

Retinov Privacy Policy

Last modified: February 12, 2025

Introduction

Retinov Inc. ("**Retinov**" or "**We**") respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the website <https://www.tina.vision> (our "**Website**"), when you use our services available through the Website (our "**Services**"). It also describes our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- On our Website and Services.
- In email, text, phone conversations, and other electronic messages between you and our Website and Services.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website, mobile application, or services operated by Retinov or any third party; or
- Any third party, including through any application or content (including advertising) that may link to or be accessible from or through the Website or Services.

In order to understand how we use your personal information, we need to explain Retinov's legal organization because it affects how we use your personal information. For purposes of clarification, Retinov does not provide any medical or clinical services. As further described in our Terms of Service, Retinov operates the Website and Services. Associated but independent clinical practices, including optometrists and dietitians, or other United States based health care providers (each, a "**Provider**"), provide the licensed professionals who may treat you separately using information generated on or through the Website. Both Retinov and the Providers (collectively, "**Retinov**," "**we**," "**our**," or "**us**") may use and disclose your personal information collected through the Website and Services, but how we use and disclose that information depends on whether it is health information or another type of personal information. **If you do not agree to be bound by those terms, you are not authorized to access or use our Website or Services, and you must promptly exit our Website or Services.**

We believe that your health information should have heightened privacy protections, which are also required by certain federal and state privacy laws. All collection, use, and disclosure of your health information by the Providers is governed by the Notice of Privacy Practices. We treat all health information that you provide when becoming a user of our services and via interacting with your Provider as health information under the Provider's Notice of Privacy Practices. That means if we need to collect, use, or disclose that health information for any reason, we follow the Notice of Privacy Practices. Please review the Notice of Privacy Practices for more information on how we protect your health information and your rights under applicable laws.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website or Services. By accessing or using our Website, and Services, you agree to this privacy policy. This policy may change from time to time (see [Changes to Our Privacy Policy](#)). Your continued use of our Website and/or Services after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Minors

Our Website and Services, including the Provider consultation services, are not intended for minors. No one under age 18 may provide any information to or on the Website or Services. We do not knowingly collect personal information from minors. If you are under 18, do not use or provide any information on our Website or Services or through any of their respective features, register on the Website, use any of the interactive or public comment features of our Website or Services or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a minor, we will delete that information. If you believe we might have any information from or about a minor, please contact us using the information below.

Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Website and Services, including information:

- By which you may be personally identified ("**personal information**") , such as:
 - if you are a Provider: your name, your postal address, your email address, your home, work, and mobile telephone numbers, your date of birth, audio, images and videos of you (including recordings and transcripts), your gender, clinical information related to the state of your patient's retina, as well as your patient's blood pressure information.
 - if you are a Patient: your name, your postal address, your email address, your home, work, and mobile telephone numbers, your date of birth, your gender, your education level, your medical history, your health insurance subscriber information, and your health information, including in particular your smoking status, your lifestyle habits and your blood pressure.
- About your internet connection, the equipment you use to access our Website or Services, and usage details, such as network traffic data, logs, referring/exit pages, date and time of your visit to our Website or Services, error information, click stream data, and other communication data and the resources that you access and use on the Website or Services.

We collect this information:

- Directly from you when you provide it to us. If you are a Provider, we also collect clinical information of your patient's retina through a medical examination of the retina, as well as your patient's blood pressure information (which is used by our software

application to predict the patient's likelihood of progressing to a more advanced form of AMD.

- Automatically as you navigate through the Website or Services. Information collected automatically may include usage details, IP addresses, and information collected through cookies and other tracking technologies.
- From third parties, for example, our business partners.

Information You Provide to Us

The information we collect on or through our Website or Services may include:

- Information that you provide by filling in forms and questionnaires on our Website. This includes information provided at the time of registering to use our Website or Services, as well as information provided when using our Services, posting material, or requesting further services from us. We may also ask you for information when you report a problem with our Website or our Services.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.

Personal information does not include information that is: (a) publicly available information from government records; (b) de-identified or aggregated consumer information; or (c) certain information excluded from the scope of CCPA (e.g., PHI covered under HIPAA and medical information covered under the CMIA as discussed above).

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website or Services, including network traffic data, location data, logs, and other communication data and the resources that you access and use on or through the Website or the Services.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.
- Information about your mobile device and internet connection, including the device's unique device identifier, IP address, operating system, browser type, mobile network information, and the device's telephone number; information stored on your mobile device, including in other applications. This may include your personal contacts and your health information.

The information we collect automatically may include personal information, or we may maintain it or associate it with personal information we collect in other ways or, if you are a patient, that we receive from your chosen Provider. It helps us to improve our Website and to deliver a better

and more personalized service, including by enabling us to recognize you when you return to our Website or Services.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser, and you may have similar capabilities on your mobile device in the preferences for your operating system or browser. However, if you select this setting you may be unable to access certain parts of our Website or Services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website and Services. For information about managing your privacy and security settings for cookies, see [Choices About How We Use and Disclose Your Information](#).

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present to you our Website, or Services.
- To provide our Services to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account, including expiration and renewal notices.
- To improve our Website and Services.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or Services.
- To allow you to participate in interactive features on our Website or Services.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

Health Information Some information Retinov collects constitutes protected health information (“PHI”) under the U.S. Health Insurance Portability and Accountability Act (“HIPAA”), referred to in this Privacy Policy as “health information”. As set forth above, the Notice of Privacy Practices describes our collection, use and disclosure of your PHI. Retinov is a “business associate” (as that term is used under HIPAA) that provides services to and for Providers, other health care providers and health care plans, referred to as “covered entities” under HIPAA, and enters into business associate agreements with these covered entities. Retinov will use and disclose PHI only in accordance with the business associate agreements and HIPAA.

We may de-identify your Personal Information, including health information, so that it no longer reasonably identifies you. In this case, we may use this de-identified data without restriction and for any purpose, including to improve our Website, or Services.

Disclosure of Your Information

We do not share, sell, or otherwise disclose your personal information for purposes other than those outlined in this Privacy Policy.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Retinov's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Retinov about our Website and Services users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For our business purposes, which includes disclosing your personal information to companies that assist us with marketing and advertising, or to certain third parties such as our health care Provider partners and our service providers.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms of use and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Retinov, our customers, or others.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of the Website and the Services may then be inaccessible or not function properly.

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. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

Residents of certain states may have additional personal information rights and choices. Please see [Your State Privacy Rights](#) for more information.

Accessing and Correcting Your Information

You can review and change your personal information by logging into the Website and visiting your account profile page.

You may also send us an email at hello@retinov.com to request access to, correct, or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

With respect to any PHI in our possession, you have certain rights under HIPAA as described in the Notice of Privacy Practices provided to you by your healthcare Provider.

Residents of certain states may have additional personal information rights and choices. Please see [Your State Privacy Rights](#) for more information.

Your State Privacy Rights

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information.

California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Montana, Oregon, Tennessee, Texas, Utah, and Virginia provide (now or in the future) their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose (excluding Iowa and Utah).
- Data portability.
- Opt-out of personal data processing for:
 - targeted advertising (excluding Iowa);
 - sales; or
 - profiling in furtherance of decisions that produce legal or similarly significant effects (excluding Iowa and Utah).
- Either limit (opt-out of) or require consent to process sensitive personal information.

The exact scope of these rights may vary by state. To exercise any of these rights please email Retinov at hello@retinov.com. To appeal a decision regarding a consumer rights request, please also contact us at: hello@retinov.com with an email whose subject line starts with [Appeal Request] and state your request in the body of your email. We will respond with 7 working days maximum to your request.

Nevada provides its residents with a limited right to opt-out of certain personal information sales. Residents who wish to exercise this sale opt-out rights may submit a request to this designated address: hello@retinov.com.

Data Security

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

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website or Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards. The information you share in public areas may be viewed by any user of the Website.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website, or Services. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Website home page. If we make material changes to how we treat our users' personal information, we will notify you by email to the email address specified in your account. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at: hello@retinov.com.