

# **T1 Pal Privacy Policy**

## **EFFECTIVE October 1, 2021**

Your information and your privacy are important — to you and to us. This policy explains how we use your information and how we keep it safe.

## **When This Policy Applies**

This Privacy Policy (Policy) covers the information generated when you use or subscribe to any and all products, services, apps, websites or networks of Medical Data Networks, LLC (DBA: MDN, T1Pal, CoPilot) to which this policy is linked. In the policy, we call them Products or Services for short.

This Policy applies to you and anyone who uses our Products or Services under your account, except where we identify for you that separate MDN privacy policies or terms and conditions apply.

## **You Are Responsible**

You are responsible for making sure all users under your account understand and agree to this Policy.

Here are special circumstances where this Policy may not apply, or may apply in addition to other policies:

Some of our Products or Services – for example the MDN Nightscout service rely on transmitting and/or receiving information to other products or services not operated by MDN. Our privacy policy does not cover those products or services not operated by MDN.

- Some areas both inside and outside of the United States - for example California and the European Union - require us to adopt different policy terms and commitments in accordance with local laws.
- In certain cases, when you are using your MDN Products or Services, other companies may be collecting information, so that your information may be covered by this Policy and other privacy policies at the same time. For example, if you purchase one of our Products or Services from a distributor or medical clinic, and/or if you use our services to connect to a social networking service, and/or if you provide your information to another company through a co- branded website, app or service controlled by the other company. In each such case, any information you provide to those companies may be subject to just their policy, or subject to both their policy and ours.

- If you are an MDN medical affiliate and/or a business customer, we may have written Product or Service agreements that contain specific provisions about confidentiality, security or handling of information. When one of those agreements differs from or conflicts with this Policy, the terms of those agreements will apply instead.

## **The Information We Collect**

We collect information about you and how you are using our Products or Services along with information about your devices and equipment. This may include performance information, along with web browsing, location and viewing information from connected products or services.

Here are detailed examples of types of information we collect from our Products or Services:

### **Account Information**

This includes things like contact and billing information, service- related details and history and similar information, including Customer Proprietary Network Information. It also includes technical, equipment and usage information that relate to the services, products, websites and networks we provide you.

### **Web Browsing and App Information**

This includes things like the websites you visit or mobile apps you use, on or off our networks. It includes internet protocol addresses and URLs, pixels, cookies and similar technologies, and identifiers such as

### **Advertising**

Advertising often uses personal IDs and/or device IDs. It can also include information about the time you spend on websites or apps, the links or advertisements you see, search terms you enter, items identified in your online shopping carts and other similar information.

### **Equipment Information**

This includes information that identifies or relates to equipment connected to our services or products, such as type, identifier, status, settings, configuration, and/or software release.

### **Product Performance And Usage**

This information includes information about our products and services, including your use of Products or Services or equipment on the networks, and how they

are performing.

## **Location Information**

This includes your street address, your ZIP code and where your device is located. Location information is generated when the devices, Products or Services you use interact with cell towers, Wi-Fi routers, Bluetooth services, access points, other devices, beacons and/or with other technologies, including GPS satellites.

## **Medical Information**

This may be generated when you use our services, such as apps, web sites, or a streaming service. We get information from the technologies you use when you use our products or services.

## **How we collect your information**

We collect your information in 3 ways

- You give it to us when you make a purchase, set up an account or otherwise directly communicate with us.
- We automatically get it when you use, or your device uses, our Products or Services.
- We get it from outside sources like credit reports, marketing mailing lists, and commercially available geographic and demographic information, along with other available information, such as public posts to social networking sites.

## **How we use your information**

We use your information to power our services and to improve your experiences.

We may or may not use your information to provide, support, improve, protect, analyze and bill for our products, service and network; to communicate with you about your service, products or apps; to market our services; to detect and avoid fraud; for advertising; and for research purposes.

Here are examples of ways we may use your information:

- Providing our Products and Services.
- Contacting you.
- Improving your experience and protecting the Products and Services we offer. This includes things like customer care, network security, verifying or

authenticating your identity, detecting fraud , billing and collection, protecting your financial accounts, authorizing transactions and the development of future Products and Services.

- Helping us plan, deploy, improve, protect and defend our network infrastructure, detecting and preventing fraud, and protecting our property and legal rights.
- Understanding the Products, Services and offers that you, and other MDN customers with whom you call and text and interact, might enjoy the most.
- Creating engaging and customized experiences and offering new or improved Products and Services or offers. This is based on things like the information we've collected and our research, development and analysis.
- Designing and delivering advertising and marketing campaigns to you and others and measuring their effectiveness.
- Delivering or customizing products and the content you see, including advertisements, articles, videos, and marketing materials.
- Creating aggregate business and marketing insights, and helping companies develop aggregate insights to improve their business (for instance, to market their products and services).
- Preventing and investigating illegal activities and violations of our Terms, Use Policies and other service conditions or restrictions.

## **We share it with your permission.**

- We share it across MDN services, vendors, and other associates.
- We share it with non-MDN companies or entities as explained in this Policy.
- We share information with MDN affiliates

Our Products and Services may be developed, managed, marketed and may be sold by a variety of affiliates. We share information that may identify you personally internally among our affiliates.

For information collected under this Policy, we require the affiliate to protect the information consistent with this Policy. We may also combine information that identifies you personally with data that comes from an app or affiliate that has a different privacy policy. When we do that, our Policy applies to the combined data set.

- We share information with non-MDN companies that provide services for us or for you

- We share information that identifies you personally with vendors that perform services for us or that support Products or Services provided to you, including marketing or ad delivery services. We do not require consent for sharing with our vendors for these purposes. We do not allow those vendors to use your information for any purpose other than to perform those services, and we require them to protect the confidentiality and security of data they get from us in a way that's consistent with this Policy.
- We share information with non-MDN companies to enable third party services to you:
- We may share information with non-MDN companies for their purposes to provide you services such as verifying or authenticating your identity, detecting fraud, protecting your financial accounts, and authorizing transactions.

We do not require proof of your explicit consent before sharing your information that identifies you personally for this purpose. We do not allow those non-MDN companies to use it for any purpose other than to perform those services, and we require them to protect the confidentiality and security of data they get from us in a way that's consistent with this Policy.

In some cases, to facilitate these programs, we will use or share identifiers such as your phone or account number. These identifiers are only used for network authentication, to detect fraud, for identity verification, or for the linking of devices you own to authenticate you.

There are also times when we provide information that identifies you personally to other companies and entities, such as government agencies, credit bureaus and collection agencies, without your explicit consent, but where authorized or required by law.

## **Reasons to share include:**

\*Complying with court orders, subpoenas, lawful discovery requests and as otherwise authorized or required by law. Like all companies, we are required by law to provide information to government and law enforcement agencies, as well as parties to civil lawsuits.

- Detecting fraud.
- Providing or obtaining payment for your service.
- Enforcing our legal rights, protecting our network and property or defending against legal claims.
- Complying with legal requirements to share the names, addresses and telephone numbers of customers .

- Providing name and number information for wireline and wireless CallerID and related services, like Call Trace. This means a person receiving a call can see the name and number of the caller.

## **Sharing Metrics Reports with non-MDN companies**

Sometimes the services you enjoy from us directly involve other businesses. We may share all of our information to them as a means of improving both their services as well as ours.

## **Sharing Information For Research**

We may share information that doesn't identify you personally with other companies and entities for research. When we share this information, we require companies and entities to agree not to attempt or to allow others to use it to identify individuals. Our agreements will also prevent businesses from reusing or reselling the information, and require that they will handle it in a secure manner, consistent with this Policy.

When a governmental entity obtains a court order, we're authorized to disclose personally identifiable information collected from a subscriber as a result of the subscriber's use of any of our products or services.

## **Security**

We work hard to safeguard your data using a range of technological and organizational security controls.

We maintain and protect the security of computer storage and network equipment, and we use security procedures that require employees to authenticate themselves to access sensitive data. We also limit access to personal information only to those with jobs requiring such access.

- We require callers and online users to authenticate themselves before providing account information.
- No security measures are perfect, however. We can't and don't guarantee that your information will never be disclosed in a manner inconsistent with this Policy. If a breach were to occur, we may notify you as required by applicable law.

## **Data storage, transfer, retention and accuracy**

We take steps to ensure that data is processed according to this Policy and to the requirements of applicable law of your country and of the additional countries where the data is subsequently processed.

Data we collect may be processed and stored in the United States or in other countries where we or our affiliates or service providers process data.

When we transfer personal data from the European Economic Area to other countries, we use a variety of legal mechanisms to help ensure all applicable laws, rights and regulations continue to protect your data.

We keep your information as long as we need it for business, tax or legal purposes. But we cannot and do not offer guarantees that your information is effectively saved or reused for any purpose.

## **Other privacy information**

### **Changes In Ownership Or To The Policy**

Information about our customers and users, including information that identifies you personally, may be shared and transferred as part of any merger, acquisition, sale of company assets or transition of service to another provider. This also applies in the unlikely event of an insolvency, bankruptcy or receivership.

We may update this Policy as necessary to reflect changes we make and to satisfy legal requirements. We'll post a prominent notice of material changes on our websites. We'll give you reasonable notice before any material changes take effect.

### **Information Specific To Children**

We don't knowingly collect personally identifying information from anyone under the age of 13 unless we first get permission from the child's parent or legal guardian. Unless we have parental consent, we will not contact a child under the age of 13 for marketing purposes. Information about our collection, use or sharing of, and your choices and controls with respect to such information, is found in [Learn more](#).

- If you create an MDN e-mail sub-account for a child under the age of 13, then with your explicit permission, we collect your child's name, nicknames and aliases, alternative e-mail address, birth date, gender and ZIP code.
- We use the information collected on sub-accounts to create and maintain those accounts, for research, to customize the advertising and content seen on our pages, and for other marketing purposes.

- Your child can use their MDN e-mail address and password to log onto websites and online services provided by us.
- Information collected from devices or services purchased by adult subscribers that are used by children without our knowledge will be treated as the adult's information under this Policy.
- We and our advertising partners may collect, use or share information about customers who log onto those sites as described in the Information we collect, how we collect your information, how we use your information and how we share your information sections of this Policy.

## **Your California Privacy Rights And other Information For Our California Customers**

- We comply with special legal requirements for California residents associated with access, deletion and sale or sharing of residents' data and application of do not track notices.
- Website Data Collection: We don't knowingly allow other parties to collect personally identifiable information about your online activities over time and across third party websites for their own use when you use our websites and services, unless we have your consent.

### **Do Not Track notice:**

We don't currently respond to Do Not Track and similar signals.