



PRIVACY POLICY AND DATA PROTECTION RIGHTS

ELITE GLOBAL DOCTORS INC values your privacy. This Privacy Policy applies to our website <https://www.eliteglobaldoctors.com> as well as the Services, which are accessible through the Site. Therefore, this privacy policy (the "Privacy Policy") aims to inform you about how the Company Group entities, acting as data controllers, collect and process the personal data you submit or disclose to us. We also act as data controllers when we process your personal data received or obtained through a third party. In this Privacy Policy ("Policy"), we describe how we collect, use, and disclose information that we obtain about visitors to our Site and users of our Services.

By visiting the Site or using our Services, you agree that your personal information will be handled as described in this Policy. Your use of our Site and Services and any dispute over privacy are subject to this Policy and our Terms of Service, including its applicable limitations on damages and the resolution of disputes.

We recommend that you read this Privacy Policy carefully. If you do not wish for your personal data to be used by us as set out in this Privacy Policy, please do not provide us with your personal data. Please note that, in this case, we may not be able to provide you with our services, you may not have access to and/or use some features of the Site, and your customer experience may be affected.

WHAT ARE YOUR DATA PROTECTION RIGHTS?

We would like to make sure you are fully aware of all your data protection rights. Every user is entitled to the following:

- **The right to access:** You have the right to request copies of your personal data from Our Company.
- **The right to rectification:** You have the right to request that Our Company correct any information you believe is inaccurate. You also have the right to request Our Company to complete information you believe is incomplete.
- **The right to erasure:** You have the right to request that Our Company erase your personal data, under certain conditions.

- **The right to restrict processing:** You have the right to request that Our Company restrict the processing of your personal data, under certain conditions.
- **The right to object to processing:** You have the right to object to Our Company's processing of your personal data, under certain conditions.
- **The right to data portability:** You have the right to request that Our Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email: info@eliteglobaldoctors.com

HOW WE USE THE INFORMATION WE COLLECT

We use information that we collect about you or that you provide to us, including any Personal Data:

- To present our Website and its contents to you.
- To register and service your account with us.
- To provide and improve the products and services we offer to you.
- To provide you with information, products, or services that you request from us.
- To administer surveys and promotions.
- To process, fulfill, and administer transactions and orders for products and services ordered by you.
- To contact you in response to a request.
- To enhance and improve our Website and Applications.
- To fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website, our Application, or any products or services we offer or provide through them.
- In any other way we may describe when you provide the information, and for any other purpose with your consent.

LEGAL BASIS FOR PROCESSING

We generally process personal information provided by visitors through our website on the basis of consent.

We may also process personal information on other bases permitted by the GDPR and applicable laws, such as when the processing is necessary for us to comply with our legal obligations.

INFORMATION WE COLLECT

As you use the Site or the Services, certain cookies may passively collect certain information, such as URLs (Uniform Resource Locators) and third-party tracking services, including:

CATEGORIES OF PERSONAL INFORMATION

We process the following information when visitors to our website provide it voluntarily:

INFORMATION	PURPOSE	NOTES
Name	Required information: necessary to complete transactions.	
Surname	Required information: necessary to complete transactions.	
Date of Birth	Required information: necessary to complete transactions and for verification purposes.	
Gender	Required information: necessary to complete transactions.	May be a requirement for some products or services.
Email Address	Required information: necessary to complete transactions and also for communications as needed.	
Identification (preferably passport)	Required information: necessary to complete transactions and for verification purposes.	
Country of Residence	Required information: necessary to complete transactions and for verification purposes.	
Mailing Address	You may need to complete transactions.	May be a requirement for some products or services.
Phone Number (preferred mobile number)	Required information: necessary to complete transactions and also for	User may choose to receive the link to download contracted services on the

	communications as needed.	phone number registered with us.
Health Information	Some products offered may require this information and it is also necessary to complete transactions.	May be a requirement for some products or services.
Additional Contact Information	We collect information from family members, partners, friends to be contacted in case of emergency.	Name, email address, and/or phone number.

We also process automatically collected information as described in our cookies section of this document.

SITE ACTIVITY INFORMATION

We may keep track of some of the actions you take on the Site, such as the content of searches you perform on the Site.

IP ADDRESSES

IP addresses are collected, which we treat as personal data. The full IP address is captured in application logs but is deleted after 90 days. A truncated version of the IP address (i.e., the last octet dropped) and one-way hashed IP addresses are securely transmitted to the U.S. for use in preparing customer analytics reports.

IP addresses can be used to help determine geolocation at the city, town, country, or DMA level.

IP addresses are anonymized (ip-masking) and used for statistical purposes; the evaluation of IP addresses related to the person is impossible.

ACCESS DEVICE AND BROWSER INFORMATION

When you access the Site from a computer or other device, we may collect anonymous information from that device, such as your Internet Protocol address, browser type, connection speed, and access times (collectively, "Anonymous Information").

MOBILE SERVICES

We may collect non-personal information from your mobile device or computer. This information is generally used to help us deliver the most relevant information to you. Examples of information that may be collected and used include how you use the application(s) and information about the type of device or computer you use. In addition, in the event our

application(s) crashes on your mobile device we will receive information about your mobile device model, software version, and device carrier, which allows us to identify and fix bugs and otherwise improve the performance of our application(s).

ANALYTICS TOOLS

Pursuant to Article 6(1)(a) GDPR, we use Google Analytics, a service of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). In this context, pseudonymous user profiles are created and cookies are used. The information stored by the cookie, such as browser type/version, operating system, referrer URL (the previously visited website), host name of the accessing device (IP address), and time of server request, is transferred to a server operated by Google for storage.

The information generated in connection with our website is used to create reports on platform usage, to improve our website, and to tailor our services to your needs.

We use tools such as Google Analytics to help analyze how users use the Site. Such third parties may use cookies, APIs, and SDKs in our services to enable them to collect and analyze user and device related data and information on our behalf.

Google Analytics uses Cookies to collect information such as how often users visit the Site, what pages they visit, and what other websites they used prior to coming to the Site. We use the information we get to improve our Site and Services.

STATISTICS

The website uses a minimal build of Google Analytics, a service that transmits website traffic data to Google servers in the United States and allows us to observe trends to improve the user experience on our website. This minimal build processes personal data such as: the unique User ID set by Google Analytics, the date and time, the title of the page being viewed, the URL of the page being viewed, the URL of the page viewed prior to the current page, screen resolution, time in local time zone, files clicked and downloaded, links clicked to an external domain, device type, and country, region, and city.

You can opt-out of this tracking at any time by activating the "Do Not Track" setting in your browser.

Although Google Analytics plants a persistent Cookie on your web browser to identify you as a unique user the next time you visit the Site, the Cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to the Site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>

HOW WE PROTECT YOUR PERSONAL DATA

We use reasonable security procedures to protect against accidental unauthorized or unlawful access, processing, disclosure, alteration, destruction, or accidental loss of your personal data.

We limit access to and use of your personal data to authorized persons. When your personal data is no longer needed, we will securely destroy it.

IMPORTANT DEFINITIONS

When we use the term "Personal Information" in this Privacy Policy, we mean information about you that is personally identifiable to you, such as your contact information (e.g., name, address, email address, or telephone number), personally identifiable health or medical information ("Health Information"), and any other non-public information that is associated with such information.

When we use the term "De-Identified Information", we mean information that is neither used nor intended to be used to personally identify an individual. When we use the term "Cookies", we mean the small pieces of information that a Site sends to your browser while you are viewing a website.

CHILDREN UNDER AGE 18

We do not knowingly collect or process information about children under the age of eighteen (18) without the permission and consent of their parents or representatives. If we discover that we have collected and processed the personal data of a child under the age of eighteen (18) directly, or the equivalent minimum age depending on the jurisdiction in question, we will take steps to delete the information as soon as possible. If you become aware that a child under the age of eighteen (18) has provided us with personal data directly, please contact us immediately via the contact address specified in this Privacy Policy. Only his/her parents or guardians can create accounts for use of the platform.

YOUR EMAIL ADDRESS

Email address information is only collected when a user communicates with us via email or when the user volunteers this information, such as in a survey and/or registration on the website. If you do not want to receive information from us via email, please let us know by checking the proper option in any of our contact forms or by contacting us at the address shown above.

YOUR TELEPHONE NUMBER

If you supply us with your telephone numbers online, you will only receive telephone contact from us with information regarding your connection or for providing you with the services you

have placed online.

COOKIES

Cookies are pieces of information stored directly on the computer you are using. Cookies allow us to recognize your computer and to collect information such as internet browser type, time spent on the Site, pages visited, and language preferences. We may use the information for security purposes, to facilitate navigation, to display information more effectively, to personalize your experience while visiting the Site, or to gather statistical information about the usage of the Site.

We may use both session Cookies (which expire once you close your web browser) and persistent Cookies to make the Site and Services easier to use, to make our advertising better, and to protect both you and our company.

How do we use cookies?

Our company uses cookies in a number of ways to improve your experience on our website, including:

- Keeping you signed in.
- Understanding how you use our website.

What types of cookies do we use?

There are several different types of cookies, however, our website uses:

- **Functionality:** Our company uses these cookies so that we recognize you on our website and remember your previously selected preferences. This could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.

How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

AD SERVERS

We do not partner with or have special relationships with any ad server companies.

YOUR RIGHTS

Upon request we provide site visitors with access to all information (including proprietary information) that we maintain about them, including financial information (e.g. credit card account information), unique identifier information (e.g. customer number or password), transaction information (e.g. dates on which customers made purchases, amounts and types of purchases), communications that the consumer/visitor has directed to our website (e.g., emails, customer inquiries), and contact information (e.g. name, address, telephone number).

You may modify registration information that you have submitted by logging into your account and updating your profile information. Please note that copies of information that you have

updated, modified, or deleted may remain viewable in cached and archived pages of the Site for a period of time.

Upon request we offer visitors the ability to have inaccuracies corrected in any such information. Consumers can have this information corrected by writing to us at the address shown above.

From time to time, we may use customer information for new, unanticipated uses not previously disclosed in our privacy notice. If our information practices change at any time in the future we will notify you of them via our website. You will be given the opportunity to opt out of these new uses. If you are concerned about how your information is used, you should check our website regularly.

If you feel that this website is not following its stated information policy, please contact us at the address shown above.

HOW DO WE STORE YOUR DATA?

Our company securely stores your data at two locations (Michigan and Florida) in the United States of America. Please see the paragraph below regarding all security precautions taken to keep your information safe.

You may also refer to our retention policy regarding your data elsewhere in this document.

SITE SECURITY

We have implemented reasonable technical, physical, administrative, and organizational safeguards designed to secure your Personal Data from accidental loss and from unauthorized access, use, alteration, and disclosure. We use encryption technology for information sent and received by us. The pages on which this information is exchanged are hosted on a secure server.

Please be aware that despite our efforts, no data security measures can guarantee 100% security. You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity.

Please remember, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

We will take appropriate technical, physical, legal and organizational measures, which are consistent with applicable privacy and data security laws.

If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any Personal Information you might have with us has been

compromised), please immediately notify us.

PRIVACY POLICIES OF OTHER WEBSITES

We may provide links to websites as a service or for further information and/or legal requirements. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

CHANGES TO OUR PRIVACY POLICY

Our Company keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on **December 27, 2023**.

INFORMATION FOR USERS ACCESSING OUR SERVICES FROM THE EUROPEAN ECONOMIC AREA (EEA)

This notice is directed to individuals located in the European Economic Area ("EEA"). Our processing of personal data of individuals located in the EEA is governed by the General Data Protection Regulation (the "GDPR"), which applies from May 25, 2018. The GDPR requires us to provide you with certain information about your personal data, which we refer to in this notice as your personal information. This supplements the information we have already disclosed in this document.

INFORMATION REGARDING TRANSFERS OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

The principal administrative offices of ELITE GLOBAL DOCTORS INC are located in the U.S. and that is where we process personal information collected through our website. When you provide personal information to us, we request your consent to transfer that personal information to the U.S. The U.S. does not have an adequacy decision from the European Commission, which means that the Commission has not determined that U.S. laws provide adequate protection for personal information. While U.S. laws do not provide legal protection equivalent to EU data protection laws, we protect your personal information by treating it in accordance with this GDPR Privacy Notice. We take appropriate steps to protect your privacy and implement reasonable security measures to protect your stored personal information. We use secure transmission methods to collect personal data through our website.

PERSONAL INFORMATION RETENTION PERIOD

How long we keep personal information varies depending on the type of information involved and the purpose for which it is used. We delete personal information within a reasonable period after we no longer need to use it for the purpose for which it was collected (or for any subsequent purpose that is compatible with the original purpose). This does not affect your right to request that we delete your personal data before the retention period expires. We may

archive personal data (meaning store it in inactive files) for a certain period of time prior to its final deletion, as part of our normal business continuity procedures.

Notwithstanding the other provisions of this Section, we will retain documents (including electronic documents) containing personal data:

- To the extent required by law.
- If we believe the documents may be relevant to any ongoing or future legal proceedings;
- If we intend to establish, exercise, or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

YOUR RIGHTS TO ACCESS, RECTIFICATION, RESTRICTION OR ERASURE OF YOUR PERSONAL DATA AND TO OBJECT TO PROCESSING

You have the right to request access to your personal data, to have your personal data corrected, restricted, or deleted, and to object to our processing of your personal data. You may also have the right to data portability, which means that you can request that we provide you (or a third party you designate) with a transferable copy of the personal information you have provided to us. Your rights may be subject to various limitations under the GDPR. If you wish to exercise any of these rights, or if you have any questions about the processing of your personal data, please contact us in any of the ways listed in the "How to Contact Us" section of our General Privacy Notice.

DATA BREACHES AND OTHER DATA INCIDENTS

Upon becoming aware of a destruction, loss, alteration, unauthorized disclosure, or accidental or unlawful access to Customer Data, including Personal Data, transmitted, stored, or otherwise processed by ELITE GLOBAL DOCTORS INC, or its Sub-processors ("Security Incident"), ELITE GLOBAL DOCTORS INC will notify the Customer without undue delay and in accordance with the terms of the Agreement, but within no more than seventy-two (72) hours, and will provide timely information as the Customer may reasonably require to enable the Customer to comply with any data breach notification obligations under EU Data Protection Legislation. We will use all reasonable efforts to identify the cause of such Security Incident and to take such steps as ELITE GLOBAL DOCTORS INC deems necessary and reasonable to remedy the cause of such Security Incident to the extent that remediation is within ELITE GLOBAL DOCTORS INC's reasonable control. The obligations herein do not apply to incidents caused by the Customer or Customer's Users.

DATA PROTECTION AGREEMENT

DEFINITIONS

- a. **"Affiliate"** means any entity that directly or indirectly controls, is controlled by, or is under common control with such entity. For purposes of this definition, "control" means direct or indirect ownership or control of more than 50% of the voting interests of the

subject entity.

- **b. "Authorized Affiliate"** means any of Customer's Affiliates that (a) is subject to the data protection laws and regulations of the European Union, the European Economic Area and/or their member states, Switzerland and/or the United Kingdom, and (b) is authorized to use the Services in accordance with the Agreement between Customer and ELITE GLOBAL DOCTORS INC., but has not signed its own Order Form with ELITE GLOBAL DOCTORS INC and is not a "Customer" as defined in the Agreement.
- **c. "Controller"** means the entity that determines the purposes and means of the processing of personal data.
- **d. "Customer Data"** means what is defined in the Agreement as "Customer Data" or "Your Data".
- **e. "Data Protection Laws and Regulations"** means all laws and regulations, including laws and regulations of the European Union, the European Economic Area and their member states, Switzerland and the United Kingdom, applicable to the processing of personal data under the Agreement.
- **f. "Data Subject"** means the identified or identifiable person to whom the Personal Data relates.
- **g. "GDPR"** means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
- **h. "Personal Data"** means any information relating to (i) an identified or identifiable natural person and, (ii) an identified or identifiable legal entity (where such information is similarly protected as personal data or personally identifiable information under applicable Data Protection Laws and Regulations), where for each (i) or (ii), such data is Customer Data.
- **i. "Processing"** means any operation or set of operations performed on Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **j. "Processor"** means the entity that processes personal data on behalf of the Controller.
- **k. "ELITE GLOBAL DOCTORS INC."** refers to the ELITE GLOBAL DOCTORS INC entity established in the Agreement that is a party to this DPA.
- **l. "ELITE GLOBAL DOCTORS INC Group"** means ELITE GLOBAL DOCTORS INC. and its Affiliates engaged in the Processing of Personal Data.
- **m. "Customer"** refers to the Customer established in the Agreement and who is a party to this DPA.
- **n. "Standard Contractual Clauses"** means the agreement entered into between the Customer and ELITE GLOBAL DOCTORS INC, pursuant to the European Commission decision (C(2010)593) of 5 February 2010 on standard contractual clauses for the transfer of personal data to processors established in third countries which do not ensure an adequate level of data protection.
- **o. "Sub-processor"** means any Processor engaged by ELITE GLOBAL DOCTORS INC, or a member of the ELITE GLOBAL DOCTORS INC Group.

- p. "**Supervisory Authority**" means an independent public authority established by an EU Member State pursuant to the GDPR.

PROCESSING OF PERSONAL DATA

a. Roles of the parties. The parties acknowledge and agree that with respect to the Processing of Personal Data, Customer is the Controller, ELITE GLOBAL DOCTORS INC is the Processor, and that ELITE GLOBAL DOCTORS INC, or members of the ELITE GLOBAL DOCTORS INC Group, will engage Sub-processors in accordance with the requirements set forth in Section 5 "Sub-processors" below.

b. Processing of Personal Data by Customer. The Customer shall, in using the Services, process Personal Data in accordance with the requirements of Data Protection Laws and Regulations. For the avoidance of doubt, Customer's instructions for the Processing of Personal Data shall comply with Data Protection Laws and Regulations. Customer shall be solely responsible for the accuracy, quality, and legality of Personal Data and the means by which Customer acquired Personal Data and shall indemnify, defend and hold harmless any claim, damages or fine against ELITE GLOBAL DOCTORS INC arising from any failure to acquire or use Personal Data with legal consent or legitimate business purpose or in violation of any legal data protection requirement.

c. Processing of personal data by ELITE GLOBAL DOCTORS INC. It will treat personal data as confidential information and will only process personal data on behalf of and in accordance with the customer's documented instructions for the following purposes: (i) processing in accordance with the Agreement and applicable order forms; (ii) Processing initiated by Users in their use of the Services; and (iii) Processing to comply with other reasonable documented instructions provided by Customer (e.g., via email) where such instructions are consistent with the terms of the Agreement.

d. Details of the processing. The subject matter of the Processing of Personal Data by ELITE GLOBAL DOCTORS INC is the provision of the Services in accordance with the Agreement. The duration of the Processing, the nature and purpose of the Processing, the types of Personal Data, and the categories of Data Subjects Processed under this DPA are specified in further detail in Annex 1 (Details of Processing) of this DPA.

DATA SUBJECT RIGHTS

Data subject requests. ELITE GLOBAL DOCTORS INC shall, to the extent permitted by law, promptly notify Customer if ELITE GLOBAL DOCTORS INC receives a request from a Data Subject to exercise the right of access, right to rectification, restriction of Processing, erasure ("right to be forgotten"), data portability, objection to the Processing, or its right not to be subject to automated individual decision-making ("Data Subject Request"). Taking into account the nature of the Processing, ELITE GLOBAL DOCTORS INC shall assist Customer by appropriate technical and organizational measures, insofar as this is possible, for the fulfillment of Customer's obligation to respond to a Data Subject Request under Data Protection Laws and Regulations. Furthermore, to the extent Customer, in its use of the Services, does not have the

ability to address a Data Subject Request, ELITE GLOBAL DOCTORS INC shall upon Customer's request provide commercially reasonable efforts to assist Customer in responding to such Data Subject Request, to the extent ELITE GLOBAL DOCTORS INC is legally permitted to do so and the response to such Data Subject Request is required under Data Protection Laws and Regulations. To the extent permitted by law, Customer shall be responsible for any costs arising from ELITE GLOBAL DOCTORS INC's provision of such assistance.

HOW TO CONTACT US

If you have any questions about our Company's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

ELITE GLOBAL DOCTORS INC

c/o Data Privacy Officer

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