

Privacy Policy & Terms and Conditions

**Trilogy Veterinary Medical Center, LLC**

**Privacy Policy**

Last Updated: July 29, 2024

**Trilogy Veterinary Medical Center** and its affiliates, (“Trilogy Veterinary Medical Center”, “we,” “our,” or “us”) values your privacy. This Privacy Policy (“Policy”) describes Trilogy Veterinary Medical Center collects, uses, discloses, and otherwise processes personal information described in this Policy, as well as the rights and choices individuals have regarding such personal information.

For additional information about the privacy choices you have regarding your personal information, please review [Section 6. Your Privacy Choices](#), as well as [Section 13. Additional Information for Certain United States Residents](#), which includes additional information about privacy rights for residents of certain US jurisdictions. If you are a California resident, please refer to [Section 13.B. Additional Information for California Residents](#) for information about the categories of personal information we may collect and your rights under which for purposes of this Policy include Trilogy Veterinary Medical Center and SVP California, P.C. for California privacy laws.

By using our Services (as defined below), you agree that your personal information will be handled as described in this Policy. Your use of our Services and any dispute over privacy, is subject to this Policy.

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### Scope

Except as otherwise described below, this Policy applies to our online and offline personal information processing activities including, but not limited to: visitors of our website where this Policy is posted (the “Site”); individuals who sign up for, or create an account with us to access and use certain features of our services; individuals who register for or participate in our events, surveys, research, promotions, and sweepstakes conducted by us; individuals who subscribe to receive news, information, and marketing communications and materials from us; current, former, and prospective business partners, and service providers; and individuals who communicate or otherwise interact or engage with us or the services available through our Site or other online services (collectively referred to as the “Services”).

*Additional Notices.* Depending on how you interact or engage with us, we may provide you with additional or supplemental privacy notices with additional details about our privacy practices. These additional notices will control to the extent there is a conflict with this Policy, with respect to your personal information that is subject to that additional notice. For example, this Policy does not apply to the personal information we collect and process about job applicants and candidates for employment with us, or to employees or contractors in the context of our working relationship with them.

### Personal Information Collected

We collect personal information directly from you, from third-party sources, and automatically through your use of the Services. To the extent permitted by applicable law, we may combine the personal information we collect from publicly available or third-party sources with other information we process about you.

*Personal Information Collected Directly.* While the personal information we collect varies depending upon your use of our Services and our interactions with you, in general, we may collect the following personal information directly from you;

- **Contact and Other Personal Information.** When you contact us, including if you send us a message or sign up to learn more about our Services, we may collect your name, email address, phone number, or other similar identifiers, as well as your message, the nature of your inquiry, and any other information you so

choose to provide. We may also collect your shipping address, email address, and telephone number, and demographic information, such as your age, gender, hometown, and interests, that you voluntarily give to us when you choose to participate in various activities related to the Site.

- **Account and Profile Information.** When you sign in or create an account in connection with our Services, we may collect your name, email address, phone number, username and password, as well as any other information used in connection with accessing your account or that you otherwise submit to us through your account.
- **Purchases and Payments.** When you make a purchase or payment through our Services, we or our service providers acting on our behalf may collect information such as payment type, payment card details, billing information, shipping address, purchasing information, such as details of SKUs and products purchased, and any other financial or commercial-related information necessary for facilitating our Services.
- **Communications and Interactions.** When you email, call, or otherwise communicate or interact with us, including if you sign up for our mailing lists, complete forms on our Site, interact with our social media pages, post a review or testimonial, submit content in any online discussion groups, or otherwise enter information into public-facing comment fields, blogs, or community forums sponsored by or affiliated with SVP, we may collect and maintain records of your contact details, communications and interactions, your posts or submissions, and our responses, if applicable. We may also collect any information you submit through our chat functions and/or virtual assistants we make available through the Services, and we may also maintain communication records regarding information provided to us related to any customer support requests.
- **Promotional Information.** We may collect your contact details, preferences, and if relevant, information about your account and profile, including the Services and features you use.
- **Programs, Sweepstakes, and Rewards.** If you participate in offers, programs, promotions, or sweepstakes we offer, we may collect certain contact details, your age, and any other information that may be required by applicable law. If you win a contest, promotion, or sweepstakes, we may also collect certain tax information and/or waivers and releases, depending on the prize and as required by applicable law. In addition, if you join our rewards program, we may collect information related to your registration for, and participation in, this program.

- **Responses and Feedback.** If you participate in surveys, questionnaires, or research activities or initiatives conducted by us, such as for market research, user satisfaction, or other similar purposes, we may collect your responses and feedback, and any other information you choose to provide.
- **Events and Registration Details.** We also may collect personal information related to your participation in our events, as well as other requests that you submit to us related to our Services. For example, if you register for or attend an event that we host or sponsor, we may collect information related to your registration for and participation in such event.
- **Preferences and Other Requests.** We also may collect information about your preferences, including communications preferences, preferences related to your use of our Services, and any other preferences or requests you provide when interacting with us.
- **Business Development Information.** To assess and pursue potential business opportunities, we may collect and receive personal information about current, former, and prospective business partners, and vendors and service providers, including contact information and other similar identifiers, company and professional-related information, and communications records.

**Personal Information Collected from Third Parties.** We may also collect and receive certain personal information about you from third party sources, such as business partners, data analytics and marketing providers, operating systems and social media platforms, public databases, clients and other SVP users, and service providers or other third parties who provide services or perform functions on our behalf. For example, we may collect your name, contact details, and other similar information from business partners and service providers for purposes of facilitating shipments and providing our Services. In addition, we may collect the following information from third-party sources:

- **Social Media Information.** While using our Services, you may choose to enable sharing information or content through various social media platforms or social networking websites. If you choose to share content or interact with our Services using your social media accounts, we may collect or receive personal information about you that you have provided to that social media platform and/or social networking website. For example, we may collect information related to your account and profile, such as your name, username, email, profile picture, public postings, and other similar information available on your social media profile. You should check your privacy settings on each social media platform to better

understand how your personal information may be used, disclosed, or otherwise processed by these platforms.

- **Lead and Prospect Information.** We may receive lead and prospect information from third parties about prospective clients that may be interested in our Services. We may also engage with third parties to enhance or update our client information. For example, we may receive certain personal information about you from data analytics and marketing providers for marketing and advertising purposes, and for purposes of reaching new clients.
- **Referral Information.** We may offer you the ability to invite friends or refer other users to access or use our Services. In doing so, we may collect and receive certain personal information about you, including from other current or prospective SVP clients who similarly engage in these activities.
- **Integrated Service Information.** We may make available the ability for you to access, register for, place orders, or otherwise interact, engage, or connect with the Services through certain third-party features or integrated services. By accessing our Services via these third-party connections or integrated services, we may collect or obtain certain personal information about you related to your use of such third-party connections or integrated services. You should check your privacy settings on each integrated service to better understand how your personal information may be used, disclosed, or otherwise processed by these parties.

**Personal Information Collected Automatically.** We may automatically collect or derive personal information about you related to your use of our Services, including through the use of cookies, pixel tags, and other similar technologies. The personal information we may automatically collect includes:

- **Device and Browsing Information.** When you use our Services, we may collect browser type, domain name, page views, access times, date/time stamps, operating system, language, device type, unique ID, Internet service provider, referring and exiting URLs, clickstream data, and other similar device and browsing information.
- **Activities and Usage.** We also may collect activity information related to your use of the Services, such as information about the links clicked, searches, features used, items viewed, time spent within the Services, your interactions with us within the Services, and other similar activity and usage information.

- **Location Information.** We also may collect or derive general location information about you, such as through your IP address.

For more information about our use of cookies and other similar technologies, please see [Section 5. Cookies and Other Tracking Mechanisms](#).

### **Purposes for Collection and Processing**

Generally, we may collect, use, disclose and otherwise process the personal information we collect for the following purposes:

- **Services and Support.** To provide and operate our Services, manage your account, communicate with you about your use of the Services, provide troubleshooting and technical support, and for similar support purposes, respond to your inquiries, fulfill your requests, and to otherwise run our day-to-day operations.
- **Analytics and Improvement.** To better understand how SVP users access and use the Services, and for other research and analytical purposes, such as to evaluate and improve the Site, our Services, and business operations, including to develop our Services and its features, and for internal quality control and training purposes.
- **Communication.** To respond to your questions, send you requested materials and newsletters, as well as information and materials regarding our Services and our offerings. We may also use this information to send administrative information to you, for example, information regarding the Services and changes to our terms, conditions, and policies.
- **Customization and Personalization.** To tailor content we may send or display on the Services, including to offer location customization and to otherwise personalize your experiences and offerings.
- **Marketing and Advertising.** For marketing, advertising, and promotional purposes. For example, to send you promotional information about our Services, including information about sales, discounts, and new offerings, as well any other information that you sign up to receive.
- **SMS Messaging.** We may use your telephone number to send you transactional messages related to your interactions with our services, such as appointment reminders and/or order confirmations, or to respond to your inquiries, requests or feedback submitted via SMS. We may also use your telephone number to send you promotional messages, special offers, or other marketing communications,

provided you have opted-in to the receipt of such messages where required by applicable law. We may send these messages using an auto dialer. If you wish to opt-out of receiving promotional or transactional SMS messages from us, you may do so by following the opt-out instructions included in the SMS messages you receive. Please note that if you opt-out of promotional messages, you are not automatically opted out of transactional messages and vice versa. You will need to follow the instructions for each type of communication.

- **Contests.** To administer sweepstakes, promotions and other contests.
- **Research and Surveys.** To administer surveys and questionnaires, such as for market research or user satisfaction purposes.
- **Insight Development and Data Enhancement.** We may combine personal information collected through the Services with other information that we or third parties collect about you in other contexts. In most cases, the information that we may combine with the personal information collected through the Services for market research, such as demographic information, does not directly identify consumers.
- **Planning and Managing Events.** For event planning and other management-related purposes, such as event registration and attendance, connecting you with other event attendees and SVP users, and contacting you about relevant events, webinars, and presentations. We may also use personal information for purposes of facilitating special events, sweepstakes, contests, and promotions, which have their own specific rules to participate.
- **Security and Protection of Rights.** To protect the Services and our business operations, our rights and those of our stakeholders and investors, to prevent and detect fraud, unauthorized activities and access, and other misuse of our Site and Services, including where we believe necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety or legal rights of any person or third party, or violations of our Terms and Conditions.
- **Compliance and Legal Process.** To comply with applicable legal or regulatory obligations, including as part of a judicial proceeding, to respond to a subpoena, warrant, court order, or other legal process, or as part of an investigation or request, whether formal or informal, from law enforcement or a governmental authority.

- **Auditing, Reporting, and Other Internal Operations.** To conduct financial, tax and accounting audits, audits and assessments of our operations, including our privacy, security and financial controls, as well as for risk and compliance purposes. We may also use personal information to maintain appropriate business records and enforce our policies and procedures.
- **General Business and Operational Support.** To assess and implement mergers, acquisitions, reorganizations, bankruptcies, and other business transactions such as financings, and to administer our business, accounting, auditing, compliance, recordkeeping, and legal functions.

### Disclosures of Personal Information

We may disclose the personal information we collect for the purposes described above and with the following recipients:

- **Affiliates, Subsidiaries and Investors.** We may disclose the personal information we collect to our corporate affiliates, subsidiaries and joint venture partners, as well as our investors and other stakeholders.
- **Business Partners.** In some circumstances, SVP may partner with other businesses to offer its Services, including to facilitate certain programs or special offerings, and we may disclose personal information to those business partners.
- **Vendors and Services Providers.** We may disclose the personal information we collect to vendors and service providers who perform functions on our behalf, such as IT and website hosting, payment processors, product shipment and order fulfillment facilitators, email delivery, marketing and marketing research providers, vendors who assist in the management and delivery of the SMS messages that we send, customer support, data storage, data analytics providers, auditors, consultants, and legal counsel.
- **Other SVP Users.** With other users of the Services in the context of specific features that are social in nature. For example, if you invite others to use our Services, or if you submit or make available information through our public-facing, interactive features, community forums, or discussion blogs, including when you post reviews or testimonials, certain personal information, may be available to, and searchable by, other users of the Services.
- **Third Party Marketing and Analytics Providers.** We may also disclose your personal information, such as device and browsing, and activities and usage information, and other similar information, to third party marketing and data

analytics providers, and other companies who provide marketing, advertising, campaign management, or analytics services on our behalf.

We may also disclose your personal information in the following circumstances:

- **In Support of Business Transfers.** If we or our affiliates are or may be acquired by, merged with, or invested in by another company, or if any of our assets are or may be transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may disclose or transfer the personal information we have collected from you with or to the other company in accordance with applicable laws. We may also disclose certain personal information as necessary prior to the completion of such a transaction or other corporate transaction such as a financing or restructuring, to lenders, auditors, and third-party advisors, including attorneys and consultants.
- **Compliance and Legal Obligations.** We may also disclose personal information to third parties to the extent required by applicable law and legal obligations. For example, we may disclose information in response to subpoenas, court orders, and other lawful requests by regulators, government entities, and law enforcement, including responding to national security or law enforcement disclosure requirements, or as otherwise required by law or legal process. We may also share information with other entities for fraud protection and credit risk reduction. In addition, we may disclose the names of sweepstakes and contests winners in accordance with applicable law.
- **Security and Protection of Rights.** Where we believe doing so is necessary to protect the Services, our rights and property, or the rights, property, and safety of others. For example, we may disclose personal information to (i) prevent, detect, investigate, and respond to fraud, unauthorized activities and access, illegal activities, and misuse of the Services, (ii) situations involving potential threats to the health, safety, or legal rights of any person or third party, or (iii) enforce, detect, investigate, and take action in response to violations of our Terms and Conditions. We may also disclose personal information related to litigation and other legal claims or proceedings in which we are involved, as well as for our internal accounting, auditing, compliance, recordkeeping, and legal functions.
- **Other Disclosures.** We may disclose personal information in other ways not described above that we notify you of or that we obtain your consent for, or that are otherwise authorized or required by law.

**Aggregate and/or Deidentified Data.** Notwithstanding anything else described in this Policy, we may use and disclose aggregate, deidentified, and other non-identifiable data

related to our business and the Services for quality control, analytics, research, development, and other purposes. Where we use, disclose or process deidentified data (data that is no longer reasonably linked or linkable to an identified or identifiable natural person, household, or personal or household device) we will maintain and use the information in deidentified form and not to attempt to reidentify the information, except in order to determine whether our deidentification processes are reasonable and adequate pursuant to applicable privacy laws.

## **Cookies and Other Tracking Mechanisms**

We and our third-party providers and service providers use cookies, pixels, local storage objects, log files, and other mechanisms to automatically collect browsing, activity, device, and similar information within our Services. We use this information to, for example, analyze and understand how users' access, use, and interact with our Services, to identify and resolve bugs and errors in our Services, to assess secure, protect, optimize and improve the performance of our Services, as well as for marketing and analytics purposes, and to personalize content in our Services. In some cases, we may aggregate or deidentify this information to facilitate these purposes or any other purposes described in this Policy. To manage your preferences regarding cookies, targeted advertising, and other similar tracking mechanisms within our Services, please see Section 6. Your Privacy Choices.

**Cookies.** "Cookies" are alphanumeric identifiers we transfer to your device's hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Services, while others are used to enable a faster log-in process, support the security and performance of the Services, or allow us to track aggregate and statistical information about user activity within the Services.

**Pixel Tags.** Pixel tags (sometime called web beacons or clear GIFs) are tiny graphics with a unique identifier, similar in function to cookies. While cookies are stored locally on your device, pixel tags are embedded invisibly within web pages and online content. We may use these, in connection with our Services to, among other things, track the activities of users, and help us manage content and compile usage statistics. We may also use these in our emails to let us know when they have been opened or forwarded, so we can track response rates and gauge the effectiveness of our communications.

**Local Storage Objects.** Local storage is a web storage mechanism that allows us to store data on a browser that persists even after the browser window is closed. Local storage may be used by our web servers to cache certain information in order enable faster loading of pages and content when you return to our websites. You can clear data

stored in local storage through your browser. Please consult your browser help menu for more information.

**Third-Party Analytics and Tools.** We use third party tools, such as Google Analytics, which are operated by third party companies. These third-party analytics companies may use cookies, pixels, and other similar tools to collect usage data about our Services in order to provide us with reports and metrics that help us evaluate usage of our Services and improve performance and user experiences. To learn more about Google's privacy practices, please review the Google Privacy Policy at <https://www.google.com/policies/privacy/partners/>. You can also download the Google Analytics Opt-out Browser Add-on to prevent their data from being used by Google Analytics at <https://tools.google.com/dlpage/gaoptout>.

**Cross-Device Tracking.** We and our third-party providers may use the information we collect about you within our Services and on other third-party sites and services to help us and these third parties to identify other devices that you use (e.g., a mobile phone, tablet, other computer, etc.).

**Third-Party Advertising.** We work with third parties, such as ad networks, analytics, marketing partners, and others ("third-party ad companies") to personalize content and display advertising within our Services, as well as to manage our advertising on third-party sites. We and these third-party ad companies may use cookies, pixels tags, and other tools to collect browsing and activity information within our Services (as well as on third-party sites and services), as well as IP address, unique ID, cookie and advertising IDs, and other online identifiers. We and these third-party ad companies may use this information to provide you more relevant ads and content within our Services and on third-party sites, and to evaluate the success of such ads and content.

**Custom Lists and Matching.** We may share or make available certain client list information (such as your name, email address and other contact information) with third parties (i) so that we can better target ads and content to you across third party sites, platforms and services, and (ii) in some cases, these third parties may help us to enhance our client lists with additional demographic or other information, so we can better target our advertising and marketing campaigns.

## Your Privacy Choices

**Managing Your Preferences.** We make available several ways for you to manage your preferences and privacy choices, as described below:

- **Marketing Communications.** We may send periodic promotional emails or other similar communications to you, in accordance with applicable law. You may

opt-out of these communications by following the instructions provided to you in the communication. If you opt-out of receiving promotional content from us, we may still send you communications about your account or any services you have requested or received from us. Additionally, you can manage your communication preferences in your account settings.

**Cookie Preferences/Targeted Advertising.** We also make available ways for you to manage your preferences regarding cookies, targeted advertising, and other similar technologies within our Services. Many of these choices are browser and device specific, which means that you need to set the preference for each browser and device you use to access our Services. In addition, if you delete or block cookies, you may need to reapply these preferences to each browser and/or device used to access our Services.

- **Cookie Settings.** To prevent cookies from tracking your activity on our Site or visits across multiple websites, you can set your browser to block certain cookies or notify you when a cookie is set. You can also delete cookies. The “Help” portion of the toolbar on most browsers will tell you how to prevent your device from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to delete cookies. Visitors to our Site who disable cookies will be able to browse the Site, but some features may not function.
- **Browser Signals.** To the extent required by applicable law, if our Site detects that your browser is transmitting an opt-out preference signal, such as a “global privacy control” (or “GPC”) signal, we will apply that to opt that browser on your device out of targeting cookies on our Site. If you come to our Site from a different device or from a different browser on the same device, you will need to apply GPC for that browser and/or device as well.
- **Industry Ad Choice Programs.** You can also control how participating third-party ad companies use the information that they collect about your visits to our Site and those of third parties, in order to display more relevant targeted advertising to you. If you are in the U.S., you can obtain more information and opt out of receiving targeted ads from participating third-party ad networks at [aboutads.info/choices](https://aboutads.info/choices) (Digital Advertising Alliance). Opting out of participating third party ad networks does not opt you out of being served advertising. You may continue to receive generic or “contextual” ads on our Site. You may also continue to receive targeted ads on other websites, from companies that do not participate in the above programs.

## **External Links and Features**

Our Services may contain links to third-party websites or features or provide certain third-party connections or integrated services. Any access to and use of such linked websites, features, or third-party services is not governed by this Policy, but instead is governed by the privacy policies of those third parties. We are not responsible for the information practices of such third parties, including their collection, use, and disclosure of your personal information. You should review the privacy policies and terms for any third parties before proceeding to those websites or using those third-party features or services.

### **User Generated Content**

We may offer public-facing interactive features, community forums, or discussion blogs in connection with our Services that enable you to share information about the Services, or other issues of interest (e.g., product reviews, testimonials, and questions). You should be aware that any communications you submit or post to any such interactive features on the Services may be viewable and searchable by others, including SVP users and the public. By submitting or posting to such public-facing, interactive features you acknowledge that you have no expectation of privacy or confidentiality in the content you submit for such features, whether or not it contains personal information about you.

### **Children's Privacy**

Our Services are not designed for children, and we do not knowingly collect personal information from children under the age of thirteen (13). If you are a parent or legal guardian and you believe we have collected your child's information in violation of applicable law, please contact us using the contact information in [Section 12. Contact Us](#).

### **Security**

We have implemented reasonable precautions aimed to protect the information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Please be aware that despite our efforts, no data security measures can guarantee security. There are also certain steps you can take to better protect against unauthorized access to your personal information. For example, when registering for an account, you should choose a strong password that is unique to the Services. You should not reuse passwords across multiple websites or services, and you should never share your password with others.

### **Changes to this Policy**

This Policy is current as of the last updated date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any updates to this Policy on this page. If we make material changes to how we collect, use, or disclose the personal information we have previously collected about you, we will endeavor to provide you prior notice, such as by emailing you or posting prominent notice on our website or within the Services.

## Contact Us

If you have any questions or concerns regarding this Policy or our privacy practices, you may contact us at [Privacy@SVP.vet](mailto:Privacy@SVP.vet) or 2204 Lakeshore Drive #325, Birmingham, AL 35209.

## Additional Information for Certain United States Residents

### A. United States

If you are a resident of California, please review [Section 13.B. Additional Information for California Residents](#) for a description of your rights pursuant to California privacy laws.

Residents of certain U.S. states, including Texas and Virginia, may have additional rights under applicable privacy laws, subject to certain limitations, which may include:

- **Access.** The right to confirm whether we are processing their personal information and to obtain a copy of their personal information in a portable and, to the extent technically feasible, readily usable format.
- **Delete.** The right to delete their personal information provided to or obtained by us.
- **Correct.** The right to correct inaccuracies in their personal information, taking into account the nature and purposes of the processing of the personal information.
- **Opt-Out.** The right to opt out of certain types of processing, including: (i) to opt out of the “sale” of their personal information; (ii) to opt out of targeted advertising by us; and (iii) to opt out of any processing of personal information for purposes of making decisions that produce legal or similarly significant effects.

You may submit a request to exercise most of your privacy rights under U.S. state privacy laws online by completing our [webform](#), or by calling (888) 394-0114. To opt out of sales and targeted advertising by us, you can adjust your cookies settings by opting out of marketing cookies in the privacy banner at the bottom of our website, or download an opt-out preference signal, such as the GPC. Please see [Section 6. Your Privacy Choices](#), for additional information about the privacy choices we provide and

how to exercise them. We will respond to your request as required under the applicable privacy law(s). If we deny your request, to the extent you are provided this right under applicable law, you may appeal our decision by emailing [Privacy@SVP.vet](mailto:Privacy@SVP.vet).

#### B. Additional Information for California Residents

This section of the Policy provides additional information for California residents and describes our information practices pursuant to applicable California privacy laws, including the California Consumer Privacy Act (the “CCPA”). This section does not address or apply to our handling of publicly available information or personal information that is otherwise exempt under the CCPA. Depending on how you interact or engage with us, we may provide you with other privacy notices with additional details about our privacy practices.

Categories of Personal Information Collected and Disclosed. The following table identifies the categories of personal information we may collect about you (and may have collected in the prior 12 months), as defined by the CCPA, as well as the categories of other entities to whom we may disclose this information. Depending on how you use the Services, we may collect and disclose the following categories of personal information:

- **Identifiers.** Includes direct identifiers such as name, alias, email, phone number, address, user ID username, unique personal identifier, online identifier, IP address, or other similar identifiers.
- **Identifiers.** Includes [driver’s license number, tax ID and other government identifiers].
- **Customer Records.** Includes information such as name, user ID, account name, contact information, and financial or payment information (i.e., payment type, payment card details, billing and shipping address).
- **Commercial Information.** Includes records of Services purchased, obtained, or considered, or other purchasing or use histories or tendencies. [For example, this may include demographic information that we receive from third parties in order to better understand and reach our clients.]
- **Internet or Other Electronic Network Activity Information.** Includes, but is not limited to, browsing history, clickstream data, search history, and information regarding interactions with our Site, advertisements, or emails, including other usage data related to your use of any of our Services or other similar online services.

- **Geolocation Data.** Such as general location information about a particular individual or device.
- **Audio, Electronic, Visual, or Similar Information.** Includes, but is not limited to, audio, electronic, visual, or similar information, (e.g., collected from visitors to our hospitals, photographs and images (e.g., that you provide us or post to your profile) and call recordings (e.g., of customer support calls)].
- **Professional Information.** Includes, but is not limited to, job title, company name, business email, business phone number, current and former employer, and other similar professional-related information.
- **Education Information.** Includes information about an individual's educational history, [such as the schools attended, degrees you were awarded, and associated dates].
- **Inferences.** Such as inferences drawn from any of the information described above in this section about a consumer including inferences reflecting the consumer's preferences, characteristics, behaviors, attitudes, abilities, and aptitudes.
- **Protected Classifications.** We may collect some information that is considered a protected classification under California or federal law, such as your gender, age, date of birth, citizenship, marital status and disability status.
- **Sensitive Personal Information,** including driver's license number.
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**Third party and other recipient disclosures** include the following, affiliates and subsidiaries, service providers and vendors, advisors and agents, data analytics providers, data brokers, advertising networks, social networks, others as required by law.

**Source of Personal Information.** We generally collect personal information from the following categories of sources: directly or indirectly from you; affiliates and subsidiaries; business partners; vendors and service providers; other SVP users; Internet service providers; operating systems and platforms; social networks; and marketing and data analytics providers.

**Purposes of Collection, Use, and Disclosure.** As described in [Section. 3 Purposes for Collection and Processing](#), in general, we collect and otherwise process personal information for the following business or commercial purposes, or as otherwise directed or consented to by you:

- Services and support;
- Analytics and improvement;
- Communication;
- Customization and personalization;
- Marketing and advertising;
- Research and surveys;
- Insight development and data enhancement;
- Planning and managing events;
- Security and protection of rights;
- Compliance and legal process;
- Auditing, reporting, and other internal operations; and
- General business and operational support.

**Sensitive Personal Information.** We do not collect, use, or disclose “sensitive personal information” beyond the purposes authorized by applicable privacy law. Accordingly, we only use and disclose sensitive personal information as reasonably necessary and proportionate: (i) to perform our services requested by you; (ii) to help ensure security and integrity, including to prevent, detect, and investigate security incidents; (iii) to detect, prevent and respond to malicious, fraudulent, deceptive, or illegal conduct; (iv) to verify or maintain the quality and safety of our services; (v) for compliance with our legal obligations; (vi) to our service providers who perform services on our behalf; and (vii) for purposes other than inferring characteristics about you.

**Retention of Personal Information.** We retain the personal information we collect only as reasonably necessary for the purposes described above or otherwise disclosed to you at the time of collection. When deciding how long to keep your personal information, we consider whether we are subject to any legal obligations (e.g., any laws that require us to keep records for a certain period before we can delete them) or whether we have taken any legal positions (e.g., issued any legal holds or otherwise need to preserve the information). Rather than delete your data, we may also deidentify it by removing identifying details. Where we have committed to maintaining and using personal information in a deidentified form, we agree not to reidentify deidentified data except as permitted by applicable law.

**Sales and Sharing of Personal Information.** The CCPA defines “sale” as disclosing or making available personal information to a third-party in exchange for monetary or other valuable consideration, and “sharing” includes disclosing or making available personal information to a third-party for purposes of cross-context behavioral advertising. While we do not disclose personal information to third parties in exchange for monetary compensation, we may “sell” or “share” the following categories of personal information: identifiers, Internet and network activity information, and commercial information. We may disclose these categories to third-party advertising networks, analytics providers, and social networks for purposes of marketing and advertising and to improve and measure our ad campaigns. We do not sell or share sensitive personal information, nor do we sell or share personal information about individuals we know are under age sixteen (16).

**California Privacy Rights.** The CCPA provides California residents with specific rights regarding personal information. Subject to certain conditions and exceptions, California residents have the following rights with respect to their personal information:

- **Right to Know.** You have the right to request: (i) the categories or personal information we collected about you; (ii) the categories of sources from which the personal information is collected; (iii) our business or commercial purposes for collecting, selling, or sharing personal information; (iv) the categories of third parties to whom we have disclosed personal information; and (v) a copy of the specific pieces of personal information we have collected about you.
- **Right to Delete.** You have the right to request we delete personal information we have collected from you.
- **Right to Correct.** You have the right to request that we correct inaccuracies in your personal information.
- **Right to Opt-Out of Sales and Sharing.** You have the right to opt-out of “sales” and “sharing” of your personal information, as those terms are defined under the CCPA.
- **Right to Limit Use and Disclosure.** You have the right to limit use and disclose of your sensitive personal information. We do not use or disclose sensitive personal information beyond the purposes authorized by the CCPA; thus, this right is not available to California residents.
- **Right to Non-Discrimination.** You have the right not to be subjected to discriminatory treatment for exercising any of the rights described in this section.

**Exercising Your Privacy Rights.** California residents may exercise their CCPA privacy rights as set forth below:

- **Right to Know, Delete, and Correct.** California residents may submit CCPA requests to access/know, delete, and correct their personal information by using our [webform](#) or calling (888) 394-0114.

When you submit a request, we will take steps to verify your identity and request by matching the information provided by you with the information we have in our records. In some cases, we may request additional information in order to verify your identity, or where necessary to process your request. If we are unable to verify your identity after a good faith attempt, we may deny the request and, if so, will explain the basis for the denial.

You may also designate someone as an authorized agent to submit requests and act on your behalf. Authorized agents will be required to provide proof of their authorization in their first communication with us, and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent.

- **Right to Opt-Out of Sales and Sharing.** To exercise your right to opt-out of the “sale” or “sharing” of your personal information, you may do so [here](#). We will apply your opt out based upon the personal information in our records that is linked or reasonably linkable to the information provided in your request. You may also click the “My Privacy Choices” link at the bottom of our Site.

In addition, if we detect that your browser or device is transmitting an opt-out preference signal, such as the “global privacy control” or “GPC” signal, we will opt that browser or device out of cookies that result in a “sale” or “sharing” of your personal information. If you come to our Site or use our Services from a different device or from a different browser on the same device, you will need to opt-out, or use an opt-out preference signal, for that browser and/or device as well. More information about GPC is available at: <https://globalprivacycontrol.org/>.