

## **Privacy Policy**

### **Cine-Med Inc.**

**Last revised on April 26, 2023**

#### **1. Scope of This Policy**

a) This Privacy Policy describes how Cine-Med Inc. (“We” or “Us”) collects, uses, consults or otherwise processes an individual's personal data. We are committed to protecting the privacy of our users and customers. This Privacy Policy is applicable to:

- visitors and subscribers of the services, websites or applications of Cine-Med Inc. (collectively may be referred to as the “Websites”);
- natural persons contacting us through the contact or other forms available on the websites as well as via email;
- subscribers to our newsletter(s);
- all users signing in to use our services or who otherwise use or access our services;
- conference and course registrants;
- individuals who access or use products purchased via phone or web.

(All of the above may be referred to as “you” or “user(s)”)

b) This Privacy Policy is intended to inform you how we gather, define, and use information that could identify you, such as your name, email address, address, other contact details, online identifiers or other information that you provide to us when using our websites or when using or relying on our services, or otherwise browsing our website or applications.

c) This policy includes a description of your data protection rights, including a right to object to some of the processing activities we carry out.

#### **2. Contacting Us**

If you have general questions about your account, or how to contact Customer Service for assistance, please send us an email at [support@cine-med.net](mailto:support@cine-med.net). Please note that if you contact us to assist you, for your security and ours, we may need to authenticate your identity before fulfilling your request.

#### **3. Collection of Information**

a) You may provide personal information such as name, address, credit card details, and contact info to us by signing up for a subscription, buying a product, or registering for a course. Personal information may be any information which can be used to identify you, and may also have specific definitions pursuant to applicable law.

#### **b) Automatic Data**

We also automatically collect certain technical data that is sent to us from the computer, mobile device and/or browser through which you access the Website using cookies or similar technologies (“**Automatic Data**”). Automatic Data, includes without limitation, a unique identifier associated with your access device and/or browser (including, for example, your Internet Protocol (IP) address), characteristics about your access device and/or browser, statistics on your activities on the Website, details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries, or information about how you came to the website/application. We attempt to anonymize such information, however, to the extent that IP addresses or similar identifiers are considered personal information by any applicable law, we also treat these identifiers as personal information. We collect Automatic Data based on your consent which was granted to us by you when you accessed this Website, or when you registered as a user, and thereby accepted this Privacy Policy. If you do not want us to collect this information, do not use the Website or delete your account on the Website. Please note: If you restrict, disable or block any or all cookies from your web browser or mobile or other device, our services may not operate properly, and you may not have access to certain services or parts of the Website or applications accompanying it. We shall not be liable for any interruption in, or inability to use, our services or degraded functioning thereof, where such are caused by your settings and choices regarding cookies.

#### **c) Non-Personal Data.**

When you interact with the Website, we may collect Non-Personal Data. The limitations and requirements of this Privacy Policy on our collection, use, disclosure, transfer and storage/retention of personal information do not apply to Non-Personal Data. When you register for the Website/application or otherwise submit personal information to us, we may associate other Non-Personal Data (including Non-Personal Data we collect from third parties) with your personal information. At such instance, we will treat any such combined data as your personal information until such time as it can no longer be associated with you or used to identify you.

#### **d) Correspondence information**

If you send us personal correspondence, such as emails or letters, we may store such information.

#### **e) Payment Information**

To protect you against fraud, unauthorized transactions (such as money laundering), claims and other liabilities, we only collect an identification number and order details which enable us to match each user to the payments made. Any credit card payments made on our websites and the corresponding name, address and contact info are securely sent to our third-party payment vendor and used only to verify identity. Credit card information is not stored on our servers.

### **4. Use of Information**

a) We use your information to provide, analyze, administer, enhance, and personalize our services and marketing efforts, to process your registration, your orders and your payments and to communicate with you on these and other topics. We may use your personal information for the following purposes:

1. We use your Information in order to resolve disputes; troubleshoot problems; process payments; measure consumer interest in services; inform you about offers, products, services, and updates; customize your experience; detect and protect us against error, fraud and other criminal activity; enforce our terms of service (TOS); and as otherwise described to you at the time of collection. We may compare and review your business or personal information for errors, omissions and for accuracy.
  2. We use your e-mail to send you system e-mails about the functionality of our Website/application/services that you cannot opt out from and you must receive if you want to use our Website. If you want to stop receiving our system e-mails, you will have to de-activate your accounts by contacting support@cine-med.net.
  3. We use your e-mail associated with your accounts in order to send you newsletters and promotions in conjunction with your use of our services. If you do not wish to receive newsletters, you may unsubscribe by clicking the unsubscribe link in the newsletter e-mail.
  4. We use Website navigation data to operate and improve our Website.
  5. We collect IP Addresses to track usage of our Website. We use IP Addresses to monitor the regions from which you navigate our Website and sign-up to use our services.
  6. We collect personal information to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting.
  7. We may monitor your browsing information on our Website, your personal information with respect to demographics, age and other consumer information, and other information relevant to our own internal marketing research.
  8. We may use your personal information to comply with our legal obligations, resolve any disputes that we may have with any of our users, enforce our agreements with third parties and for anti-fraud purposes.
  9. We may collect and use your personal information to enable you to access and use our Website, and allow you to interact with all services available therein, as well as those available on any accompanying/associated applications or functionalities.
  10. We may collect and use your personal information to operate, protect, improve and optimise our Website, services, products, business and our users' experience, such as to perform analytics, conduct research and for advertising and marketing.
  11. We may collect and use your personal information to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you, and carry out our obligations and enforce our rights arising from any applicable agreement entered into between you and us, including billing and collection.
- b) By accessing our Website and services, you hereby agree and consent to our use of your personal information as described above. Please note, we only use such information for our internal purposes, and we do not sell or disclose your information to any third parties, except to the extent such disclosure is necessary for the operation of the services, websites and applications we provide, and then only to

such third parties who are bound by confidentiality obligations with respect to the receipt of such information.

c) **No Discrimination.** We will not discriminate when providing services, software or content through the Website, if any user refuses to provide their consent for the processing their personal information and provides this refusal to us in writing at the address specified in this policy, and services, content, access, or software use shall only be discontinued for such users to the extent any such personal information is required and needed to continue providing access to such services, content, access, software or to this Website in general.

d) We do not process your personal information as it relates to revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and we do not engage in the processing of your genetic data or biometric data for the purpose of uniquely identifying you as a natural person, or process data concerning your health or sex life or sexual orientation.

e) **Data Collection.** We collect all information which users voluntarily provide to us through the Website or while interacting with us. This includes (but is not limited to) information provided:

- during registration;
- during correspondence, enquiries, support services, the making of payments, phone calls, or customer surveys;
- in the course of availing any products or services;
- via upload onto the Website in any way;
- via any chat text or other correspondence carried out via the Website or its accompanying applications, services or functions;
- if you register to receive our newsletter
- via the users use of and browsing of the Website.

## **5. Protection of Information**

a) We use reasonable administrative, logical, physical and managerial measures to safeguard your personal information against loss, theft and unauthorized access, use and modification. These measures are designed to provide a level of security appropriate to the risks of processing your personal information and are designed to be in accordance with reasonable industry standards. Indicatively:

1. We do not transfer, sell or rent your Business Information or personal information to third parties for their marketing purposes. We request only the information that we need to operate our services and Website, and improve our Website's user experience. We may also collect such information for our own internal marketing or market research. Our software runs on Cine-Med-owned servers and no data given or collected is shared with other social media platforms.

2. We use robust security measures to protect data from unauthorized access, maintain data accuracy, and help ensure the appropriate use of data. When the services are accessed using the internet, Secure Socket Layer (SSL) technology protects your information, using both server authentication and data encryption. These technologies help ensure that your Information is safe, secure, and only available to you and to whom you have granted access.

3. Cine-Med Inc. does its utmost to secure communications and data storage to protect confidentiality of your information against loss and interception by third parties. However, it is important to know that there is no zero-risk solution for loss or interception by others of your Information. You are responsible for maintaining the security and confidentiality of your account's username and password for access to the Website, and you are solely responsible for any access or use of our services via your account.

## **6. Storage of Information**

a) We save your Information in our database in order to improve our Website's user experience, and in accordance with our TOS. If you wish that your business or personal information be permanently deleted from our database when you stop using our services, please notify us at [support@cine-med.net](mailto:support@cine-med.net). However, at our discretion, in order to comply with our legal obligations or otherwise, we may decide to store any personal information provided by a user for up to six (6) years after the user ceases using our services and/or deletes their account.

b) Cine-Med Inc. is a United States (US) company. If you are located outside the US and choose to provide information to us, note that the US may not have the same data protection laws as the country in which you initially provided the Information. By visiting our Website or providing Cine-Med Inc. with your information, you fully understand and unambiguously consent to the transfer, processing, and storage of your Information in the US, and outside of your home jurisdiction, whether you reside in the European Union ("EU") or elsewhere.

## **7. Information and Rights**

a) Once you have provided your personal information, you may have several rights, which you can in principle exercise free of charge, subject to statutory exceptions. These rights may be limited, for example, if fulfilling your request would reveal personal information about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. To exercise any of your rights, you can file a request here [support@cine-med.net](mailto:support@cine-med.net). Should you have unresolved concerns, you have the right to lodge a complaint with a Supervisory Authority where you live or where you believe a breach may have occurred. We encourage you to contact us in the first instance, but to the extent that this right applies to you, you are entitled to complain directly to the relevant Supervisory Authority.

### **b) Specific Rights**

Some of the specific rights you may be entitled to are outlined below:

#### **1. Right to withdraw consent**

Wherever we rely on your consent, you may be able to withdraw that consent at any time you choose and at your own initiative by logging into your account on our website (if you have one) or by contacting us at [support@cine-med.net](mailto:support@cine-med.net). The withdrawal of your consent will not affect the lawfulness of the collection and processing of your data based on your consent up until the moment where you withdraw your consent.

#### **2. Right to access and rectify your data**

You may have the right to access, review, and rectify your personal information. You may be entitled to request a copy of your information, to review or correct it. If you wish to rectify any information such as your name, email address, and/or any other preferences, you can easily do so by logging into your account on our Website (if you have one) or by contacting us at [support@cine-med.net](mailto:support@cine-med.net). You may also request a copy of the personal information processed as described in this Privacy Policy.

### 3. Right to erasure

You may have the right to erasure of your personal information processed by us as described in this Privacy Policy in case it is no longer needed for the purposes for which the personal information was initially collected or processed or in the event you have withdrawn your consent or objected to processing as described in this Privacy Policy and no other legal ground for processing applies. Should you wish to have your personal information erased, please file a request at [support@cine-med.net](mailto:support@cine-med.net).

### 4. Right to restriction of processing

Under certain circumstances, you may ask us to restrict the processing of your personal information; for example, when you contest the accuracy of your personal information. In such event, we will restrict the processing until we can verify the accuracy of your data. Should you wish to have your personal information restricted, please file a request at [support@cine-med.net](mailto:support@cine-med.net).

### 5. Right to object to processing

Under certain circumstances, you may object to the processing of your personal information, including where your personal information is processed for direct marketing purposes. If you no longer want to receive certain communications from us via email, simply click the unsubscribe link in any of our emails.

### 6. Right to data portability

Where you have provided your data directly to us and where the processing is carried out by automated means, and based on your consent or the performance of a contract between you and Cine-Med, you may have the right to receive the personal information processed about you in a structured, commonly used, and machine-readable format, and request portability of your personal information.

### c) Honoring Your Rights.

Cine-Med will provide their reasonable best efforts towards honoring your rights with respect to personal information, to the extent Cine-Med is legally obligated to honor such rights, and when not legally obligated, to the extent of their reasonable ability.

## **8. Other Websites**

Cine-Med Inc.'s website may contain links to sites operated by third parties whose policies regarding the handling of information may differ from ours. These websites and platforms have separate and independent privacy or data policies, privacy statements, notices and terms of use, which we recommend you read carefully. In addition, you may encounter third-party applications that interact with Cine-Med Inc.'s services. You acknowledge and agree that Cine-Med is not responsible or liable for the data collection procedures or policies of any such third parties, or any of their services, actions or omissions.

## **9. Children**

We do not knowingly collect or solicit personal information from anyone under the age of 18. In the event we learn that we have collected personal information from a child under the age of 18 without verification of parental consent, steps will be taken promptly to remove that information. If you believe that we have or may have information from or about a child under 18 years of age, please contact us at support@cinemed.net.

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

We reserve the right to modify and update this Privacy Policy from time to time. We will bring these changes to your attention should they be indicative of a fundamental change to the processing of personal information, or are relevant to the nature of the processing of personal information, or are relevant to you and impact your data protection rights.

## **11. Data Retention**

We retain your personal information for as long as is required to fulfill the activities set out in this Privacy Policy, for as long as otherwise communicated to you, or for as long as is permitted by applicable law. At our discretion, in order to comply with our legal obligations, we may decide to store any personal information provided by a user for up to six (6) years after the user ceases using our services and/or deletes their account.

## **12. Applicable Law**

The validity and interpretation of this Privacy Policy shall be governed by the laws of the state of Connecticut, without regard to Connecticut's choice of law principles.

## **13. Data Breaches**

You will be notified of any breach of personal information stored on this Website or provided to us by you within 72 hours of the occurrence of such a breach. At the time we notify you of the breach, we shall also inform you as to all rectification steps we have taken to rectify and mitigate the breach. For information related to our data security and the security of any personal information you provide us via this Website, please get in touch with us at the contact address specified under Section 2 of this Privacy Policy.

## **14. Data Confidentiality**

Any use or transmittal of your data will only be completed once you are made completely aware of its use and transmittal, and then only with your consent, for the sole purpose of delivering services or products via this Website. If we disclose any of your personal information to third parties, it will be done so only with confidentiality and protective measures equivalent to those provided by us through this Privacy Policy. We will not make any of your personal information public, or disclose the same to third parties, unless you authorize us specifically.