

## Privacy Policy

This privacy policy (“**Privacy Policy**”) governs the data collection, processing, and usage made by Uniper Care, Inc. (“**Company**”, “**Uniper Care**”, “**we**” or “**us**”) with respect to the data we collect from individuals who access and use our website (respectively “**Website**” and “**Visitors**” or “**you**”).

This Privacy Policy constitutes an integral part of the Website Terms and Conditions (together “**Terms**”), and provides you with information regarding our processing operation, the lawful basis pursuant to which we process your Personal Data (as defined below), third parties to whom Personal Data will be transferred, data retention periods, as well as how you may exercise your rights, among others, and where applicable, as required according to the EU General Data Protection Regulation (“**GDPR**”) and the California Consumer Privacy Act (“**CCPA**”). Definitions used herein but not defined herein shall have the meaning ascribed to them in the Terms.

**You are not required by law to provide us with any Personal Data. Sharing Personal Data with us is entirely voluntary. However, in some cases, without providing your data we would not be able to provide you with all or some of our Services.**

### 1) AMENDMENTS

We reserve the right to periodically amend or revise the Privacy Policy, which will immediately affect the implementation of the revised Privacy Policy on our Website. The last revision date will be reflected in the “Last Modified” heading located at the top of the Privacy Policy. We will make a reasonable effort to notify you if we implement any changes that substantially change our privacy practices. We recommend that you review this Privacy Policy periodically to ensure that you understand our privacy practices and to check for any amendments.

### 2) WHO ARE WE AND OUR EU REPRESENTATIVE

We are **Uniper Care Inc.**

4136 Del Rey Avenue, Suite 512  
Marina del Rey, CA 90292, USA  
+1 (951) 897-7270

administration@uniper-care.com

Our EU representative is:

Jouni Mäkipää

Address: Hatanpäänkatu 1 5, 832, 33900 Tampere, Finland  
Tel.: +358 40 901 5800 e-mail. jouni.makipaa@smartgroup.fi

Under the GDPR, we are the data controller of the data collected from our website.

If you have any questions or comments about this Privacy Policy, or any concerns with respect to how your privacy any information are handled, please contact our privacy team through the contact details above.

### **3) WHICH DATA DO WE COLLECT AND FOR WHAT PURPOSE?**

**“Non-Personal Data”** means non-identifiable, including statistical and aggregated data, that is mainly technical data which is transmitted to us by your device when you access and interact with the Company Services. Such data includes the type of browser, type of operation system, type of device used, the time and date you access the Company Services, navigation, language preference, etc. Non-Personal Data issued mainly for technical analysis of the Company’s services activity in order to provide, maintain, develop and enhance it, and is not used to identify individuals. Under this Privacy Policy, we can use any aggregated, statistical, and such de-identified data, which can no longer be associated with any individual with no limitation. That, even if such anonymized data was derived from Personal Data. Such data may be included in our proprietary information and does not deem as Personal Data under the law.

**“Personal Data”**: means, information which identifies or may identify, with reasonable effort, an individual. Such data includes, *inter alia*, your name, address, phone number, billing information and online identifiers (such as IP address or Cookie ID).

**Please see below the table which specifies the Personal Data sets we collect and how we use it:**

#### **a. Contact Us**

If you voluntarily contact us for your interest in our products, for support, or for other inquiries, including through the use of any form on the Company Website(e.g., “Contact,” “Help Chat,” or “Help Center”) you may be required to provide us with certain information such as your name, email address, referral subject(**“Contact Information”**). If you are interested in leaving a comment on the “Help Center” page, you will be required to register with our website.

If you are contacting us on behalf of another person, we value your assistance and care for others, please note that it is your responsibility to make sure that any person whose Personal Data you provide is aware of the principles of this statement and agrees that you will provide Personal Data to us on this basis.

### **PURPOSE AND OPERATIONS**

We will use this data to respond to your inquiry or provide you with information regarding our services. We may process the content of our correspondence with you to

improve our customer service, and in the event, we believe it is required to provide you with any further assistance (if applicable).

We will store your data, including in any of our data systems such as CRM, analyze it, provide access to our relevant staff members, and keep record of our correspondence with you.

### **LAWFUL BASIS**

We process such Contact Information subject to our legitimate interest to respond to your inquiry and as part of our marketing efforts.

If you are an actual customer of our services contacting us for support or any similar inquiry, we will process your data for the fulfillment of the contract between us – providing you with our services. After addressing your inquiry, we may retain your data in our systems, as part of our business records keeping under our legitimate interest.

#### **b. Subscribing to our Mailing lists**

In the event you sign up to receive our newsletter or other marketing materials ("**Marketing Materials**"), you will be requested to provide your contact details, such as email address.

### **PURPOSE AND OPERATIONS**

We will use your email to send you our newsletter and other Marketing Materials.

We will store your data, in any of our data systems such as CRM, analyze it, provide access to our relevant staff members, and keep record of our correspondence with you.

### **LAWFUL BASIS**

We process such Marketing Materials subject to your consent. You may withdraw consent at any time through the "**unsubscribe**" link within the email or by contacting us directly.

#### **c. Recruitment Information**

In the event you apply for a job, we will collect your CVs as uploaded by you and your name, email address, phone number and a photo (optional). Further, we may receive from third parties, such as recruiting agencies, information about candidates who are interested in working at Company Group. In such cases we rely on the agreements we have with the third parties for obtaining your information.

### **PURPOSE AND OPERATIONS**

To process your job application and for recruitment purposes, and to enable us to comply with corporate governance and legal and regulatory requirements.

If you are hired by us, the Recruitment Information that you provide us may be used in connection with your employment and our corporate management.

We will keep your data including your CV, analyze it, store it in our systems, use the data or contacting you or for further recruitment stages (e.g., interview) and keep records of our interaction with you.

#### **LAWFUL BASIS**

We process such Recruitment Information subject to our legitimate interest.

#### **d. Online Identifiers**

We use third-party cookies on the Company Website, as further detailed below, these cookies provide us with analytic services as well as marketing services. The Personal Data processed is an online identifier, either a cookie agent, the IP address, etc.

#### **PURPOSE AND OPERATIONS**

To process your job application and for recruitment purposes, and to enable us to comply with corporate governance and legal and regulatory requirements.

If you are hired by us, the Recruitment Information that you provide us may be used in connection with your employment and our corporate management.

We will keep your data including your CV, analyze it, store it in our systems, use the data or contacting you or for further recruitment stages (e.g., interview) and keep records of our interaction with you.

#### **LAWFUL BASIS**

We will process such data subject to your consent through the Cookie Banner on our Website. For more information, see below “Cookies Usage”.

Please note that, the actual **processing operation** per each purpose of use and lawful basis detailed in above, may differ. Such processing operation usually includes set of operations, made by automated means, such as collection, storage, use, disclosure by transmission, erasure, or destruction. Transfer of personal data to third party countries as further detailed in the Data Transfer section is based on the same lawful basis as stipulated in the table above.

Additionally, we may record video meetings and/or activities offered through the Services, as facilitated by third-party video conference platforms (e.g., Zoom). While we will not record your video, if you choose to participate in the recorded activities, your audio may be captured, and collected as part of such recording. Before joining a recorded video session, we will notify you that the video is being recorded and request your consent.

In addition, we may use certain Personal Data to prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity thefts and any other misuse of Our service, as well as to protect the security or integrity of our databases and Company Services, and to take precautions against legal liability. Such processing is based on our legitimate interests.

#### **4) COOKIES USAGE**

We use cookies to improve your experience while you use the Company Services. We may use various types of Cookies:

- Essential Cookies – which are necessary for the Company Website to work properly (usually appears under our name/cookie tag);
- Functional Cookies – designated to save your settings on the Company Website - your language preference or other view preferences (also, under our name/cookie tag);
- Session Cookies – used to support the Company Website's functionality – such Cookies are stored only temporarily during a browsing session and are deleted from your device when you close the browser.
- Targeting Cookies - these cookies are used to collect information from you to help us improve our services and Company Services and serve you with targeted advertisements that we believe will be relevant to you (e.g., Google's Cookies).
- Social networks Cookies - Social Plug-In Cookies (e.g., Facebook, Twitter, LinkedIn Cookies, or pixels, etc.) enable sharing your usage information with your social network's accounts.
- Analytics Cookies - give us aggregated and statistical information to improve the Company Services and further developing it e.g., Google analytics, Google Firebase Catalytic, etc.
- Third-party services used by us – for example, an external service supporting our recruiting options through the Company Website (e.g., Comet or Workday), or an external service which allows us to screen short videos on the Website (e.g., YouTube or Vimeo).

Please note that the data collected by the use of Cookies may be linked to and combined with any other data, including Personal Data.

In addition, Cookie's data is usually collected through the use of third-party services, like Google, Facebook, etc. In those cases, your Personal Data might be transferred to those third parties, which might link it and use it together with other information they have on you from other sources. Such data is “owned” and processed separately by those third-parties under their terms and conditions and the direct accounts or subscriptions you have with those third parties. For example, suppose you have a

Facebook account, the Personal Data collected through Facebook's Cookies on the Company Website might be linked to other data that Facebook collects from you as a Facebook user, and might be used by Facebook per the independent agreements between you and Facebook.

The specific cookies we currently use and your choices with regard to such use are detailed at the website, by clicking on the lock icon near the URL field.

## **5) HOW DO WE COLLECT YOUR INFORMATION**

According to the nature of your interaction with Company Services, we may collect information as follows:

- Provided by you voluntarily – we will collect information if and when you choose to provide us with information, such as filing any contact form.
- Automatically – we may use cookies and similar tracking technologies (as elaborated in the Cookies Section above) to gather some information automatically when you access the Company Website.
- Provided to us by third parties – as part of our digital marketing efforts as described hereunder.

## **6) DATA SHARING – CATEGORIES OF RECIPIENTS WE SHARE PERSONAL DATA WITH**

We do **not** share any **Personal Data** collected from you with third parties or any of our partners except in the following events:

- **Legal Requirement:** We will share your information in this situation only if we are required to do so to comply with any applicable law, regulation, legal process, or governmental request (e.g.- to comply with a court injunction, comply with tax authorities, etc.);
- **Our Business Partners:** our partners and business affiliates with whom you are also engaged for using our services (such as Medicare, Medicaid, Veterans' Affairs, HMOs, national and local government agencies which referred you to our services);
- **Policy Enforcement:** We will share your information, solely to the extent needed to (i) enforce our policies and agreements; or (ii) to investigate any potential violations thereof, including without limitations, detect, prevent, or take action regarding illegal activities or other wrongdoings, suspected fraud or security issues;
- **Company's Rights:** We will share your information to establish or exercise our rights, to prevent harm to our rights, property, or safety, and to defend ourselves against legal claims, when necessary, subject to applicable law;

- **Third Party Rights:** We will share your information, solely to the extent needed to prevent harm to the rights of our customers, yourself, or any third party's rights, property, or safety;
- **Service Providers:** we share your information with third parties that perform services on our behalf (e.g. customer service, tracking cookies, servers, service functionality, marketing, and support, etc.) these third parties may be located in different jurisdictions.
- **Corporate Transaction:** we may share your information in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, our affiliated companies or acquiring company will assume the rights and obligations as described in this Privacy Policy;
- **Authorized Disclosures:** we may disclose your information to third parties when you consent to a particular disclosure. Please note that once we share your information with another company, that information becomes subject to the other company's privacy practices.

Where we share information with service providers and partners, we ensure they only have access to such information that is strictly necessary in order for us to provide the services. These parties are required to secure the data they receive and to use the data for pre-agreed purposes only, while ensuring compliance with all applicable data protection regulations.

## **7) DATA TRANSFERS**

Any information you provide us may be transferred to and processed in countries other than the country from which you accessed the Company Services. If you are a resident of the European Economic Area ("**EEA**") we will take appropriate measures to ensure that your Personal Data receives an adequate level of data protection upon its transfer outside of the EEA. If you are a resident of a jurisdiction where the transferring of your Personal Data requires your consent, then your consent to this Privacy Policy includes your express consent for such data transfer.

## **8) YOUR RIGHTS**

Individuals have certain rights under applicable privacy laws with regards to their Personal Data. Subject to your jurisdiction (and additional conditions), these rights may include might include:

- **The right to be informed** –you have the right to be provided with information regarding our data collection and privacy practices, as detailed in this Policy. If you have any additional question, please contact us.

- The right to access your Personal Data – you have the right to request a confirmation from us that we process your Personal Data, and in some cases, be provided with a copy of the Personal Data we process.
- The right of rectification - you have the right to require to update Personal Data which is not correct;
- The right to the erasure of your Personal Data – you have the right to require the erasure of certain Personal Data if specific conditions are satisfied. This right is not absolute. We may reject your request under certain circumstances, including where we must retain the data in order to comply with legal obligations or defend against legal claims, etc.;
- The right to restrict the processing of your Personal Data – you may be entitled to limit the purposes for which we process your Personal Data if specific conditions are satisfied;
- The right to object to the processing of your Personal Data – you have the right to object to the processing of Personal Data, in the event the basis for processing is our legitimate interests, however, we will be permitted to continue the processing if our legitimate interests override your rights, or when processing is necessary to establish, exercise or defend a legal claim or right, etc.;
- Data portability – you have the right to have your Personal Data "port" to a third-party;
- The right to file a complaint to a supervisory authority – specifically, with regards to Personal Data collected about you in the EEA or UK, please contact the applicable EU Data Protection Authority.
- The right to withdraw your consent – when the lawful basis for the processing of your Personal Data is your consent. For example, you may unsubscribe at any time from our mailing list.
- Right to Non-Discrimination – California residents have the right to equal treatment requires that all persons be treated equally before the law, without discrimination.
- Rights to submit a “Do not sell” request - California residents have the right to opt-out of our sale of their personal information. **Please note that we do not sell your personal information.**

You may exercise any or all of your above rights in relation to your Personal Data by contacting us by send you Data Subject Request to [meir@uniper-care.com](mailto:meir@uniper-care.com).

Where we are not able to provide you with the information for which you have asked, we will endeavor to explain the reasoning for this and inform you of your rights, including the right to complain to the supervisor authority (in the event you are EEA resident). We

reserve the right to ask for reasonable evidence to verify your identity before we provide you with any such information in accordance with applicable law.

## **9) RETENTION**

In general, we retain the Personal Data we collect for as long as it remains necessary for the purposes set forth above, all under the applicable regulation, or until you will express your preference to opt-out, where applicable.

The criteria used by us to determine our retention periods are as follows:

- We retain Personal Data for the periods needed in order to achieve the purpose for which Personal Data was collected
- We retain Personal Data for the periods needed in order to comply with our obligations under applicable laws.
- If you have a dispute with us, we may retain certain types of Personal Data as necessary and applicable to your claims, including any legal proceedings between us, until such dispute was resolved, and following, if we find it necessary, in accordance with applicable statutory limitation periods. In addition, in the event you request to exercise your rights, we will maintain the applicable correspondence for as long as needed to demonstrate compliance.

We may at our sole discretion, rectify or erase information from our systems, without prior notice to you, once we deem it is no longer necessary for such purposes.

## **10) SECURITY**

We implement extensive security measures to reduce the risks of damage, loss of information and unauthorized access or misuse of Personal Data. We implement appropriate data collection, storage and processing practices and security tools to protect personal data against unauthorized access, alteration, disclosure or destruction. You should be aware that no security measures are completely fail-proof, and it is impossible to prevent any and all threats to the security of data and systems. Therefore, you should be aware that any processing of digital Personal Data holds certain inherent risks, and we cannot guarantee that our services and databases will be immune to any wrongdoings, malfunctions, unauthorized interceptions or access, malware attacks or other kinds of abuse and misuse.

## **11) CHILDREN**

Our website is not directed nor is it intended for use by children under the age of sixteen (16) and we do not knowingly process a child's information. We will immediately discard any information that we receive from a visitor that is considered a child upon our discovery that such a visitor shared information with us. If you are under the age of eighteen(18), please be sure to read the terms of this Policy carefully with your parents



or other legal guardians. Please contact us through the above means of contact if you have reason to believe that a child has shared any information with us.

## **12) Notice to California Consumers**

If you are a California resident, please review this section carefully, as it contains information regarding privacy rights you may have in connection with your Personal Information under applicable law, including the California Consumer Privacy Act (CCPA).

### **Disclosures Related to Your Personal Information.**

We describe the categories of Personal Information that we collect about you, and the sources from which we collect such Personal Information, in greater detail in Section 3 above (“Information We Collect”). The categories of Personal Information we have collected about you, including in the past 12 months are:

- Identifiers: such as your name, email address, contact information, Account login credentials, and IP address
- Demographic information: such as your age and language preferences
- Commercial information: such as your purchases and engagement with our Service
- Internet and electronic network activity information: such as your Device information, browsing history, and other interactions with our Service, Website and/or Application
- Audio, visual, and other electronic information: such as audio or visual streaming information
- Geolocation information
- Health-related information: such as information related to your past, present, and future health status
- Information regarding your preferences
- We collect your Personal Information for the purposes described in Section 4 above (“How We Use Information We Collect”).
- We have shared your Personal Information as described in Section 5 above (“Sharing Information with Third Parties”).
- We do not sell your Personal Information.



**The Right to Know.** You have the right to request to know: (i) the specific pieces of Personal Information we have about you; (ii) the categories of Personal Information we have collected about you in the last 12 months; (iii) the categories of sources from which your Personal Information was collected; (iv) the categories of third parties to whom your Personal Information was sold or disclosed in the last 12 months; and (v) the purposes for collecting and disclosing your Personal Information.

**The Right to Request Deletion.** You have the right to request that we delete the Personal Information we have collected or maintain about you. We may deny your request under certain circumstances, such as if we need to comply with our legal obligations or complete a transaction for which your Personal Information was collected. If we deny your request for deletion, we will let you know the reason why.

**The Right to Opt-Out of the Sale of Personal Information.** You have the right to opt-out of the sale of Personal Information, but we do not sell your Personal Information.

**How to Exercise Your CCPA Rights.** You may exercise your Right to Know and Right to Request Deletion twice a year, free of charge. To exercise your Right to Know and Right to Request Deletion, contact us at 1-888-471-7623 or email us [atsupport@unipercare.com](mailto:atsupport@unipercare.com) with the subject line “CCPA Privacy Request”.

We will take steps to verify your identity before processing your request. We will not fulfill your request unless you have provided sufficient information for us to reasonably verify you are the individual about whom we collected Personal Information. If you have an Account with us, we may use our existing Account authentication practices to verify your identity. If you do not have an Account with us, we may request additional information about you to verify your identity. We will only use the Personal Information provided in the verification process to verify your identity or authority to make a request and to track and document request responses, unless you initially provided the information for another purpose.

You may use an authorized agent to submit a request. When we verify your agent’s request, we may verify both your and your agent’s identity and request a signed document from you that authorizes your agent to make the request on your behalf. To protect your Personal Information, we reserve the right to deny a request from an agent that does not submit proof that they have been authorized by you to act on their behalf.

### **13) Contact Us**

If you have any questions or queries about our Privacy Policy or your Personal Information that we may have collected, contact us by e-mail at the following address: [info@unipercare.com](mailto:info@unipercare.com).