

PRIVACY POLICY

LAST UPDATED 1. FEB 2021

Curio Digital Therapeutics Inc, Stella by Curio, Stella Prevent (“Stella,” “Supplier”, “us,” “we,” or “our”) is committed to protecting and respecting your privacy in connection with your use as an end consumer or as a business consumer or affiliate of our Site(s), www.curiodigitaltx.com (the “Site”, the “Website(s)”), applications (“Apps”) and other products, services and features thereof (the Site, the Apps and such other products, services and features are collectively referred to herein as the “Services”, “Product” or “Products”, which may be updated from time-to-time at the sole discretion of Stella). This privacy policy (“Privacy Policy”) and any other documents referred to herein set forth the basis on which any personal information or payment information we collect from you, or that you provide to us, in connection with the Services and Products will be processed or stored by us. Please read the following carefully to understand our practices regarding your personal information and how we will collect, use and disclose your personal information. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our [support](#).

Information We May Collect From You

We may collect and process the following information about you:

- Personal information including, for example, your name, e-mail address, telephone, home address, gender, birthdate and year, e-mail address, phone number and information about details of your payment, as well as information about your usage of the Services and Products, and information collected by tracking and/or API technologies (including those by Google or YouTube, in which case you are bound by Google’s Privacy Policy <https://policies.google.com/privacy?hl=en-US> and YouTube’s Privacy Policy <https://www.youtube.com/t/terms>) as further described below that may identify you as an individual or allow online or offline contact with you as an individual, including, but not limited to

- For individuals using the Products in connection with Groups, Teams, Stella for Business and Other Community Sharing options, additional information in addition to your business and corporate information may be requested such as information about your team, including names, telephone numbers and e-mail addresses as well as other related data such as information about details about your payments and/or re-funds.
- Facebook, Apple and Google profile information, such as name, email address, Facebook ID and profile picture, Apple ID and profile picture and Google ID and profile picture, if you choose to log in to the Products through Facebook, Apple or Google.
- Device Information such as operating system version, device type, amount of free storage on the device and system performance information.
- Information collected via tracking technologies, as fully described in section Tracking Technologies below.
- If, as an Account holder with Stella , you choose to invite additional friends to Stella by sending them a free demo offer, Gift Card or other campaign by Stella , we will ask you for their name and email address or other data. We will use this information to invite him or her to join the Services and Products and tracking the success of the program. We store this information for the sole purpose of sending invitations to Services and Products. If your invited friends would like us to delete their information, they can opt-out as described in each invitation or by contacting support@curiodigitaltx.com to be removed.

Payment Details

Stella does not store or directly process credit or debit card ("Payment Card") information.

Confidentiality and Security

The security of your personal information is very important to us. We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once it is received. If you have any questions about the security of your

personal information, you can contact us at support@curiodigitaltx.com. Except as described under the “Disclosure of Your Information” section below, we do not provide your personal information to any third party without your specific consent, as defined by applicable law.

Newsletters or Other Electronic Communications

If you sign up to receive promotional materials from us via email, we will use the information you give us to provide the communications you have requested.

If you inform us that you wish to cancel email promotional materials by selecting “unsubscribe” at the bottom of such communication or by emailing us at support@curiodigitaltx.com, we will remove you from our mailing list. If you no longer wish to receive push notifications, you may turn them off at the device level.

If you provide your phone number to us directly or through a third-party for the specific purpose of receiving an SMS message with a link to our Apps, you will receive such SMS message (the “SMS Service”). Standard text message rates will apply.

Tracking Technologies

Stella and our analytics partners use technologies such as cookies, tokens, beacons, tags, and scripts to enable a service to recognize your device so you don’t have to provide the same information several times during one task, recognize that you may have already given a username and password so you don’t need to do it for every web page requested, and to measure how people are using the Services, Apps and Products.

We use local storage, such as HTML5, to store content information and preferences. Third parties with whom we partner to provide certain features on the Services, Apps and Products also use HTML5 to collect and store information. Various browsers may offer their own management tools for removing HTML5.

We partner with third parties, such as Facebook and Google, to manage our advertising of the Products on other sites or platforms as well as across your other devices based on your past visits to our website. Our third party partners may use technologies such as cookies or tokens to gather information about your activities within the Services, Apps and Products to deliver such advertising to you, such as retargeting ads. We will acquire consent from you in order to use such trackers for advertising purposes to the extent required by applicable law. We currently do not respond to do-not-track signals. For more information about interest-based ads, including how to opt-out of having your web-browsing information used for behavioral advertising purposes, please visit www.aboutads.info/choices. Please note that this does not opt you out of being served ads. You may continue to receive generic ads on these third party platforms. You may also opt out of receiving ads across devices by adjusting your ad preference in your Google account.

We use third party trackers to let us know when users have visited the Services, Apps or Products by “clicking-through” our sponsored advertising or content hosted on third party platforms. The Services, Apps and Products use Google Analytics code to gather statistical information. Google Analytics sets cookies to help us accurately estimate the number of visitors to the Services, Apps and Products and the volumes of usage of the Services, Apps and Products. This is done to ensure that the Services, Apps and Products are available when you want them and are fast. For more information on how Google Analytics processes this information, visit www.google.com/analytics. You can also read Google Privacy Policy at www.google.com/policies/privacy.

YouTube API Clients

The Stella App and Services may use an API Client that uses YouTube API Services. When you are using the Stella app and Services, you also agree to be fully bound by the Google Privacy Policy at <http://www.google.com/policies/privacy> as well as YouTube’s Terms of Service at <https://www.youtube.com/t/terms>.

Through the API, we may collect and store Your e-mail address, as well as usage of the app content, statistics and information that is logged and displayed to You.

Stella does not share this API Data related information with 3rd parties. Stella does not allow third parties to serve content, including advertisements through the API Client.

You can contact our customer support at support@Stella.com with all relevant inquiries.

Mobile Analytics

We use mobile analytics software to allow us to better understand the functionality of our mobile software on your phone. This software may record information such as how often you engage with the Products, the events that occur within the Products, aggregated usage and performance data, and where the Applications were downloaded from. We may link the information we store within the analytics software to any personal information you submit within the mobile application.

Log Files

As most websites, we gather certain information and automatically store it in log files. This information may include Internet Protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data.

If you receive the HTML-formatted version of our email newsletter, your opening of the newsletter is notified to us and saved. Your clicks on links in the newsletter are also saved. These and the open statistics are used in aggregate form to give us an indication of the popularity of the content and to help us make decisions about future content and formatting.

Cookies

“Cookies” are small text files that are placed on your device by a web server when you access our Services. We may use both session cookies and persistent cookies to identify that you’ve logged in to the Services and to tell us how and when you interact with our Services. We may also use cookies to monitor aggregate usage and web traffic routing on our Services and to customize and improve our Services. Unlike persistent cookies, session cookies are deleted when you log off from the Services and close your browser. Although most browsers automatically accept cookies, you can change your browser options to stop automatically

accepting cookies or to prompt you before accepting cookies. Please note, however, that if you don't accept cookies, you may not be able to access all portions or features of the Services. Some third-party services providers that we engage (including third-party advertisers) may also place their own cookies on your device. Note that this Privacy Policy covers only our use of cookies and does not include use of cookies by such third parties.

Pixels

"Pixels"/"Web Beacons" (also known as Web bugs, pixel tags or clear GIFs) are tiny graphics with a unique identifier that may be included on our Services for several purposes, including to deliver or communicate with Cookies, to track and measure the performance of our Services, to monitor how many visitors view our Services, and to monitor the effectiveness of our advertising. Unlike Cookies, which are stored on the user's hard drive, Web Beacons are typically embedded invisibly on web pages (or in an e-mail).

Widgets

"Social Media Widgets" such as the Facebook "Like" button and LinkedIn (that might include widgets such as the share this button or other interactive miniprograms) may be on our Site. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. These social media features are either hosted by a third party or hosted directly on our Website. Your interactions with these features are governed by the privacy policy of the company providing it.

Analytics

We may also use Google Analytics and Google Analytics Demographics and Interest Reporting to collect information regarding visitor behavior and visitor demographics on some of our Services, and to develop website content. This analytics data is not tied to any Personal Information. For more information about Google Analytics, please visit <https://policies.google.com/technologies/partner-sites/>. You can opt out of Google's collection and Processing of data generated by your use of the Services by going to tools.google.com/dlpage/gaoptout.

Our uses of such Technologies fall into the following general categories:

Operationally Necessary

We may use cookies, web beacons, or other similar technologies that are necessary to the operation of our sites, services, applications, and tools. This includes technologies that allow you access to our sites, services, applications, and tools; that are required to identify irregular site behavior, prevent fraudulent activity and improve security; or that allow you to make use of our functions such as shopping-carts, saved search, or similar functions

Performance Related

We may use cookies, web beacons, or other similar technologies to assess the performance of our websites, applications, services, and tools, including as part of our analytic practices to help us understand how our visitors use our websites, determine if you have interacted with our messaging, determine whether you have viewed an item or link, or to improve our website content, applications, services, or tools

Functionality Related

We may use cookies, web beacons, or other similar technologies that allow us to offer you enhanced functionality when accessing or using our sites, services, applications, or tools. This may include identifying you when you sign into our sites or keeping track of your specified preferences, interests, or past items viewed so that we may enhance the presentation of content on our sites;

Advertising or Targeting Related

We may use first-party or third-party cookies and web beacons to deliver content, including ads relevant to your interests, on our sites or on third party sites. This includes using technologies to understand the usefulness to you of the advertisements and content that has been delivered to you, such as whether you have clicked on an advertisement. If you would like to opt-out of the Technologies we employ on our sites, services, applications, or tools, you may do so by blocking, deleting, or disabling them as your browser or device permits.

Location Information

In some cases, we may collect and store information about where you are located, such as by converting your IP address into a rough geolocation or by accessing your mobile device's GPS

coordinates or coarse location if you enable location services on your device. We may use location information to improve and personalize our Services for you. If you do not want us to collect location information, you may disable that feature on your mobile device.

Where We Store Your Personal Information

All information you provide to us through the Services, Apps and Products is stored on our secure servers located in the US and the European Union. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Products, you are responsible for keeping this password confidential. We ask you not to share a password with anyone, and suggest that you change your password frequently.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to the Products; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

Groups, Business Users and Other Community Sharing

If you have registered to use the Products through a code or other registration credential furnished by a Group (a "Group Subscription", "Team", "Team Subscription", "Business Subscription", "B2B" or any other mass subscription package or B2B Admin page), this Privacy Policy applies in full. Stella, the Group and Admin may have access to your name and the date you registered to use the Products and will have access to your usage information on an aggregated basis with all other members of the Group that are using the Products. Your Group may also have access to your usage information on an individual basis if you have provided appropriate consent for such sharing.

Single Sign-On

You can log into our Products using sign-in services such as Facebook Connect, Google Sign-In or an Open ID provider. These services will authenticate your identity, provide you the option to share certain personal information (such as your name and email address) with us, and to pre-populate our sign-up form. Services like Facebook Connect give you to the option to post information about your activities on our Products or to your profile page to share with others within your network.

Access to and Deletion of Personal Information

Upon request, Stella will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. To request this information, please email support@curiodigitaltx.com.

You may access your personal information to modify or update at any time via an online account, or by emailing support@curiodigitaltx.com.

To request the deletion of your personal data that we have on file please email us at support@curiodigitaltx.com. Upon request, Stella will permanently and irrevocably anonymize your data such that it can never be reconstructed to identify you as an individual. We will respond to your request in a reasonable timeframe.

We use information held about you in the following ways:

- To ensure that content provided by the Products is presented in the most effective manner for you and for your computer or other device.
- To provide you with information, products or services related to Stella that you will facilitate your engagement with the Products.
- To provide you with promotional communications, such as email, to the extent that you have provided consent to receive such communications under applicable law.
- To provide you with customer service communications.
- To carry out our obligations arising from any agreements entered into between you and us.
- To allow you to participate in interactive features of the Products, when you choose to do so.

- To notify you about changes to the Products.
- To understand your broad geographic location to help us identify groups of users by general geographic market (such as zip code, state or country).
- To account for applicable sales taxes based on zip codes provided to our payment processors for purchases made through the Site.
- To inform your Group about your registration and use of the Products as described under section Groups and Other Community Sharing above.
- To serve our advertisements to you through third party platforms, such as Facebook or Google, on other sites and apps or across your devices, to the extent that you have provided consent for such uses under applicable law.
- To provide you with the SMS Service to the extent that you have provided consent for such practices under applicable law.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of transactions you carry out through the Products and of the fulfillment of your Product orders.
- Details of your visits to and interactions with the Products including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.
- If you are an existing customer, we will only contact you by electronic means (e-mail, SMS, social media chat or in-Product communication) with information about products and services similar to those which were the subject of a previous sale to you.
- If you choose to submit an application or request information about becoming an Affiliate, we may request information such as your name, your CV, e-mail and address, telephone and cell number and we may allow a third party platform to access this specific data for verification purposes. In this case, we may store and process this information.

Disclosure of Your Information

We may disclose your personal information to our subsidiaries, our ultimate holding company and its subsidiaries (except data gathered from the Apple HealthKit, Clinical Health Records API, MovementDisorder APIs, ClassKit or from depth and/or facial mapping tools (e.g. ARKit, Camera APIs, or Photo APIs).

We may also disclose your personal information to third parties as follows:

- In some circumstances, based on your specific requests, we may need to disclose your personal information to a third party so that they can provide a service you have requested from such party, or fulfill a request for information from such party. An example of this is the SMS Service.
- In some circumstances, we may disclose the personal information that you have provided to Stella to a third party that offers and/or provides goods or services complementary to our own for the purpose of enhancing our users' experiences by offering you integrated or complementary functionality, complementary services or bundled pricing options.
- If Stella's service providers (like hosting, market analytics, and payment service providers) require this information to provide services to Stella. Stella requires each of its service providers to agree to maintain the confidentiality and security of your personal information.
- In the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets.
- If Stella or substantially all of our assets are acquired by a third party, in which case personal information held by us about our customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation such as to comply with a subpoena, bankruptcy proceedings, similar legal process, or in order to enforce or apply our agreements with you; or to protect the rights, property, or safety of Stella, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

- With your Community, if your subscription is a Community Subscription, as described under Corporate and Other Community Sharing above.
- With third parties, such as Facebook and Google, in order to serve Stella advertisements on such third party platforms, to the extent that you have consented to such practices under applicable law.

Withdrawal of Consent for Processing Activities

To the extent that you have provided appropriate consent under applicable law to certain processing activities, such as use of trackers for the purpose of retargeting activities, such consent can be withdrawn at any time by emailing support@curiodigitaltx.com.

Links to Third Party Sites

The Services, Apps and Products may, from time to time, contain links to and from the Products of our partner networks, advertisers and affiliates. If you follow a link to any of these external websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these websites or their policies. Please check these policies before you submit any personal information to these external websites.

Data Retention

Stella retains the Personal Information we receive as described in this Privacy Policy for as long as you use our Services, Apps and Products or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

HealthKit, GoogleFit and other Health apps

Mobile users, including Apple iOS and GoogleFit and Google users may opt-in to allow the Products to provide data personal data regarding the use of Stella , such as the amount of

minutes and the number of times listened to the tracks to the health apps found on their mobile devices. This data will not be shared with third parties or used for marketing purposes.

Policy Toward Children

Our Services are not directed to children under 13 and we do not knowingly collect Personal Information from children under 13. If we learn that we have collected Personal Information of a child under 13 we will take steps to delete such information from our files as soon as possible. If you are under the age of 18, you must have your parent's permission to access the Services, Apps and Products.

Information Posted on Forums

Stella users may have the ability to post content to one or more Stella forums. All such users may request and obtain removal of such posted content by contacting Stella at support@curiodigitaltx.com and specifically identifying the content to be removed. Please be advised that any such removal does not ensure complete or comprehensive removal of all traces of the content posted on the Stella forum(s).

Cookies and Interest-Based Advertising

As noted above, you may stop or restrict the placement of cookies on your computer or remove them from your browser by adjusting your web browser preferences. Please note that cookie-based opt-outs are not effective on mobile applications. However, on many mobile devices, application users may opt out of certain mobile ads via their device settings.

The online advertising industry also provides websites from which you may opt-out of receiving targeted ads from our data partners and our other advertising partners that participate in self-regulatory programs. You can access these, and also learn more about targeted advertising and consumer choice and privacy, at www.networkadvertising.org/managing/opt_out.asp, or youronlinechoices.eu/ and aboutads.info/choices. You can also choose not to be included in Google Analytics here.

To be clear, whether you are using our opt-out or an online industry opt-out, these cookie-based opt-outs must be performed on each device and browser that you wish to have opted-out. For example, if you have opted-out on your computer browser, that opt-out will not be effective on your mobile device. You must separately opt-out on each device. Advertisements on third party websites that contain the AdChoices link and that link to this Privacy Policy may have been directed to you based on anonymous, non-Personal Information collected by advertising partners over time and across websites. These advertisements provide a mechanism to opt-out of the advertising partners' use of this information for interest-based advertising purposes.

Changes to Our Privacy Policy

We may update this Privacy Policy to reflect changes to our information practices. If we make any material changes we will notify you by in-Product message, email (sent to the e-mail address specified in your account) or by means of a notice in the Products prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Contact

Please contact us at support@curiodigitaltx.com if you have any questions about our practices or this Privacy Policy.