Last updated: June 20, 2025

Prompt Therapy Solutions, Inc. ("Prompt," "we," "us," or "our") wants you to be familiar with how we collect, use, and disclose information. This Privacy Policy describes our online privacy practices in connection with information that we collect through: (a) website(s) operated by us from which you are accessing this Privacy Policy, including our websites at <a href="https://www.promptemr.com/">https://www.promptemr.com/</a> and <a href="https://www.predictionhealth.com/">https://www.predictionhealth.com/</a>; and (b) any email messages that we send to you that link to this Privacy Policy (collectively, the "Services").

Please note that this Privacy Policy only applies to information that we collect through the Services. As an example, this Privacy Policy does not apply to customer data, including protected health information (PHI), that Prompt processes on behalf of its customers, which is governed by separate agreements between us and our customers, including the customer's Notice of Privacy Practices and Prompt's business associate agreement with the customer.

Please read this Privacy Policy carefully. If you do not agree with any terms set forth in this Privacy Policy, you must immediately cease use of our Services. By continuing to access or use our Services, you agree to the terms set out in this Privacy Policy. We reserve the right to make changes to this Privacy Policy at our discretion. Your continued use of the Services after we make changes is deemed to be acceptance of those changes, so you should review this Privacy Policy periodically for updates.

## Personal information

"Personal Information" is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual. We collect and maintain Personal Information about you through or in connection with the Services. Such Personal Information may include, but is not limited to, the following:

- Name
- Telephone number
- Email address
- State where your business is located
- Company name
- Number of Clinic Providers
- IP address (we may also derive your approximate location) along with other internet or network activity information, such as how you interact with our website(s), applications, or advertisements

Any other information you choose to provide through the Services, which could include
information to provide to: allow us to contact you; request and receive a demo of our
products and services; receive a newsletter or other information from us; interact with any
chatbot functionality that our Services may provide; otherwise interact with our Services.

## **Employment Related Information**

Although you may be able to apply for open job positions through our website(s), any information that you choose to provide when you apply for a job with us through our website(s), such as professional experience, education history, and work authorization (collectively, "Employment Information"), will only be used by us for hiring decisions (and may be retained as part of your employment record to the extent you become employed by Prompt).

#### Collection of Personal Information

We and our service providers collect Personal Information in a variety of ways, including:

#### Through the Services or Directly From You

We collect Personal Information through the Services or otherwise as provided by you, such as when you visit our website(s) or otherwise interact with our Services, including when you sign up for a demo, complete one of our online contact forms, or utilize the Services' online chat functionality.

#### Through the use of Cookies and Similar Technologies

We use cookies and similar technologies to collect information about you and related to your use of the Services.

#### **From Other Sources**

We may receive your Personal Information from other sources, such as publicly available databases and joint marketing partners.

We need to collect Personal Information in order to provide the requested Services to you. If you do not provide the information requested, we may not be able to provide the Services. If you disclose any Personal Information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

#### Use of Personal Information

We and our service providers may use Personal Information for the following purposes:

#### Providing the functionality of the Services and fulfilling your requests

• To provide the Services' functionality to you (which includes any functionality provided through the Services such as chatbot and other functionality).

- To provide you with customer service, including demos.
- To respond to your inquiries and fulfill your requests.
- To send administrative information to you, such as changes to our terms, conditions, and policies.

## Providing you with marketing and advertising materials

- To send you marketing-related emails or to otherwise make marketing advertisements or materials available to you (whether through our websites or those of third parties).
- To contact you to discuss our product and service offerings.

## Analyzing Personal Information for business reporting and providing personalized services.

- To analyze use of the Services.
- To better understand your interests and preferences, so that we can personalize our interactions with you.

#### Aggregating and/or anonymizing Personal Information

 We may aggregate and/or anonymize Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we may use and disclose for any lawful purpose, as it no longer identifies you or any other individual.

#### Accomplishing our business purposes

- For audits, to verify that our internal processes function as intended and to address legal, regulatory, or contractual requirements.
- For fraud prevention and security monitoring purposes, including to detect and prevent cyberattacks.
- For developing new products and services.
- For enhancing, improving, repairing, maintaining, or modifying our current products and services, as well as undertaking quality and safety assurance measures.
- For identifying usage trends, for example, understanding which parts of our Services are of most interest to you and other users.
- For determining the effectiveness of our promotional campaigns.
- For operating and expanding our business activities.
- For administrative purposes.

#### Disclosure of Personal Information

We may disclose Personal Information in order to comply with any of the Uses of Personal Information as set out above. This includes:

- To our third-party service providers, to facilitate services they provide to us or on our behalf.
  - These can include providers of such services as website hosting, data analysis, fraud prevention, information technology and related infrastructure provision, customer service, chatbot functionality, email delivery, and auditing.
  - Additionally, this could include any third-party vendors (including those in the areas
    of technology, services, or sales and marketing) that assist us in providing, or
    attempting to expand the use of, our products and services, which may include
    offering products and services to you or otherwise making advertising and marketing
    materials available to you (whether through our website(s) or through third party
    sites).
- To our affiliates, to facilitate services they provide on our behalf or for their own sales and marketing purposes.

By using the Services, you may elect to disclose Personal Information on message boards or other services through which you are able to post information and content. Any information you post or disclose through these services may be available to other users and the general public.

We may also disclose Personal Information as we believe to be necessary or appropriate: (a) to comply with applicable law, to respond to third party requests, including but not limited to those from public and government authorities, to cooperate with law enforcement, and for other legal reasons; (b) to enforce our terms and conditions; and (c) to protect our rights, privacy, safety, or property, and/or that of you or others. We may use, disclose, or transfer Personal Information to a third party in connection with any proposed or actual reorganization, bankruptcy, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our assets or stock.

#### Uses and Disclosures of Other Information

We may use and disclose "Other Information" (information that does not reveal your specific identity or directly relate to an identifiable individual) for any purpose, except where prohibited by applicable law. If we are required to treat Other Information as Personal Information under applicable law, we may use and disclose it for the purposes for which we use and disclose Personal Information, as detailed in this Privacy Policy. In some instances, we may combine Other Information with Personal Information. If we do, we will treat the combined information as Personal Information as long as it is combined.

# Third-party advertising

We use third party sites to run advertising and marketing campaigns in connection with our Services and general advertising and marketing operations, for purposes of, among other services, online advertising, which may include remarketing, re-engagement, or similar advertising and marketing features. In addition to others that we may use, these may include Google Ads, X (formerly Twitter) Ads, Facebook Ads, Instagram Ads, and related services provided by Meta Platforms, Inc., LinkedIn Ads, Reddit Ads, MNTN, and Microsoft Ads. You can learn more about these services, what controls you have, and how to opt out, by visiting the third party sites:

- Google Ads
- X Ads
- Meta
- LinkedIn
- Reddit Ads
- MNTN
- Microsoft Ads

For more information about this practice, and to learn how to opt out of it in desktop and mobile browsers on the particular device on which you are accessing this Privacy Policy, please visit <a href="http://optout.aboutads.info/#/">http://optout.aboutads.info/#/</a> and <a href="http://optout.networkadvertising.org/#/">http://optout.aboutads.info/#/</a> and <a href="http://optout.networkadvertising.org/#/">http://optout.networkadvertising.org/#/</a>.

# Marketing Emails

If you no longer want to receive marketing emails from us on a going-forward basis, you may opt-out by clicking the "unsubscribe" link at the bottom of each such email. If you opt out, we may still send you certain administrative messages, from which you cannot opt out.

# Cookies and Similar Technologies

We use cookies and similar tracking technologies to collect information. These technologies may include the following methods:

#### Your browser or device

Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, and Internet browser type and version.

#### Cookies

Cookies are pieces of information stored directly on your computer. A cookie is a small text file (often including a unique identifier), that is sent to a user's browser from a website's computers and stored on a user's computer's hard drive, tablet, or mobile device. The cookie stores a small amount of data on your device about your visit to a website. Some Cookies are "session cookies," which expire at the end of the browser session and can capture your activities during the browser session. Other Cookies are "persistent cookies" which remain on your device for the period specified in the cookie and are able to capture your settings or activities on multiple websites. Cookies allow us to collect such information as browser type, time spent on the Services, pages visited, language preferences, and traffic data.

We do not currently respond to browser do-not-track signals.

If you do not want information collected through the use of cookies, most browsers allow you to automatically decline cookies or be given the choice of declining or accepting particular cookies from a particular website. You may also wish to refer to <a href="http://www.allaboutcookies.org/manage-cookies/index.html">http://www.allaboutcookies.org/manage-cookies/index.html</a>. If, however, you do not accept cookies, you may experience some inconvenience in your use of the Services.

## Pixel tags and other similar technologies

#### Pixel tags

We may use pixel tags (also known as web beacons and clear GIFs) to, among other things, track the actions of users of the Services (including email recipients), measure the success of our marketing campaigns, and compile statistics about use of the Services and response rates.

#### **Analytics**

We use certain tools, such as Google Analytics, which use cookies and similar technologies to collect and analyze information about use of the Services and to report on activities and trends. These services may also collect information regarding the use of other websites, apps, and online services.

You can learn about Google's practices by going to <a href="www.google.com/policies/privacy/partners/">www.google.com/policies/privacy/partners/</a> and exercise the opt-out provided by Google by downloading the Google Analytics opt-out browser addon, available at <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>.

#### Invisible reCAPTCHA

We use Google's invisible reCAPTCHA application on our Services in order to protect against spam and other automated abuse. The reCAPTCHA tool may make use of cookies, as well as other

information such as IP address, date, time, language, screen size and resolution, and mouse movements. The use of the reCAPTCHA tool and information collected through it are subject to Google's privacy policy, available at <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a> and Google's terms of service, available at <a href="https://policies.google.com/terms?hl=en">https://policies.google.com/terms?hl=en</a>.

## Chatbot Functionality

Through our website(s), you may interact with certain chatbot functionality. A "chatbot" or "bot" is a computer application that attempts to simulate human conversation, in order to allow users to interact with digital devices as if they were communicating with a real person. Chatbot functionality may be provided by a third party, and, therefore, such third party may have access to information about you based upon the information you disclose or is otherwise collected about you and/or your interaction with the chatbot. Additionally, through a chatbot tool, there may be links to third party websites or content. These sites or content referenced in a chat may not be under our control. If you visit one of those sites or interact with any third-party content, your data may be subject to such third party's policies and terms.

# State Law Privacy Rights

Depending on your U.S. state of residency and subject to certain limitations and exceptions, you may have certain rights relating to your Personal Information, which may include some or all of the rights listed in this section below. Please note that these rights may not apply in your jurisdiction or may otherwise be limited by applicable law. The information in this section applies to certain states, which may include, but are not limited to the following state laws: the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act, and as may be further amended (collectively "CCPA"), the Colorado Privacy Act (CPA), the Delaware Personal Data Privacy Act (DPDPA), the Maryland Online Data Privacy Act (MODPA), the New Jersey Data Privacy Act (NJDPA), and the Oregon Consumer Privacy Act (OCPA) (collectively, "State Privacy Laws").

If you are a resident of a state subject to the State Privacy Laws, you may have certain rights, including the rights to:

- Confirm whether we are processing your Personal Information;
- Gain access to certain Personal Information that we are processing about you;
- Have inaccuracies corrected, or updates made, to certain of your Personal Information;
- Have certain Personal Information provided by, or obtained about, you deleted:
- Obtain a copy of certain of the Personal Information we process about you (in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance, to the extent the process is carried out by automated means);
- Limit the use, and disclosure, of sensitive Personal Information;
- Opt-out of the processing of Personal Information for purposes of:
  - Targeted advertising;
  - The "sale" or "sharing" (as such terms are defined by the State Privacy Laws) of Personal Information; or

- Profiling in furtherance of decisions that produce legal or similarly significant effects concerning you. For clarity, we do not engage in profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.
- Not be discriminated against, in relation to how we process your information or for you
  exercising your rights under the State Privacy Laws.

You may seek to exercise these rights by contacting us through any of the below methods:

- Consumer Privacy Rights Request Form
- Postal Address:
  - Prompt Therapy Solutions, Inc. Attention: Legal Department
     1000 Maxwell Place, Suite 700 Hoboken, NJ 07030

# Categories of Personal Information Collected, Disclosed, and/or Sold/Shared

The following Categories of Personal Information may be collected:

- Identifiers (such as name, address information, IP address, email address, or other similar identifiers)
- Personal Information Categories described in CA. Civ. Code § 1798.80 (e) (such as name, address, telephone number, employment history)
- Commercial Information (such as business information and purchasing tendencies)
- Internet or Electronic Network Activity Information (such as browsing history, search history, and IP address)
- Geolocation Data (such as region, state, or postal code)
- Professional or employment-related information (such as work experience, name, phone number, and email address)
- Inferences drawn from any Personal Information identified to create a profile about a consumer (such as consumer preferences and characteristics)

The following Categories of Personal Information may be disclosed for a business purpose:

 Identifiers, Personal Information Categories described in CA. Civ. Code § 1798.80 (e), Commercial Information, Internet or Electronic Network Activity Information, Geolocation Data, Professional or employment-related information, Inferences drawn from any Personal Information identified to create a profile about a consumer

The following Categories of Personal Information may be "shared" as such term is defined under certain State Privacy Laws:

 Identifiers, Commercial Information, Internet or Electronic Network Activity Information, Geolocation Data, Inferences drawn from any Personal Information identified to create a profile about a consumer

The following Categories of Personal Information may be "sold" as such term is defined under certain State Privacy Laws:

None

## Sharing Personal Information

- Under the certain State Privacy Laws, the term "share" means "the disclosure of personal information to a third party for *cross-context behavioral advertising, whether or not for money or other valuable consideration.*"
- Pursuant to certain State Privacy Laws, we have the right to sell or share your Personal Information, subject to your right to opt-out of those sales (as set forth below).
- We may share your Personal Information with the following categories of third parties:
  - o Advertising and marketing partners
- The Personal Information we share, or otherwise may be used for these purposes, may include any of the information as set out in this Privacy Policy.

#### Sale of Personal Information:

- Under certain State Privacy Laws, the term "sale" means "the disclosure of a consumer's personal information to a third party for monetary or other valuable consideration."
- In the preceding twelve (12) months, we have not sold Personal Information for any purpose.

#### Verifiable request:

- Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your Personal Information.
- The verifiable consumer request must:
  - o Provide sufficient information that allows us to reasonably verify you are the person about whom we collected the Personal Information (or are an authorized representative of such individual).
  - o Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to your request in compliance with the State Privacy Laws.

#### **Authorized Agent:**

 If an authorized agent makes a request on your behalf, we may require the authorized agent to provide proof of signed permission, and we may also require you to verify your own identity and/or directly confirm to us that you provided the authorized agent with permission to submit the request.

#### **Response Time and Format:**

- We endeavor to respond to a verifiable consumer request within the parameters set out in the State Privacy Laws. Generally (although some states may be different), we have forty-five (45) calendar days from our receipt of a verifiable request to respond (this may be different for different states and/or for different types of requests). Additionally, if we require more time (most states allow up to a total of 90 days), we will inform you of the reason and extension period in writing. Please note that these are general rules and we will reply in accordance with the State Privacy Laws. Additionally, we will respond as soon as reasonably possible to each request, and the timeframes set forth herein are the outer limits allowed pursuant to the State Privacy Laws.
- Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we

- cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.
- We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

#### **Appeals Process:**

Certain states require an appeals process in the event a consumer's request is denied. If
your state requires this, and we have denied all or part of your request, you may seek to
appeal this decision by contacting us through any of the methods set out at in this
section.

# Third-party services

We are not responsible for the privacy, information, or other practices of any third parties, including any third party operating a website or service to which the Services link. The inclusion of a link on the Services does not imply our endorsement of the linked site or service.

We are not responsible for the information collection, use, disclosure, or security policies or practices of other organizations, such as Facebook, X, Instagram, YouTube, Pinterest, LinkedIn, Apple, Google, Microsoft, or any other social media platform, operating system provider, wireless service provider, or device manufacturer, including with respect to any Personal Information you disclose to other organizations through or in connection with our social media pages.

# Use of the Services by minors

The Services are not directed to individuals under the age of sixteen (16), and we do not knowingly collect Personal Information from individuals under the age of sixteen (16), or another age if required by applicable law.

# Security

We seek to use reasonable organizational, technical, and administrative measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the "Contact Us" section below.

## **Data Retention**

We keep your Personal Information for as long as necessary for the purposes set out above, to comply with legal obligations, and/or to protect our or other's interests. We decide how long we keep each category of Personal Information on a case-by-case basis, and retention periods are based on our internal policies and practices.

#### Jurisdiction and cross-border transfer

We are located in the United States. We may store and process your Personal Information in any country where we have facilities or in which we engage service providers. By using the Services, you understand that your information will be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country.

## Sensitive information

Unless we request it, we ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., Social Security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, or criminal background) on or through the Services or otherwise to us.

# Updates to our Privacy Policy

The "Last Updated" legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on the Services.

## Contact us

If you have any questions about this Privacy Policy, please contact us at legal@promptemr.com. Because email communications are not always secure, please do not include credit card or other sensitive information in your emails to us.