

PRIVACY POLICY

This Privacy Policy was last updated on November 17, 2023

1. Our Policy:

This MAVEN Project Privacy Policy (this “Privacy Policy”) sets forth our policy with respect to data that can be used to identify or contact you (“Personal Data”) and other information that is collected from you when you, as an individual (“you” or “your”) use or access The MAVEN Project’s (“MAVEN Project” “we,” “us” and/or “our”) platforms, systems, networks, servers, web sites, web portals, internet infrastructure, underlying software and code, and other technologies made available to you by or on behalf of MAVEN Project (all of the foregoing collectively, the “Platform”), including those made available to you in connection with any service or services that MAVEN Project may provide to you and/or, if applicable, your clinic or employer (collectively, “Services”). We may use and disclose the Personal Data and other information that we collect through the Platform as stated in this Privacy Policy.

Please review this Privacy Policy carefully. By accessing the Platform or the Services, you accept and agree to this Privacy Policy and our [Terms of Service](#) and certify that you have reviewed both. BY USING THE PLATFORM OR ANY PORTION THEREOF, YOU ACCEPT ALL OF THE PRACTICES, POLICIES, AND PROVISIONS DESCRIBED IN THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH ANY OF THE TERMS SET FORTH HEREIN, YOU ARE NOT AUTHORIZED TO ACCESS OR USE ANY PORTION OF THE PLATFORM OR SERVICES.

2. Changes to MAVEN Project’s Privacy Policy:

The Platform may change from time to time. As a result, at times it may be necessary for MAVEN Project to make changes to this Privacy Policy. MAVEN Project reserves the right to update or modify this Privacy Policy at any time and from time to time without prior notice. Please review this policy periodically, and especially before you provide any Personal Data. This Privacy Policy was last updated on the date indicated above. Your continued use of the Platform after any changes or revisions to this Privacy Policy will indicate your agreement with the terms of such revised Privacy Policy.

3. Information We Collect and How We Collect It:

When you use the Platform, we may collect Personal Data and other information from you, as further described below:

(a) Personal Data You Provide Through the Platform:

We collect Personal Data from you when you voluntarily provide such information, such as when you contact us with inquiries, register as a user of the Platform, log into your account, or fill out and submit online forms. Such Personal Data may include, without limitation, your name, email address, your place of work, business address, phone number, medical license information, and biographical information.

By voluntarily providing us with Personal Data, you are consenting to our use of it in accordance with this Privacy Policy.

(b) Data Collected by Automated Means:

When you use the Platform, we may automatically collect information about your use of the Platform, including through the use of cookies, web beacons and other tracking technologies (“Automated Information”). Automated Information may include device information such as IP address, device identifiers, and operating system, as well as usage information such as time and duration of use, interaction with content, information stored in cookies or similar technologies. MAVEN Project may store such Automated Information itself or such Automated Information may be included in databases owned and maintained by MAVEN Project agents or service providers. The Platform may use such Automated Information and pool it with other information to track, for example, the total number of users of the Platform, the number of visitors to each page of the Platform, and the domain names of our visitors’ Internet service providers.

(c) Cookies:

In operating the Platform, we use a technology called “cookies.” A “cookie” is a simple text file stored on your computer or device for use by a browser. Our cookies help provide additional functionality to the Platform and help us analyze usage of the Platform more accurately. We may use “cookies” to assist in data collection and to track visitor Platform usage and trends to help us better serve you. We may use persistent cookies for various reasons, such as making it easier for you to navigate the Platform. Specifically, we may use persistent cookies to track whether you are logged into the Platform. A persistent cookie may remain on your local device for an extended period of time.

You can refuse or accept cookies from the Platform at any time by activating the cookie settings in your browser. On most web browsers, you will find a “help” section on the toolbar. Please refer to this section for information on how to receive notification when you are receiving a new cookie and how to turn cookies off. By not accepting cookies, some Features may not fully function, and you may not be able to access certain information through the Platform. We recommend that you leave cookies turned on because they allow you to take advantage of some of the Features.

You may opt out of Google’s use of certain cookies by visiting the Google advertising opt out page at www.google.com/privacy/ads/.

Alternatively, you may opt out of many vendors’ (including Google and Facebook) use of cookies by visiting the Network Advertising Initiative opt out page at www.networkadvertising.org/managing/opt_out.asp.

(d) Google Analytics:

We also use Google Analytics to help analyze how users use the Platform. This tool uses cookies to collect standard Internet log information, device information, and visitor behavior information in an anonymous form. The information generated by the cookie about your use of the Platform (including IP address) is transmitted to Google. This information is then used to evaluate

visitors' use of our Platform and to compile statistical reports on activity on the Platform for MAVEN Project.

(e) Aggregated Personal Data:

MAVEN Project may aggregate and/or de-identify any Personal Data that we collect, such that the information no longer identifies any specific individual. We may use, disclose and otherwise process such information for our own legitimate purposes – including historical and statistical analysis and planning – without restriction. For example, in an ongoing effort to better understand and serve the users of the Platform, MAVEN Project may conduct research on Platform visitors' qualifications, interests, and behavior based on the Personal Data and other information provided to us. This research may be compiled and analyzed on an aggregated basis, and MAVEN Project may share this aggregated data with its affiliates, agents, and partners. MAVEN Project may also disclose aggregated user statistics in order to describe our initiatives to current and prospective partners, and to other third parties for other lawful purposes.

4. Our Use of Your Personal Data and Other Information:

MAVEN Project uses the Personal Data you provide in a manner that is consistent with this Privacy Policy. If you provide Personal Data for a certain reason, we may use the Personal Data in connection with the reason for which it was provided. For instance, if you contact us by e-mail, we will use the Personal Data you provide to answer your question or resolve your problem. MAVEN Project may also use your Personal Data and other personally non-identifiable information collected through the Platform to help us improve the content and functionality of the Platform, to better understand our visitors, to improve the content of the Platform, and to send you marketing materials.

5. Our Disclosure of Your Personal Data and Other Information:

We do not sell, rent, trade or otherwise transfer Personal Data to third parties who are not affiliates of MAVEN Project without your consent to do so. No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent. For purposes of this Agreement, the term "affiliate" shall mean any entity, individual, firm, or corporation, directly or indirectly, through one or more intermediaries, controlling, controlled by, or under common control with MAVEN Project (the term "control" shall mean direct or indirect ownership of over 50% of the voting stock or other contractual or economic arrangements), or has entered into an agreement with a MAVEN Project to market or promote the Platform. Except as stated in this Privacy Policy, we do not reveal Personal Data about you to third parties for their independent use unless you expressly authorize us to do so. There are, however, certain circumstances in which we may share your Personal Data with certain third parties without further notice to you, as set forth below:

(a) Third-Party Service Providers or Agents:

MAVEN Project may disclose your Personal Data to our affiliated companies, carriers, third-party service providers and/or agents (collectively, "Third-Party Service Providers"), as reasonably necessary for the Platform to function, such as maintaining databases; data

management and aggregation; evaluating the usefulness of the Platform; and technical support. When we employ another company to perform a function of this nature, we only provide it with Personal Data that the company needs to perform its specific function. We may also disclose Personal Data to our Third-Party Service Providers as reasonably necessary to provide you with the services you or your clinic or employer have requested, such as telehealth services.

(b) Legal Necessity:

MAVEN Project may disclose your Personal Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a subpoena, legal process, government request or any other legal obligation, (ii) protect and defend the rights or property of MAVEN Project, (iii) prevent, investigate, detect, or prosecute criminal offenses or attacks on the technical integrity of the Platform or our network, (iv) protect the rights, privacy, property, business, or safety of MAVEN Project, its partners and employees, users of the Platform and/or the public, and/or (v) protect against legal liability.

6. Exclusions:

This Privacy Policy does not apply to any Personal Data collected by MAVEN Project other than Personal Data collected through the Platform. This Privacy Policy does not describe the ways in which we may collect or use Personal Data obtained offline in other ways, and it does not address or control the privacy practices of other websites (including those we link to), which may have their own policies. We encourage users of the Platform to be aware when they leave the Platform and to read the privacy statements of each and every website, they visit that collects Personal Data.

7. Links to Third-Party Websites:

The Platform may contain links to other websites not operated or controlled by MAVEN Project (the “Third-Party Sites”). The policies and procedures we described here do not apply to the Third-Party Sites. The links from the Platform do not imply that MAVEN Project endorses or has reviewed the Third-Party Sites. We suggest contacting those sites directly for information on their privacy policies.

8. Security:

MAVEN Project uses commercially reasonable administrative, technical and physical safeguards for the Platform designed to protect the Personal Data provided via the Platform from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Of course, despite these measures, we cannot guaranty perfect security of the networks, servers, and databases we operate or that are operated on our behalf. No Internet or e-mail transmission is ever fully secure or error free. In particular, e-mail sent to or from the Platform may not be secure. Therefore, you should take special care in deciding what information you send to us via e-mail. Please keep this in mind when disclosing any Personal Data to us via the Platform.

9. Use of the Platform from Outside the United States:

We do not represent or warrant that the Platform, or any part thereof, are appropriate or available for use in any particular geographic location. If you choose to use the Platform, you do so on your own initiative and at your own risk, and are responsible for complying with all local laws, rules, and regulations applicable in your jurisdiction. The Platform is hosted in the United States and use thereof is governed by United States law. If you are visiting the Platform from outside the United States, your information will be transferred to, stored and processed in the United States where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. By using the Platform, you consent to your information being transferred to our facilities and to the facilities of those third parties with whom we share it as described in this Privacy Policy.

10. Data Retention:

We will retain your information for as long as needed, or otherwise as is reasonable and customary given the nature of the relationship you have with MAVEN Project.

11. Accessing or Amending Your Personal Information (Opt-Out, Access, and Correction):

You have the right to view, correct, complete or remove your Personal Data. Upon and subject to verification of your identity, we will respond to requests to view, correct, complete or remove your Personal Data within a reasonable time.

We will make all reasonable efforts to accommodate requests to delete Personal Data unless retention of such Personal Data is required by law or for any lawful business purpose, and we will always delete any Personal Data that we are required by applicable law to delete at your request.

You can help us maintain the accuracy of your information by notifying us of any changes to your Personal Data as soon as possible. Your rights to access, change, or delete your Personal Data are not absolute. We may deny you such rights when required by law or if the request would likely reveal personal information about a third party.

To request opt-out, review, modification or removal of Personal Data, you should submit a written request to us at: info@mavenproject.org.

12. Governing Law and Jurisdiction:

The Platform is owned and operated by MAVEN Project from its offices in California. Your use of the Platform, and any related legal action, shall be governed by the laws of the State of California, without regard to conflict of laws principles. The sole jurisdiction and venue for any litigation arising out of your use of or interactions with the Platform shall be an appropriate federal or state court located in the State of California.

13. Mandatory Arbitration:

Notwithstanding anything herein, if we elect in our sole discretion to resolve any claim through arbitration, you must cooperate fully with and be bound by such arbitration, without further

recourse of any kind. The American Arbitration Association (“AAA”) shall preside over such arbitration. Such arbitration shall be exclusively governed by the laws of the United States and the state of California without regard to its conflict of law provisions. All proceedings shall take place in the County of San Francisco in the State of California. If there is a conflict between the rules of the AAA and any provision of this Privacy Policy, this Privacy Policy shall govern. You are responsible for all costs that you incur in the arbitration, including without limitation, expert witnesses or attorneys. The reasonable filing fees and arbitrator’s costs and expenses shall be advanced by us. However, if the arbitration is decided in our favor, you must reimburse us for all of our fees, costs, and expenses related to the arbitration, including without limitation, all fees, costs, and expenses related to filing, arbitrators, expert witnesses, attorneys, and other third parties.

14. California Privacy Rights:

(a) California Consumer Privacy Act of 2018:

Under the California Consumer Privacy Act of 2018 (“CCPA”), California residents have certain rights relating to collection, use, and sharing of their personal information for companies that do a minimum amount of business in or with California residents.

We currently do not meet the minimum necessary requirements to be subject to the CCPA. However, we also do not sell your personal information and will not do so in the future without providing you with notice and an opportunity to opt-out of such sale if required by law. Similarly, we do not offer financial incentives associated with our collection, use, or disclosure of your personal information.

If you are a resident of California, you have the right to request to know what personal information has been collected about you, and to access that information. You also have the right to request deletion of your personal information, though exceptions under the CCPA may allow us to retain and use certain personal information notwithstanding your deletion request. You may also send your request to us by contacting us at the address below under the heading “Contacting MAVEN Project”.

(b) California Shine the Light law:

Separate from the CCPA, California’s Shine the Light law gives California residents the right to ask companies what personal information they share with third parties for those third parties’ direct marketing purposes. We do not disclose your personal information to third parties (not including affiliates or business partners) for the purpose of directly marketing their goods or services to you unless you consent to such disclosure. If you have any questions regarding this policy, or would like to change your preferences, you may contact us at the email address listed below.

(c) California Civil Code Section 1798.83:

Also, California Civil Code Section 1798.83 permits customers who are California residents and who have provided us with “personal information” (as that term is defined in Section 1798.83) to request certain information about the disclosure of that information to third parties for their direct

marketing purposes. If you are a California resident with questions regarding this, please contact us at the email address listed below.

(d) California Do Not Track Signals:

We do not currently take actions to respond to “Do Not Track” (DNT) signals because a uniform technological standard has not yet been developed. We continue to review new technologies and may adopt a DNT standard once one is created. For information about DNT, please visit: www.allaboutdnt.org.

15. Children’s Privacy:

The Company’s Services are intended for and directed to the use of users who are at least 18 years of age. We do not knowingly collect or solicit information from, market or offer services to persons under the age of 18 years old. If we become aware that a person under the age of 18 has provided us with personal information, we will take steps to remove such personal information.

16. Contacting MAVEN Project:

MAVEN Project is the owner and operator of the Platform. Please feel free to contact us at info@mavenproject.org if you have any questions about this Privacy Policy or your use of the Platform.