

PRIVACY NOTICE

Last Updated: March 26, 2025

This Privacy Notice applies to the processing of personal information by LFG Labs, Inc. *dba* Bluenote (“Bluenote,” “we,” “us,” or “our”) including on our website available at www.bluenotehealth.com, about representatives of our business customers when they express interest in, subscribe to, or obtain support for our generative AI platform, access our generative AI platform, or otherwise interact with us, and our other online or offline offerings which link to, or are otherwise subject to, this Privacy Notice (collectively, the “Services”). This Privacy Notice does not apply to the extent that we process personal information as a data processor or service provider on behalf of our customers, such as when customers subscribe to our generative AI platform, where we process any personal information contained in user inputs (such as text prompts and documents), and outputs as a data processor.

Bluenote is a global company headquartered in the United States. Many of our IT and other functions are administered centrally by Bluenote in the United States and any information that you provide or we collect may be transmitted to a country other than your country of residence for processing or storage, and it may also be communicated to third parties hired by us to provide services such as website hosting, database management, or analytics. By using our Services, you voluntarily consent to the collection, control, creation, use, storage, and processing of your personal information in any country to which we may transfer your personal information in the course of our business operations including the United States. For more information, please see [International Transfers of Personal Information](#). For information on our processing of personal information subject to applicable jurisdictional requirements (including the European Union or United Kingdom laws), please see [Annex A – Supplemental Country/Regional Notices](#).

1. UPDATES TO THIS PRIVACY NOTICE
2. PERSONAL INFORMATION WE COLLECT
3. HOW WE USE PERSONAL INFORMATION
4. HOW WE DISCLOSE PERSONAL INFORMATION
5. YOUR PRIVACY CHOICES AND RIGHTS
6. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION
7. SECURITY & DATA RETENTION
8. CHILDREN’S PERSONAL INFORMATION
9. THIRD-PARTY WEBSITES/APPLICATIONS
10. LANGUAGES OTHER THAN ENGLISH
11. CONTACT US

ANNEX A -- SUPPLEMENTAL COUNTRY/REGIONAL NOTICES

1. UPDATES TO THIS PRIVACY NOTICE

We may update this Privacy Notice from time to time in our sole discretion. If we do, we’ll let you know by posting the updated Privacy Notice on our website and/or we may also send other communications.

2. PERSONAL INFORMATION WE COLLECT

We collect personal information you provide to us, personal information we collect automatically when you use the Services, and personal information from third-party sources, as described below.

A. Personal Information You Provide to Us Directly

We may collect personal information you provide to us.

- **Account Information.** We may collect personal information in connection with the creation or administration of your account. The personal information may include, but is not limited to, your name, postal address, email address, bank account number, and other information you store with your account.
- **Purchases.** We may collect personal information and details associated with your purchases, including payment information. Any payments made via our Services are processed by third-party payment processors. We do not directly collect or store any payment card information entered through our Services, but we may receive information associated with your payment card information (e.g., your billing details).
- **Your Communications with Us.** We, and our service providers, may collect the information you communicate to us, such as through email, SMS, text, or via a chat bot or other chat tool.
- **Surveys.** We may contact you to participate in surveys. If you decide to participate, we may collect personal information from you in connection with the survey.
- **Interactive Features.** We and others who use our Services may collect personal information you submit or make available through our interactive features (e.g., messaging features, commenting functionalities, forums, blogs, and social media pages). Any information you provide using the public sharing features of the Services will be considered “public.”
- **Conferences, Trade Shows, and Other Events.** We may collect personal information from individuals when we attend or host conferences, trade shows, and other events.
- **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.
- **Job Applications.** If you apply for a job with us, we will collect any personal information you provide in connection with your application, such as your contact information and resume details.

B. Personal Information Collected Automatically

We may collect personal information automatically when you use the Services.

- **Device Information.** We may collect personal information about your device, such as your Internet protocol (IP) address, user settings, cookie identifiers, other unique identifiers, browser or device information, Internet service provider, and location information (including, as applicable, approximate location derived from IP address and precise geo-location information).

- **Usage Information.** We may collect personal information about your use of the Services, such as the pages you visit, items you search for, the types of content you interact with, information about the links you click, the frequency and duration of your activities, and other information about how you use the Services.
- **Cookie Notice (and Other Technologies).** We, as well as third parties, may use cookies, pixel tags, and other technologies (“Technologies”) to automatically collect personal information through your use of the Services.
 - **Cookies.** Cookies are small text files stored in device browsers.
 - **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in the Services collecting personal information about use of or engagement with the Services. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

See [“Your Privacy Choices and Rights”](#) below to understand your choices regarding these Technologies.

C. Personal Information Collected from Third Parties

We may collect personal information about you from third parties.

- **Third-Party Services and Sources.** We may obtain information about you from other sources, including through third-party services and organizations. For example, if you access our Services through a third-party application, such as an app store, a third-party login service, or a social networking site, we may collect information about you from that third-party application that you have made available via your privacy settings. Additionally, we may collect information from publicly available sources, such as publicly available websites or directories.
- **Customers or Other Organizations.** We may receive your personal information from our customers or other organizations, such as your employer or a clinical research organization, in connection with one or more business purposes, including to make our Services available to you.

3. HOW WE USE PERSONAL INFORMATION

We use personal information for a variety of business purposes, including to provide the Services, for administrative purposes, and to provide you with marketing materials, as described below. Where required by applicable law, you may request information regarding our personal information processing methods by contacting us as described in [“Contact Us”](#) below.

A. Provide the Services

We use personal information to fulfill our contract with you and provide the Services, such as:

- Managing your information;
- Processing your requests;
- Providing access to certain areas, functionalities, and features of the Services;
- Communicating with you;
- Sharing personal information with third parties as needed to provide the Services;
- Processing your financial information and other payment methods for Services purchased and rendered;
- Processing applications if you apply for a job we post on our Services; and
- Allowing you to register for events.

B. Administrative Purposes

We use personal information for various administrative purposes, such as:

- Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), monitor and analyze trends, network and information security, fraud prevention, and develop and test new features, products, services, and models;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Carrying out analytics;
- Measuring interest and engagement in the Services;
- Analyzing, improving, upgrading, and/or enhancing the Services through the use of artificial intelligence and other methods;
- Improving, upgrading, or enhancing the Services;
- Developing new products and services;
- Creating de-identified and/or aggregated information. If we create or receive de-identified information, we will not attempt to reidentify such information, unless permitted by, or required to comply with, applicable laws;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities, including requests to exercise your rights under this Privacy Notice;
- Debugging to identify and repair errors with the Services;
- Auditing relating to interactions, transactions, and other compliance activities;
- Enforcing our agreements and policies; and
- Carrying out activities required to comply with our legal obligations.

C. Marketing

We may use personal information to tailor and provide you with marketing and other content, brand recommendations, sale alerts, and other brand promotional information. We may provide you with these materials as permitted by applicable law and such materials will include opt out instructions. Some of our marketing activities may be considered a “sale” or “targeted advertising” under applicable privacy laws.

California Shine the Light: We have not and will not share your personal information with third parties for the third parties’ direct marketing purposes.

If you have any questions about our marketing practices or would like to change your marketing preferences, you may contact us at any time as set forth in “[Contact Us](#)” below.

D. With Your Consent or Direction

We may use personal information for other purposes clearly disclosed to you at the time you provide personal information, with your consent, or as otherwise directed by you.

E. Automated Decision Making

Our Services do not engage in automated decision making.

3. HOW WE DISCLOSE PERSONAL INFORMATION

We disclose personal information to third parties for a variety of business purposes, including to provide the Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below. Where required by applicable law, you may request the contact information of personal information recipients by contacting us as described in “[Contact Us](#)” below.

A. Disclosures to Provide the Services

We may disclose the personal information we collect to the categories of third parties described below.

- **Service Providers.** We may disclose personal information to third-party service providers assisting us with the provision of the Services. This may include, but is not limited to, service providers providing us with hosting, cloud storage, generative AI tools, customer service and relationship management, analytics, marketing services, IT support and security, payment processing, system administration, deployment of Technologies, chat features, and other related services. Please note, where required by law, we bind our service providers to privacy and security controls (including zero-day retention periods, where applicable). For a listing of our current service providers, please [click here](#).
- **Other Users You Share or Interact With.** Customers may permit their authorized Bluenote users to share personal information or interact with other authorized Bluenote users within their organization.
- **Business Partners.** We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your personal information with business partners with whom we jointly offer products or services.

Once your personal information is shared with our business partner, it will also be subject to our business partner’s privacy policy. We are not responsible for the processing of personal information by our business partners.

- **Bluenote Customers (Authorized Users Only).** In cases where you use our Services as an employee, contractor, or other authorized user of a Bluenote customer, such Bluenote customer may access information associated with all authorized users’ aggregated use of the Services including usage

data, reports generated, and files shared. Your personal information may also be subject to the Bluenote customer's privacy policy. We are not responsible for our customers' processing of your personal information.

- **Affiliates.** We may share your personal information with our corporate affiliates.
- **Advertising Partners.** We may share your personal information with third-party advertising partners. These third-party advertising partners may set Technologies and other tracking tools on our Services to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks. This practice is commonly referred to as "interest-based advertising", "personalized advertising", or "targeted advertising."

Some of the advertising partners we engage may include:

- **HubSpot.** For information about how HubSpot uses your personal information, please review the [HubSpot Privacy Policy](#). To submit a request to opt-out of HubSpot's use of your personal information, please submit your written request to privacy@hubspot.com.
- **LinkedIn.** For more information about how LinkedIn uses your personal information, please visit [LinkedIn's Privacy Policy](#). To learn more about how to opt-out of LinkedIn's use of your information, please click [here](#).

B. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing, reorganization, bankruptcy, receivership, purchase or sale of assets, transition of service to another provider, or other similar corporate transaction, your personal information may be disclosed, sold, or transferred as part of such a transaction.

4. YOUR PRIVACY CHOICES AND RIGHTS

A. Your Privacy Choices. The privacy choices you may have about your personal information are described below and in the [Annex A -- Supplemental Country/Regional Privacy Notice](#), where relevant.

- **Email Communications.** If you receive an unwanted promotional email from us, you can use the unsubscribe functionality found at the bottom of the email to opt out of receiving future promotional emails. Note you will continue to receive transaction-related emails. We may also send you certain non-promotional communications regarding us and the Services, and

you will not be able to opt out of those communications (e.g., communications regarding the Services or updates to this Privacy Notice).

- **Do Not Track signals and Global Privacy Control.** Some web browsers incorporate "do-not-track" ("DNT") or similar features signaling to websites with which the browser communicates that a visitor does not want to have their online activity tracked. As of the Effective Date, not all browsers offer a DNT option and DNT signals are not yet uniform. For this reason, we along with many other digital service operators do not respond to all DNT signals. We recognize GPC signals as required under certain state privacy laws, but we do not currently recognize other DNT signals. For more information about the Global Privacy Control, please visit <https://globalprivacycontrol.org>.
- **Cookies.** You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, the Services may not work properly.

Please note cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of certain tracking on some mobile applications by following the instructions for [Android](#), [iOS](#), and [others](#).

The online advertising industry also provides mechanisms that may allow you to opt out of receiving targeted ads from organizations participating in self-regulatory programs. To learn more, visit the [Network Advertising Initiative](#), [the Digital Advertising Alliance](#), [the European Digital Advertising Alliance](#), and [the Digital Advertising Alliance of Canada](#).

Please note you must separately opt out in each browser and on each device.

B. Your Privacy Rights. In accordance with applicable law and the Supplemental Privacy Notice below, you may have the right to:

- Confirm We Are Processing Your Personal Information;
- Request Access to or Portability of Your Personal Information;
- Request Correction of Your Personal Information;
- Request Deletion of Your Personal Information;
- Request Restriction of or Object to our Processing of Your Personal Information;
- Request to Opt-Out of Certain Processing Activities including, as applicable, if we process your personal information for "targeted advertising" (as "targeted advertising" is defined by applicable privacy laws), if we "sell" your personal information (as "sell" is defined by applicable privacy laws), or if we engage in "profiling" in furtherance of certain "decisions producing legal or similarly significant effects" concerning you (as such terms are defined by applicable privacy laws); and
- Withdraw Your Consent to our Processing of Your Personal Information. Please note your withdrawal will only take effect for future processing and will not affect the lawfulness of processing before the withdrawal.

If you would like to exercise any of these rights, please contact us as set forth in "[Contact Us](#)" below. We will process such requests in accordance with applicable laws. You may be entitled to additional rights

depending on where you live. If you live in a country offering comprehensive privacy rights, please review [Annex A – Supplemental Country/Regional Privacy Notice](#) below.

Only you, or someone legally authorized to act on your behalf in certain jurisdictions, may make a request to exercise the rights listed above regarding your personal information. If your personal information is subject to a law allowing an authorized agent to act on your behalf in exercising your privacy rights and you wish to designate an authorized agent, please provide written authorization signed by you and your designated agent using the information found in “[Contact Us](#)” below and ask us for additional instructions.

To protect your privacy, we will take steps to verify your identity before fulfilling requests submitted under applicable privacy laws. These steps may involve asking you to provide sufficient information allowing us to reasonably verify you are the person about whom we collected personal information or an authorized representative. Examples of our verification process may include asking you to confirm the email address we have associated with you.

Some laws may allow you to appeal our decision if we decline to process your request. If applicable laws grant you an appeal right, and you would like to appeal our decision with respect to your request, you may do so by informing us of this and providing us with information supporting your appeal.

5. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

All personal information we collect, control, create, or otherwise process may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We comply with laws governing the international transfer of personal information typically through the execution of legally required data protection agreements incorporating, where applicable, standard contractual clauses approved for use by the European Union or regulators of other jurisdictions, or other instructions that may be specified, updated, amended, replaced, or superseded from time to time by the applicable regulatory authority. Where required by applicable law, you may request access to information about the transfer safeguards we use by contacting us as described in “[Contact Us](#)” below.

6. SECURITY & DATA RETENTION

We employ reasonable physical, technical, and administrative safeguards designed to keep personal information secure; however, no data collection, storage, or transmission including over the Internet or other network can be guaranteed to be 100% secure. Therefore, despite these safeguards, we cannot and do not guarantee the security of any personal information transmitted to us.

Additionally, take steps to protect against unauthorized access to your password, phone, tablet, and computer by, among other things, signing off after using a shared device, choosing a robust password nobody else knows or can easily guess, and keeping log-in information and passwords private. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity. Where required by applicable law, you may request access to information about our security policies and procedures by contacting us as described in “[Contact Us](#)” below.

We store your personal information as permitted by applicable law and as required to satisfy the purpose for which the personal information is processed, unless a longer period is required for purposes such as complying with retention obligations, recordkeeping, or other commercial requirements.

7. CHILDREN'S PERSONAL INFORMATION

The Services are not directed to children under 18 (or other age as required by local law outside the United States), and we do not knowingly collect personal information from children.

If you are a parent or guardian and believe your child has uploaded personal information to the Services in violation of applicable law, you may contact us as described in "[Contact Us](#)" below.

8. THIRD-PARTY WEBSITES/APPLICATIONS

The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen, or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

9. LANGUAGES OTHER THAN ENGLISH

If the Privacy Notice and [Annex A – Supplemental Country/Regional Notice](#) are translated into or appear in a language other than English (as may be required by applicable law), the English language version shall control.

10. CONTACT US

If you have any questions about our privacy practices or this Privacy Notice, or to exercise your rights as detailed in this Privacy Notice, please contact our Privacy and Data Protection Team (including our data protection officer and representatives, where required) at:

Email: privacy@bluenotehealth.com.
Postal Mail: 548 Market Street
PMB 93710
San Francisco, California 94104

If you wish to receive a response by email, please be sure to include your name, postal address, and email address. If we do not receive an email address, we will respond by postal mail.

ANNEX A -- SUPPLEMENTAL COUNTRY/REGIONAL NOTICES

Additional data protection and privacy terms may be applicable depending on your location. Such additional terms found in this [Annex A – Supplemental Country/Regional Notice](#) are incorporated into, and should be read in conjunction with, this Privacy Notice by reference based on the applicable jurisdiction. They are updated from time to time to meet specific legal requirements and we encourage you to check this [Annex A – Supplemental Country/Regional Notice](#) page for a description of practices and your privacy rights if you are doing business with us in one of these locations.

Unless otherwise indicated, this [Annex A – Supplemental Country/Regional Notice](#) has the same effective date as this Privacy Notice. In the event of a conflict between the Privacy Notice and a Supplemental Notice that may apply to you, the terms of this [Annex A – Supplemental Country/Regional Notice](#) will control as needed to resolve the conflict.

1. ARGENTINA

The Agency for Access to Public Information, in its capacity as the supervisory authority of Law No. 25,326, has the power to deal with complaints and claims filed by those affected in their rights for breach of the current regulations on the protection of personal information.

2. ASIA PACIFIC

a. Asia (excluding Australia and New Zealand)

- i. **Purposes and Legal Basis for Processing:** Our collection, use, disclosure, and other processing of personal information is necessary for the following legal basis or bases (to avoid doubt, in addition to those specified in the Privacy Notice):
 1. Performance of the contract between us to provide you services including sending you transactional communications, verifying your identity, processing payments, providing customer/user service, and to conduct automated decision-making processes in accordance with any of these purposes;
 2. For purposes we consider to be in our legitimate interests including improving the functionality and integrity of our platforms, keeping customers/users up to date with information about services, completing corporate transactions, understanding consumer/user preferences, personalizing our interactions and developing our business relationships, as these functions help sustain and grow our business;
 3. To comply with a legal obligation to which we may be subject, such as complying with orders from government or other legal authorities, detecting and preventing illegal conduct, abuse, spam, fraud (e.g. account takeovers or payment-related fraud) security incidents and other harmful activities.
 4. Where we are required by law to obtain your consent before collecting, using, disclosing or otherwise processing personal information, we will rely upon consent as our basis for the collection, use, disclosure or other processing.

- ii. **Data Subject Rights:** In addition to the rights specified in [Section 5](#) of the Privacy Notice, Asia residents (excluding Australia and New Zealand) may have the following rights with respect to personal information under applicable laws:

1. Anonymization of your personal information in certain circumstances;

2. De-registration of your account; and
3. Claim damages in certain circumstances.

b. Asia (including South Africa, Australia, and New Zealand)

i. Countries Covered

1. Australia
2. Indonesia
3. Japan
4. Malaysia
5. New Zealand
6. Philippines
7. Singapore
8. South Africa
9. Taiwan
10. Thailand
11. Vietnam

ii. Purpose(s) And Legal Basis for Processing: Our collection, use, disclosure, and other processing of personal information is necessary for the following legal basis or bases (to avoid doubt, in addition to those specified in the Privacy Notice):

1. For purposes we consider to be in our legitimate interests to support, sustain, and grow our business;
2. To comply with a legal obligation to which we may be subject, such as complying with orders from government or other legal authorities, detecting and preventing illegal conduct, abuse, spam, fraud (e.g. account takeovers or payment related fraud), security incidents, and other harmful activities; and
3. Where we are required by law to obtain your consent before collecting, using, disclosing or otherwise processing personal information, we will rely upon consent as our basis for the collection, use, disclosure, or other processing.

iii. Your Data Subject Rights: In addition to the rights specified in [Section 5](#) of the Privacy Notice, Asia residents of the countries listed Annex Section 2(b)(i) may have the following rights with respect to personal information under applicable laws:

1. Anonymization of personal information in certain circumstances;
2. De-registration of account; and
3. Claim damages in certain circumstances.

iv. Retention of Personal Information: In addition to the retention periods specified in [Section 7](#) of the Privacy Notice, the personal information of residents of the countries listed in this Annex Section 2(b)(i) may be retained as follows:

1. For so long as you are a customer/user; and
2. For potential customers/users, we may retain personal information for no longer than three (3) years following the date of our last contact or longer if permitted or required by applicable law (e.g., a period of five (5) years for Indonesian residents).

c. Country-Specific Notices

- i. **AUSTRALIA:** The Privacy Notice is drafted to comply with the [Australian Privacy Principles](#). If you have questions or would like to file a complaint with Bluenote regarding its privacy practices, please "[Contact Us](#)".
- ii. **JAPAN:** If there is any conflict among the Privacy Notice, Supplemental Notice for Asia, and these Supplemental Terms for Japan, these Supplemental Terms for Japan shall prevail with respect to the relevant issue.
 - 1. **Joint Use Notice:** Your personal information may be jointly used with our affiliates in accordance with Article 27.5.3 of the Act on the Protection of Personal Information ("APPI") within the scope necessary for achieving the purposes described in the Privacy Notice. The categories of personal information jointly used are described in the Privacy Notice.
 - 2. **Your Data Subject Rights:** In Japan, you may also have additional unique rights under the APPI such as:
 - a. To request deletion of or cessation of processing of your personal information if such information has been used beyond the scope necessary to achieve the purpose for which it was collected, processed, obtained by deceit or in violation of the Article 20 of the APPI, our use of your personal information triggers illegal acts, is no longer necessary in relation to the purposes for which it was collected, compromised, or otherwise processed in a manner which could harm your rights or legitimate interest;
 - b. To request cessation of transferring of your personal information if it is transferred to a third party in violation of the Article 27.1 or Article 28 of the APPI or the transfer could harm your rights or legitimate interest;
 - c. To request to disclose the following information (we may refuse your request to the extent we are permitted to do so in accordance with APPI):
 - i. Implemented data security measures;
 - ii. retained personal information; and
 - iii. in cases where personal information has been shared with foreign companies including Bluenote affiliates by way of joint use and external foreign service providers: (w) measures to ensure the data recipients take sufficient data security measures (the "Measures") and the details of the Measures, (x) measures and frequency Bluenote audits such data recipients' implementation of the Measures, (y) name of the recipient country and rules of the country that could hinder the implementation of the Measures, and (z) other obstacles that could hinder the implementation of the Measures and measures Bluenote has conducted to solve such obstacles.
- iii. **PHILIPPINES:** You will be informed if your personal information will be used for automated decision-making or profiling.
- iv. **SOUTH AFRICA:** Before collecting and/or using any sensitive personal information (including photographs and video images), we will establish a lawful justification to use that information such as:

1. Your consent, if applicable;
 2. The establishment, exercise, or defense by Bluenote of a right or obligation in law, or to comply with an international public law obligation;
 3. For historical, statistical, or research purposes to the extent: (y) the purpose serves a public interest and the processing is necessary for the purpose concerned; or (z) it appears to be impossible or would involve a disproportionate effort to ask for consent, and sufficient guarantees are provided to ensure the processing does not disproportionately adversely affect customer/user privacy;
 4. Customer/user has deliberately made the personal information public; or
 5. A context-specific exemption provided for under South African local laws in relation to the processing of sensitive personal information, such as to identify a customer/user when it is essential for that purpose and to comply with laws and other measures designed to protect or advance persons, or categories of persons, disadvantaged by unfair discrimination.
- v. **THAILAND:** In addition to the data subject rights above and in the Privacy Notice, Thailand residents may be entitled to request the disclosure of the source of personal information if such information was collected without consent. Additionally, if personal information necessary to enter into a contract or for performance of the contract is not provided, we may not be able to establish a legal relationship with you, enter into a contract with you, perform our obligations (either in whole or in part), provide you with Services, or proceed with your order and the payment. If you do not provide the personal information necessary for compliance with laws applicable to us, we and/or you may be unable to comply with the laws and that may result in the violation of applicable laws.
- vi. **VIETNAM:** In the case of any incident involving your personal information, you may experience anxiety, emotional distress, increased vulnerability to identity and financial fraud.

3. BRAZIL

In addition to the rights specified in [Section 5](#) of the Privacy Notice, pursuant to Brazil's General Personal Data Protection Act (LGPD) Article 18, Brazil residents may have the following rights with respect to your personal information under applicable laws:

- a. The anonymization, blocking, or deleting unnecessary, excessive, or processed personal information;
- b. Information on public and private entities to which Bluenote disclosed personal information;
- c. Right to petition the Brazilian regulatory authority regarding the processing of personal information.

4. CANADA

In the event of a conflict between the Privacy Notice and this Supplemental Notice for Canada residents, the terms of this Supplemental Notice will prevail to the extent necessary to resolve the conflict.

Bluenote will only send customers/users commercial electronic messages (“CEMs”) where it has the express or implied consent to do so. Consent to receive CEMs is implied where Bluenote has an existing business relationship with a customer/user or such customer/user has contacted Bluenote within a certain time frame. Customers/users may unsubscribe from receiving CEMs at any time by clicking the unsubscribe button on an email or following the direction provided in a text message. Even after opting out, Bluenote may still send non-promotional messages such as those about a customer’s/user’s account or our ongoing business relations.

For Quebec residents: If Bluenote collects personal information about customers/users in Quebec, such information will be communicated outside of Quebec to other locations in Canada, the United States, or other places where we or our service providers process personal information.

5. DUBAI INTERNATIONAL FINANCIAL CENTER (“DIFC”)

- a. **Purposes and Legal Basis for Processing:** Our collection, use, disclosure, and other processing of personal information is necessary for the following legal basis or bases (to avoid doubt, in addition to those specified in the Privacy Notice) and subject to the DIFC Data Protection Law No. 5 of 2020, Sections 29 and 30:
 - i. Consent
 - ii. Contractual Necessity
 - iii. Legal Obligation
 - iv. Vital Interests
 - v. Public Interest or Official Authority
 - vi. Legitimate Interests
- b. **Processing of Sensitive Categories of Personal Information:**
 - i. **Explicit Consent:** You may have provided your explicit consent for our processing of your personal information.
 - ii. **Necessary for Employment, Social Security, or Social Protection Law Purposes:** Our processing of your personal information may be necessary for the purposes of carrying out obligations and exercising specific rights in the field of employment, social security, and/or social protection law.
 - iii. **Necessary to Protect Vital Interests:** Our processing of your personal information may be necessary to protect the vital interests of you if you are physically or legally incapable of giving consent.
 - iv. **Publicly Available Personal Information:** Our processing of your personal information may relate to personal information which has been manifestly made public by you.
 - v. **Non-Profit Bodies:** Our processing of your personal information may be necessary to carry out activities for non-profit organizations with political, philosophical, religious, or trade union aims to which you are a current or former member or are in regular contact.
 - iv. **Necessary for the Establishment, Exercise, or Defense of Legal Claims:** Our processing of your personal information may be necessary for the establishment, exercise, or defense of legal claims in international financial markets including, but not limited to,

- compliance with auditing, accounting, or anti-money laundering obligations.
- v. **Necessary for Substantial Public Interest:** Our processing of your personal information may be necessary for reasons of substantial public interest.
 - vi. **Necessary for Medical Purposes:** Our processing of your personal information may be necessary for the purposes of preventive or occupational medicine, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, or pursuant to contract with a health professional.

6. EUROPEAN UNION AND THE UNITED KINGDOM

This Supplemental Notice only applies to our processing of personal information subject to the European Union General Data Protection Regulation ("GDPR") and/or the United Kingdom Data Protection Act ("DPA").

In some cases, providing personal information may be a requirement under applicable law, a contractual requirement, or a requirement necessary to enter a contract. If you choose not to provide personal information in cases where it is required, we will inform you of the consequences at the time of your refusal to provide the personal information.

If we process personal information considered a "special" or "sensitive" category of personal information, then our processing of such personal information may be supported by one or more of the following conditions:

- a. **Explicit Consent:** You may have provided your explicit consent for our processing of your personal information.
- b. **Necessary for Employment, Social Security, or Social Protection Law Purposes:** Our processing of your personal information may be necessary for the purposes of carrying out obligations and exercising specific rights in the field of employment, social security, and/or social protection law.
- c. **Necessary to Protect Vital Interests:** Our processing of your personal information may be necessary to protect the vital interests of you if you are physically or legally incapable of giving consent.
- d. **Publicly Available Personal Information:** Our processing of your personal information may relate to personal information which has been manifestly made public by you.
- e. **Necessary for the Establishment, Exercise or Defense of Legal Claims:** Our processing of your personal information may be necessary for the establishment, exercise or defense of legal claims.
- f. **Necessary for Substantial Public Interest:** Our processing of your personal information may be necessary for reasons of substantial public interest.
- g. **Necessary for Medical Purposes:** Our processing of your personal information may be necessary for the purposes of preventive or occupational medicine, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, or pursuant to contract with a health professional.
- h. **Necessary for Substantial Interest in the Area of Public Health:** Our processing of your personal information may be necessary for reasons of public interest and/or public health.

If your personal information is subject to the applicable data protection laws of the European Union or the United Kingdom, you have the right to lodge a complaint with the competent supervisory authority if you believe our processing of your personal information violates applicable law.

If you are located within the European Union, you may find the contact details of the competent authorities in the following link: https://www.edpb.europa.eu/about-edpb/about-edpb/members_en.

If you are located within the United Kingdom, you may lodge a complaint with the Information Commissioner's Office (ICO) by clicking here: <https://ico.org.uk/make-a-complaint/>.

7. CONTACT US

If you have any questions about our privacy practices or this Privacy Notice, or to exercise your rights as detailed in this Privacy Notice, please contact our Privacy and Data Protection Team (including our data protection officer and representatives, where required) at:

Email: privacy@bluenotehealth.com.
Postal Mail: 548 Market Street
PMB 93710
San Francisco, California 94104

If you wish to receive a response by email, please be sure to include your name, postal address, and email address. If we do not receive an email address, we will respond by postal mail.