

BLATCHFORD APP PRIVACY POLICY – USA

Effective Date: 16 February, 2025

This Privacy Policy describes the information privacy practices of Blatchford, Inc. ("Blatchford," "we," "us," or "our"), for the Blatchford App platform and associated web-based sites and applications made available and operated by us that reference or link to this Privacy Policy (the "Platform"). The Platform includes, without limitation, (i) our Blatchford applications for iOS and Android (collectively, the "App"), which allows an authenticated and authorized user to interact with a compatible Blatchford device ("Blatchford Device") via a secure Bluetooth Low Energy ("BLE") connection; and (ii) our web-based administration portal (the "Portal").

This Privacy Policy explains what information we collect about you; how we collect that information; the purpose for collecting it and how it benefits you; the outside parties we share it with; and your rights, including what you can do regarding your information.

Contact us at 800-548-3534, or at information.security@blatchford.co.uk if you wish to make a request regarding your personal information.

If you are a California resident, see Section 6 for our California Notice at Collection and information provided pursuant to the California Consumer Privacy Act. Note that we do not "sell" or "share" your personal information, as those terms are defined under the California Consumer Privacy Act.

[Click here to view our Consumer Health data Policy.](#)

This Privacy Policy describes how we treat personal information collected by or on behalf of Blatchford when you use the Platform; in our email messages to you relating to the Platform; and in our offline interactions related to the Platform. This Privacy Policy does not apply to other Blatchford websites or platforms that have a different privacy policy. If you live outside of the United States, other policies will apply to your use of the Platform, not this Privacy Policy.

By accessing or using the Platform, you confirm that you have read, understand and acknowledge the terms of this Privacy Policy, and agree to our Blatchford App Patients Terms of Use or Blatchford App Institution End User License Agreement.

1. We collect and use personal information about you.

We (and the vendors and other parties that perform services on our behalf) collect, receive, and develop several different types of personal information about you depending on the nature of your interactions with us. For example, we collect:

Identifiers/Contact Information: We may collect your name, email address, mailing address, zip/postal code, and phone number. If you create an account, we also collect your username and password. We also collect identifiers that you post to the Platform.

Internet and Network Activity Information: We may collect your IP address when you visit the Platform. We also use tracking tools like cookies and pixels to passively collect information about how you interact with the Platform. This might include device identifiers and the type of browser and operating system you are using. When you use our App,

analytics tools automatically record certain log file information, including the time and date when you start and stop using the App and how you interact with the App, as well as in-app information (e.g. screen navigation and device interactions).

Location Information: We may passively collect information about your location using your IP address , the country code/ region/ state/ city associated with your SIM card or your device, language setting, and time zone.

Demographic Information: We may collect demographic information, such as your age, date of birth or gender.

Employment-Related Information: If you are a health care professional, we may collect information such as your certification and training details.

Visual/Audio Information: With your consent, we may collect video recordings that relate to your gait and your use of a Blatchford Device.

Sensitive Information: We may collect information that may be considered sensitive personal information under certain state or local laws. For example, we may collect information related to your health, such as your weight, height, heart rate, heart Rate Variability, energy expenditure, information about your gait and sleep quality, and responses to certain surveys. We also collect the username and password any account you create with us.

Information you submit or post: We collect feedback and any other information you provide when you contact us.

2. We use personal information for the purposes described below.

We use personal information to provide and administer the Platform.

We use personal information to develop and improve our products and services. We may use your information to make the Platform and our products better. We use your information to customize your experience. We may also use your information to conduct research and to develop new products and services.

We use personal information to communicate with you and respond to your requests or questions. We use your information to respond to your questions, complaints, and feedback. We might also use your information to contact you about this Privacy Policy, our Blatchford App Patient Terms of Use, or our Blatchford App Institution End User License Agreement.

We use personal information for security purposes. We use information to protect our company (including the Platform), our customers and others. We may also need to use your information to detect, investigate, and remediate fraud or other suspected illegal activity.

We use personal information to verify and respond to requests made pursuant to this Privacy Policy and for other verification purposes. We will use certain pieces of information to verify your identity if you make requests pursuant to this Privacy Policy. The verification steps and the pieces of information that we request may vary depending on the sensitivity and nature of your request.

We use information as otherwise permitted or required by law or as we may notify you.

3. We collect personal information about you from various sources, directly and indirectly.

We collect personal information directly from you. For example, we may collect information when you register an account or otherwise contact us.

We collect personal information from your devices. We use technical tracking tools that work behind the scenes, like browser cookies, beacons, and pixels, to automatically collect information from and about you and your devices. We collect this information when you interact with the Platform.

We get personal information from vendors we hire to work on our behalf. For example, vendors that host or maintain the Platform may give us information.

We get personal information about you from other parties. We may get personal information about you from your health care provider.

We combine information about you in a variety of ways. We combine information collected offline with information collected online. We also combine information collected across devices, such as computers and mobile devices. We may also combine your information with other consumers' information to improve our products and services.

4. We share personal information with other parties.

We share personal information with vendors that perform services on our behalf for our own business and operational purposes. For example, we may share information with vendors that send emails for us, run the Platform, provide analytics services, investigate and prevent data incidents, audit our business and financial statements, or provide legal advice.

We may share your personal information with your health care professionals. Your health care professionals' use of your information is subject to their respective privacy notices and policies.

We will share personal information in order to comply with the law or to protect ourselves or others. For example, we will share information as required to respond to a court order or subpoena. We may share information if a government agency or investigatory body requests it. We might share information when we are investigating potential fraud.

We may share personal information with any successor to all or part of our business. For example, if part of our business is sold, we may give our customer database to the buyer of the business as part of that transaction. We may also share information if any such transaction is proposed.

We may share information for other reasons we may describe to you or as permitted or required by law.

5. You have choices and rights regarding our use of your personal information.

You can control certain cookies and tracking tools by clicking on the applicable link or cookie banner where these options are made available to you.

6. California Privacy Notice.

This California Privacy Notice applies to California residents and provides certain details regarding how we handle your personal information and the rights you have as a California resident regarding your information. This California Privacy Notice supplements our Privacy Policy.

6.1. California notice at collection.

We may collect or receive (and may have collected or otherwise received during the last 12-month period) the following categories of personal information as set forth in applicable California law:

Category of Personal Information	Examples of Personal Information Types within Category
Identifiers and contact information	Contact information such as name, phone number, mailing address, email address, account details, and identifiers you may post
Personal records	Contact information and account details
Personal characteristics or traits	General demographic information such as your age, date of birth, or gender
Internet and other electronic network usage information	IP address, device identifiers, browser and operating system details, and your interactions with the Platform
Geolocation data	Location information
Audiovisual and similar information	Video information we record with your consent
Profession or employment-related information	Certification and training information (health care professionals only)
Sensitive personal information	Information collected and analyzed concerning health; account log-in information

For additional detail regarding the personal information we collect, see Section 1 of the Privacy Policy.

We collect and use these categories of personal information for the business and commercial purposes described in Section 2 of this Privacy Policy and as provided below:

- Performing services, including maintaining or servicing accounts, providing customer service, providing analytics services, providing storage, or providing similar services;
- Auditing compliance;
- Security and fraud prevention purposes;
- Undertaking activities to verify or maintain the quality or safety of our services;
- Debugging to identify and repair errors;
- To conduct business analysis;
- To conduct research and development; and

- To fulfill our legal function or obligations

We collect each of the foregoing categories of personal information from the sources described in Section 3 above.

We may disclose each of the foregoing categories of personal information for our business and commercial purposes to the extent permitted by applicable law to the categories of parties as described in Section 4 of this Privacy Policy, which may include, for example, suppliers and service providers; health care professionals; operating systems and platforms; data analytics providers; and other parties in connection with business transfers and legal, safety, fraud prevention, and enforcement reasons. We also disclose categories of personal information as we may describe to you from time to time or as permitted or required by law. We do not “sell” or “share” (as those terms are defined in the California Consumer Privacy Act) personal information.

We will retain each category of personal information specified above for as long as reasonably necessary to carry out the business and commercial purposes described in this Privacy Policy or any other notice provided at the time of data collection, as necessary to provide our goods and services, and as necessary to comply with our legal obligations, resolve disputes, protect and defend our legal rights, and enforce our agreements.

6.2. Your California Privacy Rights.

If you are a California resident, you can make the following requests with respect to your personal information subject to limitations and exceptions set forth in applicable law:

- Access – You can request that we disclose to you the following: (i) the categories of personal information that we have collected about you; (ii) the categories of sources from which we have collected personal information about you; (iii) the business or commercial purpose for collecting your personal information; (iv) the categories of personal information that we have disclosed about you for our business purposes and the categories of vendors to whom the personal information was disclosed; and (v) the specific pieces of personal information that we have collected about you.
- Deletion – You can request that we delete the personal information that we collected from you, subject to certain exceptions.
- Correction – You can request that we correct inaccurate personal information that we maintain about you, subject to certain exceptions.

We will not discriminate against you because you exercised any of these rights.

A California resident can exercise these rights online by emailing us at information.security@blatchford.co.uk, or by calling us at 800-548-3534. We may deny certain requests, or fulfill a request only in part, based on our legal rights and obligations. For example, we may retain personal information as permitted by law, such as for tax or other record keeping purposes, to maintain an active account, and to process transactions and facilitate customer requests.

We will take reasonable steps to verify your identity prior to responding to certain of your requests. The verification steps will vary depending on the sensitivity of the personal information and whether you have an account with us.

You may designate an authorized agent to make a request on your behalf. When submitting the request, please ensure the authorized agent is identified as an authorized agent.

We do not disclose personal information to third parties for their direct marketing purposes.

7. Your Privacy Rights (non-California U.S. Residents).

If you reside in the US. But not in California, you may make the following requests with respect to your personal information:

- **Access:** You can request to confirm whether we process your personal information. Subject to certain exceptions, you can also request a copy of your personal information. Delaware and Oregon residents may also request a list of third parties (as defined in applicable law) to whom we have disclosed personal information.
- **Deletion:** You can request that we delete personal information we have from or about you, subject to certain exceptions.
- **Correction:** You can request that we correct inaccurate personal information we maintain about you, subject to certain exceptions.

You can exercise these rights online by emailing us at information.security@blatchford.co.uk, or by calling us at 800-548-3534. Note that for purposes of these rights under this Section 7, personal information does not include information about employees and other of our personnel or information about employees and other representatives of third-party entities we may interact with.

Some state laws give consumers the right to opt out of certain sales of their personal data, or uses of their personal data for certain types of advertising. We do not engage in these activities with respect to personal information collected via the Platform.

We will take reasonable steps to verify your identity prior to responding to your requests. The verification steps will vary depending on the sensitivity of the personal information and whether you have an account with us. We may deny certain requests and will explain why your request was denied and how to appeal our decision, as required by applicable law. After receiving our explanation, if you would like to appeal our decision, you may do so as further detailed in our communication back to you. For questions, you may also contact us by calling or emailing us at the contact information above.

8. This Privacy Policy is intended for individuals in the United States.

If you are located outside the United States, other privacy policies will govern your use of the Platform.

9. The Platform is not intended for children.

We do not knowingly collect personal information from children under 18. If you are a parent or legal guardian and think your child under 18 has given us personal information, you can email us at information.security@blatchford.co.uk. Parents, you can learn more about how to protect children's privacy online here (<https://consumer.ftc.gov/identity-theft-and-online-security/protecting-kids-online>).

10. We use standard security measures.

The Internet is not 100% secure. We cannot promise that your use of the Platform will be completely safe. We encourage you to use caution when using the Internet. This includes not sharing your passwords.

We may link to other sites or outside party services on platforms we do not control.

If you click on a link to an outside party site, you will be taken to websites or platforms we do not control. This Privacy Policy does not apply to the privacy practices of that website or platform. Read the privacy policies of other websites and companies carefully. We are not responsible for these outside party practices.

We keep personal information as long as reasonably necessary to carry out the business and commercial purposes described in this Privacy Policy or any other notice provided at the time of data collection, to provide our goods and services, and as necessary to comply with our legal obligations, resolve disputes, protect and defend our legal rights, and enforce our agreements.

11. Feel free to contact us if you have more questions.

If you have any questions about this Privacy Policy or want to correct or update your information, or submit a complaint, please email us at information.security@blatchford.co.uk. You can also write to us or call at:

Blatchford, Inc.
1031 Byers Road
Miamisburg, OH 45342
Telephone: 800-548-3534

12. We may update this Privacy Policy.

From time to time we may change our privacy policies. We will notify you of any material changes to our Privacy Policy to the extent required by law. We will also post an updated copy on the Platform. Please check the Platform periodically for updates.

CONSUMER HEALTH DATA PRIVACY POLICY

Effective: 16 February, 2025

This Consumer Health Data Privacy Policy (this "Policy") describes how Blatchford, Inc. ("Blatchford," "we," "us," or "our") collects, uses, and shares consumer health data (as that term is defined by applicable laws in Nevada and Washington). We ask that you review it carefully. This Policy describes how we treat consumer health data collected by or on behalf of Blatchford when you use the Blatchford App platform and associated web-based sites and applications made available and operated by us that reference or link to this Policy (the "Platform"). The Platform includes, without limitation, (i) our Blatchford applications for iOS and Android (collectively, the "App"), which allows an authenticated and authorized user to interact with a compatible Blatchford device ("Blatchford Device") via a secure Bluetooth Low Energy (BLE) connection; and (ii) our web-based administration portal (the "Portal"). This policy applies to our email messages to you relating to the Platform, and in our offline interactions where this Policy is referenced. By providing us with consumer health data or using or accessing the Platform, you agree to the collection, use, and disclosure of your consumer health data, as described in this Policy. If you do not agree, please do not provide us with consumer health data and do not access or use the Platform or our services.

This Policy supplements the Blatchford App Privacy Policy and applies solely to consumer health data, as described above.

1. Consumer health data we may collect.

We (and the vendors and other parties we use to perform services on our behalf) may collect the following categories of consumer health data; the categories of consumer health data we collect from or about you specifically (if any) will depend on the context of your interactions with the Platform and the choices you make:

- Information about your health conditions, symptoms, status, diagnoses, testing, or treatments (including surgeries, procedures, medications, or other interventions): We may collect this information, for example, to provide our services;
- Measurements of bodily functions, vital signs, or characteristics: We may collect this information, for example, to provide our services;
- Biometric information: We may collect gait information, for example, with your consent;
- Genetic information: We may collect this information, for example, if we need it to provide you with information regarding your use of a Blatchford Device;
- Information that identifies a consumer seeking health care services; and
- Other information that identifies your past or present health status

2. Sources of consumer health data.

We may collect consumer health data directly from you—for example, in connection with your use of the App and a Blatchford Device. Additionally, we and our vendors may use cookies and related technologies to passively collect information from and across your devices when you interact with the Platform. For more information about how we use

information that is collected passively, please see our Privacy Policy. Finally, we may acquire consumer health data about you from other sources, such as healthcare professionals. We may also combine information about you that we receive from other parties (such as when you choose to use Apple HealthKit or a similar service) with other information about you that we collect when you use the Platform or that you choose to share with us, and this combined information may in some instances be considered consumer health data.

3. Purposes for which we may collect and use consumer health data.

We may collect and use consumer health data to:

- Provide our services and administer the Platform;
- Fulfill and comply with our contractual and other obligations;
- Provide support and respond to your inquiries, and to contact and communicate with you when necessary;
- Review the usage and operations of the Platform, develop new products or services, improve the Platform, and conduct research and analyses to enhance or improve our content, products, and services;
- Prevent, detect, and investigate fraud, cyber incidents, or other illegal or harmful activity and for other security, safety, compliance, and due diligence purposes; and
- Create data in an aggregated format that may be used for analytical and demographic purposes.

We will obtain your consent or authorization where required by applicable law in connection with any of the uses described above. Additionally, we may use consumer health data for other purposes for which we give you choices and/or obtain your consent or authorization as required by law. See Sections 6 and 7 below for more details on the controls and choices you may have.

4. How we may share consumer health data.

We may share your consumer health data for the purposes described above. Additionally, we may share personal information, including consumer health data, with your consent or as reasonably necessary to complete any transaction or provide any product or service you have requested or authorized, as described above.

We may share your consumer health data with your health care professionals.

We may also disclose your consumer health data (a) to vendors that provide business, professional, or technical support functions for us, help us operate our business and the Platform, or administer activities on our behalf; (b) to comply with law, or to respond to subpoenas, judicial processes, or government requests and investigations, or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law; (c) to protect the security of the Platform, servers, network systems, databases, and business; (d) as necessary, if we believe that there has been a violation of our Patient Terms of Use, any other legal document or contract related to our services, or the rights of any third party; and (e) to another entity that acquires or intends to acquire us or any of our assets in connection with a sale or bankruptcy or reorganization proceeding.

5. Third party collection of consumer health data.

Third parties may be able to collect consumer health data from you over time and across different websites depending on your browser, browser add-ons, and associated permissions you set on your devices.

6. Your privacy rights.

Subject to certain legal limitations and exceptions, you may be able to exercise some or all of the following rights:

- **Confirmation and Access:** You may request to confirm whether we collect or share consumer health data about you. You may also request to access such consumer health data, including a list of all third parties and affiliates with whom Blatchford has shared the consumer health data and an active email address or other online mechanism that you may use to contact these third parties.
- **Deletion:** You may request that we delete any of your consumer health data collected from you and retained by us.
- **Withdraw Consent:** You may request to withdraw consent to Blatchford's collection and sharing of consumer health data concerning you.
- **Review and Revise:** You may request to review and/or revise your consumer health data.

We may deny your request to exercise any of the rights described above if doing so is reasonably necessary for us (or our affiliates or processors) to:

- Prevent, detect, protect against, or respond to security incidents, identity theft, fraud, harassment, malicious or deceptive activities, or any activity that is illegal under applicable law;
- Preserve the integrity or security of systems; or
- Investigate, report, or prosecute those responsible for any such action that is illegal under applicable law.

7. Exercising your rights.

You may exercise your rights by emailing us at information.security@blatchford.co.uk, or by calling us at 800-548-3534. We may take steps to verify your identity before responding to your request by asking you a series of questions about your previous interactions with us.

We may deny certain requests and will explain why your request was denied and how to appeal our decision, as required by applicable law. After receiving our explanation, if you would like to appeal our decision, you may do so as further detailed in our communication back to you. For questions, you may also contact us by calling or emailing us at the contact information in Section 9 below.

8. Changes to the SmartStep Consumer Health Data Privacy Policy.

We reserve the right, at our sole discretion, to change, modify, add, remove, or otherwise revise portions of this Policy at any time. When we do, we will post the change(s) on the Platform. Your continued use of our services following the posting of changes to this Policy means you accept these changes.

9. Contact information.

If you have any questions or concerns about this Policy or the practices described herein, please email us at information.security@blatchford.co.uk. You can also write to us or call at:

Blatchford, Inc.
1031 Byers Road
Miamisburg, OH 45342
Telephone: 800-548-3534