

Privacy Notice

Last Updated: September 9, 2025

1. Introduction

Huxley Medical, Inc. ("Company," "we," "us," or "our") respects your privacy and are committed to protecting it through our compliance with this Privacy Notice ("Notice" or "Policy"). This Notice explains how we collect, process, retain, use, disclose, and safeguard your personal information when providing services to you through our medical devices, websites, portals, and mobile applications that link to this Notice ("Services").

Please read this Notice carefully. By accessing or using our Services, you agree to the terms of this Notice. If any term in this Notice is unacceptable to you, please do not use our Services or provide us with any personal information. We may provide additional or different privacy notices that are specific to certain features, services, or activities.

In this Notice, when we talk about "**Personal Information**," we mean any information that is related to an identified or identifiable natural person.

If you are a patient of a Provider, this Notice does not govern our use of Protected Health Information (i.e., individually identifiable health information) provided to us through the Services, including through your Provider's patient portal. Our use of such information is governed by the Transaction Documents with your Provider and applicable law, including without limitation the Health Insurance Portability and Accountability Act ("HIPAA"). Your Provider's collection, use, disclosure, and transfer of such information is governed, in turn, by your Provider's terms and conditions and privacy practices between you and your Provider.

This Notice does not apply to any products, services, websites, mobile applications, or content (including advertising) offered by third parties or that may be linked to or from the Services. Data collected by these third parties is covered by their own privacy notices.

2. Information We Collect

We may collect the following types of information:

a. Personal Information

- Name, address, email, phone number
- Date of birth

b. Health Information

- Information related to your medical condition, diagnosis, or treatment
- Consumer health data such as biometric readings and cardiopulmonary sensor streams (e.g., heart rate, rhythm, respiratory rate, oxygen saturation), device diagnostics, and other inferences
- We may also process precise location data when needed to deliver a feature you request (e.g., emergency services), but we prohibit geofencing around health-care facilities

We provide services to health-care organizations and to individual consumers. When we process Protected Health Information (“PHI”) as defined under HIPPA, we do so in compliance with applicable regulations. For a covered entity under a Business Associate Agreement (“BAA”), we comply with HIPAA and the terms of the BAA. When we collect information directly from consumers, including consumer health data, we comply with applicable state privacy laws and Federal Trade Commission requirements. Where we reference de-identified information, we apply the HIPAA de-identification standards (Safe Harbor or Expert Determination) as appropriate.

You can access, delete, and receive a portable copy of your consumer health data by submitting a request using the methods listed below.

c. Technical and Usage Data

- IP address
- Browser type, device information
- Cookies and usage data from our websites or apps. Our websites and mobile applications use cookies and software development kits (SDKs) for functionality, security, analytics, and product improvement. Where required, we obtain consent for non-essential cookies and provide controls to manage preferences. If we use advertising technologies, we describe those partners and how to opt out in our Cookie Notice; such use may relate to “sharing” under California law, and controls are provided accordingly.

d. View and Opinions

- Survey responses and other information included within your interactions with us or otherwise provided via our Services
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3. How We Use Your Information

We use your information for the following purposes:

- To provide and maintain our products and Services
 - To improve performance and safety of our products and Services
 - To respond to your inquiries and provide support
 - To communicate with you about our Services or to provide you with relevant information. To comply with legal or regulatory obligations
 - To help maintain the safety, security, and integrity of our Services, technology assets, and business
 - For internal analytics and research
 - Any other purpose disclosed by us when you provide the information or with your consent
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4. How We Share Your Information

We do not “sell” personal information. We also do not “share” personal information for cross-context behavioral advertising. If our practices change, we will provide a “Do Not Sell or Share My Personal Information” link and honor Global Privacy Control (GPC) signals. We limit our use and disclosure of Sensitive Personal Information (including health and precise geolocation) to purposes permitted by California law unless you direct us otherwise. California residents may exercise their rights—access, deletion, correction, portability, and restriction of Sensitive Personal Information—through our contact methods below.

We may disclose information about you as follows and as otherwise described in this Notice or at the time of collection:

- With service providers that help us deliver our services (e.g., cloud hosting, analytics)
- With healthcare providers or authorized personnel with your consent or where legally required

- With regulatory authorities when required to comply with applicable laws
- Where required by law, court order, or subpoena if we believe disclosure is in accordance with, or required by, applicable law or legal process or where necessary to prevent, detect, or prosecute criminal offenses or to protect the rights, property, and safety of the Company or others
- With business partners only as necessary and under strict confidentiality agreements
- Between and among the Company and our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership
- In connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company
- With your consent or at your discretion

We may also process and disclose information to third parties if the information has been de-identified or aggregated in a way so it cannot be used to identify you.

5. HIPAA Compliance

If we qualify as a "business associate" under the Health Insurance Portability and Accountability Act (HIPAA), we comply with all applicable HIPAA requirements. We safeguard PHI through administrative, technical, and physical security measures and only use or disclose PHI as allowed by law.

6. Data Security

We use reasonable security measures to protect your information, including:

- Data encryption
- Access controls
- Secure storage of sensitive data

While we strive to protect your data, no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the information you supply will not be intercepted while being transmitted to and from us over the Internet. Please see the Huxley Terms of Use for more information. We encourage you to take steps to protect your own information as well.

Data Retention & De-identification

We retain device data and derived analytics to support safety, quality, and troubleshooting in accordance with the terms of the BAA of each Covered Entity. When retention periods end, we delete or de-identify information. Where we rely on de-identification, we apply technical and organizational safeguards, including, as appropriate, HIPAA de-identification standards (Safe Harbor or Expert Determination), designed to prevent re-identification and maintain data segregation and access controls.

Cloud Security & Sub-processors

We host data with reputable cloud providers using encryption in transit and at rest, role-based access controls, logging and monitoring, and vulnerability management. We engage third-party service providers (“sub-processors”) to support our services.

Incident & Breach Notifications

If we determine a security incident has compromised the privacy or security of information, we will notify affected individuals and, where applicable, regulators and media. For PHI processed as a business associate, we follow HIPAA and the applicable BAA. For non-HIPAA consumer health data, we follow the Federal Trade Commission’s Health Breach Notification Rule and applicable state laws.

7. Your Privacy Rights

Depending on your state of residency or jurisdiction, you may have certain rights related to your personal data, including:

- Access or correct your personal data
- Request deletion of your data
- Opt Out of Using Personal Data for Targeting Advertising, Profiling, Sales
- Withdraw consent (where applicable)

The exact scope of these rights vary by state. There are also several exceptions where we may not have an obligation to fulfill your request. You can submit privacy requests, by email at privacy@huxleymed.com, or by calling toll-free at 888-726-7239. We verify requests using information associated with your account or device. We respond within 45 days, subject to a permissible 45-day extension where reasonably necessary. Some states provide an appeals process if we deny your request; instructions will be included with our response. You may also use an authorized agent to submit requests where permitted by law.

8. Children

The Services are not directed towards children. We do not knowingly collect Personal Information from children under the age of 16 through the Services. If you are under 16, please do not give us any Personal Information. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Notice by instructing their children to never provide Personal Information through the Services without their permission. If you have reason to believe that a child under the age of 16 has provided Personal Information to us, please contact us using the methods described in Section 10 "How to Contact Us," and we will endeavor to delete that information from our databases.

9. Accessibility

We are committed to providing our Privacy Policy and related notices in accessible formats and strive to conform to WCAG 2.1 AA. If you need an alternative format or assistance, please contact us at privacy@huxleymed.com

10. Changes to This Notice

We may update this Notice from time to time, and we will provide notice of any such changes to the Notice as required by law. The date the Notice was last updated is identified at the top of the page. We will notify you of changes to this Notice by updating the "last updated" date and posting the updated Notice on the Services. We may email or otherwise communicate reminders about this Notice, but you should check our Services periodically to see the current Notice and any changes we have made to it. Your continued use of the Services after we make changes as described here is deemed to be acceptance of those changes.

11. Contact Us

If you have questions or concerns about this policy, or about exercising your rights, you may contact us below:

Huxley Medical Inc.

Attn: Privacy

1465 Northside Dr NW

Atlanta, GA

Toll-free: 888-726-7239

Email: privacy@huxleymed.com