

## CLICK THERAPEUTICS, INC. PRIVACY POLICY

Effective Date: June 27, 2022

This Privacy Policy explains how Click Therapeutics, Inc. (“we”, “us”, “the Company”, or “Click”) collects personal information through our websites and mobile applications that refer or link to this Privacy Policy (the “Services”) and how we use and disclose that information. When we use the term “Personal Information” in this document, we mean any information relating to an identified or identifiable person.

By accepting this Privacy Policy during registration, or by visiting and/or using any of our Services, you expressly consent to our collection, use, and disclosure of your Personal Information (as described further below) in accordance with this Privacy Policy.

### 1. WHAT PERSONAL INFORMATION DO WE COLLECT?

We collect the following types of information from our users:

**Information You Provide to Us.** We collect and store information you enter on or through our Services or otherwise provide to us. The Personal Information we collect from you will vary depending on the Services you are using or the features you have enabled and how you access the Services. Personal Information you provide to us may include:

- Contact information such as your name, mobile phone number, email address, and home or business postal addresses.
- Demographic information such as your gender, birthdate, and age.
- General health information related to your condition or use of non-prescription aides in order for you to take advantage of certain features of the Services.
- Information collected through a digital therapeutics research study in which you participate, including your responses to lessons and treatment exercises, and information that you provide about the usability of the Services.
- Professional and employment-related information, such as your resume, cover letter, and any other information you choose to provide in your employment inquiries or applications.
- Information that enables you to create or log in to an account such as username, password, email address, phone number, or other contact information.
- Any other information you might provide when you contact us, such as when you contact us for technical support or customer service, or otherwise engage with us through the Services.

**Information Collected Automatically.** We collect certain information automatically when you use the Services (such as through cookies, Java scripts, or log files). The information that we collect automatically relates to your access to and use of the Services, including the following:

- *Log Data:* We automatically receive and record certain data on our server logs from your browser, including your IP address, and the page you requested.
- *Cookies:* We may collect cookies or other identifiers to recognize you when you arrive at our Services via an external link, such as a link appearing on a third-party site or in an email we sent to you.
- *Browser and Device Information:* Certain information is automatically collected by most websites, such as information about your device and your browser. For example, we may receive

device identifiers such as IP address and MAC address, operating system type and version, and Internet browser type and version.

- *Usage Data:* We may automatically collect information about your use of the Services, such as the time that you start and complete a lesson or exercise.
- *Email Analytics:* We may also receive an auto-generated confirmation when you open an email from us, if your computer supports this type of program.
- *Location Information:* We collect the general location of your device in cases where you use a mobile device to access our Services. Your general location also may be discernible from your device's IP address or the URLs we receive while you use the Services. If you choose to enable location services through our mobile apps or mobile websites, we will receive your precise, real-time location data.
- *Google Analytics Data:* Our websites use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies" to help us analyze how users use our websites. The information generated by the cookie about your use of the websites (including your IP address) will be transmitted to and stored by Google. To learn more about Google Analytics and how you can opt out, visit <https://tools.google.com/dlpage/gaoptout>. By using our websites, you consent to the processing of data about you by Google.
- *Calendar Information:* Some of our mobile applications may have functionality that enables them to access and collect certain information from your device's calendar application (and schedule events). This information may include whether your calendar indicates that you are free or busy during particular time frames.

We do not permit third parties to collect Personal Information through our Services concerning your activities over time across different websites or applications.

## **2. WHY DO WE USE AND DISCLOSE THE INFORMATION WE COLLECT?**

We may use and disclose the information collected through the Services (including Personal Information) for the following purposes:

- To provide the Services and supporting the features available to you.
- To communicate with you about our Services, including updates and new features or personalized messaging or reminders related to your goals.
- To respond to your emails, submissions, questions, comments, requests, and complaints and provide customer service.
- To monitor and analyze usage and trends, and to increase the functionality and user friendliness of our Services.
- To provide content or features that match your profile or interests.
- To determine your availability to schedule activities associated with the Services and to schedule those activities in your calendar application.
- To detect, prevent, investigate and address technical issues with our Services.
- To send you confirmations, updates, alerts, administrative messages and otherwise facilitate your use of, and our administration and operation of, our Services.
- To assist you in sending messages to your supporters using the Services, including text messages.
- To verify your identity.
- For our recruitment and hiring purposes, including evaluating and processing your employment application.

- To troubleshoot, de-bug, and otherwise address issues that may arise with the functionality of the Services.
- To evaluate requests that we receive from you, such as requests to exercise the choices you have regarding your Personal Information.
- For security purposes and for internal auditing and data analysis.
- To comply with legal obligations, industry standards, or regulatory requests or to enforce our rights arising from any agreements we have entered with you, such as the Terms of Use.
- To protect the rights, property, or safety of our company, our affiliates, our users, our customers, or others.
- For such purposes as we may separately describe when or prior to collecting personal information or in notices that are presented to you through your use of the Services, and for any such purposes that you otherwise authorize.

We also may aggregate or de-identify the Personal Information that we collect. Information that is aggregated or de-identified will not be subject to this Policy and will be used to the extent permissible under applicable law.

### **3. WITH WHOM DO WE SHARE INFORMATION?**

We may share or disclose your Personal Information:

- To our affiliates.
- To our business partners, such as collaboration partners with which we jointly provide or develop the Services or jointly provide or develop other services.
- To our contractors, service providers, and other third parties we use to support our organization and the Services. We take commercially reasonable steps designed to ensure that these third parties protect your Personal Information in a manner consistent with the terms of this Policy.
- To government agencies or other judicial, legal, or regulatory bodies, in order to comply with our legal obligations.
- To other organizations, such as a buyer or other successor in interest, in the event of a potential or actual merger or sale involving our business, including any transfer made as part of insolvency or bankruptcy proceedings. By continuing to use our Services, you acknowledge that if we sell or transfer our business (e.g., through an acquisition) or an asset (e.g., our mobile application) to another company, we will share your Personal Information with such company.
- To the employer or sponsor of a wellness program. If you are using the Services in connection with an employer wellness program or similar sponsored program, we may share certain information with the employer or sponsor of the program, such as to enable the employer or sponsor to provide the intended benefit offerings to you or evaluate the effectiveness of the program.
- To any organization as separately described when or prior to collecting personal information or that we identify in privacy notices that are presented to you through your use of the Services. We also may disclose personal information to organizations with your authorization or permission, such as when we request your consent to share information and you agree.

### **4. HOW DO WE RESPOND TO DO NOT TRACK SIGNALS?**

Our Services do not currently respond to browser-based do-not-track signals. Most web browsers automatically accept cookies, but you can modify your browser settings to decline or block cookies if you

prefer. In some cases, blocking or disabling cookies may prevent you from being able to use certain features of our Services.

## **5. HOW DO WE PROTECT YOUR PERSONAL INFORMATION?**

We employ administrative, physical, and technical measures designed to safeguard and secure Personal Information we collect through the Services. Your Personal Information may be accessible when you log-in to certain features of the Services. In those instances, you are responsible for keeping your user credentials and password confidential and secure so that your information is protected.

## **6. WHAT CHOICES DO I HAVE REGARDING MY PERSONAL INFORMATION?**

As stated previously, you can always opt not to disclose your Personal Information to us, even though it may be needed to take advantage of certain features of the Services. You also have the following rights or choices related to Personal Information we maintain about you:

- You may contact us to request to correct or amend your Personal Information using the contact information below.
- You may ask us to remove your records from our system or to delete your account. Please note that in certain circumstances, some personal information about you may remain in our records after deletion of your account, including any information or records we are legally or contractually obligated to retain.
- You may be able to opt out of location services through our mobile website and mobile app by changing your device settings to prohibit location tracking or blocking our app from collecting your location data.
- You may be able to choose not to allow us to access and collect certain information from your device's calendar application through your device settings.
- You may choose not to receive communications from us by indicating your preferences to us or using the opt-out or unsubscribe features included in our communications.

In certain circumstances, we may need to consult with and/or obtain the permission of a business partner, or refer you to that business partner, before deleting your account, or correcting, amending, or deleting the associated Personal Information. For example, if you are enrolled in the Services as part of a research study, we may refer you to a business partner to address your request. This may also be necessary when you obtain the Services through an employer wellness program or similar sponsored program.

For questions, or to request to exercise any of these choices, please contact us by either:

- Emailing us at [privacy@clicktherapeutics.com](mailto:privacy@clicktherapeutics.com), or
- Completing [this form](#).

## **7. LINKS TO OTHER WEBSITES AND SERVICES**

The Services may contain links to third-party websites or apps. Such websites or apps are not governed by this Privacy Policy. We do not have any control over those websites or apps and are not responsible

for their security, privacy policies and/or practices. When linking to a third-party website or app, you should exercise caution and read the privacy policy published on those websites or apps.

## **8. HOW DO WE PROTECT CHILDREN’S PRIVACY?**

The Services are not directed to children (or anyone under age 18). We do not knowingly or intentionally collect Personal Information from children. If you are a parent or guardian and you believe your child has provided us with Personal Information, please contact us using the contact information provided below and we will delete such Personal Information from our files.

## **9. CHANGES TO THIS PRIVACY POLICY**

By using the Services, you agree to the current Privacy Policy and our Terms of Use, into which this Privacy Policy is incorporated. Please review this Privacy Policy periodically as we may change it at any time without prior notice to you. Any changes will be effective immediately upon posting unless otherwise indicated. By continuing to access or use the Services after we have posted a modification or have provided you with notice of a modification, you are indicating that you agree to be bound by the modified Privacy Policy. The date at the top of this page indicates when this Privacy Policy was last updated.

## **10. QUESTIONS?**

Please contact us at 80 White Street, New York, NY 10013 or [privacy@clicktherapeutics.com](mailto:privacy@clicktherapeutics.com) if you have any questions about this Privacy Policy.