STETHOPHONE PRO Privacy Policy

Last Update: August 21, 2026

This notice describes how Personal Data and/or information about you may be used and disclosed and how you can obtain access to this information. Please review it carefully before using Stethophone Pro.

INTRODUCTION

We at Sparrow Acoustics Inc. (“**we**”, “**us**”, “**Company**”, or “**Sparrow Acoustics**”) value your privacy and are committed to keeping your personal data confidential. We use certain data solely in the context of providing a mobile application (“**Stethophone Pro**”) to (i) healthcare providers and clinical staff (“**Provider Users**”) to listen and record heart and lung sounds recorded by the healthcare practitioner or by the order of the healthcare practitioner (**"Chest Sound Data"**) for further analysis within diagnostic decision-making in clinical or non-clinical environments, and/or (ii) patients by prescription or order of licensed healthcare practitioners to enable them to record and share their Chest Sound Data and disease tags and notes that they input in Stethophone Pro (**“Examination Data”**) with their healthcare practitioner (“**Consumer User**”). Sounds captured and amplified by Stethophone Pro can be recorded and stored for later use or assessment by Provider Users and Consumer Users and can be shared with third parties that the Provider User or Consumer User authorizes (each, an “**Authorized Third Party**”). To view certain data that is shared with

them, Authorized Third Parties must create a User Account (as defined below). Provider Users, Consumer Users, and Authorized Third Parties who create a User Account to view data shared with them are collectively referred to in this Privacy Policy as "**Users**." Stethophone Pro and all relevant content and functionality associated with Stethophone Pro are collectively referred to as the "**Services**."

Stethophone Pro Privacy Policy Applicability

This Privacy Policy applies to personal data ("Personal Data") that Sparrow Acoustics collects from Users of Stethophone Pro. The term "Personal Data" includes any information that can be used on its own or with other information in combination to identify or contact one of our Users.

We believe that privacy and transparency about the use of your Personal Data are of utmost importance. In this Privacy Policy, we provide you with detailed information about our collection, use, maintenance, and disclosure of your Personal Data. The Privacy Policy explains what kind of information we collect, when and how we might use your Personal Data, how we protect Personal Data, and your rights regarding your Personal Data.

For additional information related to how we use and disclose your Personal Data, ***please contact our Data Privacy Officer at privacy@sparrowbioacoustics.com***.

Note regarding third-party sites: Our Services do not currently contain links to other sites that are not operated

by Sparrow Acoustics. However, if you click a third-party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy(ies) of every site you visit. Sparrow Acoustics has no control over and assumes no responsibility for the content, privacy policies, or practices of any third-party sites or services. ***This Privacy Policy does not apply to your use of or access to any third-party sites or services.***

Agreement to Stethophone Pro Privacy Policy Terms

BY SELECTING THE CHECKBOX "BY SELECTING, I CLEARLY CONSENT TO SPARROW ACOUSTICS INC. PROCESSING OF MY PERSONAL AND HEALTH DATA ON THE TERMS AND CONDITIONS AND IN THE MANNER DESCRIBED IN THE PRIVACY POLICY" YOU ARE ACKNOWLEDGING THAT YOU HAVE READ, UNDERSTOOD AND AGREE TO THE PROVISIONS OF THE STETHOPHONE PRO PRIVACY POLICY AND AFFIRM THAT THE STETHOPHONE PRO PRIVACY POLICY IS A PART OF THE STETHOPHONE PRO TERMS & CONDITIONS.

Stethophone Pro Privacy Policy Updates

Please note that ***we occasionally update this Privacy Policy, and it is your responsibility to stay up to date with any amended versions.*** Any material revisions to Stethophone Pro Privacy Policy will be presented for your acceptance on your next login into Stethophone Pro. Any changes to Stethophone Pro Privacy Policy will be effective immediately upon providing notice via the Stethophone Pro login page and will apply to all Personal

Data that we maintain, use, and disclose. If you continue to use the Services and Stethophone Pro following such notice, you are agreeing to those changes.

Account Deletion

If at any point you no longer agree to the use and disclosure of Personal Data, as described in this Privacy Policy, you can delete your User Account ("**User Account**") through Stethophone Pro and/or by sending a deletion request to privacy@sparrowbioacoustics.com with the following information:

- Your login email address; and
- A statement that you are requesting account deletion.

Questions or Concerns

If you have any questions or concerns after reading this Privacy Policy, please do not hesitate to contact us at privacy@sparrowbioacoustics.com. We appreciate your feedback.

COLLECTION AND USE OF PERSONAL DATA

What Personal Data Does Sparrow Acoustics Collect?

We collect six types of information from Users (collectively, "**Personal Data**"): (i) demographic data; (ii) examination data; (iii) examination information (notes) data; (iv) support data; (v) technology data; (vi) geolocation data; and (vii) network and connection data (for certain customers). Each category of data is explained in depth below.

Demographic Data: Sparrow Acoustics collects demographic data that you provide to us, which may

include, but not be limited to, your email address (your "**Demographic Data**"). The collection of this demographic data is primarily used to create your User Account, which you can use to securely access the Services and enable you to share your Chest Sound Data.

Examination and Chest Sound Data: As part of the Services, Sparrow Acoustics will analyze and store heart and lung sound files that you record ("Chest Sound Data"). Along with these recordings, we may collect disease tags and notes that you input on Stethophone Pro ("Examination Data"). We use Chest Sound Data and Examination Data to provide you with the Services and to improve Stethophone Pro and the Services in accordance with this Privacy Policy. IF WHILE RECORDING HEART AND LUNG SOUND, YOU ACCIDENTALLY RECORD OTHER SOUNDS THAT MAY CONTAIN PERSONAL DATA (E.G., A CONVERSATION) OF OTHER INDIVIDUALS, SPARROW ACOUSTICS IS NOT RESPONSIBLE FOR THIS. **FOR THE AVOIDANCE OF DOUBT, CHEST SOUND DATA AND EXAMINATION DATA ARE NOT "PROTECTED HEALTH INFORMATION" OR "PHI" AS THAT TERM IS DEFINED IN 45 C.F.R. 160.103.**

Examination Information (Notes) Data: As part of the Services, Sparrow Acoustics may collect information (notes) that you input on Stethophone Pro, including if and when you choose to share Chest Sound Data and/or Examination Data with Authorized Third Parties. WHEN ADDING EXAMINATION INFORMATION (NOTES)

THROUGH STETHOPHONE PRO, DO NOT SUBMIT SENSITIVE PERSONAL INFORMATION (i.e., credit card information, social security or other identification numbers, etc.) AS THIS INFORMATION MAY BE ACCESSIBLE TO AUTHORIZED THIRD PARTIES.

Support Data: If you contact us for support or to lodge a complaint, we may collect certain information from you that may qualify as Personal Data, including mobile device and application identification numbers (e.g., universally unique identifiers or a "**UUID**"), mobile device model, your operating system, Demographic Data contained in your User Account, the Chest Sound Data and Examination you have recorded using Stethophone Pro, and the other data required to resolve your request ("**Support Data**"). Support Data will be used for the purposes of troubleshooting, customer support, software updates, and improvement of Stethophone Pro and the Services in accordance with this Privacy Policy.

Technology Data: We may use common information-gathering and third-party analytical tools and similar technologies to automatically collect information, which may contain Personal Data from your mobile device as you navigate and use Stethophone Pro or interact with emails, our social media you interacted with, or other communications we have sent you. The information we collect may include your mobile device and application identification numbers (including UUID, custom identification numbers for purposes of multi-factor authentication), mobile device model, your operating

system, and date/time stamps associated with your usage and other usage data (collectively, "**Technology Data**"). Technology Data is used to analyze overall trends, help us provide and improve our Services and marketing, determining the effectiveness of our promotional campaigns, and ensure the proper functioning and security of Stethophone Pro and the Services.

Geolocation Data: With your consent, we may collect information about your location from your mobile device ("**Geolocation Data**"). We use Geolocation Data for the purposes of classifying Chest Sound Data that you input into Stethophone Pro, analyzing overall trends, providing and improving our Services, and enforcing network-based access controls (for certain customers). You may opt out of processing of Geolocation Data at any time in Stethophone Pro Settings or by accessing your mobile device settings and turning location services off.

Network and Connection Data (for certain customers): For organizations that have enabled network-based access controls (such as the optional Wi-Fi restriction for operating within specific medical facilities), we may collect certain network information when you use Stethophone Pro (only when geolocation is enabled in your mobile device settings). This may include the Wi-Fi network IP and name (SSID) that are necessary to verify whether the device is connected to an Authorized Network designated by your organization and to enforce on-premises use limitations. For organizations that do

not enable such configurations, this information is not collected or used for access control purposes.

How Will Sparrow Acoustics Use Personal Data?

Sparrow Acoustics processes your Personal Data as a Personal Data controller based on legitimate business interests, the fulfillment of our Services to you, compliance with our legal obligations, and/or at your direction or with your consent.

For Ukraine: Personal Data collected through Stethophone Pro is processed by Sparrow Acoustics based on the consent.

We only disclose your Personal Data when it is legally mandated, where it is necessary to fulfill those purposes described in this Privacy Policy, and/or at your direction or with your consent. Where required by law, we will ask for your prior consent before disclosing your Personal Data to a third party.

By selecting the checkbox in Stethophone Pro “BY SELECTING, I CLEARLY CONSENT TO SPARROW ACOUSTICS INC. PROCESSING OF MY PERSONAL DATA ON THE TERMS AND CONDITIONS AND IN THE MANNER DESCRIBED IN THE PRIVACY POLICY” you at the same time give consent to the disclosure (dissemination, sharing, transferring) of Personal Data, namely Chest Sound Data to anybody and in any way. If you have any concerns about the scope of Personal Data and to whom and how it may be disclosed, please send it to privacy@sparrowbioacoustics.com.

More specifically, Sparrow Acoustics processes your Personal Data for the following legitimate business purposes:

- To enable you to use Stethophone Pro and to provide you with the Services;
- To provide Authorized Third Parties with access to Chest Sound Data and Examination Data you possess within our system, if you authorize the sharing of such Personal Data;
- To fulfill our obligations to you under the Stethophone Pro Terms & Conditions;
- To communicate with you about your User Account, the Services, to obtain feedback, to manage your User Account;
- To send you newsletters, marketing, advertisements, promotional materials, other messages not related to Your User Account or the Services;
- To properly store and track your Personal Data within our system;
- To respond to lawful requests from public and government authorities, and to comply with applicable provincial/territorial/state/federal law, including cooperation with judicial proceedings and court orders;
- To protect our rights, privacy, safety, or property, and/or that of you or others by providing proper notices, pursuing available legal remedies, and acting to limit our damages;
- To handle customer support and other requests from you;

- To enforce and ensure your compliance with the Stethophone Pro Terms & Conditions or the terms of any other applicable services agreement we have with you;
- To manage and improve our operations and Stethophone Pro, including through research and development of additional functionality (e.g., artificial intelligence (AI) tools);
- To provide educational, research and other scientific activities, including the publishing of research. Note: Sparrow Acoustics bears no responsibility for educational, research and other scientific activities performed by the third parties using Stethophone Pro without a special agreement with Sparrow Acoustics.
- To evaluate the quality of service you receive and improve your user experience;
- To keep our Stethophone Pro safe and secure;
- To send you information about changes to our terms, conditions, and policies;
- To enable you to view Chest Sound Data and Examination Data or to enable you to share your Chest Sound Data and Examination Data with other people of your choice using the Stethophone Pro functionality, if you are a Provider User, to analyze the patient's Chest Sound Data and Examination Data and/or share it with others if the patient authorized the sharing of such Personal Data;
- To monitor the dynamics of Stethophone Pro usage in order to analyze overall trends, help us provide and

improve our Services and marketing, and ensure the proper functioning and security of Stethophone Pro and the Services;
- To enforce agreed restrictions on where Stethophone Pro may be used (for example, only within designated facilities and on Authorized Networks), in case your organization has enabled network-based access controls.

As part of improving and validating our artificial intelligence and algorithmic tools, we may use Chest Sound Data, Examination Data, and related usage information to train, test, and evaluate our models. Where feasible, we will de-identify or anonymize such data before using it for these purposes, in accordance with applicable law and this Privacy Policy.

Where Is Personal Data Processed?

The Personal Data we collect through Stethophone Pro will be stored or maintained in encrypted form on secure servers provided by third parties in the United States, Canada and/or countries of the European Union. These third parties are not permitted to transfer your Personal Data, unless otherwise provided by national legislation.

For Ukraine: By selecting the checkbox in Stethophone Pro “BY SELECTING, I CLEARLY CONSENT TO SPARROW ACOUSTICS INC. PROCESSING OF MY PERSONAL AND HEALTH DATA ON THE TERMS AND CONDITIONS AND IN THE MANNER DESCRIBED IN THE PRIVACY POLICY” you simultaneously provide unambiguous consent to the

transfer of your Personal Data to foreign subjects to the territory of other states (cross-border transfer), including the United States, Canada, and/or countries of the European Union, provided that the relevant states ensure proper protection of Personal Data. If you have any concerns about the above, please send it to privacy@sparrowbioacoustics.com.

With Whom Does Sparrow Acoustics Share Personal Data?

We may share your personal information with the following categories of individuals/entities:

Business Partners and Vendors: We share Personal Data with a limited number of partners, service providers, and other persons/entities who help run our business ("**Business Partners**"). Specifically, we may employ third-party companies and individuals to store your Personal Data, facilitate our Services, provide Services on our behalf, perform Service-related functions, or assist us in monitoring and analyzing how our Services are used. Our Business Partners are contractually bound to protect your Personal Data and to use it only for the limited purpose(s) for which it is shared. Business Partners' use of Personal Data may include, but is not limited to, the provision of services such as marketing services, infrastructure, data hosting, and IT services.

Presently, Sparrow Acoustics uses the following Business Partners: Amazon Web Services (AWS).

Our Advisors: We may share your Personal Data with third parties that provide advisory services to Sparrow Acoustics, including, but not limited to, our lawyers, auditors, accountants, and banks (collectively, "**Advisors**"). Personal Data will only be shared with Advisors if Sparrow Acoustics has a legitimate business interest in the sharing of such data.

Third Parties Upon Your Direction or Consent: You may share your Personal Data with third parties that you identify using the Stethophone Pro functionality. You may direct Sparrow Acoustics to share your Personal Data with third parties that you identify. Specifically, Stethophone Pro enables Users to share Chest Sound Data, Examination Data, and Examination Information (Notes) Data directly with Authorized Third Parties. Authorized Third Parties will not be permitted to modify or delete any Chest Sound Data, Examination Data, or Examination Information (Notes) Data stored on your User Account. HOWEVER, ONCE CHEST SOUND DATA, EXAMINATION DATA, AND/OR EXAMINATION INFORMATION (NOTES) DATA ARE SHARED WITH AN AUTHORIZED THIRD PARTY, SUCH SENDING CANNOT BE CANCELED. FURTHER, ONCE CHEST SOUND DATA, EXAMINATION DATA, AND/OR EXAMINATION INFORMATION (NOTES) DATA ARE SHARED WITH AN AUTHORIZED THIRD PARTY, DELETION OF PERSONAL DATA FROM YOUR USER ACCOUNT WILL NOT AUTOMATICALLY PROHIBIT AUTHORIZED THIRD PARTIES FROM VIEWING SUCH DATA. SPARROW

ACOUSTICS IS NOT AND WILL NOT BE RESPONSIBLE FOR ANY AUTHORIZED THIRD PARTY'S PROCESSING OF YOUR PERSONAL DATA ONCE IT IS SHARED.

Third Party Research: We may share aggregated and/or anonymized User data, which cannot be reasonably used to identify you, with third parties for research purposes if such research can help us provide our Users with better services or improve the app's functionality. We also reserve the right to use aggregated, statistically reworked, and/or anonymized User data, which cannot be reasonably used to identify you, to publish research that contributes to open science.

Third Parties Pursuant to Business Transfers: In the event of a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of the Sparrow Acoustics corporate entity, assets, or stock (including in connection with any bankruptcy or similar proceedings), we may share your Personal Data with a third party.

Government and Law Enforcement Authorities: If reasonable, necessary, and permitted under applicable law, we may share your Personal Data to (i) comply with legal processes or enforceable governmental requests, or as otherwise required by law; (ii) cooperate with third parties in investigating acts or omissions that violate this Privacy Policy or the Stethophone Pro Terms & Conditions; or (iii) bring legal action against someone who may be violating the Stethophone Pro Terms & Conditions or who may be causing intentional or

unintentional injury or interference to the rights or property of Sparrow Acoustics or any third party, including other users of our Services.

What Protections Do Business Partners with Whom Sparrow Shares Personal Data Have in Place?

Sparrow Acoustics carefully selects Business Partners with whom it shares Personal Data, if any. Our Business Partners, and any parent companies, subsidiaries, or related entities, who access, store, and/or use your Personal Data have agreed to comply with applicable privacy laws and to implement reasonable safeguards to protect your Personal Data. We use commercially reasonable efforts to engage with Business Partners that post policies and notices describing their collection, retention, processing, and use of personal information. For further information regarding the access and use of your information by a Business Partner, please review their privacy policy and/or notice.

How Long Does Sparrow Acoustics Retain Personal Data?

Sparrow Acoustics retains your Personal Data only as long as necessary and as required for our business operations, the provision of Services, archival purposes, and/or to satisfy legal requirements of different countries.

For Ukraine: Sparrow Acoustics retains your Personal Data only as long as necessary and as required to achieve the legitimate purposes for which the Personal Data was collected or processed with the possibility of further

processing of it for historical, statistical, or scientific purposes, provided that it is properly protected.

The exact period of retention will depend on: (i) the amount, nature, and sensitivity of the Personal Data; (ii) the personal risk of harm for unauthorized use or disclosure; (iii) the purposes for which we process your Personal Data, including whether those purposes can be achieved through other means; and (iv) business operations and legal requirements. In general, Sparrow Acoustics strives to retain your data for no longer than twenty-five (25) years after your User Account is deleted in order to comply with applicable law (the "**Retention Period**"); however, the above factors may extend or decrease this Retention Period.

At the end of the applicable Retention Period, we will remove Personal Data of your deleted account from our databases and will require that our Business Partners remove any identifiable Personal Data from their databases. If there is any data that we are unable to delete entirely from our systems for technical reasons, we will put in place appropriate measures to prevent any further processing of such data. ***Please note that once we disclose your Personal Data to third parties, we may not be able to access that Personal Data and we cannot force the deletion or modification of such information by third parties.***

Unless otherwise prohibited by applicable law or restricted by contractual obligations to our Users, Sparrow Acoustics may continue using and disclosing

de-identified and/or aggregated data indefinitely, even after Personal Data has been removed from Sparrow Acoustics databases. We may continue to disclose de-identified data to third parties in a manner that does not reveal personal information, as described in this Privacy Policy.

What Happens to Personal Data Submitted by Minors?

Sparrow Acoustics does not knowingly collect Personal Data for purposes of setting up a User Account from individuals under the age of 22. Additionally, our Services are not directed to individuals under the age of 22. We request that these individuals not provide Personal Data to us. If we learn that Personal Data from users under the age of 22 has been collected, we will deactivate the User Account associated with that data and take reasonable measures to promptly delete such data from our records. If you are aware of a user under the age of 22 accessing the Services or Stethophone Pro, please contact us at privacy@sparrowbioacoustics.com.

IF YOU ARE A PROVIDER USER: Please note that Stethophone Pro is intended to be used to care patients who are 22 years of age or older ONLY.

If you are a resident of California under the age of 22 and have registered for a User Account with us, you may ask us to remove content or information that you have posted to Stethophone Pro.

For Ukraine and Canada: The restrictions set forth in the paragraph «What Happens to Personal Data Submitted

by Minors?» of this Privacy Policy applies in Ukraine and Canada to individuals under the age of 18.

YOUR RIGHTS

What Rights Do Users Have Concerning Their Personal Data?

As a User of Stethophone Pro, you have certain rights relating to your Personal Data. These rights are subject to local data protection and privacy laws and may include the right to:

- Access Personal Data held by Sparrow Acoustics, including information about whether your Personal Data is processed;
- Erase/delete your Personal Data, to the extent permitted by applicable data protection and privacy laws and to the extent technologically feasible;
- Be informed regarding and/or receive communications related to the processing of your Personal Data;
- Restrict the processing of your Personal Data to the extent permitted by law;
- Object to the further processing of your Personal Data, including the right to object to marketing;
- Request that your Personal Data be transferred to a third party, if possible;
- Receive your Personal Data in a structured, commonly used, and machine-readable format;
- Rectify inaccurate Personal Data and, taking into account the purpose of processing the Personal Data, ensure it is complete; and/or

- Make a complaint to a relevant data protection authority, to the extent permitted by applicable data protection and privacy laws.

For Ukraine: As a subject of Personal Data, you have additional rights to:

- Know about the sources of collection, the location of your Personal Data, the purpose of its processing, the location or place of residence (stay) of the controller or processor of Personal Data, or to give the relevant instructions for obtaining this information to the authorized persons, except for cases established by law;
- Receive information about the conditions of access to Personal Data, including information about third parties to whom your Personal Data is transmitted;
- Have access to your Personal Data;
- Receive no later than thirty calendar days from the date of the request, except in cases provided by law, a response on whether your Personal Data is being processed, and to receive the content of such Personal Data;
- Present a reasoned demand to the controller of Personal Data with objections against the processing of your Personal Data;
- Present a reasoned demand for the modification or destruction of your Personal Data by any controller or processor of Personal Data if these data are processed unlawfully or are inaccurate;
- Protect your Personal Data from unlawful processing and accidental loss, destruction, damage due to

intentional concealment, failure to provide or untimely provision, as well as to protect against providing information that is inaccurate or defames honor, dignity, and business reputation of an individual;

- File complaints about the processing of your Personal Data to the Ukrainian Parliament Commissioner for Human Rights or to the court;
- Apply legal protection measures in case of violation of the legislation on personal data protection;
- Make concerns regarding the limitation of the right to process your Personal Data when giving consent;
- Withdraw consent to the processing of Personal Data;
- Know the mechanism of automatic processing of Personal Data;
- Be protected from an automated decision that has legal consequences for you.

Where the processing of your Personal Data by Sparrow Acoustics is based on consent, you have the right to withdraw that consent at any time. If you would like to withdraw your consent or exercise any of the above rights, please contact us at privacy@sparrowbioacoustics.com.

How Can Users Update, Correct, or Delete Personal Data or Their User Accounts?

You have the right to request restrictions on the uses and disclosures of your Personal Data. While we are not required to agree to all restriction requests, we will attempt to accommodate reasonable requests when appropriate.

If you need to make changes or corrections to the information contained in your User Account, you may contact us at support@stethophone.com or our support portal support.stethophone.com. To comply with certain requests to limit the use of your Personal Data or in the event of a recall, we may need to terminate your ability to access and/or use some or all of the Services. BY REQUESTING TO LIMIT THE USE OF YOUR PERSONAL DATA OR DELETE PERSONAL DATA, YOU ACKNOWLEDGE AND AGREE THAT SPARROW ACOUSTICS WILL NOT BE LIABLE TO YOU FOR ANY CORRESPONDING LIMITATION IN THE SCOPE OF SERVICES OR TERMINATION OF SERVICES AS NECESSARY TO COMPLY WITH YOUR REQUEST.

You have the right to request the deletion of any Personal Data from your User Account. To request the deletion of your Personal Data, please email us at privacy@sparrowbioacoustics.com and include a description of the Personal Data you would like removed. We will respond to all requests for data deletion as soon as reasonably possible.

By selecting the checkbox in Stethophone Pro “BY SELECTING, I CLEARLY CONSENT TO SPARROW ACOUSTICS INC. PROCESSING OF MY PERSONAL DATA ON THE TERMS AND CONDITIONS AND IN THE MANNER DESCRIBED IN THE PRIVACY POLICY” you understand that once Chest Sound Data is anonymized in the database for use in research or other purposes, we will

have no means of tracking your records and linking them to you.

Should you decide to delete your User Account, you can do so by accessing the Stethophone Pro Settings. By terminating your User Account, you agree that you will not be able to access or restore any information previously contained in your User Account. You further understand that it may not be legally or technologically possible to remove all of your Personal Data from our systems. While we will use reasonable efforts to remove your Personal Data, the need to back up our systems to protect information from inadvertent loss means a copy of your Personal Data may exist in a non-erasable form that will be difficult or impossible for us to locate or remove.

SAFEGUARDING PERSONAL DATA

Is Personal Data Secure?

Sparrow Acoustics understands the importance of data confidentiality and security. We use a combination of reasonable physical, technical, and administrative security controls to (i) maintain the security and integrity of your Personal Data; (ii) protect against any threats or hazards to the security or integrity of your Personal Data; and (iii) protect against unauthorized access to or use of such information in our possession or control that could result in substantial harm to you.

If Sparrow Acoustics receives, maintains, or transmits PHI, we shall only use and disclose that information in

accordance with HIPAA, as amended, and its implementing regulations. We will apply reasonable and appropriate measures to safeguard the confidentiality, integrity, and availability of any PHI we receive, maintain, or transmit. Under HIPAA, healthcare professionals are required to provide or make available a Notice of Privacy Practices ("**NPP**") to patients. The NPP is intended to explain to patients the ways in which healthcare professionals use and share PHI and to inform patients about their health privacy rights. **SPARROW ACOUSTICS IS NOT RESPONSIBLE FOR A USER'S USE OR SHARING OF PATIENT PHI OR THE DISTRIBUTION OF ANY REQUIRED NPP TO PATIENTS.**

While we maintain industry standard and/or legally required administrative, technical, and physical safeguards designed to protect Personal Data against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use, no method of transmission of data over the Internet, or any other method of electronic storage or transmission, is 100% secure. WE WILL TAKE ALL POSSIBLE SAFEGUARDS DESIGNED TO PROTECT YOUR PERSONAL DATA, BUT **WE CANNOT GUARANTEE OR WARRANT** THAT OUR PHYSICAL, TECHNICAL, AND ADMINISTRATIVE CONTROLS WILL PREVENT UNAUTHORIZED ENTRY OR USE, HARDWARE OR SOFTWARE FAILURE, AND OTHER FACTORS THAT MAY COMPROMISE THE SECURITY OF YOUR PERSONAL DATA. YOU UNDERSTAND AND AGREE THAT THE RISKS DESCRIBED ABOVE EXIST.

Stethophone Pro software does not require you to enter any personally identifiable information in order to function. Records can be stored and recalled through the use of an arbitrarily assigned examination name. If you choose to enter a meaningful patient Name or patient Identifier, then **YOU AGREE TO ASSUME ANY AND ALL RISKS OF AND LIABILITIES INCURRED WITH TRANSMITTING AND STORING SUCH PERSONALLY IDENTIFIABLE INFORMATION** through Stethophone Pro, including risks to the privacy and security of such personally identifiable information.

What Safeguards Does Sparrow Acoustics Have in Place to Secure Personal Data?

Sparrow Acoustics stores Personal Data on secured servers and uses a combination of technical, administrative, and physical safeguards that include, but are not limited to, two-factor authentication, encryption (both in-transfer and at-rest), backups, and access controls.

How Can Users Protect Their Personal Data?

You are solely responsible for preventing unauthorized access to your User Account by protecting your account credentials and limiting access to the mobile device you use to operate Stethophone Pro. Sparrow Acoustics has no access to or control over your mobile device's security settings, and it is your responsibility to implement any security features and protections you feel are appropriate (e.g., password protection, encryption, remote wipe

capability). We recommend that you take all appropriate steps to secure any mobile device that you use to access our Services and Stethophone Pro and follow the cybersecurity precautions listed on the label of Stethophone Pro: please review the cybersecurity precautions on the label prior starting to use Stethophone Pro. In particular, we recommend that you protect the mobile device you use to access Stethophone Pro with a device passcode or screen lock and, where available, enable biometric authentication (such as Face ID or Touch ID) and automatic device encryption. These measures help prevent others from accessing the Personal Data, Examination Data, and Chest Sound Data accessible through your device if it is lost, stolen, or left unattended.

Please note that Sparrow Acoustics will never send you an email requesting confidential information, such as account numbers, usernames, passwords, or Social Security Numbers. If you receive a suspicious email from what you think is Sparrow Acoustics, please notify us at privacy@sparrowbioacoustics.com.

Further, if you know of or suspect any unauthorized use or disclosure of your User Account information or any other security concern, please notify Sparrow Acoustics immediately.

What If Sparrow Acoustics Experiences a Data or Security Breach?

Sparrow Acoustics takes the security of your Personal Data seriously. In the event of a data or security breach, Sparrow Acoustics will take the following actions: (i) promptly investigate the security incident, validate the root cause, and, where applicable, remediate any vulnerabilities within the control of Sparrow Acoustics that may have given rise to the security incident; (ii) comply with laws and regulations directly applicable to Sparrow Acoustics in connection with such security incident; (iii) as applicable, cooperate with any affected Sparrow Acoustics user or client in accordance with the terms of any contract between such user or client and Sparrow Acoustics; and (iv) document and record actions taken by Sparrow Acoustics in connection with the security incident and conduct a post-incident review of the circumstances related to the incident and actions/recommendations taken to prevent similar security incidents in the future. Sparrow Acoustics will notify you of any data or security breaches as required by and in accordance with applicable law.

ADVERTISING, MARKETING, TRACKING, AND OTHER COMMUNICATIONS

Does Sparrow Acoustics Send Marketing or Advertisement Materials?

Sparrow Acoustics may send you newsletters, marketing, advertisements, promotional materials, other messages

not related to your User Account or the Services. If you have any concerns about the above (for example, you want to opt out of receiving such communications), please send a message to privacy@sparrowbioacoustics.com.

Can Users Opt Out of Receiving Communications from Sparrow Acoustics?

We may send communications, including emails, to you regarding your User Account, the Services, Stethophone Pro, or to obtain feedback. You can choose to filter any emails from Sparrow Acoustics using your email settings, but many of our communications to you are time-sensitive and may affect your ability to access or use the Services and Stethophone Pro. We do not provide an option for you to opt out of these communications within your User Account or Stethophone Pro.

You can opt out of communications about newsletters, marketing, advertisements, promotional materials, other messages not related to Your User Account or the Services in the manner specified above.

What Is the Stethophone Pro Cookie Policy?

Cookies are small files that a web server sends to your computer or mobile device when you visit a web application that uses cookies to keep track of your activity on that site. Cookies also exist within applications when a browser is needed to view or display certain content within the application. Cookies hold a small amount of data specific to a web application, which can later be

used to help remember information you entered in the application (like your email or username), preferences selected, and movement within the application.

Presently, Stethophone Pro does not use any cookies.

Do Not Track Disclosure

Some web browsers may transmit do not track ("**DNT**") signals to websites with which the user communicates. To date, there is no industry standard for DNT and users cannot know how a given company responds to a DNT signal they receive from browsers. Sparrow Acoustics is committed to remaining apprised of DNT standards. ***Sparrow Acoustics does not track users via web browsers, support DNT browser settings, or currently participate in any DNT frameworks that would allow Sparrow Acoustics to respond to signals or other mechanisms regarding the collection of your personal information.***

CALIFORNIA PRIVACY RIGHTS

Under California Civil Code sections 1798.83-1798.84, California residents are entitled to ask for and obtain from us an annual list identifying the categories of personal customer information which we shared, if any, with our affiliates and/or third parties in the preceding calendar year for marketing purposes. This list will be provided free of charge. Contact information for such affiliates and/or third parties must be included. If you are a California resident and would like a copy of this notice, please submit a written request to the following address:

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