

PRIVACY POLICY

Last Updated: November 15, 2022

This Privacy Policy (“Policy”) governs your use of our online interfaces and properties (e.g., websites and mobile applications) owned and controlled by **Knapp Nutritional & Pharmacy, Inc.**, (“Knapp”), and services and products made available to you through our website <https://knapprx.com> (the “Website”). Terms used in this Policy have the meaning prescribed to them under our Terms of Use (“Knapp Terms of Use”) unless otherwise provided herein.

1. **Our Commitment.** We are committed to maintaining the privacy and security of your personal information, and we appreciate that health information may be particularly sensitive. Knapp respects the privacy of all users of our Website and Service.
2. **Purpose.** This Policy discloses Knapp’s information collection and dissemination practices in connection with our Service, Website, all apps, features, and other Knapp services (collectively, the “Knapp Platform”). Please, remember that your use of the Knapp Platform is also subject to our Terms of Use. This Privacy Policy does not address personal information that you provide to us in other contexts (e.g., through a business relationship not handled through our website).
3. **Information We Collect.** When you use the Knapp Platform, we collect the information you provide, usage information, and information about your device. We also collect information about you from other sources like third party services, and optional programs in which you participate, which we may combine with other information we have about you.

To the extent that we collect any personal information that constitutes “Protected Health Information” under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), such information will only be used and disclosed in accordance with HIPAA and any applicable Business Associate Agreement between Knapp and any Covered Entity (as defined in HIPAA).

Below are the types of information we collect about you:

A. Information You Provide to Us

- i. **Account Registration.** When you create an account with Knapp, we collect the information you provide us, such as your name, email address, phone number, birth date, and payment information. You may choose to share additional info with us for your profile, like photo or saved addresses (e.g., home or work), and set up other preferences (such as preferred pronouns).
- ii. **Personal Information.** Knapp may collect personally identifiable information (“PII”), including health information, through the Knapp Platform, when you choose to provide such information, such as when registering to become a member so that you may receive information and updates regarding the Knapp Service. PII can include name, prescription and over-the-counter medications, health history, health condition, laboratory testing results, diagnostic images, insurance data, address, telephone number, e-mail address, social security number, credit/debit card information, date of birth, healthcare coverage, pharmacy, prescription, and physician.
- iii. **Publicly Available Personal Information.** In order to better provide the suite of Knapp Service to assist you, Knapp may request publicly available personal information about you that is maintained by the consumer data companies or other similar services. This publicly available personal information may be used by Knapp to verify your identity in online transactions and to aid in tailoring the Knapp Service to your needs.
- iv. **Communications.** When you contact us or we contact you, we collect any information that you provide, including the contents of the messages or attachments you send us.

B. Information We Collect When You Use the Knapp Platform

- i. **Location Information.** In order to facilitate accurate, efficient deliveries, the Knapp Platform collects location information (including GPS and WiFi data) differently depending on your device permissions. Where permitted, we collect your device's precise location when you open and use the Knapp Platform.
- ii. **Usage Information.** We may collect information about your interactions with the Knapp Platform like our apps and websites, including the pages and content you view and the dates and times of your use.
- iii. **Device Information.** We may collect information about the devices you use to access the Knapp Platform, including device model, IP address, type of browser, version of operating system, identity of carrier and manufacturer, radio type (such as 4G), preferences and settings (such as preferred language), application installations, device identifiers, advertising identifiers, and push notification tokens.
- iv. **Cookies, Analytics, and Third-Party Technologies.** We collect information through the use of "cookies", tracking pixels, data analytics tools like Google Analytics, SDKs, and other third-party technologies to understand how you navigate through the Knapp Platform and interact with Knapp advertisements, to make your Knapp experience safer, to learn what content is popular, to improve your website experience, to serve you better ads on other sites, and to save your preferences. Cookies are small text files that web servers place on your device; they are designed to store basic information and to help websites and apps recognize your browser. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be accessed every time you use the Knapp Platform. You should consult your web browser(s) to modify your cookie settings. Please, note that if you delete or choose not to accept cookies from us, you may miss out on certain features of the Knapp Platform.

C. Information We Collect from Third Parties

- i. **Third Party Services.** Third party services provide us with information needed for core aspects of the Knapp Platform, as well as for additional services, programs, loyalty benefits, and promotions that can enhance your Knapp experience. These third-party services can include insurance partners, financial service providers, marketing providers, and other businesses. We may obtain the following information about you from these third-party services:
 - Information to make the Knapp Platform safer;
 - Information about your participation in third party programs that provide insurance coverage and financial instruments, such as insurance, payment, transaction, and fraud detection information;
 - Information to operationalize loyalty and promotional programs, such as information about your use of such programs; and
 - Information about you provided by specific services, such as demographic and market segment information.
2. **How We Use Your Information.** We use your personal information to: provide the Knapp Platform; maintain the security and safety of the Knapp Platform and its users; build and maintain the Knapp community; provide customer support; improve the Knapp Platform; and respond to legal proceedings and obligations.
 - A. **Providing the Knapp Platform.** We use your personal information to provide an intuitive, useful, efficient, and worthwhile experience on our platform. To do this, we use your personal information to: verify your identity and maintain your account, settings, and preferences; calculate prices and process payments; communicate with you and collect feedback about your Knapp experience; facilitate additional services and programs with third parties; and maintaining the security and safety of the Knapp Platform and its users.

- B. **Maintaining Safety and Security.** To do this, we use your personal information to: authenticate users; find and prevent fraud; and block and remove unsafe or fraudulent users from the Knapp Platform.
- C. **Building and maintaining the Knapp Community.** Knapp works to be a positive part of the community. We may use your personal information to: communicate with you about events, promotions, elections, and campaigns; personalize and provide content, experiences, communications, and advertising to promote and grow the Knapp Platform. Knapp may also use your PII to deliver advertisements and marketing communications to you that we believe may be of interest. Marketing communications that you receive from Knapp may include (i) advertisements for the Knapp Service, (ii) advertisements for prescription drugs, and (iii) advertisements for other healthcare services or other goods or services.
- D. **Customer Support.** We work hard to provide the best experience possible, including supporting you when you need it. To do this, we use your personal information to: investigate and assist you in resolving questions or issues you have regarding the Knapp Platform; and provide you support or respond to you.
- E. **Improving the Platform.** We are always working to improve your experience and provide you with new and helpful features. To do this, we use your personal information to: perform research, testing, and analysis; develop new products, features, partnerships, and services; prevent, find, and resolve software or hardware bugs and issues; and monitor and improve our operations and processes, including security practices, algorithms, and other modeling.
- F. **Responding to Legal Proceedings.** Sometimes the law, government entities, or other regulatory bodies impose demands and obligations on us with respect to the services we seek to provide. In such a circumstance, we may use your personal information to respond to those demands or obligations.

3. **How We Share Your Information.** We do not sell your personal information, including PII. To make the Knapp Platform work, we may need to share your personal information with other users, third parties, and service providers. This section explains when and why we share your information.

A. Sharing with Third-Party Service Providers for Business Purposes

- i. We may share the following categories of your personal information to provide you with the Knapp Platform:
 - Personal identifiers, such as your name, address, email address, date of birth, government identification number, or NPI;
 - Financial information, such as bank routing numbers, tax information, and any other payment information you provide us;
 - Internet or other electronic network activity information, such as your IP address, type of browser, version of operating system, carrier and/or manufacturer, device identifiers, and mobile advertising identifiers; and
 - Location data.
 - ii. We have not shared any such PII or personal information over the past twelve months.
 - iii. We may disclose those categories of personal information to service providers to fulfill the following business purposes: maintaining and servicing your Knapp account; providing you customer service; processing transactions; verifying the identity of users; detecting and preventing fraud; providing marketing and advertising services; providing analytics services to Knapp; or undertaking internal research to develop or improve the Knapp Platform.
- B. **For Legal Reasons and to Protect the Knapp Platform.** We may share your personal information in response to a legal obligation, or if we have determined that sharing your personal information is reasonably necessary or appropriate to: comply with any applicable federal, state, or local law or

regulation, civil, criminal or regulatory inquiry, investigation or legal process, or enforceable governmental request; respond to legal process (such as a search warrant, subpoena, summons, or court order); enforce our Terms of Use; cooperate with law enforcement agencies concerning conduct or activity that we reasonably and in good faith believe may violate federal, state, or local law; or exercise or defend legal claims, protect against harm to our rights, property, interests, or safety or the rights, property, interests, or safety of you, third-parties, or the public as required or permitted by law.

- C. **In Connection with Sale or Merger.** We may share your personal information while negotiating or in relation to a change of corporate control such as a restructuring, merger, or sale of our assets.
 - D. **Upon Your Further Direction.** With your permission or upon your direction, we may disclose your personal information to interact with a third party or for other purposes.
4. **How We Use and Share Health Information.** Consistent with applicable federal and state regulations, Knapp may use health information for purposes of providing Service and obtaining payment for Service. In some circumstances, health information may be used or disclosed for these purposes without written consent.
- A. **To Obtain Payment.** Knapp may include health information to bill and collect payment from health insurance plans or third parties for the Service received from Knapp.
 - B. **To Conduct Operations.** Knapp may use and disclose health information for its own operations in order to facilitate the function of Knapp and as necessary to provide quality care to all of Knapp's clients. Healthcare operations include such activities as:
 - i. Provide you with the Knapp Service;
 - ii. Quality assessment and improvement activities;
 - iii. Protocol development, case management and care coordination;
 - iv. Referral activities which may include referring services to an agency, affiliate company, or to a business associate;
 - v. Professional review and performance evaluation;
 - vi. Training programs including those in which students, trainees or practitioners in healthcare learn under supervision;
 - vii. Training of non-healthcare professionals;
 - viii. Accreditation, certification, licensing, or credentialing activities;
 - ix. Review and auditing, including compliance reviews, medical reviews, legal services and compliance programs;
 - x. Business planning and development including cost management and planning related analyses and formulary development;
 - xi. Business management and general administrative activities of Knapp, for example, to train our staff, to evaluate staff performance, or to improve healthcare outcomes and lower costs through comparative analysis of client data.
 - C. **When Legally Required.** Knapp will disclose health information when it is required to do so by any federal, state or local law.

- D. **When There Are Risks to Public Health.** Knapp may disclose health information for public activities and purposes in order to:
- i. Prevent or control disease, injury or disability, report disease, injury, vital events such as birth or death and the conduct of public health surveillance, investigations and interventions.
 - ii. Report adverse events, product defects, to track products or enable product recalls, repairs and replacements and to conduct post-marketing surveillance and compliance with requirements of the Food and Drug Administration.
 - iii. Notify a person who has been exposed to a communicable disease or who may be at risk of contracting or spreading a disease;
 - iv. Prevent or lessen a serious and imminent threat to health or safety or to the health and safety of the public, if Knapp, in good faith, believes that such disclosure is necessary.
- E. **To Report Abuse, Neglect or Domestic Violence to Conduct Health Oversight Activities.** Knapp may disclose health information to a health oversight agency for activities including audits, civil administrative or criminal investigations, inspections, licensure or disciplinary action. Knapp, however, may not disclose health information if you are the subject of an investigation and health information is not directly related to the investigation.
- F. **In Connection with Judicial and Administrative Proceedings.** Knapp may disclose health information in the course of any judicial or administrative proceeding in response to an order of a court or administrative tribunal as expressly authorized by such order or in response to a subpoena, discovery request or other lawful process.
- G. **For Law Enforcement Purposes.** As permitted or required by state law, Knapp may disclose health information to a law enforcement official for certain law enforcement purposes as follows:
- i. As required by law for reporting of certain types of wounds or other physical injuries pursuant to the court order, warrant, subpoena or summons or similar process;
 - ii. For the purpose of identifying or locating a suspect, fugitive, material witness or missing person;
 - iii. Under certain limited circumstances, when you are the victim of a crime;
 - iv. To a law enforcement official if Knapp has a suspicion that death was the result of criminal conduct including criminal conduct at Knapp;
 - v. In an emergency in order to report a crime.
- H. **To Coroners and Medical Examiners.** Knapp may disclose health information to coroners and medical examiners for purposes of determining your cause of death or for other duties, as authorized by law.
- I. **For Worker's Compensation.** Knapp may disclose protected health information as authorized by and to the extent necessary to comply with laws relating to Workers' Compensation or other similar programs established by law that provide benefits for worker-related injuries or illnesses without regard to fault.
- J. **For Specified Government Functions.** In certain circumstances, the federal regulations authorize Knapp to use or disclose your health information to facilitate specified government functions relating to military and veterans, national security and intelligence activities, protective services for the President and others, medical suitability determinations and inmates and law enforcement custody.

K. Authorization to Use or Disclose Health Information. Other than as stated above, Knapp will not disclose health information without your written authorization. Knapp will not disclose or sell health information for research and/or marketing purposes without express written authorization. If you or your representative authorizes Knapp to use or disclose health information, you may revoke that authorization in writing at any time.

5. How We Store and Protect Your Information. We retain your information for as long as necessary to provide you and our other users the Knapp Platform. This means we keep your profile information for as long as you maintain an account. We retain transactional information, such as payments, for at least seven years to ensure we can perform legitimate business functions, such as accounting for tax obligations. We take reasonable and appropriate measures designed to protect personal information, but no security measures can be 100% effective, and we cannot guarantee the security of your information, including against unauthorized intrusions or acts by third parties.

6. Your Rights and Choices Regarding Your Data. As explained more below and on our Website, Knapp provides ways to access and delete personal information as well as exercise other data rights that give certain control over personal information.

A. All Users

- i. Email Subscriptions.** You can always unsubscribe from our commercial or promotional emails by clicking unsubscribe in those messages.
- ii. Text Messages.** You can opt out of receiving text messages by contacting us as provided below (“Contact Us”). Note that opting out of receiving texts may impact your use of the Knapp Platform.
- iii. Push Notifications.** You can opt out of receiving push notifications through your device settings. Please, note that opting out of receiving push notifications may impact your use of the Knapp Platform.
- iv. Profile Information.** You can review and edit certain account information you have chosen to add to your profile by logging in to your account settings and profile.
- v. Location Information.** You can prevent your device from sharing location information through your device’s system settings. But if you do, this may impact Knapp’s ability to provide you our full range of features and services.
- vi. Cookie Tracking.** You can modify your cookie settings on your browser, but if you delete or choose not to accept our cookies, you may be missing out on certain features of the Knapp Platform.
- vii. Do Not Track.** Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services that you do not want them to track your online activities. The Knapp Platform does not currently support Do Not Track requests at this time.
- viii. Deleting Your Account.** If you would like to delete your Knapp account, please, visit our Website. In some cases, we will be unable to delete your account, such as if there is an issue with your account related to trust, safety, or fraud. When we delete your account, we may retain certain information for legitimate business purposes or to comply with legal or regulatory obligations. For example, we may retain your information to resolve open insurance or payment claims, or we may be obligated to retain your information as part of an open legal claim. When we retain such data, we do so in ways designed to prevent its use for other purposes.
- ix. Exercising Your Rights.** You may exercise rights through your account on our Website. In addition, you may write to us to exercise rights. Please, include your full name, email address, and phone number associated with your use of the Knapp Platform, along with why you are

writing, so that we can process your request in an efficient manner. To respond to some rights, we will need to verify your request either by asking you to log in and authenticate your account or otherwise verify your identity by providing information about yourself or your account. Authorized agents can make a request on your behalf if you have given them legal power of attorney, or you provide signed permission, verification of your identity, and confirmation that you provided the agent permission to submit the request.

- x. **Response Timing and Format.** We aim to respond to a consumer request for access or deletion within 45 days of receiving that request. If we require more time, we will inform you of the reason and extension period in writing.
- xi. **Right to Non-Discrimination.** Knapp cannot deny services, charge you a different price, or provide a different level or quality of services just because you exercised your rights under the relevant Data Protection Law. However, if you refuse to provide your personal information to us or ask us to delete your personal information, and that personal information is necessary for Knapp to provide you with services, we may not be able to complete the relevant transaction.
- xii. **Right to Know.** You may request that Knapp discloses to you what personal information we have collected, used or shared about you, and why we collected, used or shared that information. Specifically, you may request that Knapp discloses:
 - The categories of personal information collected.
 - Specific pieces of personal information collected.
 - The categories of sources from which we collected personal information.
 - The purposes for which we use the personal information.
 - The categories of third parties with whom Knapp shares the personal information
 - The categories of information that we disclose to third parties.

Knapp must provide you this information for the 12-month period preceding your request and free of charge.

There are some exceptions to the right to know. Common reasons why Knapp may refuse to disclose your personal information include:

- We cannot verify your request.
- The request is manifestly unfounded or excessive, or we have already provided personal information to you more than twice in a 12-month period.
- We cannot disclose certain sensitive information, such as your social security number, financial account number, or account passwords, but we must tell you if we're collecting that type of information.
- Disclosure would restrict Knapp's ability to comply with legal obligations, exercise legal claims or rights, or defend legal claims.
- If the personal information is certain medical information, consumer credit reporting information, or other types of information exempt by law.

- B. **California Residents: Your California Privacy Rights.** Under the California Consumer Privacy Act of 2018 ("CCPA"), California residents have certain rights regarding our collection, use, and sharing of their personal information. We do not sell your personal information and will not do so in the future without providing you with notice and an opportunity to opt-out of such sale as required by law. Similarly, we do not offer financial incentives associated with our collection, use, or disclosure of your personal information. We collect various categories of personal information when you use Knapp, including Cookies, commercial information, internet or other electronic network or device activity information, geolocation data, and professional information.

If you are a resident of California, you have the right to know what personal information has been collected about you, and to access that information. You also have the right to request deletion of your personal information, though exceptions under the CCPA may allow us to retain and use certain personal information notwithstanding your deletion request. You can learn more about how to submit a data rights request by contacting us by methods listed below in the "Contact" section. We will not

discriminate against you for exercising your rights under the CCPA. An agent may submit a request on your behalf, but you must verify that your agent is authorized to do so.

Separate from the CCPA, California's Shine the Light law gives California residents the right to ask companies what personal information they share with third parties for those third parties' direct marketing purposes. We do not disclose your personal information to third parties for the purpose of directly marketing their goods or services to you unless you request such disclosure. If you have any questions regarding this policy, or would like to change your preferences, you may contact us by methods listed below in the "Contact Us" section.

- C. **Nevada Residents: Your Nevada Privacy Rights.** Nevada law (SB 220) requires website operators to provide a way for Nevada consumers to opt out of the sale of certain information that the website operator may collect about them. We do not sell your personal information to third parties as defined in Nevada law, and will not do so in the future without providing you with notice and an opportunity to opt-out of such sale as required by law. If you have any questions regarding our data privacy practices or our compliance with Nevada data privacy law, please contact us at the email address listed below in the "Contact" section.
- D. **GDPR Compliance.** As Knapp is not intended to be used by individuals residing in the European Union; is not advertised or directed towards individuals residing in the European Union; and is not hosted on websites, platforms, or is using technology that is located or operated inside the European Union, Knapp is not to be subject to European Union's law.

However, we make good faith efforts to comply with the European Union General Data Protection Regulation ("GDPR"). Knapp fully protects the subject's personal data from misuse in accordance with applicable law, in particular while respecting the principles and rules set out in the Regulation (EU) 2016/679 of the European Parliament and of the Council, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation). Knapp processes the personal data on the basis of the compliance with a legal obligation, performance of a contract, legitimate interests of the controller, and on the basis of consent of the data subject.

- 7. **Change of information, restriction of processing.** You may request to correct, update, suppress, or otherwise modify, any of your information that you have previously provided to us, or object to the use or processing of such information by us. In your request, please make clear what information you would like to have changed; whether you would like to have your information suppressed from our database or otherwise modified; or let us know what limitations you want to place upon your information. For your protection, we may only implement requests with respect to your information associated with the particular e-mail address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably possible. Please note that we may need to retain certain information for recordkeeping purposes, and there may also be residual information that will remain within our databases and other records, which will not be removed as defined below.
- 8. **Children's Data.** Knapp is not directed to direct use by children, and we don't knowingly collect personal information from children under the age of 18 unless such data is provided by their parents or lawful guardians. If you believe that a child under the age of 18 has given us personal information without his/her parents' or lawful guardians' permission, please Contact Us.
- 9. **Links to Third Party Websites.** The Knapp Platform may contain links to third-party websites. Those websites may have privacy policies that differ from ours. We are not responsible for those websites, and we recommend that you review their policies. Please contact those websites directly if you have any questions about their privacy policies.
- 10. **Changes to This Privacy Policy.** We may update this policy from time to time as the Knapp Platform changes and privacy law evolves. If we update it, we will do so online, and if we make material changes, we will let you know through the Knapp Platform or by some other method of communication like email. When you use Knapp, you are agreeing to the most recent terms of this policy.

11. **Dispute Resolution.** Any dispute, claim, or controversy arising out of or relating to this Privacy Policy or previous Privacy Policy statements shall be resolved through negotiation or arbitration as provided in Knapp Terms of Use.
12. **Entire agreement.** This Privacy Policy hereby incorporates by reference any additional terms that we post on Knapp (including, without limitation, our Terms) and, except as otherwise expressly stated herein, this Privacy Policy is the entire agreement between you and us relating to the subject matter herein and supersedes any and all prior or contemporaneous written or oral agreements or understandings between you and us relating to such subject matter.
13. **Contact Us.** If you have any questions or concerns regarding this Privacy Policy, please contact us by calling 718-513-6178 and ask to speak to the compliance officer. To the extent you are required to send a written request to us to exercise any right described in this Privacy Policy, you must submit your request to:

KNAPP NUTRITIONAL & PHARMACY, INC.

Attn: Compliance Officer

Address: 2310 Knapp Street, Brooklyn, NY, U.S., 11229 - 5927

Tel: 718-513-6178

Email: info@knapprx.com

You may also make a complaint to your local data protection authority.