

# Villyge Privacy Policy

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This Privacy Policy is meant to help you understand what information we collect, why we collect it, and how you can update, manage, export, and delete your personal information.

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This privacy policy (“Policy”) describes how Villyge Inc. (“Company”, “Villyge”, “we”, “us”) collects, uses, and shares personal information of users of this website, <https://villyge.com/> (the “Site”), as well as associated products and services, including, without limitation, mobile applications, and participate in coaching or guidance services developed by the Company (together, the “Services”), and applies to information that we collect through the Site and our Services as well as information you provide to us directly. This Policy also applies to any of our other websites or mobile applications that post this Policy. This Policy does not apply to websites that post different statements, such as third-party websites that may be accessible through hyperlinks on this Site or Services. Please note that by using the Site or the Services, you accept the practices and policies described in this Policy and you consent that we will collect, use, and share your information as described below. If you do not agree to this Policy, please do not use the Site or Services.

This Policy is effective as of March 1, 2023.

## **WHO WE ARE**

We are Villyge Inc., a Delaware corporation, with a headquarter in New York in the United States. Our mailing address is: 37 Northern Blvd #210, Greenvale, NY 11548.

If you believe that Villyge may have violated your privacy rights, you should contact us at the mailing address provided above or via e-mail at [legal@villyge.com](mailto:legal@villyge.com).

## **WHAT WE COLLECT**

We collect information about you in a number of ways.

**Information You Give to Us.** We collect information that you provide to us, which may include the following categories of information depending on how you use our Services:

- Information that identifies you, such as your full name, email address, username, and password
- Work information such as the identity of your employer or your job title
- Family planning information that you share with us when using, signing up for, or requesting more information about the Services, including, but not limited to demographic information, such as gender and birth date

If you provide other sensitive personal information to us, you consent to our use of this information as described in this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information to us.

By providing us with an email address, you consent to receiving information from us by email to that address.

**Information We Get From Your Employer.** We may receive information from your Employer to enable us to confirm your eligibility, to contact you in order to inform you of the availability of the Villyge benefit, and to better understand and/or support you. Such information may include:

- First name
- Last name
- Middle initial

- Email
- Date of birth
- Date of employment
- Department
- Title
- Manager
- Manager's email

**Information Automatically Collected.** We automatically log information about you and your computer, phone, tablet, or other devices you use to access the Site and Services. For example, when visiting our Site or when using the Company's mobile applications, we log your computer or device identification, IP address, operating system type, browser type, browser language, the website you visited before browsing to our Site, pages you viewed, how long you spent on a page, access times and information about your use of and actions on our Site or in the Company's mobile applications. This type of information is routinely collected by virtually any web enabled application or website. How much of this information we collect depends on the type and settings of the device you use to access the Site and Services.

**Information We Get From Social Media.** We may maintain promotional pages and provide our Services via social media platforms, such as Slack, Instagram, Twitter, LinkedIn, and other third party platforms. When you visit or interact with our Company on those platforms, the platform provider's privacy policy will apply to your interactions and their collection, use and processing of your personal information. You or the platforms may provide us with information through the platform, and we will treat such information in accordance with this Privacy Policy.

## **COOKIES**

To enhance your online experience, we use “cookies.” Cookies are small text files placed by the Sites in your computer’s browser to make a user’s experience more efficient. Cookies, by themselves, do not tell us your e-mail address or other personal information. However, once you choose to furnish the Site with information, this information may be linked to the data stored in the cookie. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Site. Other similar tools we may use to collect information by automated means include web server logs, web beacons and pixels.

We use cookies to understand internet usage, enhance the performance of the Site, activate special web features and security mechanisms. In addition, we may use cookies to offer you the Services.

You always have the option of setting your browser to warn you when a cookie is being accessed on your computer, to delete cookies that are currently on your computer or to decline cookies altogether. However, to take full advantage of the Site and the Services, your browser will need to accept cookies.

Villyge stores cookies on your device if they are strictly necessary for the operation of this site. For all other types of cookies we need your permission.

#### **CALIFORNIA DO NOT TRACK DISCLOSURE.**

We currently do not support the Do Not Track browser setting or respond to Do Not Track signals. Do Not Track (or DNT) is a preference you can set in your browser to let the websites you visit know that you do not want them collecting certain information about you. For more

details about Do Not Track, including how to enable or disable this preference, visit <http://www.allaboutdnt.com>.

If you choose to interact on the Site or through the Services (such as by registering, using our Services, completing questionnaires, surveys, service contacts, or requests for information) Villyge will collect the personal information that you provide. We may collect personal information about you that you provide through telephone, email, or other communications. If you provide us with personal information regarding another individual, we will assume that you have that person's consent to give us their personal information. Providing personal information about another individual without their consent could be viewed as a data privacy violation and could subject you to sanctions.

## **USE OF PERSONAL INFORMATION**

**Recipients.** We have service providers in the United States and other countries. Your personal information may be collected, used and stored in the United States or other locations outside of your home country. At times, we may work with a contracted third party to support delivery of our Services or to deliver Services to you directly. Data protection laws in the locations where we handle your personal information may be more or less as protective as the data protection laws in your home country. Regardless, Villyge requires that all recipients of personal information uphold the highest standards of data protection feasibly possible.

**Use of Information Collected.** Subject to this Privacy Policy, the Terms of Use, and applicable terms and conditions of third-party applications, all data transmitted through the Services is owned by Villyge with exception of personal health data which you retain ownership of and those rights you may have as a resident of the European Union and/or United Kingdom. To the extent Villyge is precluded from owning data transmitted through the Services, you grant Villyge

a perpetual, worldwide, royalty-free license to use such data to the extent necessary to enable the use of the Services that we provide to you. Generally, we may use information in the following ways and as otherwise described in this Privacy Policy:

- To provide the Services and personalize your experience: We use information about you to provide the Services to you, including to:
  - help establish and verify the identity and eligibility of users;
  - for the purposes for which you specifically provided it including, without limitation, to enable us to process and fulfill your Account, provide the Services or other requests;
  - to communicate with coaches and consultants (Villyge Experts);
  - to send you information about your relationship or transactions with us;
  - to otherwise contact you with information that we believe will be of interest to you, including marketing and promotional communications;
  - to enhance or develop features, products, and Services;
  - to allow us to personalize the content that you and others see on the Services; and/or
  - to create aggregated and other anonymous data by removing information that makes the data personally identifiable.
- For research and development: We are always looking for ways to make our Services smarter, secure, integrated and useful to you. We use collective learnings about how people use our Services and feedback provided to us to troubleshoot and to identify trends, usage, activity patterns and areas for integration and improvement of the Services; to analyze and improve our Site and/or Services

(including developing new products and services); improving safety; managing our communications; analyzing our products; performing market research; for peer-reviewed and non-peer-reviewed clinical research; and performing data analytics. For example, we use information collected about how users engage with our Services to design a better, more user-friendly user experience.

- To communicate with you about the Services:
  - We use your contact information to send transactional communications via email, and within the Services, including sending you reminders, responding to your comments, questions and requests, providing customer support, soliciting outcomes and feedback, and sending you technical notices, updates, security alerts, and administrative messages.
  - Depending on your settings, we may send you email notifications when you or others interact on the Services, for example, when you are sent a message from your Villyge Expert through our Services.
- For customer support: We use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyze crash information, and to repair and improve the Services.
- To coordinate with a Villyge Expert: Where you give us permission to do so, we share your information with a Villyge Expert for the purpose of responding to support-related requests.
- For safety and security: We use information about you and your Service use to verify accounts and activity, to monitor suspicious or fraudulent activity, identify violations of Service policies, authenticate, protect against, investigate, and deter fraudulent, unauthorized, or illegal activity.



- To protect our legitimate business interests and legal rights: Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, accounting, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.
- With your consent: We use information about you where you have given us consent to do so for a specific purpose not listed above.

## **DATA HANDLING**

We may combine all of the information that we collect with data obtained from third parties or through our products and Services. We may also collect and store information locally on your device using mechanisms such as browser web storage (including HTML 5) and application data caches.

Villyge will take reasonable precautions to protect your information from loss, misuse or alteration. Please be aware, however, that any transmission you send in an unencrypted manner cannot be completely protected against unauthorized interception. In particular, we want to make you aware that personal email may not be secure, and Villyge is not responsible for any unauthorized access to information when information is sent to your personal email. You are not required to authorize the use of email for this purpose, a decision not to consent or to opt out of receiving these emails will not restrict your ability to access the Services, and you can continue to receive other emails from Villyge, using our secure electronic communication system instead of your personal email.

We may also use aggregated or anonymous information (for example, statistics regarding use and metrics) for research purposes, for marketing and promotional purposes, and to develop new learning tools and solutions and we may share such information with third parties, including researchers and/or prospective clients. We may also use IP addresses to analyze trends, administer the Services, track a Site visitor's movement, and gather information which we may combine with other aggregated or anonymous data for the uses described above.

You acknowledge that unless you request in writing otherwise, Villyge, in its sole discretion, has the right but not the obligation to store any information, whether it is Personal Identifiable Information or otherwise, perpetually, to the extent permitted by law. If you wish for any information about you to be removed from our database, please contact us through the contact information provided below in the "How to Contact Us" section of this Privacy Policy. We will not use any of the health-related information you provide for any purpose other than to provide you with the Services and/or customer support services you request from us.

## **SHARING OF PERSONAL INFORMATION**

**Personally Identifiable Information:** We will not rent or sell your personally identifiable information to others without your consent.

With your consent, we may share your information as follows:

- **With Service Providers:** We may use other companies to perform services including, without limitation, facilitating some aspects of our Services such as sending emails, messages, and push notifications, providing scheduling functionality and updates, and fulfilling data reporting and/or requests. These other companies may be supplied with or have access to your personal information

solely for the purpose of providing these services to you on our behalf. Such service providers shall be bound by appropriate confidentiality and security obligations, which may include, as applicable, business associate contract obligations;

- With your Employer: We may share your enrollment status as a user of the Services, including your name, employee ID, and enrollment date, with your employer for the purposes of administering our contractual obligations or other administrative reporting purposes;
- With Villyge Experts: Subject to receipt of your express consent, we may share your personal information with Villyge Experts enlisted to provide the Services.
- Special Circumstances: We also may disclose your Personal Information:
  - In response to a subpoena or similar investigative demand, a court order, or other request from a law enforcement or government agency where required by applicable law;
  - When disclosure is required or allowed by law in connection with efforts to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of our company, our users, our employees, or others; to comply with applicable law or cooperate with law enforcement; or to enforce our Terms or other agreements or policies;

Any personally identifiable information you elect to make publicly available on our Sites or through the Services will be available to others. If you remove information that you have made public on our Sites or through the Services, copies may remain viewable in cached and archived

pages of our Sites or through the Services, or if other users have copied or saved that information.

**Non-Personally Identifiable Information:** We may share non-personally identifiable information (such as anonymous usage data, referring/exit pages and URLs, platform types, number of clicks, etc.) with interested third parties to help us understand the usage patterns for certain Services.

Non-personally identifiable information may be stored indefinitely.

**Instances Where We Are Required To Share Your Information:** Villyge will disclose your information where required to do so by law, if subject to subpoena or other legal proceeding or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to protect the rights to enforce our Terms of Service or to protect the security or integrity of our Service; or (c) to exercise or protect the rights, property, or personal safety of Villyge, our users or others, including enforcing Villyge's agreements, policies and terms of use or sharing information in an emergency.

**What Happens In The Event Of A Change Of Control:** We may buy, in whole or in part, another company or sell/divest/transfer/reorganize the Company (including any shares in the Company), or any combination of its products, services, assets and/or businesses. Your information such as names and email addresses, and other User information related to the Service may be among the items sold or otherwise transferred in these types of transactions. We may also sell, assign or otherwise transfer such information in the course of corporate divestitures, mergers, acquisitions, bankruptcies, dissolutions, reorganizations, liquidations, similar transactions or proceedings involving all or a portion of Villyge, but only if the recipient of personally identifiable data commits to a Privacy Policy that has terms substantially consistent with this Privacy Policy. You will be notified via email or a prominent notice on our Site of any change in ownership or uses of

your personal information, as well as any choices you may have regarding your personal information.

## **HOW INFORMATION IS STORED AND PROCESSED**

Your information is stored in databases maintained by Amazon Web Services.

You should be aware that when you are on the Site or using our Services, you can be directed to other websites that are beyond our control, and we are not responsible for the privacy practices of third parties or the content of linked websites.

## **HOW INFORMATION IS PROTECTED**

We are committed to protecting your privacy and data. We encrypt sensitive information (e.g. your login credentials, PII) during transmission and storage using industry standards. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you, other involved parties, and any applicable regulator(s) of a breach as soon as reasonably possible, in accordance with applicable laws.

However, no method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, we cannot guarantee its absolute security. If you have any questions about the security of our Services, you can contact us at [legal@villyge.com](mailto:legal@villyge.com).

In some circumstances, our clients (usually your employer) who sponsor the services offered by Villyge have requested further limitations on our use and disclosure of your personal information than those scenarios described in this Privacy Policy. To the extent there are any inconsistencies between this Privacy Policy and the terms of any agreements we have entered into with our customers, the terms of the customer documents will control.

## **WHAT ARE YOUR DATA PROTECTION RIGHTS?**

Our Company 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 Our Company for copies of your personal data.

We may charge you a small fee for this service if there is more than one request per year.

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: [legal@villyge.com](mailto:legal@villyge.com) or write to us at Villyge Inc., 37 Northern Blvd #210, Greenvale, NY 11548.

## **INFORMATION CHOICES AND CHANGES**

Our emails may have an option to “opt-out.” If you choose to do so, you will not receive future promotional emails unless you open a new account or sign up to receive newsletters or emails. If you opt out, we may still send you non-marketing emails. Non-marketing emails include emails about your accounts and our business dealings with you.

You may send requests about personal information to our Contact Information below or to [legal@villyge.com](mailto:legal@villyge.com). You can request to change contact choices, opt out of our sharing with others, and update your personal information.

## **CHILDREN’S PRIVACY**

WE DO NOT KNOWINGLY ENROLL OR COLLECT INFORMATION DIRECTLY FROM CHILDREN UNDER THE AGE OF EIGHTEEN. Children under the age of 18 may not use the Services. We support and comply with the Children’s Online Privacy Protection Act (COPPA) and we do not knowingly collect information from children under the age of 18, nor do we share such information with third parties. This Service and Website is not intended for persons under the age of 18. Villyge does not target its Service or Website to children. Villyge does not

knowingly collect personally identifiable information or personal health information from children under the age of 18.

## **CHANGES TO THIS PRIVACY POLICY**

We may change this privacy policy from time to time and encourage you to frequently check this page in order to be up to date on the changes. If we make any changes, we will change the Last Updated date above, and in cases of material changes, we will provide additional notice (such as adding a statement to our homepage or sending you a notification through email). Your continued use of the Services after any changes in this Privacy Policy will constitute your consent to such change(s).

## **HOW TO CONTACT US**

If you have any questions, comments or concerns about our Privacy Policy, you may contact us at [legal@villyge.com](mailto:legal@villyge.com) or by writing to us at Villyge Inc., 37 Northern Blvd #210, Greenvale, NY 11548.

## **NOTICE TO CALIFORNIA RESIDENTS**

This privacy notice describes the personal information we collect or process about California residents in connection with the Site or the Services, how we use, share, and protect that personal information, and what your rights are concerning personal information that we collect or process.

In this section, “personal information” has the same meaning as under the California Consumer Privacy Act (CCPA), California Civil Code Section 1798.83: information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked,



directly or indirectly, with a particular consumer or household. Personal Information does not include information that has been de-identified or aggregated or information that is considered “PHI” under HIPAA or medical information protected under California’s Medical Information Act.

**Personal Information We Collect and Share, and For What Purpose:** In the past 12 months, we have collected and shared personal information from visitors in the following circumstances when they interact with the Site or the Services, as described in detail above:

- Information You Give to Us
- Information We Get From Your Employer
- Information We Get From Others
- Information Automatically Collected
- Cookies

As described in detail above, we use your personal information for a variety of purposes to operate, assess activity on, and improve the performance of the Site, including the following:

- To provide the Services and personalize your experience
- For research and development
- To communicate with you about the Services
- To market, promote, and drive engagement with the Services
- For Customer support
- For safety and security
- To protect our legitimate business interests and legal rights

Except as described in detail above, we will not share with third parties information about you without your consent.

We do not share your personal information with third parties for third party marketing purposes.

**Your Rights as a California Resident:** Under California law, users who are California residents have specific rights regarding their personal information. These rights are subject to certain exceptions described below. When required, we will respond to most requests within 45 days unless it is reasonably necessary to extend the response time.

**Right to Disclosure of Information:** You have the right to request that we disclose certain information regarding our practices with respect to personal information. If you submit a valid and verifiable request and we confirm your identity and/or authority to make the request, we will disclose to you any of the following at your direction:

- The categories of personal information we have collected about you in the last 12 months.
- The categories of sources for the personal information we have collected about you in the last 12 months.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.
- If we disclosed your personal information to a third party for a business purpose, a list of the personal information types that each category of recipient received.

**Right to Delete Personal Information:** You have the right to request that we delete any of your personal information collected from you and retained, subject to certain exceptions. Upon receiving a verified request to delete your personal information, we will do so unless otherwise authorized by law.

**How to Exercise these Rights:** You may submit a verifiable consumer request to us for disclosure or deletion of personal information by emailing us at [legal@villyge.com](mailto:legal@villyge.com). We will respond to verifiable requests for disclosure or deletion of personal information free of charge, within 10 days of receipt.

In order to protect your privacy and the security of your information, we verify consumer requests by matching personal information that you provide with information in our possession, in order to confirm your identity. Any additional information you provide will be used only to verify your identity and not for any other purpose.

You may designate an authorized agent to make requests on your behalf. You must provide an authorized agent written permission to submit a request on your behalf, and we may require that you verify your identity directly with us. Alternatively, an authorized agent that has been provided power of attorney under Probate Code sections 4000-4465 may submit a request on your behalf.

**Right to Opt Out of Sale of Your Personal Information:** We do not sell your personal information.

**Right to Non-Discrimination:** You have the right not to be discriminated against for the exercise of your California privacy rights described above.

## **NOTICE TO RESIDENTS OF THE EUROPEAN UNION AND THE EUROPEAN ECONOMIC AREA AND THE UNITED KINGDOM**

The data controller is Villyge Inc., 37 Northern Blvd #210, Greenvale, NY 11548.

**Purposes and Legal Basis.** When processing your Personal Data, we rely on the EU General Data Protection Regulation in the EEA, and the UK General Data Protection Regulation in the UK (both referred to herein as “GDPR”), a legal framework in the EEA and the UK for the standardization of data protection. Villyge primarily processes data as a controller, for the purposes of providing our Services to you, or to improve our Services and protect our interests as described above in accordance with Article 6 of the GDPR. When we process special categories of personal data, such as data concerning health or sex life or sexual orientation we do so only based on your explicit consent in accordance with Article 9 of the GDPR, and only for the purposes described above. This may include sharing your Personal Data with one of our experts, coaches, and/or consultants, upon your request. In addition, we are legally obliged to provide certain information to criminal prosecution or tax authorities in individual cases upon request. In these cases, the legal basis for the processing is either legal requirements or reasons of public interest in accordance with Article 6 of the GDPR.

We are handling certain data on behalf of our clients (your employer), as described above. In this case Villyge is a data processor and relies on the legal basis of your employer.

**Retention Periods.** We generally process and store your personal data to the extent necessary to fulfill our legitimate interests, contractual or legal obligations. Therefore, we store the data for the duration of the contractual relationship with you and after termination only to the extent and for as long as legally required. If data is no longer required to fulfill legal obligations (e.g. under tax or commercial laws), it will be deleted unless further processing is necessary to preserve

evidence or defend against legal claims against us. If the processing is based on your explicit consent, we process your personal data to the extent necessary or until you have withdrawn your consent.

Processing Data outside the UK and the EEA. Villyge is a US company that stores your information in databases maintained by Amazon Web Services. When personal data is transferred outside of the UK or EEA to the US or is processed in the U.S., there is a particular risk that U.S. authorities may gain access to your personal data and you may not be granted effective legal protection against any such access in the U.S.. Villyge may also share your personal data with our employees, partners, contractors, experts, coaches and/or consultants who may be based outside of the UK and/or the EEA, and so their processing of your personal data will involve a transfer of data outside the UK and/or the EEA, and such transfers will rely on adequacy determinations and/or be based on the UK or European Commission's approved Standard Contractual Clauses.