

Privacy Policy

This privacy policy ("**Policy**") informs you of our practices when handling your or your patient's Personal Information through the Services (both as defined below). In this Policy, "you" or "your" refer to you individually or to your patient. In this Policy, "**Expert AI**," "**we**" or "**us**" refers to Expert Consultancy Corporation, a company registered in Delaware with its registered address located at 251 Little Falls Drive, Wilmington, DE 19808.

For the purpose of this Policy, "**Personal Information**" means any information relating to an identified or identifiable individual. This includes Personal Information you provide or generate when you use: (a) our healthcare transcription, data analysis and communication app (the "**App**"); and (b), <https://experthealth.ai/>, and any other dedicated Experthealth.ai websites (the "**Website**") (collectively, the "**Services**"). When you use the Services, you accept and understand that we may collect, process, use, and store your Personal Information as described in this Policy.

BY USING OR ACCESSING THE SERVICES IN ANY MANNER, YOU ACKNOWLEDGE THAT YOU ACCEPT THE PRACTICES AND POLICIES OUTLINED IN THIS PRIVACY POLICY, AND YOU HEREBY CONSENT THAT WE MAY COLLECT, USE, AND SHARE YOUR INFORMATION IN THE WAYS DESCRIBED HEREIN. IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY, YOU MAY NOT USE THE SERVICES. IF YOU USE THE SERVICES ON BEHALF OF SOMEONE ELSE (SUCH AS YOUR CHILD), YOU REPRESENT THAT YOU ARE AUTHORIZED BY SUCH INDIVIDUAL TO ACCEPT THIS PRIVACY POLICY ON THE INDIVIDUAL'S BEHALF.

Any use of the Services is subject to the Agreement (as the term "Agreement" is defined in our Terms of Use which incorporates this Privacy Policy).

HIPAA and PHI

Certain demographic, health and/or health-related information that ExpertAI collects about you as part of providing the Services may be "protected health information" ("**PHI**") governed by the Health Insurance Portability and Accountability Act ("**HIPAA**"). Specifically, when (i) ExpertAI is providing administrative, operational, or other services to a healthcare provider that is a "**Covered Entity**" (as defined by HIPAA); and (ii) in order to provide those services, ExpertAI receives identifiable information about you on behalf of the healthcare provider, where ExpertAI is acting as a "**Business Associate**" (as defined by HIPAA); and (iii) this identifiable information is regulated as PHI.

This Privacy Policy does not apply to PHI, which is instead regulated by HIPAA. HIPAA provides specific protections for the privacy and security of PHI and restricts how PHI is used and disclosed. Please read the Notice of Privacy Practices of your health provider to understand how your PHI can be used and disclosed.

Personal data that you provide to ExpertAI when ExpertAI is not acting as a Business Associate is not PHI and is therefore covered by this Privacy Policy. To provide just a few examples, we may collect personally identifiable information ("**PII**") when you (i) create an account, (ii) use the services to transcribe patient-provider healthcare appointments; (iii) edit or otherwise annotate transcriptions; (iv) transmit transcriptions; or (v) otherwise utilize data collected using the ExpertAI transcription and data analyses services.

1. INFORMATION WE COLLECT

We may collect and use the following Personal Information about you:

Information you provide to us

Registration Information. When you create an account on our Services, you will be asked to provide your name, email, and a password, you may voluntarily add a profile picture. For paid Services, our payment processing partner Stripe, Inc. may also collect your name, billing address, and payment information. Payment information is not shared with us and is maintained by Stripe.

App Information. When you use the Services, you may provide us with your audio recordings ("**Audio Recordings**"), automatic screenshots and any text, images or videos that you upload or provide to us in the context of the Services.

Communication Information. When you contact us, you provide us with your phone number, email, and any other information you choose to provide over such communication, including information about your query.

Information you provide us about others

If you provide an Audio Recording, this may contain the Personal Information or PHI of third parties. Before you do so, please make sure you have the necessary legal and other permissions from your patients, colleagues or other third parties before sharing Personal Information or PHI or referring them to us.

If you choose to utilize the Services to communicate with a patient, collaborate with a colleague or other third party or refer us to them, you may provide us with the email address and contact information of that patient, colleague or third party.

Information we may automatically collect or is generated about you when use the Services

Usage Information: When you use the Services, you generate information pertaining to your use, including timestamps, such as access, record, share, edit and delete events, app use information, screenshots/screen captures taken during the meeting, interactions with our team, and transaction records.

Device Information: We may assign a unique user identifier ("**UUID**") to each mobile device that accesses the Services. When you use our Services, you provide information such as your IP address, UUIDs, device IDs, web beacons and other device information (such as carrier type, whether you access our Service from a desktop or mobile platform, device model, brand, web browser and operating system).

Cookies: We may In this Policy, use Cookies and other similar technologies ("**Cookies**") to enhance your experience when using the Service. For more information about our Cookies policy, see [HOW WE MAY USE COOKIES AND SIMILAR TECHNOLOGIES](#) below.

Location Information: When you use the Services, we may receive your approximate location information. For example, we may infer your approximate location by using your IP address.

Information received from third parties

Information we may receive from third party platforms: When you connect third party platforms, apps or providers (such as Google Calendar, iCal or other calendar programs, Google Contacts or Zoom) to our Services, or when you register through a third party account (such as Google or Microsoft), we may receive Personal Information that may include your username, profile picture, email address, time, location, calendar information, contact information from such third parties and any information you choose to upload to such third party platforms (“**Platform Information**”).

Information from platforms our Services relies on: We receive transaction information from our payment processor, Stripe.

Other third parties. We may receive additional information about you, such as demographic or interest attributes from third parties such as data or marketing partners and combine it with other information we have about you.

We may also collect and use aggregated data such as statistical or demographic data for our purposes. Aggregated data may be derived from your Personal Information but is not Personal Information or PHI as this data will not directly or indirectly reveal your identity. However, if we combine or connect aggregated data with your Personal Information so that it can directly or indirectly identify you, we will treat the combined data as Personal Information which will be used in accordance with this Policy.

2. HOW WE MAY USE YOUR PERSONAL INFORMATION

We may use your Personal Information to:

Set up your account. We use your registration information, device information and information received from third parties (such as your username, email address) in order to set up an account for you to use our Services. We do so in accordance with our contractual and pre-contractual obligations to you in order to provide you with an account to use the Services.

Provide you with the Services. We may use your Audio Recordings, usage information and Platform Information in order to provide you with the Services. In addition, we may use your communication information to facilitate support (e.g. retrieval of a forgotten password). We do so in accordance with our contractual obligations to you in order to provide you with the Services.

Improve and monitor the Services. We may use information we automatically collect or generate about you when you use the Services, as well as information about your device such as device manufacturer, model and operating system, and the amount of free space on your device, to analyze the use of and improve our Services. We may train our proprietary artificial intelligence technology on de-identified Audio Recordings. We may also train our technology on transcriptions to provide more accurate services, which may contain Personal Information. We obtain explicit permission (e.g. when you rate the transcript quality and check the box to give ExpertAI and its third-party service provider(s) permission to access the conversation for training and product improvement purposes) for manual review of specific audio recordings to further refine our model training data.

Communicate with you. If you contact us, we will use your contact information to communicate with you and, if applicable, we may use your usage information to support your use of the Services.

Send you newsletters about product news or updates that may be of interest to you. We may send you emails with news or updates pertaining to our Services. When doing so, we process your email address, name and may process your usage information. Your consent can be withdrawn at any time by following the unsubscribe mechanism at the bottom of each communication.

Prevent fraud, defend ExpertAI against legal claims or disputes, enforce our terms and to comply with our legal obligations. It is in our legitimate interest to protect our interests by (1) monitoring the use of the Services to detect fraud or any other user behavior which prejudices the integrity of our Services, (2) taking steps to remedy aforementioned fraud and behavior, (3) defending ourselves against legal claims or disputes, and (4) enforcing our terms and policies. When doing so, we may process the Personal Information relevant in such a case, including information you provide us, information we automatically collect about you, and information which is provided to us by third parties.

3. HOW WE MAY USE COOKIES AND SIMILAR TECHNOLOGIES

We and our third-party partners may use Cookies, pixel tags, and similar technologies to collect information about your browsing activities and to distinguish you from other users of our Services in order to aid your experience and measure and improve our advertising effectiveness.

Cookies are small files of letters and numbers that we store on your browser or on your device. They contain information that is transferred to your device.

We may use Cookies to collect information about your browsing activities and to distinguish you from other users of our Services in order to aid your experience.

We may use the following types of Cookies and similar technologies:

Strictly necessary Cookies: Some Cookies are strictly necessary to make our Services available to you; for example, to provide login functionality, user authentication and security. We may not be able to provide you with the Services without this type of Cookie.

Functional Cookies: These are used to recognize you when you return to our Website. This enables us to personalize our content for you and remember your preferences (for example, your choice of language).

Analytical, performance, or advertising Cookies: We may also use Cookies and similar technologies for analytics purposes in order to operate, maintain, and improve our Services and measure and improve our advertising effectiveness. We may use third party analytics providers, including Google Analytics and Amplitude, to help us understand how users engage with us. We may also use third party advertising partners, including Facebook, to deliver ads to you on other sites. Google Analytics uses first-party Cookies to track user interactions which helps show how users use our Service and Website. This information is used to compile reports and to help us improve our Service and Website. Such reports disclose Website trends without identifying individual visitors. You can opt out of Google Analytics by going to <https://tools.google.com/dlpage/gaoptout> or via Google's Ads settings.

You can block Cookies by setting your internet browser to block some or all of Cookies. However, if you use your browser settings to block all Cookies (including strictly necessary Cookies) you may not be able to use our Services.

4. WITH WHOM WE SHARE YOUR PERSONAL INFORMATION

Third party services are not owned or controlled by ExpertAI and third parties may have their own policies and practices for collection, use and sharing of information. Please refer to third party privacy and security policies for more information before using such services. Third parties include vendors and service providers we rely on the provision of the Services. We may share your Personal Information with selected third parties, including:

Other users who see your Personal Information (such as your username and email) and any other information you choose to share with them through the Services.

Cloud service providers who we rely on for computing and data storage, including Amazon Web Services, based in the United States.

Platform support providers who help us manage and monitor the Services and provides user event data for our Services.

Data labeling service providers who provide annotation services and use the data we share to create training and evaluation data for ExpertAI's product features.

Artificial intelligence service providers that provide backend support for certain ExpertAI product features.

Mobile advertising tracking providers who help us measure our advertising effectiveness.

Analytics providers who provide analytics, segmentation and mobile measurement services and help us understand our user base. We may work with a number of analytics providers, including Google LLC, which is based in the U.S. You can learn about Google's practices by going to <https://www.google.com/policies/privacy/partners/>, and opt-out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

Advertising Partners: We may work with third party advertising partners to show you ads that we think may interest you. Some of our advertising partners may be members of the Network Advertising Initiative (<http://optout.networkadvertising.org/>) or the Digital Advertising Alliance (<http://optout.aboutads.info/>). If you do not wish to receive personalized ads, please visit their opt-out pages to learn about how you may opt out of receiving web-based personalized ads from member companies. You can access any settings offered by your mobile operating system to limit ad tracking, or you can install the AppChoices mobile app to learn more about how you may opt out of personalized ads in mobile apps.

Providers of integrated third-party programs, apps or platforms, such as Google Calendar and Apple iCal. When you connect third party platforms to our Services, you authorize us to share designated information and data created and/or uploaded by you to our servers with these third-party programs on your behalf.

Payment processors, such as Stripe. These payment processors are responsible for the processing of your Personal Information, and may use your Personal Information for their own purposes in accordance with their privacy policies. More information is available here: <https://stripe.com/gb/privacy>.

Law enforcement agencies, public authorities or other judicial bodies and organizations. We disclose Personal Information if we are legally required to do so, or if we have a good faith belief that such use is reasonably necessary to comply with a legal obligation, process or request; enforce our terms of service and other agreements, policies, and standards, including investigation of any potential violation thereof; detect, prevent or otherwise address security, fraud or technical issues; or protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law (including exchanging information with other companies and organizations for the purposes of fraud protection).

Change of corporate ownership. If we are involved in a merger, acquisition, bankruptcy, reorganization, partnership, asset sale or other transaction, we may disclose your Personal Information as part of that transaction.

5. HOW LONG WE STORE YOUR INFORMATION

ExpertAI stores all Personal Information for as long as necessary to fulfill the purposes set out in this Policy, or for as long as we are required to do so by law or in order to comply with a regulatory obligation. When deleting Personal Information, we will take measures to render such Personal Information irrecoverable or irreproducible, and the electronic files which contain Personal Information will be permanently deleted.

6. YOUR RIGHTS

In certain circumstances you have the following rights in relation to your Personal Information that we hold.

Access. You have the right to access the Personal Information we hold about you, and to receive an explanation of how we use it and who we share it with.

Correction. You have the right to correct any Personal Information we hold about you that is inaccurate or incomplete.
Erase. You have the right to request for your Personal Information to be erased or deleted.

Object to processing. You have the right to object to our processing of your Personal Information where we are relying on a legitimate interest or if we are processing your Personal Information for direct marketing purposes.

Restrict processing. You have a right in certain circumstances to stop us from processing your Personal Information other than for storage purposes.

Portability. You have the right to receive, in a structured, commonly used and machine-readable format, Personal Information that you have provided to us if we process it on the basis of our contract with you, or with your consent, or to request that we transfer such Personal Information to a third party.

Withdraw consent. You have the right to withdraw any consent you previously applied to us. We will apply your preferences going forward, and this will not affect the lawfulness of processing before your consent was given.

Please note that, prior to any response to the exercise of such rights, we will require you to verify your identity. In addition, we may require additional information (for example, why you believe the information we hold about you is inaccurate or incomplete) and may have valid legal reasons to refuse your request. We will inform you if that is the

case. For more information on how to exercise your rights, or to exercise your rights, please email contact@experthealth.ai

California Rights and Disclosures

The California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (“**CCPA**”), provides California residents with specific rights regarding their personal information. Please see the “Exercising Your Rights” section below for instructions regarding how California residents can exercise these rights. This section describes your CCPA rights and explains how to exercise those rights. If you have any questions about this section or whether any of the following applies to you, please contact us at contact@experthealth.ai and indicate “California Rights” in the subject line of your communication.

Access

You have the right to request certain information about our collection and use of your Personal Data, including the following:

The categories of Personal Data that we have collected about you.

The categories of sources from which that Personal Data was collected.

The business or commercial purpose for collecting or selling your Personal Data.

The categories of third parties with whom we have shared your Personal Data.

The specific pieces of Personal Data that we have collected about you.

If we have disclosed your Personal Data for a business purpose, we will identify the categories of Personal Data shared with each third-party recipient. If we have sold your Personal Data over the past 12 months, we will identify the categories of Personal Data purchased by third-party recipients.

Deletion

You have the right to request that we delete the Personal Data that we have collected from you. Under the CCPA, this right is subject to certain exceptions: for example, we may need to retain your Personal Data to provide you with the Services or complete a transaction or other action you have requested. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

Correction

You have the right to request that we correct any inaccurate Personal Data we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, if we decide, based on the totality of circumstances related to your Personal Data, that such data is correct. If your correction request is subject to one of these exceptions, we may deny your request.

Processing of Sensitive Personal Information Opt-Out

We collect Personal Data that is considered “Sensitive Personal Information” under the CCPA. Because we use or disclose Sensitive Personal Information for purposes other than those set forth in section 7027(m) of the CCPA regulations, California residents have the right to request that we limit the use or sharing of their Sensitive Personal Information (“**Right to Limit**”). The Right to Limit allows California residents to direct a business that collects Sensitive Personal Information to limit its use of this information to that use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services, to perform the services set forth in paragraphs (2), (4), (5), and (8) of subdivision (e) of Section 1798.140, and as authorized in the CCPA regulations.

Personal Data Sharing or Selling

Under the CCPA, California residents have certain rights when a business “shares” or “sells” Personal Data with third parties for purposes of cross-contextual behavioral advertising. While ExpertAI does not sell users’ information to unaffiliated parties for money, we do share Cookies and other web data to advertising and marketing partners in a manner which might be considered “selling” or “sharing” your personal information as those terms are defined under the CCPA. Accordingly, we have shared and sold the foregoing categories of Personal Data for the purposes of cross-contextual behavioral advertising:

Demographic data

Web analytics or other similar network activity information

As described in the “Tracking Tools, Advertising and Opt-Out” section above, we have incorporated Cookies from certain third parties into our Services. These Cookies allow those third parties to receive information about your activity on our Services that is associated with your browser or device. Those third parties may use that data to serve you relevant ads on our Services or on other websites you visit. Under the laws of the CCPA, “sharing” of a User’s web analytics is also considered “selling.” You can opt out of such data selling and/or sharing by following the instructions in this section.

We share Personal Data with the following categories of third parties:

Advertising partners

Over the past 12 months, we may have shared Personal Data with the categories of third parties listed above for the following purposes:

Marketing and advertising the Services.

Showing you advertisements, including interest-based or online behavioral advertising.

Once you have submitted an opt-out request, we will not ask you to reauthorize the sharing of your Personal Data for at least 12 months. To our knowledge, we do not share the Personal Data of minors under 16 years of age.

We Will Not Discriminate Against You for Exercising Your Rights Under the CCPA.

We will not discriminate against you for exercising your rights under the CCPA. We will not deny you our goods or services, charge you different prices or rates, or provide you with a lower quality of goods and services if you exercise your rights under the CCPA.

Financial Incentives

At ExpertAI, we value your data because it allows us to better understand your goals and preferences and improve our products and services to better serve you. From time to time, we may offer a financial incentive for your participation in our user research. The financial incentive we offer is based on our determination of the estimated value of your data. If you participate in the research, you may be asked to submit personal information in surveys, forms, or through your account. The personal information you submit in connection with this research will only be used internally to improve our product; we will never share or sell this data to third parties.

Through your participation in the research, we may collect the following categories of personal information about you:

Identifiers, such as your name, address, unique personal identifier, online identifier, internet protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers. Characteristics of protected classifications under California or federal law.

Commercial information, such as products or services you've purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Internet or other electronic network activity information, such as your browsing history, search history, and information regarding your interaction with an internet website, application, or advertisement.

Geolocation data.

Audio, electronic, visual, thermal, olfactory, or similar information. For example, we may collect your voice recordings.

Professional or employment-related information.

Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99).

Any other personal information you may enter into a free-form field of our surveys or forms.

Inferences drawn from any of the foregoing categories of personal information.

Participation in the financial incentive is entirely optional. If you participate in a financial incentive, you agree that we are not required to comply with your right to know or delete personal information collected in exchange for the financial incentive. If you are a participant in a financial incentive we offer, you may withdraw from the financial

incentive at any time by emailing us at the email address provided to you with your individual notice of the financial incentive.

Other California Resident Rights

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties' direct marketing purposes. To submit such a request, please contact us at contact@experthealth.ai

Other U.S. State Rights and Disclosures

If you are a resident of Virginia, Colorado, Connecticut, Utah, Washington State (solely with respect to consumer health information) or another state with a similar comprehensive consumer privacy law, you may have certain rights regarding your information. Please see the "Exercising Your Rights" section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers' end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data. Additionally, please note that these rights are subject to certain conditions and exceptions under applicable law, which may permit or require us to deny your request.

If you have any questions about this section or whether any of the following rights apply to you, please contact us at contact@experthealth.ai and indicate "State Rights" in the subject line of your communication.

Access

You may have the right to request confirmation of whether we are processing your Personal Data and to access your Personal Data.

Correction

You may have the right to correct inaccuracies in your Personal Data, to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing your Personal Data.

Portability

You may have the right to request a copy of your Personal Data in a machine-readable format to the extent technically feasible.

Deletion

You may have the right to delete your Personal Data.

Opt-Out of Certain Processing Activities

You may have the right to opt-out to the processing of your Personal Data for targeted advertising purposes. As discussed in the “Personal Data Sharing” section of the “California Rights” section of this Privacy Policy, we process your Personal Data for targeted advertising purposes. To opt-out of our processing of Personal Data for targeted advertising purposes, please see the “Exercising Your Rights” section.

You may have the right to opt-out to the sale of your Personal Data. We do not currently sell your Personal Data to others for monetary consideration.

You may have the right to opt-out from processing your Personal Data for the purposes of profiling in furtherance of decisions that produce legal or similarly significant effects to you, if applicable.

Appealing a Denial

If we refuse to take action on a request within a reasonable period of time after receiving your request in accordance with this section, you may have the right to appeal such decision. In such appeal, you must (1) provide sufficient information to allow us to verify that you are the person about whom the original request pertains and to identify the original request, and (2) provide a description of the basis of your appeal. Please note that your appeal will be subject to your rights and obligations afforded to you under the applicable state law that applies to you. We will respond to such appeal within 45 days of receiving your request. If we deny your appeal, you may have the right to contact the applicable regulators in your state.

You may appeal a decision by us using the following methods:

email us at: contact@experthealth.ai (title must include “Consumer Appeal”)

Exercising Your Rights

To exercise the rights under the CCPA or other state laws as described above, you must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data, and (2) describes your request in sufficient detail to allow us to understand, evaluate, and respond to it. Each request that meets both of these criteria will be considered a “Valid Request.” We will only use Personal Data provided in a Valid Request to verify you and complete your request.

We will respond to your Valid Request within the applicable time period required by law. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive, or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

To the extent rights are afforded to you, you may submit a Valid Request using the following methods:

email us at contact@experthealth.ai

You can submit requests to access (by portable copy or otherwise), delete, correct by the following methods:

email us at contact@experthealth.ai

Changes to this Privacy Policy

We reserve the right to amend our Privacy Policy at our discretion and at any time. When we make changes to the Privacy Policy, we will notify you by email or through a notice on our website homepage. Use of the information we collect is subject to the Privacy Policy in effect at the time such information is collected.

Contact Information

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data, your choices, and rights regarding such use, please do not hesitate to contact us at: contact@experthealth.ai