

# Phinch.AI Application Privacy Policy

Last modified: October 23, 2023

## **Introduction**

Phinch AI LLC (“**PHINCH**” or “**Company**” or “**We**” or “**Us**”) respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you use the **PHINCH.AI** website, application and related services (our “**Application**”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- Via the Application.
- Via various services and activities associated with the use of the Application should such services and activities be deployed.
- In email, text, and other electronic messages between you and us in relation to the Application and related activities.

It does not apply to information collected by any third party.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use the Application. By accessing or using the Application, you agree to this privacy policy. This policy may change from time to time (see Changes to Our Privacy Policy). Your continued use of this Application after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

## **Children Under the Age of 13**

Our Application is not intended for children under 13 years of age without parental consent. No one under age 13 may provide any information to the Application without parental consent. We do not knowingly collect personal information from children under 13 without parental consent. If you are under 13, do not use or provide any information to this Application without parental consent. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13 without parental consent, please contact us at : *phinch@pontehealth.com*

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see Your California Privacy Rights for more information.

## **Information We Collect About You and How We Collect It**

We collect several types of information from and about users of the Application, including information:

- By which you may be personally identified, such as an e-mail address or any other identifier by which you may be contacted online or offline ("**personal information**"); and
- That is about you but individually does not identify you.

We collect this information:

- Directly from you when you provide it to us.

#### *Information You Provide to Us*

The information we collect on or through the Application may include:

- Information that you provide by filling in forms or answering questions on the Application.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Data collected in keeping with the Application's functionality.

#### *Information We Collect Through Automatic Data Collection Technologies*

As you navigate through and interact with our Application, we may use automatic data collection technologies to collect certain information about your equipment, devices, browsing actions, and patterns, including:

- Details of your use of the Application, including location data, logs, and other communication data and the resources that you access and use in the Application.

#### **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Application and its contents to you.
- To provide you or a third party with information, products, or services that enable the Application to fulfill its functionality.

#### **Disclosure of Your Information**

We may disclose aggregated information about our users that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.

- To fulfill the purpose for which you provide it.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by our Company about our Application users is among the assets transferred.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms of use.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of our Company, our users, or others.

### **Your California Privacy Rights**

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit <https://www.oag.ca.gov/privacy/ccpa>.

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Application that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to : ***phinch@pontehealth.com***

### **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on our website located at [ ] with a notice that the privacy policy has been updated on the Application's home page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Application's home page. The date the privacy policy was last revised is identified at the top of the page.

### **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us at : ***phinch@pontehealth.com***