

## MDOUTLOOK PRIVACY POLICY

**PLEASE READ THIS PRIVACY POLICY STATEMENT CAREFULLY.** This privacy policy statement (“**Privacy Policy**”) explains how MDoutlook, LLC, a Georgia limited liability company, and/or its subsidiary and affiliated entities (collectively, “**MDoutlook**,” “**MDO**,” “**we**,” “**us**,” or “**our**”) may collect information about you through the MDoutlook services and products, including without limitation our web-based Lumineer™ platform, the various mobile applications, websites (which expressly include without limitation the top-level-domains [www.mdoutlook.com](http://www.mdoutlook.com) and [lumineer.mdoutlook.com](http://lumineer.mdoutlook.com), and their and our affiliate sites [www.oncologyintelligence.com](http://www.oncologyintelligence.com), [www.diseaseintelligence.com](http://www.diseaseintelligence.com), and [www.onconation.com](http://www.onconation.com)), devices, hardware, software, SMS, APIs, email notifications, buttons, widgets, features, ads and commerce services (including without limitation all current and future digital products and service offerings we make available and any products, services, and content provided in collaboration with our partners), that are operated by MDoutlook and link to this Privacy Policy (collectively, the “**Services**”) and how this information may then be used, shared, disclosed, transferred, and/or stored.

This Privacy Policy applies only to the Services and does not apply to those portions of the Services that do not display or link to this Privacy Policy or that have their own privacy policy statement or to information we may collect from you or about you in other ways, including through emails, texts and/or phone calls you may send and/or make to us. We may update this Privacy Policy from time to time by posting the updated terms on the Services (including on our applications and/or websites). You are responsible for periodically reading this Privacy Policy. If you register, subscribe, create an account, purchase a product or service, participate in an online survey, or otherwise interact or access the Services after we have updated this Privacy Policy, you acknowledge that you have read the updated terms and consent to our revised privacy practices.

*This Privacy Policy describes our privacy practices, including what information we may collect from you through the Services, and what we may then do with this information. The Services are not directed to or intended for use by minors. In compliance with laws, we will not intentionally collect any personal information from children under the age of 18. If you think that we have collected personal information from a minor child, please [contact us](#).*

By using the Services, you acknowledge that you have read this privacy policy statement and consent to our privacy practices as described in this statement, including our use and disclosure of Personal Data (as hereinafter defined) for the purposes described below. You further affirm your consent by becoming a registered member and/or account holder of MDoutlook or submitting content or materials to or through the Services. This statement is not intended to and does not create any contractual or other legal right in or on behalf of any person.

BY USING THE SERVICES, YOU CONSENT TO THE COLLECTION, USE AND TRANSFER OF YOUR PERSONAL DATA FOR PROCESSING IN THE UNITED STATES AS DESCRIBED IN THIS PRIVACY POLICY. The Services, including registration and MDoutlook accounts, are housed on servers in the United States. If you are located outside of the United States, please be aware that information we collect (including cookies and device data) will be processed and stored in the United States, a jurisdiction in which the data protection and privacy laws and principles, including your data subject rights, may not offer the same level of protection as those in the country/region where you reside or are a citizen. By using the Services and providing information to us, you consent to the transfer to and processing of the information in the United States and, unless otherwise stated in this Privacy Policy, we use this consent as the legal ground for that data transfer. When collecting your Personal Data through certain Services, you may be asked for your

explicit consent to this data transfer as part of account creation.

**Residents of the State of California**, please also read the *California Residents - Your Privacy Rights* section below to understand additional rights you may have pursuant to California Civil Code Section 1798.83.

**Residents of the European Union:** In order to comply with the requirements of the European General Data Protection Regulation ("**GDPR**") for our European consumers and users, this Privacy Policy outlines the legal basis on which we process your Personal Data and provides other information required by the GDPR.

PLEASE READ THIS PRIVACY POLICY CAREFULLY, AS YOUR ACCESS TO AND USE OF THE SERVICES SIGNIFIES THAT YOU HAVE READ, UNDERSTAND AND AGREE TO ALL TERMS WITHIN THIS PRIVACY POLICY. IF YOU DO NOT CONSENT TO OUR PRIVACY PRACTICES AS DESCRIBED IN THIS PRIVACY POLICY STATEMENT, PLEASE DO NOT REGISTER, SUBSCRIBE, CREATE AN ACCOUNT, PURCHASE A PRODUCT OR SERVICE, PARTICIPATE IN AN ONLINE SURVEY, OR OTHERWISE INTERACT OR ACCESS THE SERVICES.

IF YOU ENCOUNTER A SCREEN OR PAGE THAT REQUESTS INFORMATION YOU DO NOT WANT TO SHARE WITH US, DO NOT ENTER THE INFORMATION AND DO NOT PROCEED WITH THAT SCREEN OR PAGE.

### INFORMATION WE MAY COLLECT THROUGH THE SERVICES

This Privacy Policy only applies to information that we collect through the Services and does not apply to any information we collect through any other means.

### COLLECTION AND USE OF PERSONAL DATA

Personal Data ("**Personal Data**") is information that can be used to identify, locate, or contact a single person, such as a person's name, address, telephone number, or email address. It also includes other information that may be associated with Personal Data.

You may be asked to provide your Personal Data anytime you register, subscribe, create an account, purchase a product or service, participate in an online survey, or otherwise interact or access the Services or are in contact with us. We may share this Personal Data with and use it consistent with this Privacy Policy. We may also combine it with other information to provide and improve our products, services, content, and advertising.

The Services are not directed to or intended for use by minors. In compliance with laws, we will not intentionally collect any Personal Data from children under the age of 18. If you think that we have collected Personal Data from a minor child, please [contact us](#).

Here are some examples of the types of Personal Data we may collect and how we may use, share, disclose, transfer and store it.

### WHAT PERSONAL DATA WE MAY COLLECT

- When you register, subscribe, create an account, purchase a product or service, participate in an online survey, or otherwise interact or access the Services or are in contact with us, we may collect a variety of information, including your first and last name, zip code, mailing address, phone numbers, email addresses, other addresses at which you receive communications from or on

behalf of MDoutlook, social media website user account names, and contact preferences.

- When you share your content with MDoutlook (and/or your colleagues, family and friends using the Services), or invite others to join you on our forums, we may collect the information you provide about those people such as first and last names, mailing addresses, email addresses, and phone numbers.
- We may collect information that helps us to understand who you are and what types of products, services and offers you might like. This information includes lifestyle information; location information related to your state/province, city, or neighborhood; areas of interest, the types of products, services and offers that interest you, information collected from social media interactions; demographic information (e.g., birth date, age, gender); information about persons for whom you have purchased our products, services and/or offers as gifts or who have bought our products, services and/or offers as gifts for you; and information about friends who refer you or who you have referred.
- We may collect information about how you interact with us, such as the products, services, offers and or sub-domains you view, purchase and redeem; other information about how you use the Services; and how you interact with our other users, merchants, business partners, and Service Providers (as hereinafter defined).
- We may collect financial account information as needed to process payments for our products and services that you buy, such as your credit or debit card number, expiration date, and card verification number.
- If you are a physician or other qualified health care professional, clinical staff, medical or disease researcher and/or a pharmaceutical industry representative and you claim or update your account profile, we may collect (i) professional and other information about you and your practice, research and/or products and services, and (ii) personal information that is submitted to us by subscribers.

## HOW WE MAY USE YOUR PERSONAL DATA

If you do provide us with Personal Data, we may use it for the purposes described in this Policy Statement or where it is collected. Primarily, we use Personal Data to:

- develop, deliver, and improve our products, services, content, and advertising;
- create and publish content on or through the Services;
- allow you access to certain areas of the Services;
- register you as a member and/or account holder and develop your profile and enable you to take advantage of the features of the Services and/or the products, services and offers offered on or through the Services;
- if you are a physician or other qualified health care professional, clinical staff, medical or disease researcher and/or a pharmaceutical industry representative, to verify your identity when attempting to update or complete your account profile information;
- deliver products and services;
- alert you to announcements, special offers, upcoming events, updated information, and our new products and services or those of other third-parties;

- send important notices, such as communications about purchases and changes to our terms, conditions, and policies;
- send you reminders, technical notices, updates, security alerts and support and administrative messages service bulletins, or marketing;
- forward promotional materials and to fulfill the terms of such promotion;
- complete a transaction or service requested by you;
- target the Services to your needs;
- manage our everyday business needs such as Services administration (including administration of our applications and websites), forum management, fulfillment, analytics, fraud prevention, enforcement of our corporate reporting obligations, [Terms of Service](#) or to comply with the law;
- perform auditing, data analysis, and research to improve our products, services, and customer communications;
- provide advertisements to you through the Services, email messages, text messages, voicemail messages, applications, or other methods of communication;
- administer surveys or other promotional activities or events sponsored by us or our partners and to administer such activities or events;
- identify you as a poster or provider of content; and
- contact you in response to sign up forms such as “Contact Us” and “Sign Up”.

#### **WHEN AND WHY WE MAY SHARE, DISCLOSE, TRANSFER AND STORE PERSONAL DATA**

If you do provide us with Personal Data (including without limitation Personal Data that is Protected Health Information (“**PHI**”) that is protected under the U.S. Health Insurance Portability and Accountability Act of 1996 (“**HIPAA**”)), we may share, disclose, transfer and store it for the purposes described in this Policy Statement or where it is collected (provided such sharing, disclosure, transfer and storage is allowable under HIPAA). Primarily, we share, disclose and transfer Personal Data (including without limitation PHI) to (provided such sharing, disclosure, transfer and storage is allowable under HIPAA):

- Affiliated companies (e.g., subsidiaries and other companies owned by or controlled by MDoutlook) who may use the Personal Data (including without limitation PHI) for the purposes described above.
- With your consent, physician or other qualified health care professional, clinical staff, medical or disease researcher and/or a pharmaceutical industry representative may use the Service as a means of collecting data (including your Personal Data and/or PHI) for the trial study. If the Service is used as part of a clinical trial study, we will use and share information about the clinical trial collected through the Service in accordance with our agreement with the clinical trial program and any privacy notices provided to you as part of the clinical trial program.
- Our Service Providers, agents, and independent contractors that provide products and services to and for us such as sending texts, emails, and voicemails; information processing; maintaining the Services (including maintaining our applications and websites); fulfilling customer orders; delivering products and services to you; managing and enhancing customer data; providing customer service; sending customer communications on our behalf; assessing your interest in our products and services; conducting customer research or satisfaction surveys; and processing

payments.

- Our affiliates, strategic partners, agents, third-party marketers and other unaffiliated parties so that they may offer you products and services that we believe may be of interest to you, or to assist such parties for research, administrative, and/or business purposes. These parties may contact you with an offer or advertisement related to a product or service, or they may use such information for their own research, administration or business purposes.
- Third-parties to complete your purchase. If you choose to make a purchase on or through the Services, we may ask you for your credit card number, billing address, and other information in connection with completing such purchase, and we may use such information to fulfill your purchase. We may also provide such information, or other Personal Data provided by you, to unaffiliated third-parties to complete your purchase (for example, to process your credit card).
- Third-parties to comply with law, or in the good faith belief that such action is necessary to conform to the requirements of law, or comply with legal process served on us, and to protect and defend our rights or property, including our rights and property on the Services, or act in urgent circumstances to protect the personal safety of you and our other visitors.
- Third-parties as part of a corporate reorganization process including, but not limited to, mergers, acquisitions, and sales of all or substantially all of our assets.
- Third-parties to track and analyze non-identifying, aggregate usage and volume statistical information from our visitors and customers and provide such information to third-parties.
- Third-parties to protect against fraud and potential fraud.
- Third-parties to help us verify the information on the Services. In the course of such verification, we may receive additional Personal Data about you from such services. In particular, if you use a credit card or debit card to purchase products or services with us, we may use card authorization and fraud screening services to verify that your card information and address match the information you supplied to us, and that the card has not been reported as lost or stolen.

*We seek to ensure that any unaffiliated third-parties will not use your Personal Data for any purpose other than that for which they are responsible. However, we cannot guarantee that they will not use it for any other purpose.*

## **COLLECTION AND USE OF NON-PERSONAL DATA**

We may also collect non-Personal Data and data in a form that does not permit direct association with any specific individual, including technical information; demographic information (such as your age, gender, or interests); your activity on the Services; and information such as your occupation, language, zip code, area code, unique device identifier, location, and the time zone where you use or receive a product or service (collectively, “**Non-Personal Data**”).

Here are some examples of the types of Non-Personal Data we may collect and how we may use, share, disclose, transfer and store it.

## **WHAT NON-PERSONAL DATA WE MAY COLLECT**

- **Internet Protocol (IP) address.** Your “IP address” is a number that lets computers attached to the Internet know where to send you data, such as the screens and pages of the Services that you view. We use this information to deliver our screens and pages to you upon request, to tailor the

Services to the interests of you and our other visitors, and to measure traffic to and within the Services.

- **Cookie.** A “**cookie**” is a small text file that may be used to collect information about your activity on the Services. For example, when you visit a screen or page on the Services, a cookie is placed on your mobile device, computer, tablet or other machine (if you or your browser accept the cookie). This cookie may then be read by screen or pages on the Services. You may configure or instruct your browser to notify you or to reject and block cookies, but if you do (or if you do not accept cookies), you may not have access to some areas of the Services, or to the personalized features of the Services. Examples of Cookies we use:
  - \* **Session Cookies.** We use Session Cookies to operate the Services.
  - \* **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
  - \* **Security Cookies.** We use Security Cookies for security purposes.
  - \* **Advertising Cookies.** Advertising Cookies are used to serve you with advertisements that may be relevant to you and your interests.
- **Web Beacon.** A “**web beacon**”, “**clear gif**”, “**web bug**”, or “**pixel tag**” is a tiny graphic file with a unique identifier, that is similar in function to a cookie, but allows us to count the number of users that have visited certain pages or screens of the Services, and to help determine the effectiveness of promotional or advertising campaigns. When used in HTML-formatted email messages, web beacons can tell the sender whether and when the email has been opened. In contrast to cookies, which may be stored on your computer’s hard drive, web beacons are typically embedded invisibly on pages or screens.
- We may collect information from your mobile device when using the Services at the time of recording, including accelerometer data, local time, local time zone, and geographic location.
- In some of our email and text messages, we use a “click-through URL” linked to content on the Services and/or third-party websites. When customers click one of these URLs, they pass through a separate web server before arriving at the destination page on the Services and/or a third-party’s website. We track this click-through data to help us determine interest in particular topics and measure the effectiveness of our customer communications. If you prefer not to be tracked in this way, you should not click text or graphic links in the email or text messages.

You can enable or disable location services when you use the Services at any time, through your mobile device, computer, tablet or other machine settings.

#### HOW WE MAY USE, SHARE, DISCLOSE, TRANSFER AND STORE YOUR NON-PERSONAL DATA

Non-Personal Data does not identify you personally. If you do provide us with Non-Personal Data, we may collect, use, share, disclose, transfer and store it for any purpose.

Aggregated data is considered Non-Personal Data for the purposes of this Privacy Policy. If we do combine Non-Personal Data with Personal Data the combined information will be treated as Personal Data for as long as it remains combined.

We do not behaviorally target advertising to children under the age of 18.

## RETENTION OF DATA

MDoutlook will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy (and in order to comply with any applicable requirements of HIPAA)). We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws, including without limitation HIPPA), resolve disputes, and enforce our legal agreements and policies.

MDoutlook will also retain data collected automatically either generated by the use of the Services or from the Services infrastructure itself (collectively, **“Usage Data”**) for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of the Services, or we are legally obligated to retain this data for longer time periods.

## TRANSFER OF DATA

If you are located outside of the United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

MDoutlook will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place unless there are adequate controls in place including the security of your Personal Data, data and other information.

## DISCLOSURE FOR LAW ENFORCEMENT

Under certain circumstances, MDoutlook may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

## LEGAL REQUIREMENTS

MDoutlook may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation;
- To protect and defend the rights or property of MDoutlook;
- To prevent or investigate possible wrongdoing in connection with the Service;
- To protect the personal safety of users of the Service or the public; or
- To protect against legal liability.

## “DO NOT TRACK” SIGNALS UNDER CALIFORNIA ONLINE PRIVACY PROTECTION ACT (CALOPPA)

We do not support Do Not Track (“DNT”). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your mobile device



and/or web browser.

## ACCESS TO INFORMATION

*As a registered member or account holder of MDoutlook, you can review and update your profile at anytime by logging-in and visiting your personal account.*

*The Services are not directed to or intended for use by minors. In compliance with laws, we will not intentionally allow a child under the age of 18 to register an account with us. If you think that a minor child has created an account, please [contact us](#) so that we can take steps to terminate such minor child's account with us. If you think that we have collected personal information from a minor child, please [contact us](#) so that we can take steps to remove that information from our servers.*

## OPT-OUT

We may communicate with our registered members and account holders on a regular basis via email. For example, we may use your email address to confirm your request, to send you notice of payments, to send you information about changes to our products and services, and to send notices and other disclosures as required by law. Generally, users cannot opt-out of these communications, but they will be primarily informational in nature rather than promotional.

However, we do provide you with the opportunity to opt-out of:

- receiving other types of communication from us, such as emails, texts, updates or other communications regarding new services and products offered on or through the Services and any new features or services on the Services;
- sharing or disclosing your Personal Data with third-parties.

You may exercise your opt-out by [contacting us](#). We will process your unsubscribe as soon as possible, but please be aware that in some circumstances you may receive a few more messages until your request is processed. You also may opt-out of receiving such emails by clicking on the “unsubscribe” link within the text of the applicable email or text.

## FORUMS, CHAT ROOMS, AND OTHER PUBLIC POSTING AREAS

We may provide public areas on the Services, such as forums and chat rooms, where you can post information about yourself and others. Please exercise discretion and use caution with respect to your information, especially in such public areas. We do not control who reads postings on the Services, or how they may use or disclose such information. If you choose to voluntarily disclose information on public portions of the Services, that information will be publicly available and can be collected and used by others. For example, if you post your email address or phone number, you may receive unsolicited messages. PLEASE BE EXTREMELY CAREFUL WHEN DISCLOSING ANY INFORMATION ABOUT YOURSELF OR OTHERS IN PUBLIC AREAS OF THE SERVICES. WE ARE NOT RESPONSIBLE FOR THE USE OR DISCLOSURE OF SUCH INFORMATION.

## SERVICE PROVIDERS

We may employ third-party companies and individuals to facilitate the Services (“**Service Providers**”), to provide the Services on our behalf, to perform Services-related services or to assist us in analyzing how the Services are used.



These third-parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### **ANALYTICS**

We may use third-party Service Providers to monitor and analyze the use of the Services.

### **ADVERTISING**

We may use third-party Service Providers to show advertisements to you to help support and maintain the Services.

### **PAYMENTS**

We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your Personal Data is governed by their privacy policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

### **THIRD-PARTY WEBSITES AND ADVERTISERS**

The Services may contain links to third-party websites. While we endeavor to work with third-parties that share our respect for user privacy, we are not responsible for the websites or privacy practices of such third-parties. We may also use third-party advertisers, ad networks, and other advertising, marketing, and promotional companies, to serve advertisements on the Services. Such third-parties may gather information about your visit to the Services or other third-party websites and applications, monitor your access to or market products or services to you, monitor the ads you view, click-on, or interact with, when they were delivered, and the screens and pages that they are on.

We do not endorse these parties, their content, or any products and services they offer. You are responsible for knowing when you are leaving the Services to visit a third-party website or application, and for reading and understanding the terms of use and privacy policy statements for each such third-party.

Please note that a separate privacy policy may apply to third-party services you use to access our content. We strongly encourage you to familiarize yourself not only with this Privacy Policy, but any other privacy policies or agreements that may govern your use of services.

### **SECURITY OF DATA; PROTECTION OF INFORMATION**

The security of your data is important to us and MDoutlook is committed to using appropriate technical and organizational safeguards to protect against unauthorized or unlawful processing of Personal Data (including PHI) and against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data (including PHI), including without limitation implementing the following safeguards:

- We comply with HIPAA's security rule
- We encrypt many of our Services using SSL.
- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We restrict access to Personal Data (including PHI) and Non-Personal Data to MDoutlook's Service Providers, employees, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.
- We keep Personal Data (including PHI) and Non-Personal Data housed on servers in the United States.
- We store Personal Data (including PHI) and Non-Personal Data for as long as required under applicable law. Where there is no legal, fiscal, administrative, or contractual requirement to retain the data for a longer or shorter period, data will be destroyed within five (5) years of its collection.

Notwithstanding our efforts in protecting your Personal Data (including PHI), no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data (including PHI), we cannot guarantee its absolute security. No data transmissions over the Internet are completely secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us or others over the Internet. You transmit such information at your own risk.

Once we receive your transmission, we make reasonable efforts to ensure the security of our systems. We use firewalls to protect your information from unauthorized access, disclosure, alteration, or destruction. However, this is not a guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of such firewalls or secure server software.

If we learn of a breach of our security system or processes, we may attempt to notify you electronically so that you can take appropriate protective steps. By using the Services, or providing Personal Data (including PHI) to us through them, you agree that we can communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Services. In the event of a breach, we may post a notice on the Services or send you an email or text at the email address and/or mobile phone number you provided.

YOU MAY HAVE ADDITIONAL RIGHTS TO RECEIVE WRITTEN NOTICE OF SECURITY BREACHES UNDER APPLICABLE LAW OF YOUR JURISDICTION.

You can also help us protect information about you by:

- using only secure web browsers;
- employing common anti-virus and anti-malware tools on your system to keep it safe;
- carefully logging out after using the Services;
- using a strong password with a combination of letters and numbers;
- changing your password often; and

- by [contacting us](#) if you feel your login and/or password have been compromised.

## ASSIGNMENT

You consent to our assignment of your account and the information we have about you, including Personal Data and PHI, in the event that all or part of our assets are sold or acquired by another party, including all or substantially all of the Services or our top-level-domain, or in the event of a merger for the same; provided, however, that such assignment must comply with any applicable requirements of HIPPA.

## TERMS OF SERVICE

Please read our [Terms of Service](#) to understand the terms that apply to your use of the Services. By using the Services, you acknowledge that you have read our [Terms of Service](#) and consent to them. You further affirm your consent by creating an account with us or submitting content or materials to or through the Services.

## PRIVACY QUESTIONS

If you have any questions or concerns about MDoutlook' Privacy Policy or data processing, please [contact us](#).

- By email: [privacy@MDoutlook.com](mailto:privacy@MDoutlook.com)
- By visiting this page on our website: <http://www.MDoutlook.com/privacy>

*The Services are not directed to or intended for use by minors. In compliance with laws, we will not intentionally allow a child under the age of 18 to register an account with us. If you think that a minor child has created an account, please [contact us](#) so that we can take steps to terminate such minor child's account with us. If you think that we have collected personal information from a minor child, please [contact us](#) so that we can take steps to remove that information from our servers.*

## NOTICE FOR INTERNATIONAL USERS; INTERNATIONAL TRANSFER OF INFORMATION

Notwithstanding anything to the contrary and/or the following sections of this Privacy Policy (*Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)* and/or *Your Data Protection Rights Under General Data Protection regulation (GDPR)*), the Services are designed for and targeted to United States audiences, and subject only to applicable provisions of the GDPR, are governed by and operated in accordance with the laws of the United States. While users from countries other than the United States may access certain of the Services, notwithstanding anything to the contrary and subject only to applicable provisions of the GDPR, we make no representation that the Services are operated in accordance with the laws or regulations of, or governed by, other nations. If you are located outside of the United States, you use the Services at your own risk and initiative and notwithstanding anything to the contrary and subject only to applicable provisions of the GDPR, you, not us, are responsible for compliance with any applicable local and national laws. Please be aware that notwithstanding anything to the contrary and subject only to applicable provisions of the GDPR (if any), any Personal Data and other information you provide to us or we obtain as a result of your use of the Services shall be collected in the United States and/or transferred to the United States and subject to United States law.

Notwithstanding anything to the contrary and subject only to applicable provisions of the GDPR (if any), we make no representation that the Services are operated in accordance with the laws or regulations of

any other nations. Notwithstanding anything to the contrary and subject only to applicable provisions of the GDPR (if any), information collected through the Services (including without limitation Personal Data) may be stored and processed in the United States or any other country in which we or our Service Providers maintain facilities. Notwithstanding anything to the contrary and subject only to applicable provisions of the GDPR (if any), our Service Providers may transfer information that we collect about you, including without limitation Personal Data, across borders and from your country or jurisdiction to other countries or jurisdictions, some of which may not have the same data protection laws as your jurisdiction. Notwithstanding anything to the contrary and subject only to applicable provisions of the GDPR (if any), by using the Services and providing us with information directly or indirectly, you consent to the transfer of information (including without limitation Personal Data) to the United States or to any other country in which our Service Providers maintain facilities for processing by us in accordance with this Privacy Policy. Consequently, to the full extent permitted by law, you hereby waive any claims relating to the processing of your Personal Data or other information in accordance with this Privacy Policy that may arise under the laws and regulations that apply to you in or of any other country or jurisdiction.

### LEGAL BASIS FOR PROCESSING PERSONAL DATA UNDER GENERAL DATA PROTECTION REGULATION (GDPR)

If you are from the European Economic Area (EEA) and solely to the extent we are subject to applicable provisions of the GDPR, MDoutlook's legal basis for collecting and using the Personal Data described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

MDoutlook may process your Personal Data because:

- We need to perform a contract with you;
- You have given us permission to do so (which you have done in the foregoing section of this Privacy Policy, *Notice for Internal Users*);
- The processing is in our legitimate interests and it's not overridden by your rights; or
- To comply with the law.

### YOUR DATA PROTECTION RIGHTS UNDER GENERAL DATA PROTECTION REGULATION (GDPR)

If you are a resident of the European Economic Area (EEA) and solely to the extent we are subject to applicable provisions of the GDPR, you may have certain data protection rights. MDoutlook aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please [contact us](#).

In certain circumstances (subject to the foregoing section of this Privacy Policy, *Notice for Internal Users* and solely to the extent we are subject to applicable provisions of the GDPR), you may have the following data protection rights:

- *The right to access, update or to delete the information we have on you.* Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please [contact us](#) to assist you.
- *The right of rectification.* You may have the right to have your information rectified if that information is inaccurate or incomplete.

- [\*The right to object.\*](#) You may have the right to object to our processing of your Personal Data.
- [\*The right of restriction.\*](#) You may have the right to request that we restrict the processing of your Personal Data.
- [\*The right to data portability.\*](#) You may have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- [\*The right to withdraw consent.\*](#) You also may have the right to withdraw your consent at any time where MDoutlook relied on your consent to process your Personal Data.

Please note that the foregoing (i) is subject to the foregoing section of this Privacy Policy, *Notice for Internal Users* and is applicable solely to the extent we are subject to applicable provisions of the GDPR, and (ii) we may ask you to verify your identity before responding to such requests.

Subject to the foregoing section of this Privacy Policy (*Notice for Internal Users*) and solely to the extent we are subject to applicable provisions of the GDPR, you may have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

### CHANGES TO THIS PRIVACY POLICY

We may update our Privacy Policy from time to time. This Privacy Policy is not intended to and does not create any contractual or other legal rights in or on behalf of any party. We will notify you of any changes by posting the new Privacy Policy on this page. We will let you know via email and/or a prominent notice on the Services, prior to the change becoming effective and update the “effective date” set forth below in this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page. MDoutlook reserves the right to modify this Privacy Policy at any time, so please review it frequently.

Last modified: March 4, 2021

### CONTACT US

If you have any other questions about our Privacy Policy or our information handling practices, including our practices with respect to your Personal Data, or would like further information regarding the Services, please [contact us](#) at:

Privacy Coordinator  
c/o MDoutlook, LLC  
45 Technology Parkway South, Suite 220  
Norcross, Georgia 30092  
United States

Or email us at:  
[privacy@MDoutlook.com](mailto:privacy@MDoutlook.com)

### California Residents – Your Privacy Rights

(As provided by California Civil Code Section 1798.83)

A California resident who has provided Personal Data to a business with whom he/she has established a business relationship for personal, family, or household purposes ("**California customer**") is entitled to request information about whether the business has disclosed Personal Data to any third-parties for the third-parties' direct marketing purposes. In general, if the business has made such a disclosure of Personal Data, upon receipt of a request by a California customer, the business is required to provide a list of all third-parties to whom Personal Data was disclosed in the preceding calendar year, as well as a list of the categories of Personal Data that were disclosed.

However, under the law, a business is not required to provide the above-described lists if the business adopts and discloses to the public (in its privacy policy statement) a policy of not disclosing customer's Personal Data to third-parties for their direct marketing purposes unless the customer first affirmatively agrees to the disclosure, as long as the business maintains and discloses this policy. Rather, the business may comply with the law by notifying the customer of his or her right to prevent disclosure of Personal Data and providing a cost free means to exercise that right.

As stated in our privacy policy statement, we do not share information with third-parties for their direct marketing purposes unless you affirmatively agree to such disclosure -- typically by opting-in to receive information from a third-party. To prevent disclosure of your Personal Data for use in direct marketing by a third-party, do not opt-in to such use when you provide Personal Data on, to or through the Services. Please note that whenever you opt-in to receive future communications from a third-party, your information will be subject to the third-party's privacy policies and practices. If you later decide that you do not want that third-party to use your information, you will need to contact the third-party directly, as we have no control over how third-parties use information. You should always review the privacy policies and practices of any party that collects your information to determine how that entity will handle your information.

California customers may request further information about our compliance with this law by [contacting us](#). Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this e-mail address.