given company responds to a DNT signal they receive from browsers. Meomind is committed to remaining apprised of DNT standards. However, Meomind does not support DNT browser settings and does not currently participate in any DNT frameworks that would allow Meomind to respond to signals or other mechanisms regarding the collection of your personal information.

If you are a California resident, the California Consumer Privacy Act (“**CCPA**”) may apply to you. Please see the CCPA Attachment for an explanation of your rights.

Under California Civil Code sections 1798.83-1798.84, California residents are entitled to ask for and obtain from us an annual list identifying the categories of personal customer information which we shared, if any, with our affiliates and/or third parties in the preceding calendar year for marketing purposes. This list will be provided free of charge. Contact information for such affiliates and/or third parties must be included. If you are a California resident and would like a copy of this notice, please submit a written request to the following address:

Meomind, Inc.
156 Brighton Road
Pacifica, CA 94044

[END]