

## BELLE PRIVACY POLICY

Welcome to the BelleTorus Corporation Privacy Policy (“**Privacy Policy**”) provided by BelleTorus Corporation (“**Belle**” or “**Belle.ai**”). This Privacy Policy describes how we collect, use, and disclose information about you related to your use of any of our Belle.ai mobile applications, including (a) BellePRO™ (each, a “**Module**” or “**Modules**” or “**Software Offerings**”), (b) our website available at <https://www.belle.ai/> or any successor site (the “**Website**”), (c) all content, tools, features and functionalities offered on or through any of our Modules or Website or Software Offerings, and (d) all other services provided by us (items (a) through (d) collectively, the “**Services**”). Please read this Privacy Policy carefully.

For purposes of this Privacy Policy, “**you**” and “**your**” means you as the user of the Services.

This Privacy Policy applies only to the information collected in connection with the Services. Please read this Privacy Policy carefully to understand our policies and practices regarding your information. ***If you do not agree with our policies and practices, your choice is not to use our Services. By accessing and using the Services, you acknowledge and agree to be bound to the provisions of this Privacy Policy.***

If you are a healthcare provider and are using the Services in your professional capacity, you agree to be bound by the Business Associate Agreement set forth in Exhibit A of Belle’s Terms of Service (the “**BAA**”). Please refer to the BAA to understand how we collect, use, and disclose protected health information you may share with us. If you are a healthcare provider and are using the Services in your professional capacity and you do not agree to the BAA, please do not use the Services, or share any health-related information of your patients with us.

### **I. WHAT INFORMATION WE COLLECT**

#### **Information we collect about you through the Services**

When you use the Services, we may collect information about you, including

- Registration details you provide when you create an account, such as your name, e-mail address, telephone number, birthdate, username, and password.
- Health-related and other personal information you provide when you use the Services, including information related to your health condition, as well as other information you provide when you access or use the Services and each time you interact with the Services or otherwise with us, for example, when you update your personal information in your app, communicate with us by telephone or e-mail, upload photos or images, and order or download updates. For clarity, any digital images, including photos of you, information about your health, physical, or emotional condition or circumstance, you provide via the Services are considered health-related information and personal information.
- Information you provide in public forums through the Services, including using our chat, review, comment, post, or similar functionality.

- Information collected through authorized access to your electronic health records or health information exchanges.
- Information we receive about you from third parties, e.g., if you access the Services through a third-party platform or log-in, we may also collect your e-mail address and other information associated with that third party, and any information you have made public in connection with that service or which the third-party shares with partner services). See also Section VI (“**Third Party Websites and Links**”) below.

### **Information that we collect automatically**

We also collect certain information automatically from you. We and the third parties we work with use cookies and similar tracking technologies to track activity on our Services and to collect information about your use of the Services, such as your IP address, browser type, browser version, pages viewed, time spent on pages, links clicked, location and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, provide customer support, troubleshoot issues with and improve the operation of the Services, and better understand your online activity. Cookies are files with small amounts of data that may include an anonymous unique identifier. They are sent to your browser from a website and stored on your device. Other tracking technologies we use are beacons, tags, and scripts to collect and track information and to improve and analyze our Services. If you do not want a cookie placed on your hard drive or mobile device, you may be able to turn that feature off on your computer or mobile device. Please consult your Internet browser’s documentation for information on how to do this. However, if you decide not to accept cookies from us, the Services may not function properly.

We also use Google Analytics, which is a web analytics tool that helps us understand how users engage with the Services. Like comparable services, Google Analytics uses first-party cookies to track user interactions, as in our case, where we use this information to collect information about how users use our site. We use this information to compile reports and to help us improve the Services. The reports disclose website trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you visit our site – for more information on opting out of being tracked by Google Analytics across all websites you use, visit this Google page: <https://tools.google.com/dlpage/gaoptout>.

### **Online tracking**

“Do Not Track” is a privacy preference that users can choose in various web browsers, allowing users to opt out of tracking by websites and online services. We respond to global privacy controls, including “Do Not Track” signals.

## **II. HOW WE USE YOUR INFORMATION**

The ways in which we may use your information include the following:

- To provide you with the Services and other services you request.
- To administer your account.
- To communicate with you about your account or transactions with us and send you details or updates about features of the Services or changes to our policies.

- To create anonymized, non-anonymized, and aggregated data sets that may be used for a variety of functions, including research, internal analysis, analytics, and other functions.
- To personalize content and experiences.
- To detect, investigate and prevent activities that may violate our policies or be illegal.
- To optimize, improve, and create content, services, and features of the Services, including using your information to test, train, and/or validate our AI/ML algorithms.
- To personalize and improve the Services and user experiences, to increase the functionality and user friendliness of the Services, to deliver content or features that match user profiles or interests.
- To monitor and analyze the Services usage and trends and otherwise measure the effectiveness of the services.
- To send you offers and promotions for our other products and services.
- With your opt-in permission, we may (i) provide you with news and updates about the Company; or (ii) send you surveys to collect feedback about your experience with the Company, to improve the Services. You are permitted to opt out of any such communications at any time.

### **III. HOW WE SHARE YOUR INFORMATION**

If you are a healthcare provider and are using the Services in your professional capacity, we will only share the protected health information you disclose to us in accordance with the BAA.

For all other users, we will not share your personal information outside Belle, except in the following circumstances:

- When you allow to us share your personal information with another company, such as directing us to share your personal information with third-party sites or platforms, including social networking sites. If you use third-party sites or platforms made available through the Services, those third parties will have access to your data to the extent that you have authorized their access. Please consult Section VI (“Third Party Website and Links”) below and the third party’s privacy policy for additional information.
- When you request our referral services to forward or share certain content with a friend, such as an e-mail inviting a friend to use the Services or sharing certain content from the Services with a friend, or with a skin healthcare services provider.
- When we do so with a third party to provide services on our behalf, for example, with companies who provide us with certain administrative services, as well as other partners who assist us in carrying out, developing, and maintaining the Services.
- In connection with the sale of a business or our securities, including merger, acquisition, sale of all or a material portion of its assets, change in corporate control, a private or public equity offering, or insolvency or bankruptcy proceedings.
- To enforce our Terms of Service or rules, to ensure the safety and security of our users and third parties, to protect our rights and property and the rights and property of our users and third parties, to comply with legal process, including judicial warrant, rule, order, or subpoena or in other cases if we believe in good faith that disclosure is required by law or regulation.

In addition, we may share anonymized and aggregated data sets with third parties, alone or in combination with anonymized information of other users.

#### **IV. PUBLIC VENUES AND SEMI-PUBLIC VENUES OF THE SERVICES.**

If you use a message board, comment function, conversation pages, blogs, social community environments, profile pages, or other public or semi-public venue or forums of the Services, you will be identified on those venues by the username you submit.

#### **V. YOUR CONTROLS AND CHOICES**

You can exercise certain controls and choices regarding our collection, use and sharing of your information. These controls and choices include your right to:

- Correct, update, and delete your registration account.
- Request access to the personal information we hold about you and that we amend or delete it.

You may exercise your controls and choices, or request access to your personal information, by modifying your profile or by contacting us at [support@belle.ai](mailto:support@belle.ai) or following instructions provided in communications sent to you. Please be aware that, if you do not allow us to collect personal information from you, we may not be able to deliver certain Services to you, and some of our Services may not be able to take account of your interests and preferences. If you have questions regarding the specific personal information about you that we process or retain, please contact us at [support@belle.ai](mailto:support@belle.ai).

#### **VI. THIRD PARTY WEBSITES AND LINKS**

Our Services may contain links to other online platforms operated by third parties. We do not control these other online platforms and are not responsible for their content, their privacy policies, or their use of your personal information. Our inclusion of such links does not, by itself, imply any endorsement of the content on such platforms or of their owners or operators except as disclosed via the Services.

Please keep in mind that personal information you post on public or semi-public venues, including personal information you share on third party social networking platforms (such as Facebook or Twitter) may also be viewable by other users of the Services and/or users of those third-party online platforms without limitation as to its use by us or by a third party. When you provide personal information to a third-party online platform, the personal information you provide may be separately collected by that third-party. The personal information the third-party online platform collects may be subject to the third-party online platform's privacy practices. Privacy choices you make on the third-party online platform will not apply to our use of the information we collect directly through our Services. We expressly disclaim liability for the actions of third parties, including but without limitation to actions relating to the use and/or disclosure of your personal information by third parties.

#### **VII. CHILDREN'S PRIVACY**

Our Services are not directed to children who are under eighteen years of age, and we do not seek or knowingly collect any personal information from them without obtaining consent from the child's parent or guardian. To the extent you wish to enable your child to use the Services, you must create an account for the child in accordance with our Terms of Service and provide consent

for us to collect such information from your child. If we become aware that we have unknowingly collected personal information from a child under 18 years of age without such consent, we will make commercially reasonable efforts to delete such information from our database.

If you are the parent or guardian of a child under eighteen years of age who has provided us with personal information, you may contact us to request it be deleted.

## **VIII. SECURITY AND DATA RETENTION**

Please note that Information you send to us electronically may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential personal information to us. From time to time, we review our security procedures to consider appropriate new technology and methods. Please be aware though that, despite our best efforts, no security measures are perfect or impenetrable. We will retain your personal information for the length of time needed to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required, or for the establishment, exercise, or defense of legal claims, or for legitimate businesses purposes, or as provided by law.

## **IX. CALIFORNIA RIGHTS**

If you are a user of the Services and a California resident under the age of eighteen, you may request to have your posted content or personal information removed from the publicly viewable portion of the Services by contacting us directly. Content or information may not be removed from our systems or databases. In certain situations, content or information cannot be removed.

## **X. UPDATING THIS PRIVACY POLICY**

We may modify this Privacy Policy from time to time in which case we will update the “Last Update” date at the bottom of this Privacy Policy. If we make changes that are material, we will use reasonable efforts to attempt to provide notice to you and, where required by applicable law, we will obtain your consent. Notice may be sent by e-mail to you at the last e-mail address you provided us, by posting notice of such changes via the Services, or by other means, consistent with applicable law. However, it is your responsibility to review the Privacy Policy from time to time to view any such changes. The updated Privacy Policy will be effective as of the time of posting, or at such later date as may be specified in the updated Privacy Policy.

## **XI. HOW TO CONTACT US**

Any questions or concerns regarding the use or disclosure of personal information should be directed to [support@belle.ai](mailto:support@belle.ai).

You may contact us regarding the Services of BelleTorus Corporation, at 245 First Street, Riverview II, 18th Floor, Cambridge, MA 02142 or by e-mail at [support@belle.ai](mailto:support@belle.ai).

## **XII. PRIVACY POLICY ADDENDUM FOR CALIFORNIA RESIDENTS**

Under the California Consumer Privacy Act (“CCPA”), California residents are afforded certain rights about the personal information (as such term is defined under the CCPA) we have collected about them, which we have described in more detail below. This Section XII does not apply to

“**protected health information**” or “**PHI**” that is governed by the Health Insurance Portability and Accountability Act of 1996, as amended by the Health Information Technology for Economic and Clinical Health Act, and all regulations promulgated thereunder (“**HIPAA**”) or “**medical information**” that is governed by the California Confidentiality of Medical Information Act (“**CMIA**”).

In the chart below, we have described the categories of Personal Information that we have collected and shared over the past twelve (12) months, the purposes for such collection and the types of entities with whom we have shared such information.

Categories of Personal Information	Sources of Information	Use of Information	Sharing of Information
Identifiers, including your uploaded photos, name, postal address, email address, and telephone number.  These data types also include “personal information,” as the term is defined by Cal. Civ. Code 1798.	We collect this information directly from you.	We use this information to: provide, maintain, optimize and improve our Services; train, test and/or validate our AL/ML; respond to consumer inquiries; and personalize your online experience.	We share this information with service providers who help us provide, maintain, and improve our Services; deliver products to you; and personalize your online experience.
Internet or other electronic network activity information, such as IP addresses and cookies.	We collect this information automatically from your computer or device.	We use this information to provide, maintain, and improve our Services and to personalize your online experience.	We share this information with service providers who collect this information on our behalf to help us provide, maintain, and improve our Services and to personalize your online experience.
Audio, electronic, visual, thermal, olfactory or similar information	We collect this information directly from you.	We may record calls to our customer and technical support personnel.	We share this information with service providers who collect this information on our behalf to help us provide, maintain, and improve our Services and to personalize your online experience.

Categories of Personal Information	Sources of Information	Use of Information	Sharing of Information
Geolocation data	We collect this information from your device when you give us permission to do so.	We use this information to provide features of our Services and to improve and customize our Services.	We work with service providers who collect this information on our behalf to help us provide, maintain, and improve our Services and to personalize your online experience.
Inferences drawn from other Personal Information	We collect this information directly from you and/or collect this information from your device when you give us permission to do so.	We use this information to provide features of our Service and to improve and customize our Services.	We work with service providers who collect this information on our behalf to help us provide, maintain, and improve our Services and to personalize your online experience.

**The Company does not, and during the past twelve (12) months did not, “sell” personal information of California residents (as such term is defined in the CCPA).**

### ***Rights under the CCPA***

If you are a California resident, the processing of certain personal information about you may be subject to the CCPA. Where the CCPA applies, this section provides additional privacy disclosures and informs you of key additional rights as a California resident. We will never discriminate against you for exercising your rights, including providing a different level or quality of services or denying goods or services to you when you exercise your rights under the CCPA.

### ***Right to Know Request***

Under the CCPA, California residents have a right to request information about our collection, use, and disclosure of your personal information over the prior twelve (12) months, and ask that we provide you free of charge with the following information:

1. the categories of personal information about you that we collected;
2. the categories of sources from which the personal information was collected;
3. the purpose for collecting personal information about you;
4. the categories of third parties to whom we disclosed personal information about you and the categories of personal information that was disclosed (if applicable) and the purpose for disclosing the personal information about you; and

5. the specific pieces of personal information we collected about you.

### ***Right to Delete Request***

Under the CCPA, you also have a right to request that we delete personal information, subject to certain exceptions.

**“Shine the Light”**: California’s “Shine the Light” law (Cal. Civ. Code § 1798.83) permits users of our Website or the Platform who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us at the below information.

### ***How to Exercise Your Rights***

If you are a California resident to whom the CCPA applies, you may contact us to exercise your rights by sending an email to [support@belle.ai](mailto:support@belle.ai).

Once we receive your request, we will review it, determine whether we can verify your identity, and process the request accordingly. We may need to collect information from you to verify your identity, such as your email address, government issued ID or date of birth. You may make a verifiable consumer request to access your personal information twice per twelve (12) month period. We aim to fulfill all verified requests within forty-five (45) days pursuant to the CCPA. If necessary, extensions for an additional forty-five (45) days will be accompanied by an explanation for the delay.

You may designate, in writing or through a power of attorney document, an authorized agent to make requests on your behalf to exercise your rights. Before accepting such a request from an agent, we will require that the agent provide proof that you have authorized them to act on your behalf, and we may need you to verify your identity directly with us.