

OCTI PRIVACY NOTICE
Last Updated: December 10, 2025

This privacy notice (“**Privacy Notice**”) governs how we, Octi health, Inc. (together, “**Octi**” “**we**”, “**our**” or “**us**”) use, collect, disclose, and store Personal Information we collect or receive from or about you (“**you**”) in connection with <https://www.octi.health/> (the “**Website**”) and the services provided within our web application (“**Services**”).

Notice at Collection			
The following serves as our notice at collection (“ Notice ”) of Personal Information. We collect Personal Information as detailed in this Notice and in our Privacy Notice https://www.octi.health/privacy .			
Categories of personal information collected	Purposes such Personal Information is collected for	Is such information sold or shared?	Retention Period
Identifiers: This includes your full name, date of birth, email address, and mobile or other telephone number.	To contact you, provide you with support, answer your questions and provide you with our Services.	This information will not be sold or shared.	- Your Personal Data will be stored for the duration of the provision of Services, and until we proactively delete it or until you send a valid deletion request
Demographic information. This includes your age, address, size of household, household’s yearly income, employment status.	To provide you with our Services.	This data will not be sold or shared.	- Your Personal Data will be stored for the duration of the provision of Services, and until we proactively delete it or until you send a valid deletion request
Financial Account Information. This includes information regarding the breakdown of household income, expenses, assets, pay slip and bank accounts.	So we could process your payments and provide you with our Services.	This data will not be sold or shared.	- Your Personal Data will be stored for the duration of the provision of Services, and until we proactively delete it or until you send a valid deletion request
Characteristics of Protected Classifications under California or Federal Law: This includes your age, gender, marital status, and/or medical information.	To provide you with our Services.	This data will not be sold or shared.	- Your Personal Data will be stored for the duration of the provision of Services, and until we proactively delete it or until you send a valid deletion request
Inferences Drawn from the Above: We collect profile inferences that we draw from your information and web activity to create a personalized profile so we can better identify goods and services that may be of interest to you.	To provide you with our Services.	This data will not be sold or shared.	- Your Personal Data will be stored for the duration of the provision of Services, and until we proactively delete it or until you send a valid deletion request
Sensitive Personal Information: social security number, driver's license, racial or ethnic origin, genetic data. (" Sensitive Personal Information ")	To provide you with our Services.	This data will not be sold or shared.	- Your Personal Data will be stored for the duration of the provision of Services, and until we proactively delete it or until you send a valid deletion request
Personal Information collected via our transactions with you (e.g., our correspondence with you via text, emails, and phone calls).	To contact you, provide you with support, answer your questions and provide you with our Services.	This data will not be sold or shared.	- Your Personal Data will be stored for the duration of the provision of Services, and until we proactively delete it or until you send a valid deletion request
Personal information collected via our marketing efforts, including, without limitation, full name, business email address, job title, business address and phone number, business cards.	To establish a business relationship with you, contact you about our Services and send you marketing communications.	This data will be shared (as such term is defined under applicable laws) for the purpose of cross-context-behavioral advertising.	- Your Personal Data will be stored for the duration of the provision of Services, and until we proactively delete it or until you send a valid deletion request

Please read this Privacy Notice carefully, so you can understand our practices and your rights in relation to personal data. “**Personal Data**” or “**Personal Information**” means any information that can be used, alone or together with other data, to uniquely identify any living human being and any information deemed as Personally Identifiable Information by privacy laws. Please note that this is a master privacy notice and some of its provisions only apply to individuals in certain jurisdictions. Important Note: Nothing in this Privacy Notice is intended to limit in any way your statutory right, including your rights to a remedy or means of enforcement.

Table of contents:

What information we collect, why we collect it, and how it is used

1. What information we collect, why we collect it, and how it is disclosed.
2. How we protect and retain your Personal Information
3. How we disclose your Personal Information
4. Your privacy rights.
5. Notice of right to opt-out of the sale or sharing of your Personal Information
6. Notice Of financial incentive
7. Use by children
8. Interaction with third party products
9. Analytic tools/Cookies
10. Contact us

This Privacy Notice can be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Notice. If we implement significant changes to the use of your Personal Data in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

1. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS DISCLOSED.

Categories of Personal Information	Sources of Personal Information	Why is the Personal Information collected/ for what commercial purpose?
<i>When you Browse or Interact with our Website and Services</i>		
Cookies, analytic tools, and log files For more information, please read our cookies policy	When you browse or visit our Website and Services.	• To review or improve the usage and operations of our Website and Services • To analyze trends • To administer the Website and Services • To track users' movement around the Website
<i>When you make use of, or interact with, our Services (e.g., by creating an account, logging in, etc.)</i>		
• Full name; • Phone number; • Email address; • Household yearly income; • Status (e.g., unemployed, veteran, reason for hospitalization, etc.); • Medical bills, medical records, insurance documents (e.g., EOB, medical condition, etc.); • Number of persons in the household; • Financial Account Information. • Residency (e.g., the State in which you live); • Any other Personal Information that we need in order to provide you with our Services (for example, correspondence with you when providing you with the Services); and/or • Any other Personal Information that you decide to provide us with.	When you interact with our Services by, for example: • Answering the questionnaire; • Requesting that we contact you; • Uploading documents; • Retrieving documents per your request and/or • Using our Services in order to reduce your medical bills.	We will use your Personal Information to: • Contact you; • Provide you with the Services (e.g., to respond to your request that we reduce your medical bill); • Process your requests; • Communicate with you about your use of the Services and for support purposes; • Fulfill any instruction and/or request made by you in the context of the Services; • Send you emails and notifications regarding certain features of the Services, including, updates pertaining to the Services we provide you with; • Personalize your experience with our Services; • Generally administer and improve the Services.
<i>When you request customer support.</i>		
• Email correspondence, text messages , and any other information necessary to provide you with the Services.	• When you contact us through the Website and/or chat. • When we contact you via email, text and/or phone, we will collect on a case-by-case basis your Personal Information.	We collect your Personal Information to: • Provide you with the Services; and • Answer your questions and provide support when requested by you.
<i>When we want to establish a business relationship with you</i>		
• Full name; • Business or personal email address; • Job title; • Business address; • Phone number; • Any other Personal Information you decide to provide us with.	• When you attend a marketing event; • Exchange business cards with us; and/or • Otherwise provide us with your Personal Information for marketing purposes	• To establish a business relationship with you; • Contact you about our Services and/or • Send you marketing communications.

Finally, please note that some of the abovementioned Personal Data will be used for detecting, taking steps to prevent, and prosecution of fraud or other illegal activity, to identify and repair errors, to conduct audits, and for security purposes. Personal Data may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we may or will anonymize or de-identify your Personal Data and further use it for internal and external purposes, including, without limitation, to improve the Services and for research purposes. In addition, in some circumstances, we may use artificial intelligence (including without limitation, machine learning algorithms) to review and analyze your Personal Information (e.g., medical bill, insurance records, etc.) in order to improve and provide you with our Services. “**Anonymous Information**” means information which does not enable identification of an individual user, such as aggregated information about the use of our Services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our Services and enhance your experience with them).

2. HOW WE PROTECT AND RETAIN YOUR PERSONAL INFORMATION.

- 2.1. **Security.** We have implemented appropriate technical, organizational and security measures designed to protect your Personal Data. However, please note that we cannot guarantee that the information will not be compromised as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.
- 2.2. **Retention of your Personal Data.** Your Personal Data will be stored for the duration of the provision of Services, until we proactively delete it (upon the passing of a year from the de-activation of your account) or you send a valid deletion request, please note that in some circumstances we may store your Personal Data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings. We have an internal data retention policy to ensure that we do not retain your Personal Data perpetually.

3. HOW WE DISCLOSE YOUR PERSONAL INFORMATION.

- 3.1. We may disclose your Personal Data as follows:
 - 3.1.1. To our business partners with whom we jointly offer products or services. We may also disclose Personal Data to our affiliated companies (if any).
 - 3.1.2. We use third party service providers to process your Personal Data for the purposes outlined above, including, without limitation: (i) with cloud service providers for hosting purposes; (ii) with websites and web content creation platforms in order to help us manage our Website; (iii) with external artificial intelligence solutions, including artificial intelligence and large language models (LLMs) tools; and (iv) with email providers, marketing, CRM, other similar tool providers;
 - 3.1.3. To the extent necessary, with regulators, courts or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
 - 3.1.4. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your Personal Data to such third party (whether actual or potential) in connection with the foregoing events;
 - 3.1.5. In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your Personal Data in connection with the foregoing events, including, in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company; and/or
 - 3.1.6. Where you have provided your consent to us sharing or transferring your Personal Data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality).
 - 3.1.7. We may disclose Personal Data with our lawyers, accountants, auditors and other professional advisors where necessary to obtain legal or other advice or otherwise protect and manage our business interests.

3.1.8. We may use or disclose Personal Data to investigate, prevent, or take action regarding illegal activities, suspected fraud, cybersecurity threats, situations involving potential threats to the physical safety of any person, violations of this notice, or as otherwise required or allowed by law and regulations.

3.2. If you want to receive the list of the current recipients of your Personal Data, please make your request by contacting us to privacy@octi.health.

4. YOUR PRIVACY RIGHTS.

4.1. **Rights:** Some applicable data protection laws grant you certain rights in connection with your Personal Information, the following rights (which may be subject to certain exemptions or derogations) shall apply to individuals protected by such laws:

- You have the right to know what Personal Information is being collected about you. This includes the right to request that we disclose what Personal Information of yours we collect, use, and disclose;
- You have the right to request the erasure/deletion of your Personal Information (e.g. from our records and the records of our service providers). Please note that there may be circumstances in which we are required to retain your Personal Information, for example for the establishment, exercise or defense of legal claims;
- You have the right to correct inaccurate Personal Information that we maintain about you.
- You have the right to know whether your Personal Information is sold or disclosed and to whom;
- You have the right to restriction of, or object to, processing of your Personal Information;
- You have the right to limit the processing of your sensitive Personal Information;
- You have the right to opt out of the processing of the Personal Data for purposes of (i) targeted advertising, or (ii) profiling in furtherance of decisions that produce legal or similarly significant effects concerning the consumer;
- You have the right to obtain a copy of the Personal Data that you have previously provided us with in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another controller without hindrance, where the processing is carried out by automated means

Please be advised that without certain types or categories of data, we will not be able to supply you with the Service.

4.2. **Non-Discrimination.** If you decide to exercise your rights, you will not receive any discriminatory treatment by us for the exercise of the privacy rights conferred by the CCPA. However, note that some features of our Website, our products and/or our Services will not function without your Personal Information. Unless permitted by the CCPA, we will not:

4.2.1. Deny you goods or services.

4.2.2. Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.

4.2.3. Provide you a different level or quality of goods or services.

4.2.4. Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

4.3. You can exercise your rights by contacting us at privacy@octi.health or, if you are an individual protected by CCPA, you can make your requests by email. If we decline to take action on one of your rights, applicable law may allow you to submit an appeal, this may be done by emailing us at privacy@octi.health. You may authorize someone to make a privacy rights request on your behalf (an authorized agent). Authorized agents will need to demonstrate that you have authorized them to act on your behalf or must demonstrate they have power of attorney pursuant to applicable probate law. We retain the right to request confirmation directly from you confirming that the agent is authorized to make such a request, or to request additional information to confirm the agent's identity. An authorized agent is prohibited from using a consumer's Personal Information, or any information collected from or about the consumer, for any purpose other than to fulfill the consumer's requests, for verification, or for fraud prevention. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initial requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

4.4. Additional Rights granted to California residents.

4.4.1. **California Privacy Rights:** California Civil Code Section 1798.83 permits our customers 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 send an email to privacy@octi.health. Please note that we are only required to respond to one request per customer each year.

5. NOTICE OF RIGHT TO OPT OUT OF THE SALE OR SHARING OF YOUR PERSONAL INFORMATION.

5.1. We do not consider that we sell or share any Personal Information. Therefore, we have not sold or shared consumers' Personal Information for a business purpose in the preceding 12 months.

5.2. We do not currently offer financial incentives; however, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your Personal Information's value and contain written terms that describe the program.

5.3. We do not knowingly share (for cross-context behavioral advertising) the Personal Information of consumers under 18 years of age. For more information about treatment of children's Personal Information, see Section 7 below.

6. **NOTICE OF FINANCIAL INCENTIVE.** We do not offer financial incentives for the collection of Personal Information.

7. **USE BY CHILDREN.** We do not offer our products or Services for use by children. In the event that we become aware that you provide Personal Information in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at privacy@octi.health.

8. **INTERACTION WITH THIRD PARTY PRODUCTS.** We enable you to interact with third party websites, mobile software applications and products or services that are not owned or controlled by us (each a "Third Party Service"). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect Personal Data from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

9. ANALYTIC TOOLS

9.1. **Google Analytics.** The Website uses a tool called "Google Analytics" to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with Personal Information we collect. Google's ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <https://marketingplatform.google.com/about/analytics/terms/us/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.

9.2. **PostHog:** We use PostHog on our Website and some of the services in order to better understand our users' needs and to optimize this service and experience. PostHog collects user experience data of your usage of our Website and services and surfaces issues to engineering, product and marketing teams. PostHog uses cookies and other technologies to collect data on our users' behavior and their devices, device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display our Website). For further details, please see PostHog privacy policy [here](#).

9.3. We use log files. We use such personal information to analyze trends, administer the Website, track user movement around the Website, and gather demographic information.

10. **CONTACT US.** If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at privacy@octi.health.