

# Privacy Policy

Your privacy is important to us. Neurodiagnostics & Neuromonitoring Institute, LLC ("NNI") is committed to protecting your privacy and maintaining the integrity of any identifiable information ("Personal Information") we collect about you. The purpose of this Privacy Policy is to outline the steps we take to keep your Personal Information confidential, to inform you about how and why we collect Personal Information and to provide you with our contact information in case you have any questions or concerns arising out of our Privacy Policy.

Protecting your privacy and maintaining the integrity of Personal Information means that: we will keep your information and the business you do with us in confidence; we will not sell, rent or loan your information to third parties; we will respect your privacy when we may contact you concerning various products and services which we make available to you from time to time; you will have control over how we obtain, use and under circumstances give out information about you; and you will have access to the information that we have about you.

## Why NNI May Collect Personal Information

NNI collects Personal Information and uses it to:

- Establish identity;
- Perform necessary identity and security verifications;
- Process transactions and conduct business;
- Deliver products and services;
- Provide customer support and services;
- Provide ongoing service delivery;
- Provide you with information;
- Improve products, services and service delivery;
- Better understand your needs, interests and suitability for various products and services;
- Recommend specific products and services that may meet your needs;
- Respond to issues, questions, and queries;
- Protect you and us against errors or fraud; and
- Co-operate with law enforcement and legal authorities, where required, to comply with applicable laws and with court orders.

NNI will collect, use and may disclose personal information only for purposes that a reasonable person would consider appropriate in the circumstances; and endeavors to collect as little information as possible as may be necessary under the circumstances.

Please note that aggregated statistics and information, where the identity of a specific individual cannot be identified, is not Personal Information. NNI reserves the right to use aggregated information in any manner it determines, in its discretion, to be appropriate. Use of such aggregated information may include, but not be limited to, the preparation of aggregated user statistics and information summaries to improve efficiencies, more effectively describe our product and service offerings, and assist in the marketing of our products and services. Aggregated statistics and information will not contain Personal Information.

## What Type of Personal Information NNI May Collect

NNI collects various types of Personal Information. During the course of doing business or interacting with NNI, or receiving products and services from or through NNI, you may, depending on the nature of the circumstances, be asked to provide NNI with:

- Geographic (physical) addresses;
- Demographic information;
- E-mail addresses;
- Phone numbers or other contact information;
- Names (first, and last or whatever the family identifying name is);
- Shipping information;
- Billing information;
- Transaction history;
- Web site usage preferences;
- Feedback regarding our business, services, web site and public relations;
- Source IP addresses;
- Times and dates of access to Web site servers;
- Language;
- Personal preferences;
- Product and service preferences;
- Browsers types and configurations; and
- Miscellaneous administrative and computer traffic information.

Certain forms of information, such as government issued or private sector issued licenses, permits, certificates, cards, in the nature of driver's licenses, social insurance/security number, passports, insurance cards, voucher numbers, and the like, although convenient for identification, is voluntary. It is up to you whether you want to provide this, or other suitable identification, subject to any legal requirements.

## How Does NNI Collect Personal Information

NNI will only collect Personal Information that you have voluntarily provided to us or have agreed to have provided to us. NNI will not collect any Personal Information about you without advising you accordingly (either by way of this Privacy Policy or by way of providing you with some other form of notice at the time we are requesting or collecting Personal Information), why and how that Personal Information is being collected and how such Personal Information will be used or disclosed. NNI may collect Personal Information through a variety of means:

- using our website;
- using our services;
- in the course of communications with us (face-to-face, by e-mail, by phone, mail or otherwise);
- in the course of feedback to us regarding our business, services, website and public relations;
- when registering with us for services or, where relevant, accounts, or, where relevant, for the download of our software;
- customer, membership, recipient, or service lists that have been lawfully acquired from third parties;
- through the completion of manual or electronic forms;

- website cookies – Cookies are identifiers that can be sent from a website via your browser to be placed on your computer's hard drive. You may elect not to accept cookies by changing the designated settings on your web browser; however, not utilizing cookies may prevent you from using certain functions and features of web site. Information collected from the use of cookies is used to improve NNI services;
- web beacons – Web beacons are small, graphic images that allows a website operator to collect certain information and monitor user activity on its website. A web beacon is a very small pixel which is invisible to the user. NNI uses web beacons to collect information that is not of a personal nature;
- clickstreaming - Clickstreaming is a technology that allows a website operator to track the paths that surfers take as they access a website and look at the site's pages, and as they use links to other sites. NNI collects such information from visitors to [www.neuro-institute.net](http://www.neuro-institute.net); and
- website traffic information, which is monitored and analyzed in order to determine which products, services or features may be of interest to visitors, so we may improve our website, products, services, features or other offerings.

In addition, we may review and analyze your use of products and services, to help us serve you better, and to bring other products and services to your attention, which we feel, will be of benefit to you. We also collect and analyze information from other sources for the same purposes.

### **How NNI May Disclose Personal Information**

NNI does not sell any Personal Information it collects to third parties. NNI may share Personal Information with its affiliates, subsidiaries, employees, contractors and agents in the course of providing you with our business services, support, or the fulfillment or delivery of our products or services.

NNI may disclose Personal information if we are required to do so a court of competent jurisdiction, other legal or regulatory authority, or, if there is a good faith belief, and reliance on said belief that disclosure is necessary to: comply with any legal process served on NNI; maintain, uphold or protect NNI' rights or property; protect and ensure the personal safety of the public or other NNI clients; or protect against criminal or quasi-criminal activities, or to detect, prevent, investigate allegations of, or address, misrepresentation or fraud.

NNI reserves the right that in the event of a bankruptcy filing, mergers with third parties, acquisition by third parties, sale of assets (all or partial), or any other transfer of all or substantially all of NNI relevant assets to a third party, that NNI shall be entitled share (or sell as an ancillary aspect of the overarching business transaction) the Personal Information you have provided to us to the third party.

### **Retention and Disposal**

We keep information only for so long as it is needed for the efficient and effective delivery or fulfillment of the software, products, or services you are using or contemplating using and for a reasonable time thereafter, or to meet any legal requirements. We will either destroy or remove information when it is no longer needed.

### **Security and Storage**

NNI endeavors to maintain appropriate physical, procedural and technical security with respect to its offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of Personal Information. This also applies to our disposal or destruction of Personal Information. NNI keeps the Personal Information we collect from about you strictly confidential. Only authorized personnel have access to this Personal Information. NNI personnel who have access to Personal Information receive training regarding privacy protection.

If any employee, contractor or agent of NNI misuses Personal Information, this will be considered as a serious offense for which disciplinary action may be taken, up to and including termination of employment or contract for service. If any individual or organization misuses Personal Information - provided for the purpose of providing services to or for NNI, this will be considered a serious issue for which action may be taken, up to and including termination of any agreement between NNI and that individual or organization and possible legal action against such individual or organization.

Our computer security specialists build security by design by default into our computer systems. The aim is to protect your information at all times, when it is stored in data files or handled by our employees. Our systems are also designed to protect your information when it is transmitted, for example, between our data processing centers, our stores and corporate offices. Personal Information may be stored or processed in any jurisdiction in which we or our affiliates, suppliers, subsidiaries or agents maintain facilities. By supplying us with Personal Information you consent to any transfer of this information to other jurisdictions (including countries which have not been assessed for adequacy of privacy laws).

NNI is and shall continue to use industry-standard technology to maintain the security of your personal information, and for our connections to the internet; however, NNI cannot and does not guarantee the privacy, security, authenticity or non-corruption of any information transmitted through the internet or any for information stored in any third-party system connected to the internet.

While NNI takes steps to verify that any service providers, suppliers or the like with whom we share information are committed to maintaining the privacy of Personal Information at standards that are at least as stringent as our own Privacy Policy and has communicated to them to refrain from making any independent or unauthorized use of any Personal Information, NNI does not and cannot guarantee the actions, conduct or standards of any such parties.

NNI shall not be responsible for any claims, damages, costs or losses whatsoever arising out of or in any way related to third-party connections to or use of the Internet. NNI cannot and does not ensure the protection of any Personal Information that you provide to a third-party web site that may reference, be referenced or link to our website. Personal Information collected by these third parties is not subject to, or governed by, this Privacy Policy. NNI shall not be responsible for events beyond our direct control. NNI will not be liable for any direct, indirect, incidental, consequential or punitive damages relating to the uses or releases of Personal Information.

## **Contact**

We are committed to upholding our Privacy Policy. We have policies and procedures in place to educate and assist our employees and contractors in fulfilling their obligations under our Privacy Policy. Our policies and procedures will be reviewed on a regular basis and their results of such review will be presented to NNI' personnel responsible for overseeing privacy matters.

NNI is committed to treating you with the greatest respect and consideration. Please let us know if you have any questions or concerns and we will take steps to address them. If you have any questions regarding this Privacy Policy, would like to confirm the accuracy of your personal information, believe that the privacy of your personal information has not been respected, or would like to update or delete incorrect personal information, please contact NNI by emailing us at: [privacy@neuro-institute.net](mailto:privacy@neuro-institute.net) or write to us the attention of Privacy Policy Manager, Neurodiagnostics & Neuromonitoring Institute, LLC, 3502 Paesanos Parkway, Suite 100, San Antonio, Texas 78231. The Privacy Policy Manager will acknowledge your query and will respond within thirty business days. If we need to extend timing for response, or have to refuse your request, we will advise you accordingly, subject to any legal restrictions.

## **Age**

NNI is committed to protecting the safety of children. NNI will not knowingly request or use Personal Information from children under the age of thirteen without parental consent. If NNI receives actual knowledge does not knowingly or intentionally collect any Personal Information from children under the age of thirteen, NNI will take steps to have such information eliminated. This website is not to be used by anyone under the age of eighteen. Persons under the age of eighteen are not authorized to use this website and are directed to immediately discontinue use of this website.

## **Updates**

NNI may from time to time update this Privacy Policy, with the updated policy to be posted on the NNI website. The use of Personal Information provided to NNI prior to the update will continue to be governed by the policy in effect at the time the information was provided. We recommend that you revisit this Privacy Policy from time to time on a regular basis.

## **Consent**

By using this website, you agree, and do hereby consent, to our collection and use of information and Personal Information for purposes for which the information/Personal Information was collected and in accordance with this Privacy Policy. If you do not consent, you are to immediately discontinue use this website and to refrain from further using this website.

## **Governing Law and Venue**

By visiting and using this website, you acknowledge and agree that the laws of the State of Texas shall govern, construe, and apply to this Privacy Policy (without any reference or regards to any principles of conflict of laws). The venue for the resolution of any question, dispute, proceeding or other matter arising out of this Privacy Policy shall be the federal or state courts located in the State of Texas.

NNI will disclose personal information without your permission when required by law, or in good faith belief that such action is necessary to investigate or protect against harmful activities to our company, associates, or property (including this site), or to others.