

Privacy Policy

Introduction:

NeuroLab 360, a California nonprofit public benefit corporation, and its affiliates, successors and assigns (collectively, “us,” “we,” or “NeuroLab 360”) respects the privacy rights of its visitors and other users (“you”) of the NeuroLab 360 website www.neurolab360.com (“Site”). This privacy policy (“Privacy Policy”) is only applicable to the Site, and not to any other websites or applications that you may be able to access from the Site, each of which may have data collection, storage, and use practices and policies that differ materially from this Privacy Policy. By using the Site or our services offered through the Site, you agree to the terms of this Privacy Policy.

We never knowingly collect or maintain information from those we know are under 18 years old, and no part of our Site or services rendered in connection therewith is directed at or structured to attract anyone under 18 years old. Visitors younger than 18 years of age may not use the Site or the services rendered in connection therewith.

IF YOU DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY, YOU MAY NOT ACCESS OR OTHERWISE USE OUR SITE OR USE OUR SERVICES.

Information Collected Through Our Site:

Personal Information Collected. In order for you to access services that we offer via the Site, we require you to provide us with certain information that personally identifies or may reasonably identify you or your household (“Personal Information”). Personal Information includes without limitation your name, mailing address, home address, phone numbers, e-mail address, billing address, credit card information, information regarding your physical abilities and disabilities, fall history, use of medical devices, exercise history, exercise class preference and any other information that you provide us.

Notwithstanding the above, Personal Information does not include information that is collected anonymously (i.e., Traffic Data and other information without identification of the individual user) or demographic or use information not connected to an identified individual.

We may use your Personal Information in a variety of ways including, but not limited to:

- Fulfilling the reason(s) you provided the information (e.g., if you share your Personal Information to make a donation, we will use that information to process your donation);
- Provide service communications such as appointment and class confirmations and reminders, program registrations, notifications of upcoming fundraising and other activities and other administrative messages;
- Acknowledge contributions and thanking donors;
- Respond to emails or online requests for programs, services, or information;
- Deliver and process surveys in an effort to enrich our programs and services;
- Personalize and improve the usability of our Site;
- Develop, fulfill and deliver programs, services and community outreach objectives;
- Tailor content, advertising and marketing;
- Share with third parties as required by law and to pursue legal matters;
- Properly administer our Site and conduct audits;
- Maintain our internal record keeping as required by law and best nonprofit practices;

- Report to applicable agencies as required as terms of our nonprofit organization status;
- Ensure Site content is properly delivered to your device; and
- Keep our Site secure and protect our Site from malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity.

We may occasionally recognize contributors and their participation in fundraising and other NeuroLab 360 events in annual reports and other promotional materials. Please let us know if you would prefer to remain anonymous.

Traffic Data Collected. We may automatically track and collect the following categories of information when you visit our Site: (1) IP addresses; (2) domain servers; (3) types of computers accessing the Site; and (4) types of web browsers used to access the Site (collectively “Traffic Data”). Traffic Data is anonymous information that does not personally identify you. We may use it for marketing purposes and to improve your experience on the Site.

Cookies and Other Tracking Technologies. Cookies and web beacons are very small text files that are stored on your computer when you visit certain web pages. NeuroLab 360 collects user and use information through cookies and web beacons about your web browsing activities such as the address of the page you are visiting, the address of the referrer page you previously visited, the time you are viewing the page, your browsing environment, and your display settings. We may use cookies and web beacons to:

- Understand traffic patterns and the number of visitors to the Site and other non-NeuroLab 360 websites that we partner with;
- Understand how you use and interact with the Site;
- Plan and improve our programs, classes, exercise classes, and other services and community outreach;
- Optimize your experience on our Site or your use of our services;
- Provide non-Personal Information auditing, researching, modeling, and reporting for our advertisers and other partners;
- Provide you relevant advertisements and content; and
- Properly manage our Site and services provided in connection therewith.

Please note that some cookies may be placed by a third party service provider who performs some of these functions for us. Third party service providers use of their cookies is subject to their own privacy policies, and not this Privacy Policy.

If you are concerned about cookies, most browsers permit individuals to decline cookies. A user refusing cookies may limit your ability to take advantage of all of the features and services we offer on the Site.

Sharing of Personal Information:

We may disclose information we collect about you with other third parties, including without limitation to:

- **Service Providers** - NeuroLab 360 may share your information with third parties that help us to maintain and operate our Site, to provide our services and to execute our mission statement and objectives. Our service providers include without limitation our payment processors (e.g., Square), platform providers (e.g., Zoom), internet service providers, data analytics providers, and operating systems providers. These third parties may only use such

information to perform specific services that we have contracted with them for and may not use it for any other purpose.

- **Affiliates** - We may share information with our affiliates and partners, or to their employees, agents, contractors, representatives, legal counsel and/or accountants, for: operational, management and administrative purposes; internal audit, legal, regulatory, security, insurance, financial, processing and other similar purposes; or as otherwise permitted or required by law.
- **Third Parties that You Direct Us to Share With** - We share information at your request or direction. We may also share your information with those that you have consented or directed us to share your information with.
- **Third Parties in Connection with a Merger, Acquisition or other Business Transaction** - We may share information if NeuroLab 360 is involved in a merger, acquisition, sale of all or a portion of its assets, financings, joint ventures, reorganizations, dissolution, liquidations, or other event where we sell or transfer all or a portion of our assets. We will not provide you with notice before disclosure in such cases.
- **Third Parties for Security and Compelling Disclosure Purposes** - NeuroLab 360 must disclose information about you in response to lawful requests by public authorities, including but not limited to meeting national security or law enforcement requirements. We may share information about you in connection with legal requirements, such as in response to an authorized subpoena or when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, or investigate fraud. Such disclosures may be carried out without notice to you.

User Choice Regarding Collection, Use, and Distribution of Personal Information:

We do not sell your Personal Information for monetary consideration, but we may share your Personal Information to third parties as further described in this Privacy Policy. If you do not want us to share your Personal Information to any third parties that we deem at our sole discretion are not essential for us to operate our services and mission statement, or if you would like to be removed from our mailing list, please send us an email at info@neurolab360.com or write to us at the address below. You may also opt-out of our mailing list by following the opt-out instructions found in our communications. If you wish to update and/or correct certain Personal Information that we maintain about you, such as your contact information (e.g., name, address, phone number), you may do so by logging into your account and accessing the Site, sending us an email, or writing to us at the address listed below. We will process your request within a reasonable time once we are able to authenticate your request and verify your identity.

California Residents: Your California Rights:

Under California Civil Code section 1798.83, California resident have a right to request a list of all third parties to which we, during the immediately preceding calendar year, have disclosed certain personal information for direct marketing purposes. We do not share personal information about you with any third parties for their own marketing purposes. We are only required to respond to such a request once during any calendar year. To make such a request, you should contact us as listed below. Please be aware that not all information sharing is covered by the California privacy rights requirements and only information sharing that is covered will be included in our response.

NeuroLab does not track its customers over time and across third party websites to provide targeted advertising and therefore does not respond to web browser's Do Not Track (DNT) signals.

However, some third party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. You may set the DNT signal on your browser so that third parties (including advertisers) know you do not want to be tracked.

In accordance with California Civil Code Sec. 1789.3, California resident users are entitled to know that they may file grievances and complaints regarding our Site with the Complaint Assistance Unit of the Division of Consumer Services of the California Department of Consumer Affairs, in writing at 1625 North Market Blvd., Sacramento, CA 95834, by telephone at (916) 445-1254 or (800) 952-5210, or by email to dca@dca.ca.gov.

Third Party Advertisers and Links to Other Sites:

During your use of our Site you may link to, or view as part of a frame on our page, certain content that is created or hosted by a third party. Third parties, including our advertisers, affiliates and other content providers accessible through our Site, may have their own privacy and data collection policies and practices. We are not responsible for the actions, privacy, security or content of such third party sites and do not endorse such sites. If you are asked to provide information on one of these websites, we encourage you carefully to review their privacy policy before sharing your information.

Security and Storage:

We have taken reasonable precautions to maintain the security and accuracy of the Personal Information we collect including without limitation limiting the number of people who have physical access to our database servers. However, despite our efforts, please be aware that no security measures are perfect or impenetrable and we cannot guarantee that the information you transmit or provide to us will be completely secure.

We will retain your Personal Information for as long as needed to provide you with our services or as needed to fulfill our own obligations, such as preventing fraud, meeting regulatory requirements, resolving disputes, improving our services or maintaining security, and in each case, as consistent with applicable law. We may retain non-personal information that has been sufficiently aggregated or anonymized for a longer period.

Modification to this Privacy Policy:

We reserve the right at our discretion to make changes to this Privacy Policy at any time, and all such changes shall be immediately effective. When we make changes, the "Effective Date" of this Privacy Policy will be revised. Your continued use of our Site following the posting of changes to this Privacy Policy will mean you accept those changes. We encourage you to review the Privacy Policy each time you visit the Site. Without limiting the effectiveness of the foregoing, in the event of certain changes to this Privacy Policy, you may also be required to assent to the new terms, and you may also be notified by email if we have your email address. If any modification is unacceptable, you should stop using the Site and our services.

Geographic Restrictions:

We may limit the availability of our Site and services to any person or geographic area at any time. If you access our Site from outside the United States, you do so at your own risk.

IF YOU ARE A USER ACCESSING OUR SITE AND SERVICES FROM ANY OTHER COUNTRY WITH LAWS OR REGULATIONS GOVERNING PERSONAL DATA COLLECTION, USE AND DISCLOSURE THAT DIFFER FROM THE LAWS OF THE UNITED STATES, PLEASE BE ADVISED THAT THROUGH YOUR CONTINUED USE OF OUR SITE, YOU ARE TRANSMITTING YOUR PERSONAL DATA TO THE

UNITED STATES AND YOU CONSENT TO THAT TRANSMISSION. ADDITIONALLY, YOU UNDERSTAND THAT YOUR PERSONAL DATA MAY BE TRANSMITTED TO AND PROCESSED IN COUNTRIES (INCLUDING THE UNITED STATES) WHERE LAWS REGARDING PROCESSING PERSONAL DATA MAY BE LESS STRINGENT THAN IN YOUR COUNTRY.

Contact Us:

If you have any questions about this Privacy Policy or our Site in general, please contact us at info@neurolab360.com or send us a letter to:

NeuroLab 360
830 S. Cedros Ave.
Solana Beach, CA 92075

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