

Privacy Policy

This Privacy Policy (“**Policy**”) contains information about the collection and processing of your Personal Information when you visit our website, [www.springmonarchmd.com] (“**Website**”) and [use our telehealth platform available for login on our Website or Mobile Application] (the “**Atlas MD**”) to receive medical treatment from a medical provider (“**Dr Sidhu**”) or engage in related transactions (collectively, the “**Services**”). We are committed to complying with all data protection laws as are applicable to us.

We reserve the right to make changes to this Privacy Policy at any time. Any changes will be posted in this Privacy Policy. We encourage you to regularly review this Privacy Policy to make sure you are aware of any changes and how your data may be used.

If you have any questions or comments about the Policy, please contact us by reaching out to us via email at [drsidhu@springmonarchmd.com]. This Policy is incorporated into and is subject to the Terms of Service. Your use of Platform and any personal information that you provide on the Platform remains subject to the terms of this Platform Privacy Policy and Terms of Service. Please click on any of the following questions to be directed to the relevant answer in the main body of this Policy.

[HOW WE COLLECT YOUR PERSONAL INFORMATION](#)

[THE PERSONAL INFORMATION WE COLLECT ABOUT YOU](#)

[WHY WE NEED TO COLLECT YOUR PERSONAL INFORMATION](#)

[TO WHOM WE GIVE YOUR PERSONAL INFORMATION](#)

[HOW LONG WE RETAIN YOUR PERSONAL INFORMATION](#)

[HOW WE PROTECT YOUR PERSONAL INFORMATION](#)

[CHILDREN'S PRIVACY PROTECTION](#)

[AVAILABLE RIGHTS TO YOU](#)

[PROTECTED INFORMATION](#)

HOW WE COLLECT YOUR PERSONAL INFORMATION

- **Directly from you.** For example, when you register to use the Platform or submit information to us by email or a form on our Website.
- **Tracking Technologies:** We use cookies and similar technologies to help us understand your activity on the Website and the Platform.
- **Social Networking Services.** You may register for an account directly with our Platform, or through a social networking service (Facebook/Instagram, Google). If you register with a social networking service, later link your account to one or if you visit the site without logging into the social networking service, we will collect certain information about you

from that social networking service using website pixels, and what we collect depends on your privacy settings with that social networking service. You may register to join the Service directly via the Service or by logging into your account with a third-party social networking service (“SNS”) via our Service (e.g., Facebook, and other third-party services that let you sign in using your existing credentials with those services). If you choose to register via an SNS, or to later link your account with the Service to your account with an SNS, we will use the Personal Information you have provided to the SNS (such as your name, email address, gender and other information you make publicly available via the SNS) to create your account. Note that the information we collect from and through an SNS may depend on the privacy settings you have set with the SNS and the permissions you grant to us in connection with linking your account with the Service to your account with an SNS. Other than what we may share with the SNS as described below, the Personal Information an SNS has about you is obtained by the SNS independent of our Service, and Spring Monarch is not responsible for it.

THE PERSONAL INFORMATION WE COLLECT ABOUT YOU

- **Cookie Information.** The information we collect from tracking technologies on our Platform and Website.
- **Employment Information.** Information you provide as part of applying for a job or during the course of your employment.
- **Health Information.** Information about your health and medical history.
- **Identifying Information.** Name, email address, postal address, phone number, date of birth, account name, user name, social media handle, and similar identifiers.
- **Payment Information.** If you use the Services to make or receive payments, we will collect certain financial information, such as credit card or other financial account information used for the transaction.
- **Technical Information.** IP address, browser type and version, preferred language, geographic location, operating system and computer platform, device identification, links on our Website and/or Platform that you have viewed or clicked.

WHY WE NEED TO COLLECT YOUR PERSONAL INFORMATION

To the extent permitted by applicable law, we use your Personal Information for the following purposes:

Categories of Information	What we use your Personal Information for
Health Information, Identifying Information, Payment Information, Technical Information	<ul style="list-style-type: none"> ● To provide our Services to users, such as to create a profile, process payments, and send notifications. ● To allow Providers to treat you. ● To prevent and detect fraud; ● Other processing necessary to comply with professional, legal and regulatory obligations that apply to us; ● Screening for financial and other sanctions or embargoes; ● Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies; ● Ensuring business policies are adhered to, e.g. policies covering security and internet use;

	<ul style="list-style-type: none"> • Operational reasons, such as improving efficiency, training and quality control; • Ensuring the confidentiality of commercially sensitive information; • Statistical analysis to help us manage our business, e.g. in relation to our financial performance; • Preventing unauthorized access and modifications to systems; • Ensuring safe working practices and staff administration and assessments; • External audits and quality checks, e.g. for accreditation and the audit of our accounts;
Employment Information	<ul style="list-style-type: none"> • To assess your eligibility for employment, onboard and enroll you as an employee, evaluate your performance, operate our business, comply with laws, communicate with you, and to provide you with compensation and benefits.
Cookie Information; Technical Information	<ul style="list-style-type: none"> • To provide our Services to users. • For our advertising and analytics purposes and those of our third-party partners. • To carry out analytics and market research and internal reporting to enable us to plan, develop and improve our Services (For example, we may use your IP address to help diagnose problems with our server, to administer the Platform, to refine the Platform based on which features people use most often, to help identify Platform users and gather general demographic information about Platform users.)

TO WHOM WE GIVE YOUR PERSONAL INFORMATION

We will not sell your Personal Information for reasons other than those described in this Privacy Policy. However, we may need to disclose your Personal Information to third parties in the following instances:

- **Service providers:** We will disclose your Personal Information to companies that provide services to us, such as companies that assist us in operating our Platform and vendors that assist us with payment processing and marketing campaigns.
- **Medical Providers:** We disclose your Personal Information to Providers who provide treatment and other services to you.
- **We share some Cookie Information and Technical Information** to third parties and service providers or analytics and advertising purposes. We only share information about your use of the Website, not the from your use of the Platform, and we only share the information to the extent that it is not individually identifiable health information as defined in HIPAA.
- **Third parties to meet applicable legal requirements:** We may need to disclose your Personal Information to a third party if it is necessary to comply with a legal obligation or the decision of the judicial authority, a public authority, or a government body, or if the disclosure is necessary for national security, law enforcement or other public interest.

- **Third parties in connection with a business sale:** If we make a sale or transfer of assets, or are otherwise involved in a merger or business/asset transfer, we may transfer your Personal Information to one or more third parties as part of that transaction.
- **Other third parties with your consent:** We may also share your Personal Information with other third parties when you separately consent to such sharing.

Personal Information We Sell. Some jurisdictions consider the sharing or disclosing of Personal Information collected by online tracking technologies like cookies with third-parties to be a “sale” of Personal Information. To the extent this information is considered a sale, we share some Personal Information gathered when you browse our website with third-parties like Google. We do not sell any other Personal Information.

HOW LONG WE RETAIN YOUR PERSONAL INFORMATION

Your Personal Information will be retained only for so long as reasonably necessary for the purposes set out in this Privacy Policy in accordance with applicable laws, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements. Your information may persist in copies made for backup and business continuity purposes for additional time. If you choose to provide us with Personal Information, we encourage you to routinely update the data to ensure that we have accurate and up-to-date information about you.

Where Your Personal Information is Held. Information may be held at our offices, those of our Service Providers, and third parties (see above: “TO WHOM WE GIVE YOUR PERSONAL INFORMATION”).

CHILDREN’S PRIVACY PROTECTION

The Platform is not intentionally targeted to, or intended for, children under the age of 18. We do not knowingly collect data relating to children. If you are the parent or legal guardian of a child younger than age 18 and believe that Spring Monarch has collected Personal Information from your child, please contact us at [\[SUPPORT EMAIL\]](#).

AVAILABLE RIGHTS TO YOU

State privacy law provide residents with certain rights that may be applicable to you:

<p>Disclosure of Personal Information We Collect About You</p>	<p>You have the right to know:</p> <ul style="list-style-type: none"> ● Whether we are processing your Personal Information; ● The categories of Personal Information we have collected about you; ● The categories of sources from which the Personal Information is collected; ● Our business or commercial purpose for collecting or selling Personal Information; ● The categories of third parties with whom we share Personal Information, if any; and ● The specific pieces of Personal Information we have collected about you. <p>Please note that we are not required to:</p>
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	<ul style="list-style-type: none"> ● Retain any Personal Information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained; ● Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered Personal Information; or ● Provide the Personal Information collected to you more than twice in a 12-month period.
Personal Information Sold or Used for a Business Purpose	<p>In connection with any Personal Information we may sell or disclose to a third party for a business purpose, you have the right to know:</p> <ul style="list-style-type: none"> ● The categories of Personal Information about you that we sold and the categories of third parties to whom the Personal Information was sold; and ● The categories of Personal Information that we disclosed about you for a business purpose.
Right to Opt-out	<p>You have the right to opt-out of the sale of your Personal Information to third parties or Service Providers, the use for targeted advertising, and profiling in furtherance of a decision that produces a legal or similarly significant effect concerning you. If you exercise your right to opt-out, we will refrain from selling your Personal Information, unless you subsequently provide express authorization. To opt-out of the sale of your Personal Information, please click here to update your Preferences [INSERT LINK].</p>
Right to Access	<p>The right to be provided with a copy of your Personal Information (the right of access).</p>
Right to Limit the Use and Disclosure of Sensitive Personal Information.	<p>The right to limit the use and disclosure of any Sensitive Personal Information about you.</p>
Right to Rectification or Correct Personal Information	<p>The right to require us to correct any mistakes in your Personal Information</p>

<p>Right to be Forgotten or Deleted</p>	<p>The right to require us to delete your Personal Information</p> <p>We may deny the request if the information is necessary to:</p> <ul style="list-style-type: none"> • Complete providing a Service requested or reasonably anticipated by the Opt-In Participant • Detect and protect against security incidents, malicious, deceptive, fraudulent, or illegal activity, or take action against those responsible for such activity • Debug to identify and repair errors impairing intended functionality • Engage in research in the public interest adhering to applicable ethics and privacy laws where the Opt-In Participant has provided informed consent • Enable solely internal uses reasonably aligned with the Opt-In Participant's expectations based on the Opt-In Participant's relationship with us • Comply with any legal proceeding, court order, law, legal investigation, regulatory body, or other legal obligation • Otherwise use the information internally in a lawful manner compatible with the context in which the Opt-In Participant provided the information
<p>Right to Restriction of Processing</p>	<p>The right to require us to restrict processing of your Personal Information—in certain circumstances, e.g. if you contest the accuracy of the data.</p>
<p>Right to Data Portability</p>	<p>The right to receive the Personal Information you provided to us in a portable and readily usable format. If the Personal Information is in a platform, you may have the right to receive the information in a format that allows the transfer to another platform.</p>
<p>Right to Object</p>	<p>The right to object:</p> <ul style="list-style-type: none"> • At any time to your Personal Information being processed for direct marketing (including profiling) • In certain other situations to our continued processing of your Personal

	Information, e.g. processing carried out for the purpose of our legitimate interests
Right Not to Be Subject to Automated Individual Decision-Making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.
Right Not to Be Discriminated Against	<p>You have the right to not be discriminated against by us because you exercised any of your rights. This means we cannot, among other things:</p> <ul style="list-style-type: none"> ● Deny goods or services to you; ● Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; ● Provide a different level or quality of goods or services to you; or ● Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services. <p>Please note that we may charge a different price or rate or provide a different level or quality of goods and services to you, if that difference is reasonably related to the value provided to our business by your Personal Information.</p>
Right to Appeal the Denial of an Enforcement of Your Right by Us	<p>You have the right to appeal the denial or failure to enforce any request of your rights listed above by us.</p> <p>You can appeal any data privacy decision or indecision we make concerning your Personal Information by emailing use at [SUPPORT EMAIL] and including the word “Appeal” in the subject line of the email with information sufficient to allow us to identify the original request.</p>

How to Contact us or Exercise Your Rights. If you would like to contact us or exercise any of your rights as described in this Policy, please:

- Complete the form available on our Website at **[LINK]**;
- Call us, toll-free, at **+** **[PHONE]**; or
- Email us at **[SUPPORT EMAIL]**.
- Users of our Services (*i.e.*, those who have created an account to login to our portal) may manage the use of some data in the Account Settings section of their account.

Not all of the rights listed above may apply to you depending on your state of residence and other factors, including restrictions on the number of times per year you can make certain kinds of requests. We reserve the right to evaluate your request to determine our responsibilities for complying with the request.

If you choose to contact us directly by, you will need to provide us with:

- Enough information to identify you (e.g., your full name, email address and phone number or WhatsApp number provided);
- Proof of your identity and address (e.g., a copy of your driving license or passport and a recent utility or credit card bill); and
- A description of what right you want to exercise and the information to which your request relates.

We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information, or is someone authorized to act on such person's behalf.

Any Personal Information we collect from you to verify your identity in connection with you request will be used solely for the purposes of verification.

PROTECTED INFORMATION

When you set up an account with Spring Monarch , you are creating a direct customer relationship with Spring Monarch that enables you to access and/or utilize the various functions of the Platform and the Service as a user. As part of that relationship, you provide information to Spring Monarch , including but not limited to, your name, email address, shipping address, phone number and certain transactional information, which we do not consider to be “protected health information” or “medical information.”

However, in using certain components of the Service, you may provide certain health or medical information that may be protected under applicable laws. Spring Monarch is a “covered entity” under the Health Insurance Portability and Accountability Act of 1996, Public Law 104-191, and its related regulations and amendments from time to time (collectively, “**HIPAA**”). One or more of the labs or pharmacies may or may not be a “covered entity” or “business associate” under HIPAA, and Spring Monarch may in some cases be a “business associate” of a lab or pharmacy. It is important to note that HIPAA does not necessarily apply to an entity or person simply because there is health information involved, and HIPAA may not apply to your transactions or communications with Spring Monarch, the Providers, the labs, or the pharmacies.

In addition, any other information that you provide that is subject to specific protections under applicable state laws (collectively, with PHI, “**Protected Information**”), will be used and disclosed only in accordance with such applicable laws. However, any information that does not constitute Protected Information may be used or disclosed in any manner permitted under this Privacy Policy. Protected Information does not include information that has been de-identified in accordance with applicable laws. The Providers have adopted a Notice of Privacy Practices that describes how they use and disclose Protected Information. By accessing or using any part of the Service, you acknowledge receipt of the Notice of Privacy Practices from your Provider(s).

By accessing or using any part of the Service, you understand that any information that you submit to Spring Monarch that is not intended and used solely for the provision of diagnosis and treatment by the Providers, laboratory services by the labs or prescription fulfillment by the pharmacies, is not

considered Protected Information, and will be subject only to our Privacy Policy and any applicable state laws that govern the privacy and security of such information. For purposes of clarity, information you provide to Spring Monarch in order to register and set up an account on the Platform, including name, date of birth, username, email address, shipping address, and phone number, are not considered Protected Information.