

# Privacy Policy

## Saguaro Bloom Diagnostics, LLC

Saguaro Bloom Diagnostics, LLC and its subsidiaries, (collectively "Saguaro Bloom", "We", "Us" or "Our"), is a personal diagnostics company that is committed to protecting and respecting your ("Your" or "You") privacy and personal information, meaning any information about You which is personally identifiable ("Personal Information"), that We may collect from or which You may submit to or through [www.bloomsafely.com](http://www.bloomsafely.com) or other Saguaro Bloom websites that directly link to this privacy policy (the "Website").

This privacy policy (the "Privacy Policy"), together with Our [Terms of Use](#), describes how We may use Your Personal Information and how that information may be used or disclosed by Us.

Please read the following carefully to understand Our views and practices regarding Your Personal Information and how We will treat it.

This Privacy Policy applies only to Personal Information collected on the Website. It does not apply to Personal Information collected on any third-party site that may link to or be accessible to the Website over which We have no influence or control. The use of other sites, or the submission of Personal Information to other third-party sites is at Your own risk and is subject to their privacy policies and policies.

## Collecting Your Personal Information Directly from You

Generally, You can visit the Website without revealing who You are and without disclosing any of Your Personal Information. However, there may be times when We require Personal Information about You or when You wish to disclose such Personal Information to Us. Such Personal Information is obtained when submitted by You and is subject to the provisions set out in this Privacy Policy.

We may collect and process the following Personal Information about You:

- Information that You provide by filling in forms on the Website, such as Your personal details (e.g., Your name, date of birth, etc.) or contact details (e.g., telephone number, email address, postal address, etc.). This includes information provided at the time of registering to use the registration-only sections of the Website.
- We may also ask You for Personal Information (such as when You report a problem with the Website).
- If You contact us, in writing, by email or other electronic means, We may keep a record of that correspondence.
- Details of Your visits to the Website and information as You navigate through the Website together with details of the resources that You access. This information includes but is not limited to: usage details, IP addresses, location data and other communication data which will be used in accordance with this Privacy Policy.

Where required by law we may ask for Your explicit consent to collect information considered to be sensitive Personal Information (such as information about Your ethnicity or health information). You may withdraw Your consent at any time by contacting Us at the details below.

We do not ask you to provide personal health care information to us through our general website.\* We obtain personally identifying information about you only if you voluntarily choose to provide such information via correspondence with Saguaro Bloom. Feedback forms used in Saguaro Bloom correspondence specifically request that you not include personal information such as user names, passwords, social security numbers, and private health information.

\* If you are a user of Saguaro Bloom's Self Registration Kit or other specific Saguaro Bloom diagnostic products, you may be asked to provide personally identifiable information (PII) and personal and family health information (PFHI) through those products. In addition to the general applicability of this Privacy Policy to those products, use of those products and any information collected through there, are governed by specific end user agreements, as well as Saguaro Bloom's [Terms of Use](#) relating to use and disclosure of individually identifiable health information.

We may be required by law to collect certain Personal information about You or as a consequence of any contractual relationship We have with You. Failure to provide this information may prevent or delay the fulfillment of these obligations.

## Collecting Your Information from Other Sources

Saguaro Bloom will also collect the following categories of Personal Information from third parties, such as digital ad agencies, lists from acquired companies, events and conferences, and purchased lists.

- Name, address, email address, company name, title, preferences

We may enhance or merge Your Personal Information with data obtained from third parties for the same purposes for which We use Your Personal Information that You personally volunteer.

## How We Will Use Your Personal Information

We may use Your Personal Information for the following purposes, which are in Our legitimate interests:

- We may analyze Your Personal Information to better understand Your needs and how We can improve Our websites, products and services. For instance, We may use Your information to verify that content from the Website is presented in the most effective manner for You and for Your device, or to allow You to participate in the registration-only features of the Website, when You choose to do so.
- We may use Your Personal Information to communicate to You about new services and products that may be of interest to you. When You register online for one of Our services, You may be given the option of receiving periodic informational/promotional mail or email from Saguaro Bloom. You choose whether or not to receive correspondence when You provide this information or by changing Your preferences within Your registration profile or by following the instructions provided in the email at any time. Saguaro Bloom may utilize email marketing software as a third-party service to manage certain email communications.
- We may use Your Personal Information to provide You with the services and products You request, to assist with Your questions about Our services, billing or payment methods, and to process or collect payments made in connection with Our services to You.
- We may use Your Personal Information to respond to subsequent requests You may make to Us.

We may use any of the categories of Your Personal Information to exercise Our legal rights where it is necessary to do so, for example to detect, prevent and respond to fraud claims, intellectual property infringement claims, or violations of law or the contract.

If You do not want Us to use Your Personal Information in this way, please contact Us at the details below.

## Third Parties

We may share or disclose your personal information in the following circumstances:

- Service Providers. We may employ other companies and individuals to facilitate our Services (“Service Providers”), provide the Services on our behalf, perform Service-related services or assist us in analyzing how our Services are used. The Service Providers have access to your personal information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose. The Service Providers are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.

- Within Our Corporate Organization. We may share your personal information with our subsidiaries and affiliates in order to provide you with the Services and take actions based on your request.
- Corporate Transactions. To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by us about our Site users is among the assets transferred, and you agree to and do hereby consent to our assignment or transfer of rights to your personal information.
- Third Party Advertisers. In certain circumstances we may share your personal information with third parties to market their products or services to you if you have not opted out of these disclosures. We contractually require these third parties to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- Consent. We may disclose your personal information for any purpose with your consent.
- As Required by Law. Under certain circumstances your personal information may be subject to processing pursuant to laws, regulations, judicial or other government subpoenas, warrants, or orders. We may be required to disclose personal information in coordination with regulatory authorities in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, or for public health purposes, including reporting HIV and other sexually transmitted disease results to state public health regulatory bodies. We will preserve and disclose any and all information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that we may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce our Terms of Service and other policies; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of Saguaro Bloom, its employees, its users, its clients, and the public.

Saguaro Bloom reserves the right to share Personal Information in response to duly authorized information requests of any law enforcement agency, court, regulator, government authority, or other third party, where We believe such disclosure is necessary to comply with a legal or regulatory obligation, or otherwise to protect Our rights or the rights of any third party.

Please note that we may disclose, without restriction, aggregated or anonymized information about our users, which is information that does not identify any specific individual.

## Information Security and Storage

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. All personal information you provide to us is stored on our secure servers behind firewalls.

Any payment transactions will be encrypted using SSL or other encryption technology, or will use our third party payment processors, who will use appropriate security procedures. This information may be accessed only by Saguaro Bloom agents and employees who maintain password and position-required access rights, and third-party vendors who support Saguaro Bloom's billing operations.

We reserve the right to take appropriate legal action, including without limitation, referral to law enforcement, for any illegal or unauthorized use of this Website. We also reserve the right to take any action to prevent the unauthorized use of Our intellectual property rights.

We may cooperate with any law enforcement authorities or court order requesting or directing Us to disclose the identity of or locate anyone for the prevention or detection of crime or the apprehension or prosecution of offenders. There may be other circumstances in which We may be required by law to disclose information about You or Your use of this Website. You waive and hold Us harmless from any claims resulting from such disclosures and from any actions taken as a consequence of investigations by either Us or law enforcement authorities.

We may investigate any complaints or reported breaches of this Privacy Policy and take any action that We deem appropriate (which may include, without limitation, removing any of Your information, issuing warnings, suspending, restricting, or terminating Your access to this Website). We also reserve the right at Our discretion to suspend, restrict, or terminate Your access to this Website at any time without notice if We have reasonable grounds to believe that You have breached this Privacy Policy or Our Terms of Use.

## **The Safety and Security of Your Personal Information Also Depends on You**

If You choose or are given a user identification code, password or any other information as part of Our security procedures for one of the registration-only sections of the Website, You are responsible for maintaining the confidentiality of Your password and username for the Website and You are responsible for all activities that are carried out under them.

We do not have the means to check the identities of people using the Website and We will not be liable where Your password or user name is used by someone else. You agree to notify Us immediately at the contact information provided below of any unauthorized use of Your password or user name of which You become aware. We have the right to disable any user identification code or password, whether chosen by You or allocated by us, at any time, if in Our opinion, You have failed to comply with any of the provisions of these terms or Our Terms of Use.

Please be aware that while We take appropriate steps to safeguard the security of Your Personal Information, the transmission of information over the Internet is not completely secure and therefore You do this at Your own risk. Once We receive Your Personal Information We will implement strict security procedures with the objective of preventing unauthorized access.

We implement technical and organizational measures to maintain a level of security appropriate to the risk to the Personal Information We process. These measures are aimed at maintaining the on-going integrity and confidentiality of Personal Information. We evaluate these measures on a regular basis.

We will retain Your Personal Information in accordance with Our record retention policy, as updated from time to time, and as long as We have a relationship with You. To request that Your Personal Information be deleted from Our databases, please contact [privacy@bloomsafely.com](mailto:privacy@bloomsafely.com)

## **Cookies**

Saguaro Bloom tracks visitors to our website by collecting data elements called cookies. Cookies collected from the Saguaro Bloom website are used to (1) enable certain functions and tools on this website, (2) assist in the navigation of the website, (3) track resources and data used on this site, (4) promote Saguaro Bloom's products and services, and (5)

remember computer settings. Saguaro Bloom also collects other forms of non-personal information, such as browsers used to access our website, search terms used to find the website, and traffic referrals and links to our website. Cookies are not permanently maintained within our tracking system. You may prevent your computer from accepting cookies by modifying the properties on your web browser; however, stopping your computer from accepting cookies may limit your web browser's functionality on the Saguaro Bloom website.

Saguaro Bloom also uses the services of Google Analytics software to analyze traffic to the various Saguaro Bloom webpages. Data collected regarding site usage is compiled in aggregate to improve the performance of the site. If you do not wish your information to be included in this aggregated data through Google Analytics, you can download and install Google's "Google Analytics Opt-out Browser Add-on" available [here](#).

If you wish to prevent the use of cookies or for your information to be included in aggregated data through Google Analytics, You must modify the properties on your web browser for both as described above.

### Other Tracking Technologies

We may also use tracking technologies to collect "clickstream" data, such as the domain name of the service providing you with Internet access, your device type, IP address used to connect your computer to the Internet, your browser type and version, operating system and platform, the average time spent on our Services, webpages viewed, content searched for, access times and other relevant statistics, and assign unique identifiers to the device or other credentials you use to access the Services for the same purposes.

Pages of our Site and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

### Your Choices

Your browser may provide you with the option to refuse some or all browser cookies. You may also be able to remove cookies from your browser. You can exercise your preferences in relation to cookies served on our Sites by taking the steps outlined below.

- *First-Party Cookies.* You can use the browser with which you are viewing this Site to enable, disable or delete cookies. To do this, follow the instructions provided by your browser (usually located within the "Help", "Tools" or "Edit" settings). Please note, if you set your browser to disable cookies, you may not be able to access secure areas of the Site. Also, if you disable cookies other parts of the Services may not work properly. You can find more information about how to change your browser cookie settings at <http://www.allaboutcookies.org>.
- *Third-Party Cookies.* To opt-out of third-party advertising networks and similar entities that use advertising cookies go to <http://www.aboutads.info/choices>. Once you click the link you may choose to opt-out of such advertising from all participating advertising companies or only advertising provided by specific advertising entities. For more information about third-party advertising networks and similar entities that use these technologies, please see <http://www.aboutads.info/consumers>.
- *Flash Cookies.* Certain features of our Site may use locally-stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from and on our Site. If you do not want Flash Cookies stored on your computer, you can adjust the settings of your Flash player to block Flash Cookies storage. Flash cookies are not managed by the same browser settings as are used for browser cookies, but may be managed here: [http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager07.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html).
- *Targeted Advertising.* If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt-out by adjusting your user advertising preferences in your account profile by checking or unchecking the relevant boxes or by sending an email stating your request to [support@bloomsafely.com](mailto:support@bloomsafely.com). You can also opt out of interest-based targeting provided by participating ad servers through the Digital Advertising Alliance (<http://optout.aboutads.info/>) or

the Network Advertising Initiative (<http://optout.networkadvertising.org/?c=1>). In addition, on your iPhone, iPad or Android, you can change your device settings to control whether you see online interest-based ads.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. In addition, most web browsers provide help pages relating to setting cookie preferences. More information may be found for the following browsers here:

- [Google Chrome](#)
- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Safari \(Desktop\)](#)
- [Safari \(Mobile\)](#)
- [Android Browser](#)
- [Opera \(Desktop\)](#)
- [Opera \(Mobile\)](#)

## Internet Links

As a convenience to our site visitors, the Saguaro Bloom website may contain links to a number of sites that may provide useful information. Links contained on the Saguaro Bloom website that transfer you to a non-Saguaro Bloom site are not maintained by Saguaro Bloom and may contain different information and/or different privacy policies from those of our Company. You may review the privacy policies of these websites and/or receive specific information regarding that site's privacy policies and procedures after leaving the Saguaro Bloom site. Saguaro Bloom is not responsible for the content or privacy practices of a non-Saguaro Bloom website. Saguaro Bloom does not control, or have any input into, whether our business partners or internet-linked sites, use or accept cookies on their sites.

## Updates and Changes

We may update this Privacy Policy from time to time. When We do update it, for Your convenience, We will make the updated Privacy Policy available on this page. Changes and additions to the Privacy Policy are effective from the date on which they are posted. Please review the Privacy Policy from time to time to check whether We have made any changes to the way in which We use Your Personal Information.

## Children's Privacy

You should be aware that this Site is not intended for, or designed to attract, individuals under the age of 18.

## Your Rights over Your Personal Information

You have certain rights regarding Your Personal Information, subject to local law. These include the following rights to:

- access Your Personal Information;
- rectify the information We hold about You;
- erase Your Personal Information;
- restrict Our use of Your Personal Information;
- object to Our use of Your Personal Information;

- receive Your Personal Information in a usable electronic format and transmit it to a third party (right to data portability); and
- lodge a complaint with Your local data protection authority if one exists in Your country.

We encourage You to contact Us to update or correct Your Personal Information if it changes or if the Personal Information We hold about You is inaccurate. Please note that We will likely require additional information from You in order to honor Your requests.

Please note that should You request that Your Personal Information be deleted, You may continue to receive materials for a short period while We are updating Our lists. Your records will then be permanently deleted from Our systems in a timely manner.

## **How to Contact Us**

Saguaro Bloom Diagnostics, LLC is based in the US and is the controller responsible for Personal Information that it collects and processes.

If You have any questions or concerns regarding the way in which Your personal information is used, please contact Us at [privacy@bloomsafely.com](mailto:privacy@bloomsafely.com).

This Privacy Policy was last updated Feb. 28, 2021.