

PRIVACY POLICY

ABOUT US

Witty Health Inc. was created to build a global ecosystem enabling personalized treatment and precise medicine for millions of cancer patients. Operating under its brand name “**OncoPower**”, Witty Health Inc. connects patients and physicians for cutting edge cancer care.

Witty Health Inc. and its affiliates, subsidiaries and divisions (collectively, "Witty," "we," "us" and "our") value your confidence in us and respect your privacy. There’s nothing more important to us than our relationship with you and protecting your privacy is one of our top priorities. Please take a few minutes to read the following carefully to understand our views and practices regarding your personal data and how we will treat it. We’re committed to the confidentiality and security of any personal information you provide us with. This privacy policy explains how we collect and use information about you and how we protect your information that we do collect.

This Privacy Policy (“Privacy Policy”) discloses the privacy practices for Witty with regards to you (“You” or “Your” or “User”) use of the websites (<https://oncopower.org/>; <https://www.kardiopower.org/>, <https://www.oncopower.com>, and <https://www.oncopower.io/>) (the “Site“ or “Sites”). By using our Sites, engaging with healthcare professionals through the Sites (including remote diagnostic consultations and virtual video consultations, i.e. telemedicine), using any of our online services, our suite of apps (including mobile apps), newsletters, mobile applications, reference tools, sponsored content, continuing medical education and communications, as well as your use of interactive features, widgets, plug-ins, applications, content, downloads and/or other services, (collectively, the “Services”), you consent to the terms of this [Privacy Policy](#), [Terms and Conditions of Use](#) and [Business Associate Agreement](#), and you consent to our collection, storage, use and disclosure of your personal and non-personal information. This [Privacy Policy](#) applies to all Services and Sites that are offered and provided by Witty and to any online service location (e.g. website or application) that posts a link to this [Privacy Policy](#).

WE WILL BE COLLECTING AND TRANSMITTING PERSONAL, MEDICAL AND HEALTH-RELATED INFORMATION ABOUT YOU. IF YOU DO NOT AGREE TO THE TERMS OF THIS [PRIVACY POLICY](#), YOU MUST NOT USE THE SERVICES OR ACCESS THE SITE.

INFORMATION THAT WE COLLECT

Children’s Online Privacy Protection Act (“COPPA”):

This policy is in accordance with COPPA and outlines our practices in the United States and any other territories in which we operate regarding children’s personal information. For more information about COPPA and general tips about protecting children’s online privacy, please visit: <https://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/childrens-online-privacy-protection-rule>. We do not knowingly or intentionally collect or maintain personally identifiable information from persons under 13 years old, and no part of our website or application is directed to persons under 13. **IF YOU ARE UNDER 13 YEARS OF AGE, PLEASE DO NOT USE OR ACCESS OUR SERVICES AT ANY TIME OR IN ANY MANNER.** If Witty learns that personally identifiable information of persons less than 13 years old has been collected without verifiable parental consent, then we will take appropriate steps to delete this information. If you are a parent or guardian and discover that your child under the age of 13 has obtained a Witty account, then please alert us at support@oncopower.org and request that we delete that child’s personal information from our systems.

Information Collected from Other Sources:

Witty collects publicly available information about physicians in a database to provide a directory and referral service to other healthcare professionals and create a profile for each (“Profile”). This Profile may include the physicians’ names, office addresses, office phone numbers and fax numbers, specialties, and the medical school and training institutions the physicians attended. We may also receive this information from other Application Programming Interface (“API”) partners, such as Doximity or LinkedIn. Almost all oncology doctors, and many other healthcare professionals, are included within our database. If a Physician registers and becomes a User (“Physician User”), you are agreeing that the information that we have collected about you in your Profile is accurate, so please verify your Profile.

Information Collected from You:

There are several purposes of the Witty Service. One purpose is to permit Physician Users to add to the publicly available information about themselves in their Profile in order to develop, maintain and enhance a network of professional contacts. Physician Users may provide us certain personal information, such as their affiliations, and work history, which we collect and publish in order to allow you to enhance your network of contacts. If an authorized third-party, such as an administrator in your office, completes the registration form on your behalf, both you and that third-party will be deemed to have accepted all of the terms of this [Privacy Policy](#).

An additional service is to permit Users who are patients, caregivers or family members of patients, the ability to connect to Physician Users for medical services. This may require the disclosure of certain additional information, such as information or records relating to your medical or health history, health status and laboratory testing results, diagnostic images, and other health related information, as well as health information about you prepared or obtained by the Physician User(s) who provide clinical services through the Site, such as medical and therapy records, treatment and examination notes, and other health related information. Please note that certain information, statements, data, and content (such as photographs) which you may submit to Witty, or groups you choose to join might, or are likely to, reveal your gender, ethnic origin, nationality, age, and/or other personal information about you. You acknowledge that your submission of any information, statements, data, and content to us is voluntary on your part. If you have any hesitation about providing such information to us or other Users and/or having such information displayed on the Witty Sites or otherwise used in any manner permitted in this [Privacy Policy](#), the [Terms and Conditions of Use](#) and [Business Associate Agreement](#), please do not provide this information. The only information that you are required to provide in order to become a member of Witty is your email address. By default, your email address is not published in your Witty Profile, and we will use it only to send you product updates and information. You can, of course, choose not to receive these updates.

INFORMATION GATHERING PROCESS

When You Register as a User:

The following fields may be required to register as a patient, caregiver or a family User during the registration process:

- name,
- phone number;
- email address;
- Provider's full name;
- Provider's Email;
- Provider's Phone Number;
- password.

We use Onfido's service to verify the identification of Users.

When Physician Registers as a User:

The following fields are required for Physician Users during the registration process to ensure that Witty's network is a useful directory for its members:

- name,
- address,
- specialty,
- office phone,
- occupation,
- email address and
- password.

Physicians are required to additionally enter or confirm the medical school that they attended, year of graduation and birthday. Most of this information, other than email address, will already be included in Physician's profile, but we ask that the Physician verify that the information is correct, and update it where necessary. We use either the Physician's Doximity login or Onfido service provider login for identifying Physicians.

We also give Physicians the option to provide the following additional information:

- subspecialty,
- title/practice,
- clinical areas of interest,
- maiden name,
- languages spoken at Physician's office, and
- profile photo.

Providing such information is completely optional and choosing not to provide this information will not affect the Physician's ability to browse the Witty directory or use the Witty Services. All of the information that is publicly available, the information that you voluntarily provide or the information that is gathered via Doximity will be included in your profile, which is accessible to anyone browsing the Witty directory, EXCEPT your birth year, year you graduated from medical school, and your email address.

Passwords:

In order to secure your personal information, access to your data on Witty is password protected and you are responsible for keeping this password confidential and to protect the security of your login information. Please do not share your password with anyone.

Adding to Your Public Profile:

Once you have completed the registration process, you may at any time provide additional information to your Profile. Depending on the type of User, such information may include the following: medical group, IPA and hospital affiliations, internship, residency program, fellowships, work history, presentations, publications, education, professional interests, memberships, and board certifications. Providing additional information is entirely optional for each User, however any additional information enables the User to better identify themselves and find new opportunities in the Witty Service to build and leverage their professional network. All of the information that is publicly available or that you voluntarily provide will be published on your profile, which is accessible to anyone browsing the Witty directory; EXCEPT (i) the year(s) you graduated from your internship, (ii) residency and/or (iii) fellowship programs. Any information you provide to us, whether during the registration process or as an update to your Profile, may be used in the same manner and extent to which other information is permitted to be used hereunder, including for the purpose of creating and serving advertisements through the Service.

When You Add a Private Profile:

If you choose, you may create a private profile on Witty. The private profile can consist of back line, mobile phone, home phone, other phone, pager, inpatient and admit number, email address or other private mode of communication. Your private profile is visible only to those Users with whom you select to share it.

When You Invite Others to Join Witty:

If you wish to invite other physicians, Clinicians (as defined below) or colleagues to join Witty, you can use our email invitation service to email their offices. In this case, no additional information about you is collected. Alternatively, you may enter their names and email addresses, which Witty will use to send your invitation, including a message that you may write to them. The names and email addresses of people that you invite will be used only to send your invitation and reminders.

When You Contact Customer Support:

Witty may collect information through our website or through Customer Support in order to, among other things, accurately categorize and respond to your inquiries and deliver the appropriate Service s.

Cookies:

Like most websites, Witty uses cookies and web log files to track site usage. A cookie is a tiny data file which resides on your computer that allows Witty to recognize you as a User when you return to the Witty website using the same computer and web browser. Like the information you enter at registration or when you update your Profile, cookie and log file data is used to customize your experience on our website. One type of cookie, known as a "persistent"

cookie, is set once you've logged in to your Witty account. The next time you visit the Witty website, the persistent cookie will allow us to recognize you as an existing User so you will not need to log in before using the Service. However, if you log out of the Witty website you will need to re-enter your password the next time you visit in order to log in to your account. We use cookies to improve the quality of our Service by storing User preferences and tracking User trends. Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent.

Log files, IP addresses and information about your computer and mobile device:

Due to the communications standards on the internet, when you visit the Site we automatically receive the URL of the site from which you came and the site to which you are going when you leave Witty. Witty also receives the internet protocol ("IP") address of your computer (or the proxy server you use to access the World Wide Web), your computer operating system and the type of web browser you are using, email patterns, mobile device operating system (if you are accessing Witty using a mobile device), as well as the name of your ISP or your mobile carrier. We use this information to analyze overall trends to help improve our Service. The linkage between your IP address and your personally identifiable information is not shared with third parties without your permission, except as described in this [Privacy Policy](#).

Consent to Witty Processing Information About You:

Certain information you provide to Witty may reveal, or allow others to identify, your nationality, ethnic origin, religion or other aspects of your private life, and more generally about you. Please be aware that in providing information to Witty for the purposes of opening your User account, you are expressly and voluntarily accepting the terms and conditions of this [Privacy Policy](#), the [Terms and Conditions of Use and Business Associate Agreement](#). The supplying of all such information by you to Witty, including all information deemed "personal" or "sensitive" by applicable law, is entirely voluntary on your part. You have the right to withdraw your consent at any time, in accordance with the terms of this [Privacy Policy](#), the [Terms and Conditions of Use and Business Associate Agreement](#), but please note that your withdrawal of consent will not be retroactive.

Accessing and Changing Your Account Information:

You can review the personal information you provided us and make any desired changes to the information you publish, or to the settings for your Witty account, including your email and contact preferences, at any time by emailing support@oncopower.org. You can also make these changes on the Witty website by updating your Profile. Please be aware that even after your request for a change is processed, Witty may, for a time, retain residual information about you in its backup and/or archival copies of its database.

USE AND PROTECTION OF PERSONAL INFORMATION:

Witty is an online Service dedicated to helping medical professionals more effectively connect with one another and to assist patients with obtaining the best possible medical care no matter where they are located. The information you choose to provide about yourself on the Site is used to help you describe yourself to other Users; to provide you with the Services; to improve healthcare quality through the performance of quality reviews and similar activities; to notify you when site updates are available; to market and promote the Site and the Services to you; to fulfill any other purpose for which you provide us your personal information; and for any other purpose for which you give us authorization. Other information, that does not personally identify you as an individual, is collected by Witty from Users (such as, for example, patterns of utilization) and is exclusively owned by Witty. This information can be utilized by Witty in such manner as Witty, in its sole discretion, deems appropriate.

HIPAA & HITECH:

Witty is a covered entity under the Health Insurance Portability and Accountability Act (HIPAA) of 1996 and the Health Information Technology for Economic and Clinical Health ("HITECH") Act. Witty Health maintains personal health information in compliance with these rules and regulations.

NOTICE OF HIPAA PRIVACY PRACTICES

THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED, AND DISCLOSED, AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY AND REPORT ANY ISSUES, OR CONCERNS, TO US:

Witty Health
ATTN: Legal Department
5850 San Felipe Suite 500
Houston, TX 77057

HIPAA is a federal program requiring that all medical records and other individually identifiable health information used, or disclosed, by us in any form, whether electronically, on paper, or orally, are kept properly confidential. This Act gives you significant rights to understand and control how your health information is used. HIPAA provides penalties for covered entities that misuse personal health information. We have prepared this "Notice of HIPAA Privacy Practices" to explain how we are required to maintain the privacy of your health information and how we may use and disclose your health information. We may use and disclose your health information or medical records for each of the following purposes: treatment, payment, and health care operations:

- TREATMENT means providing, coordinating, or managing health care and related services by one or more Clinicians, Physician Users and/or health care providers.
- PAYMENT means such activities as obtaining payment or reimbursement for services, billing or collection activities and utilization review.
- HEALTH CARE OPERATIONS include managing your personal health information to facilitate messaging and consultations with Clinicians, Physician Users and/or health care providers, as well as conducting quality assessment review and service improvement planning activities, auditing functions, cost-containment analysis, and customer service.

We may also create and distribute de-identified health information by removing all references to individually identifiable information. We may contact you to provide information about our services or other health-related services that may be of interest to you. Any other uses and disclosures will be made only by you or with your written authorization. You may revoke such authorization in writing, and we are required to honor and abide by that written request, except to the extent that we have already taken actions relying on your authorization.

You have the following rights with respect to your protected health information, which you can exercise by presenting a written request to:

Witty Health
ATTN: Legal Department
5850 San Felipe Suite 500
Houston, TX 77057

You have the right to ask for restrictions on the ways we use and disclose your health information for treatment, payment, and healthcare operations. You may also request that we limit our disclosures to persons assisting your care. We will consider your request but are not required to accept it.

You have the right to request that you receive communications containing your protected health information from us by alternative means or at alternative locations. For example, you may ask that we only contact you at home or by mail.

Except under certain circumstances, you have the right to inspect and copy medical, billing and other records used to make decisions about you. If you ask for copies of this information, we may charge you a nominal fee for copying, packaging, and postage.

If you believe that information in your records is incorrect, or incomplete, you have the right to ask us to correct the existing information or add missing information. Under certain circumstances, we may deny your request, such as when the information is accurate and complete.

You have a right to receive a list of certain instances when we have used or disclosed your medical information. If you ask for this information from us more than once every twelve months, charges may apply, to cover our costs for administration, archive retrieval, copying, packaging, and postage.

Business Associate Agreements

HIPAA generally requires that covered entities and business associates enter into contracts to ensure that the business associates will appropriately safeguard protected health information. A business associate contract serves to clarify and limit, as appropriate, the permissible uses and disclosures of protected health information by the business associate, based on the relationship between the parties and the activities or services being performed by the business associate. By using this Site and/or the Services, You and Witty agree to the terms provided in the [Business Associate Agreement](#) relating to any communications of electronic protected health information.

Medical Information used for treatment

We may use or disclose your medical information, (1) to provide you with access to Physicians as anticipated by the Services offered by Witty, (2) to share your medical information with others who provide care to you such as hospitals, nursing homes, doctors, nurses, physician assistants, technicians, emergency service and transportation providers, medical and nursing students, therapists, medical equipment providers, pharmacies, and others involved in your care that may not be listed. Within the scope of care provided by the Physicians, they may share your medical information to assist with filling your prescriptions, requesting lab work and x-rays along with other medical needs that may not be listed. We may use or disclose your medical information, (1) to facilitate payment for the services provided by Witty or the Physician Users or its network Physicians, vendors or providers, (2) to inform billing companies, insurance plan administrators, or others to acquire approval for anticipated care.

Witty's Communications to You:

Witty will communicate with you through email and notices posted on the Witty website or through other means available through the Service, including text and other forms of messaging. If we send any communications to you via the carrier Service with which you have a mobile communications subscription or otherwise have access, you understand you will pay any Service fees associated with any such access (including text messaging charges for messages to your mobile device). Our communications to you include emails which help inform Users about various features of the Service. Witty may send you promotional information unless you have opted out of receiving such information. You can change your email and contact preferences at any time by sending a request to support@oncopower.org or by updating your profile information.

Customized Content:

Information provided to Witty (or to third parties with whom it offers combined Services) is also used to customize your experience on our website. For example, you can store “favorite” phone numbers for easy reference.

Sharing Information with Third Parties:

Witty takes the privacy of Users very seriously. We do not sell, rent, or otherwise provide your private information to third parties for marketing or other purposes. We may provide data about the usage of our Services to third party Service providers with whom we contract to help us provide our Services. For example, we may work with vendors, consultants or other third parties to host and maintain our data and website properties, analyze our data, or provide marketing assistance. All contracted third parties must agree not to use your personal information and communications other than to fulfill their responsibilities to us and are bound by confidentiality agreements with regard to their use of such information. We may provide aggregated anonymous data about the usage of our Services to third parties for such purposes as we deem, in our sole discretion, to be appropriate, including to prospective investors in Witty. We may segment our Users by specialty, education, alumni groups, training, research, grants, trials, geographic location or other similar information and provide information from your public profile as part of our Services and product offerings. If you would like to be excluded from the aggregated research or products based upon aggregated or segmented data and Users’ activities on the site, please email support@oncopower.org.

As part of our Services, we may share personal information with accredited Continuing Medical Education (CME) and Continuing Education (CE) providers who certify CME and CE activities, to process CME or CE activities you may choose to take through our Service. As part of our Services, we may also share public profile information with medical leading publications and ranking bodies, such as U.S. News and World Reports to increase the visibility of our Users. When you use the Witty Service through a Witty website, newsletter, mobile app or other medium, you may be presented with advertisements or opportunities to engage in informational programs consisting of sponsor-selected content. Examples of these programs include sponsored news alerts or branded or unbranded discussion groups. All sponsored programs will be labeled clearly as a sponsored program. When you choose to engage with a sponsored program, such as engaging with a commercial client’s sponsored news alert, we may provide our

commercial clients with your identifiable information and information about the type of engagement (e.g., whether you viewed, interacted with or requested information about such promotional content). We will only share your identifiable information with clients who have agreed to use such information solely for authorized purposes. You may revoke your authorization to participate in these features of our Services at any time. If you would like to be excluded from the accredited bodies, leading publications or commercial features of our Services, please email support@oncopower.org.

Finding Clinicians:

We use your information, including the addresses you import through our contact importers, to make suggestions to you and other Users on Witty. For example, if another User imports the same email address as you do, we may suggest that you add each other as clinicians (“Clinicians”). To help your friends find you, we allow other Users to use contact information they have about you, such as your email address, to find you, including through contact importers and search.

Search:

We offer search Services to help you find information and learn more about other Users (for example, you can search for Users with particular expertise, or that you may know from your medical school). We use information from User profiles and other contributions to Witty to inform and refine our search Service.

Surveys and Polls:

As a User, you may receive requests to participate in market research including polls and surveys submitted by other Witty members. If you participate in surveys and polls offered through our website, the information you provide may be visible to others using the Witty website. You may opt-out of participating by emailing support@oncopower.org to stop receiving these inquiries and requests.

Communications with Other Users:

Communications you initiate through Witty, such as invitations to Clinicians that are not a User, will list your name in the message, along with your current office address and phone/fax numbers. No other contact information will be included in the message.

Witty offers various forums (such as Witty Messaging, Onco-space and Onco-Klinik) where you can communicate with other Users, individuals and groups. Witty Users may communicate with one another using the Witty Messaging feature. Messages may only be initiated between two Users who have confirmed a Clinician relationship within the Witty network; or in the case of non-Physician Users (i.e., patients) who wish to connect with other non-Physician Users (i.e., patients), each User must confirm that they wish to connect with other Users. In the case where a User has initiated a group message to two or more of his or her Clinicians or Users, recipients of this group message may “reply all” to the recipients of this group message, even though they are not all Clinicians. This is the only instance where a Clinician may receive a message from a non-Clinician. Sending messages may be sent securely or non-securely. Secure messages require recipients to confirm their identity by entering their PIN code prior to viewing. Non-Secure messages may be read by anyone with access to a User’s mobile device.

You can disable Messaging at any time under your “Settings” tab in your account. You can disable “push” notifications of new Messaging messages at any time through the settings on your mobile device.

Disclosures of Information as Necessitated by Law:

It is possible that we may need to disclose personal information when required by law, such as responses to civil or criminal subpoenas, or other requests by law enforcement personnel. We will disclose such information when we have a good-faith belief that it is necessary to comply with a court order, ongoing judicial proceeding, subpoena, or other legal process or request to Witty brought in any country throughout the world, or to exercise our legal rights or defend against legal claims.

Disclosures to Others:

We may also disclose your personal and other information you provide, to another third party as part of reorganization or a sale of substantially all of the business of Witty. Any third party to which we transfer or sell Witty’s assets will have the right to continue to use the personal and other information that you provide to us.

YOUR INFORMATION AND ACCOUNT CHOICES

Rights to Access, Correct and Delete Personal Information About You:

You have a right to access, modify, correct and delete the personal information about you, which has been collected pursuant to your decision to become a User. If you update any of your information, we may keep a copy of the information which you originally provided to us in our archives for uses documented herein. We take your rights seriously and encourage you to use them as you deem necessary. You may exercise these rights by emailing us at support@oncopower.org or by contacting us at:

Witty Health Inc.
ATTN: Privacy Policy Issues
5850 San Felipe Suite 500
Houston, TX 77057

Closing Your Account:

You can also close your account at any time by emailing support@oncopower.org. If you close your Witty account, we will remove all of the information that you have provided to Witty from our publicly viewable database, as well as any private profile information that you have stored with us, EXCEPT THAT, we will retain all publicly available data in the database, including all of the information about you that was available on our database prior to your joining the Witty network. We may also retain certain data contributed by you if we believe it may be necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated, non-personally identifiable data, account recovery, or if required by law.

When you close your account, we may be required (by law or otherwise) to keep this information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). Witty may also retain and use your information if necessary, to provide the Services to other Users. For example, just as an email you may send to another person through an email Service provider resides in that person's inbox even after you delete it from your sent files or close your account, communications to other Users, as well as your contributions to Onco-Space or other communications, may remain visible to others after you have closed your account. Similarly, other information you have shared with others, or that other Users have copied, may also remain visible. This includes personal health information that you communicate through the Witty Services. Furthermore, when we delete your information, it will be deleted from the active database, but may remain in our archives and we may also retain anonymous information about your use of our Services. You should also note that once we disclose some of your personal information to third parties, we may not be able to access that personal information any longer and cannot force the deletion or modification of any such information by the parties to whom we have made those disclosures. Further, after we delete your personal information, we may retain information that has been scrubbed of any personally identifiable information about that individual and we will continue to use that information as permitted under this [Privacy Policy](#). Witty disclaims any liability in relation to the deletion or retention (subject to the terms herein) of information or any obligation not to delete the information. Witty does not control when search engines update their cache, which may contain certain public profile information that has since been removed from Witty's publicly viewable database.

To request that we close your account and remove your information from the Witty website, please send your request to support@oncopower.org. Please send your request using an email account that you have registered with Witty under your name. You will receive a response within five business days of its receipt.

Memorializing Accounts:

If we learn that a User is deceased, we may memorialize the User's account. We may restrict profile access and remove messaging functionality. We close an account if we receive a formal request from the User's next of kin or another proper legal request to do so.

IMPORTANT INFORMATION

Insurance Data:

Insurance data on Witty is offered for informational purposes only, should not be relied upon, and Users agree to hold harmless Witty and its data suppliers for use of the data.

Payments processors:

We provide paid products and/or services on our Site for which we use third-party services for payment processing (e.g. payment processors). We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their privacy policy.

Security:

We have a number of security measures in place to protect your personal Information from unauthorized access, disclosure, alteration or destruction. Although no online service can guarantee the absolute security of your personal information, we are committed to implementing strong physical, technical and administrative safeguards. These procedures include the use of firewalls, secure connections on our websites, and the use of Secured Socket Layers (SSLs) to encrypt pages that collect personal information. Personal information is stored in limited access servers and physical access to our servers requires individual authorization and authentication. Only authorized Witty employees or contractors carrying out permitted functions are allowed access to personal information. In addition, each employee and contractor of Witty is required to sign a confidentiality agreement requiring him or her to keep confidential all Personal Information of Users and customers. We regularly train our employees and contractors on proper use and handling of personal information. Employees and contractors who violate these policies may be subject to disciplinary action, termination of their employment and legal action. Our service providers are also required to maintain security measures similar to Witty. However, for added protection, we ask that you keep your login information and passwords confidential. By using the Services or providing personal information to us, you agree that we may communicate with you electronically about security, privacy, and administrative issues relating to your use of the Services. If you have reason to believe that your interaction with Witty is no longer secure, please email us immediately at support@oncopower.org or by contacting us at:

Witty Health Inc.
ATTN: Security Issues
5850 San Felipe Suite 500
Houston, TX 77057

Operation in the United States and Cross Border Transfers:

Our servers are located in the United States and your information is transferred to, stored, and processed in the United States. While the data protection, privacy, and other laws of the United States might not be as comprehensive as those in your country, we take many steps to protect your privacy. This means that if you are located in the European Union (EU), your personal data is transferred to the U.S., which is not considered to have the same level of data protection as in the EU. However, we have implemented appropriate safeguards as detailed in this [Privacy Policy](#) so as to ensure an adequate level of protection. By using our Services and by submitting your information, you consent to the use of that information as set out in this [Privacy Policy](#) and you understand and consent to the collection, storage, processing, and transfer of your information to our facilities in the United States.

EU-U.S. and Swiss-U.S. Privacy Shield Frameworks:

Witty complies with the EU-U.S. and Swiss-U.S. Privacy Shield frameworks, as set forth by the U.S. Department of Commerce, regarding the collection, use, and retention of personal information transferred from the European Economic Area to the US. If there is any conflict between the terms in this [Privacy Policy](#) and the Privacy Shield principles, the Privacy Shield principles will govern. To learn more about the Privacy Shield program, please visit <https://www.privacyshield.gov/>.

For questions or complaints regarding our participation in Privacy Shield, please contact us at support@oncopower.org. For any complaints that cannot be resolved with Witty directly, Witty requires all complaints to be handled by binding arbitration, as set forth in the [Terms and Conditions of Use](#).

Third Party Links/ Other Sites:

Occasionally, we may include or offer third-party links or services on our Site. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites. Further, if you follow a link from our Site to another site, this [Privacy Policy](#) will no longer apply. To the extent that you access or use the Service through or on another website or application, then the privacy policy of that other website or application will apply to your access or use of that site or application. We are not responsible for the information handling practices of third-party sites and we encourage you to read the privacy policies appearing on those sites.

Changes to this Privacy Policy:

We reserve the right to modify this privacy statement at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, by email, or by means of a notice on our home page. If you use the Witty Service or visit the Site after notice of these changes have been posted, you are providing your consent to the changed practices. If Users have questions or concerns regarding this statement, you may contact Witty by email at support@oncopower.org.

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