



Privacy Policy

Introduction

Luminopia, Inc. (“**Luminopia**”) provides proprietary digital therapeutic solutions consisting of software and content (“**Solution**”) to users (users of our Solution, and their parents which may have purchased the Solution are hereinafter collectively referred to as “**End-users**”). We have taken steps to ensure that any personal information provided to Luminopia is protected by a range of robust business procedures and rigorous security safeguards to ensure that personal information is kept confidential and used only for the purposes detailed in this Privacy Policy. This Privacy Policy is intended to establish responsible and transparent practices for the management of personal information. We will ensure that all personal information that we collect and maintain will be (i) processed lawfully, fairly, and in a transparent manner; (ii) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; (iii) adequate, relevant, and limited to what is necessary; (iv) accurate and kept up to date; and (v) processed in a manner that ensures appropriate security of the Personal Information, including protection against unauthorized or lawful processing and against accidental loss, destruction or damage.

Application and Scope

This Privacy Policy generally applies to any personal information (as defined below in the section entitled Definition of Personal Information) collected or generated by Luminopia from or about our End-users and other individuals with whom we deal, which may include potential customers. This Privacy Policy also governs personal information collected about Luminopia websites’ users and explains how we use and disclose personal information that we collect from people who visit our websites and otherwise interact with us through any of our websites associated with our domains: luminopia.com (such as www.luminopia.com), luminopia.ca (such as www.luminopia.ca), lmn.li (such as www.lmn.li), luminopia.org (such as www.luminopia.org), and luminopia.co.uk (such as www.luminopia.co.uk) (collectively referred to as “**websites**”). It also explains how we use cookies and similar technologies.

Definition of Personal information

When used in this Privacy Policy, personal information means “any information about an identifiable individual”. This may include, for example, our End-users’ name, contact information, email-address, information relating to their account, the services used and subscribed to, as well as the End-Users’ health condition. It may also include other types of more technical information such as website users’ IP addresses or browser history (pages accessed, date of access, location when accessed), but only when this information can identify an individual. Personal information that is aggregated and cannot be associated with an identifiable individual is not considered to be personal information.

In certain situations, we may be considered a Business Associate as defined by HIPAA (the federal Health Insurance Portability and Accountability Act) of certain Covered Entities (as also defined in HIPAA), and as such we may have certain federal, state and contractual restrictions on how we can use your Protected Health Information (“PHI”). When acting as a Business Associate, we may only use or disclose your PHI or personal information as required by law or as permitted by the Business Associate Agreement (“BAA”)

that we have in place with a specific Covered Entity. Please be aware that when you give other individuals access to your PHI or personal information, they may be able to use, reproduce, distribute, display, transmit, and/or communicate the data to others and the public. We shall not have any responsibility for access, use, or disclosure of your PHI or personal information by people you authorized to have access to your user account.

Collection of Personal Information

We collect most of our information directly from our End-users (in some cases through our service providers), with their consent, or with the consent of their parents (for End-users which have not reached the age of majority in their province of residence). In many cases, we collect the following types of information:

- **Inquiries and Subscriptions.** We may collect the name, contact information, e-mail address and any information provided to us upon someone making an inquiry or contacting us by phone, mail, or through our websites or upon an individual signing up to receive our newsletter.
- **Using our Solution.** We may collect information when End-users purchase and use our Solution. This may include the End-users' name, address, financial information, health condition and medical prescription from the referring doctor or healthcare professional.
- **Software / Device.** We may collect information pertaining to the End-users' use of the Luminopia software / device, such as the relevant IP address of the device, time and duration of device use, device movement metrics, application crash reports, internet connection status and speed. We may also record activities of the End-user using our Solution, such as the type and name of the shows watched and their duration, as well as other similar type of information pertaining to how the End-users respond to our Solution.
- **Portal.** We may collect information pertaining to the End-users' use of our patient portal, such as time and duration of use information pertaining to the device used to access the portal, such as device attributes (operating system, hardware version, browser type), language and time zone.
- **Website and Social Media.** We may also collect information from website visitors or online users. For details on the type of information that we collect via our website or when you use social media, please refer to the [Website and Social Media](#) section of this Privacy Policy.

Use of Personal Information

Luminopia generally collects personal information from or about its End-users and other individuals with whom it deals, and thereafter uses it, for the following purposes:

- to provide our Solution to End-users and monitor their use of our products and services to ensure that our products and services are adequately supported and implemented;
- to establish, develop and preserve our business relationship respectively with End-users and other individuals with whom we deal;

- to provide End-users with reminders and to otherwise communicate with End-users;
- to receive payment for the products and services that you receive;
- to create, establish and administer End-users' accounts and to respond to customer inquiries;
- to authenticate the identity and preserve the privacy of End-users contacting Luminopia by telephone, electronic means or otherwise;
- for internal training and quality assurance purposes;
- to manage our businesses and ensure the efficiency, reliability and security of our systems and networks;
- to meet legal and regulatory requirements and allow Luminopia to meet contractual requirements relating to the Solution provided to End-users;
- to understand and assess the interests, wants and changing needs of End-users with a view to improving its products and services and developing new ones;
- to provide personalized products and services as well as to recommend training videos or testimonials to End-users; and
- subject to our End-users' [Right to Withdraw Consent](#) provided in this Privacy Policy, to conduct surveys on the quality of our products, services or customer service or to provide our End-users with offers for additional products and services that we feel may be of interest to our customers or that we believe meet our customers' changing needs.

If you have applied for employment with Luminopia, the personal information submitted with your job application will be used for recruitment and other customary human resources purposes. For example, we may send you information about new job opportunities within Luminopia as well as other career development resources.

Unless required or authorized by law, Luminopia will not collect or use personal information for any other or new purpose without obtaining further consent. For details on how we use information collected via our websites, please refer to the [Website and Social Media](#) section of this Privacy Policy.

Your Consent

Luminopia obtains consent from the individuals concerned for the collection, use or disclosure of personal information through various written documents, including agreements, forms or electronic communications. In general, by purchasing the Solution and/or submitting information to us in connection with using Luminopia products and services, you are providing your consent to the collection, use and disclosure of personal information as set out in this Privacy Policy and in the Luminopia [End-User Agreement](#). Moreover, by visiting, interacting with and/or using our websites, you agree to benefit from and be bound by, the terms and conditions of this Privacy Policy.



Privacy Policy

Consent may be withdrawn at any time, subject to legal or contractual restrictions and reasonable notice; however, without such consent, Luminopia may limit the services or products it is able to provide customers. You may also withdraw your consent as follows:

- **Mail marketing, Telephone marketing and Quality control communications.** You may decide that you prefer Luminopia not to use your personal information to promote new and/or additional products and/or services which may be of interest to you and refuse that we contact you by mail or telephone for marketing purposes or by email or telephone for quality control purposes. If this is the case, you may advise us by contacting customer service or contacting us using the information detailed in the [How to Contact Us](#) section below.
- **Commercial Electronic Communications.** You can always limit the communications that Luminopia sends to you. To opt-out of commercial emails, simply click the link labeled “unsubscribe” or “opt-out” at the bottom of any commercial electronic communication we send you. Please note that even if you opt-out of promotional communications, we may still need to contact you with important information about your account as well as important updates to this Privacy Policy.

For information on how you can limit the type of information that we collect, use or share about you when you visit and/or use our websites, please refer to the [Website and Social Media](#) section of this Privacy Policy.

Sharing of Personal Information

Luminopia will not sell, rent or trade your personal information to any third party. However, we may share your personal information when authorized by law or as follows:

- **Health Professionals.** We may provide your referring healthcare provider with copies of your record or reports that will assist him/her in your treatment and healthcare during your treatment or after you have completed your treatment using our Solution if you have instructed us to do so, either through our patient portal where you can request an email report which you can then share with your healthcare professional, or through other means.
- **Third party or affiliated service providers.** We may hire service providers, which may be affiliates, to perform services on our behalf. This may include, without limitation, a person or an organization retained by Luminopia to perform work on its behalf. We provide them with a limited amount of information which is necessary in order for them to provide the services required. They are prohibited from using the information for purposes other than to facilitate and carry out the services they have been engaged to provide. These service providers are not permitted to disclose this information to others.
- **Content providers.** We may be required, under the licensing agreements that we have with our content providers, to share video engagement and usage metrics and statistics, although the information shared with such content providers will, at all times, be provided on an aggregate level, and will never identify an End-user on an individual basis.

- **As permitted or required by law.** From time to time, Luminopia may be compelled to disclose personal information in response to a law, regulation, court order, subpoena, valid demand, search warrant, government investigation or other legally valid request or enquiry. In these circumstances, Luminopia will protect the interests of its End-users by making reasonable efforts to ensure that orders or demands comply with the laws under which they were issued, that it discloses only the personal information that is legally required and nothing more, and that it does not comply with casual requests for personal information from government or law enforcement authorities. We may also disclose information to our accountants, auditors, agents and lawyers in connection with the enforcement or protection of our legal rights. We also reserve the right to report to law enforcement agencies any activities that we, in good faith, believe to be unlawful or to law enforcement and emergency services providers, in an emergency or where required or permitted by law. We may release certain personal information when we have reasonable grounds to believe that such release is reasonably necessary to protect the rights, property and safety of others and ourselves, in accordance with or as authorized by law.
- **Business transaction.** We may disclose personal information to a third party in connection with a sale or transfer of business or assets, an amalgamation, re-organization or financing of parts of our business. However, in the event the transaction is completed, your personal information will remain protected by applicable privacy laws. In the event the transaction is not completed, we will require the other party not to use or disclose your personal information in any manner whatsoever and to completely delete such information.

For information on how you can limit the type of information that we collect, use or share about you when you visit and/or use our website, please refer to the [Website and Social Media](#) section of this Privacy Policy.

Website and Social Media

- **Technical information.** When you visit our websites, we may collect, using electronic means such as cookies, technical information. This information may include information about your visit to our websites, including the IP address of your computer and which browser you used to view our websites, your operating system, resolution of screen, location, language settings in browsers, time and duration of use, device attributes (such as operating system, hardware version, browser type), language settings in browsers, time zone, third party information such as from partnered advertisers or social media sites as detailed in the [Social Media](#) section of this Privacy Policy, the site you came from, keywords searched (if arriving from a search engine), the number of page views, information you entered and advertisements you have seen. This data is used to measure and improve the effectiveness of our websites or enhance the experience for our customers. For instance, it may be used to ensure that the products advertised on our websites are available in your area or that we are not showing you the same ads repeatedly. We treat this information as personal information when it is associated with your account or contact information. For instance, we may collect and use the following type of information when you visit and/or interact with us on our websites:
 - **Analytics:** We use an analytics provider such as Google Analytics or a similar provider which allows us to see information on user website activities including, but not limited to, page views, source

and time spent on our websites. This information is depersonalized and is displayed as numbers, meaning that it cannot be tracked back to individuals. You may opt-out of our use of Google Analytics by visiting the [Google Analytics opt-out page](#).

- **Google AdWords and Advertising Networks:** We may use Google AdWords Remarketing to advertise Luminopia across the Internet and to advertise on third party websites (including Google) to previous visitors to our websites. AdWords remarketing will display ads to you based on what parts of the Luminopia websites you have viewed by placing a cookie on your web browser. It could mean that we advertise to previous visitors who haven't completed a task on our site or this could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. This cookie does not in any way identify you or give access to your computer or mobile device. The cookie is only used to indicate to other websites that you have visited a particular page on our websites, so that they may show you ads relating to that page. If you do not wish to participate in our Google AdWords Remarketing, you can opt out by visiting Google's [Ads Preferences Manager](#). We may also use third party network advertisers, including Facebook's Audience Network, to serve advertisements and third party analytics vendors to evaluate and provide us with information about the use of our websites and viewing of our content.
- **Interest-based Advertising:** Luminopia may also allow a limited number of trusted third parties to install cookies on your hard drive from our websites. Our websites may include third-party advertising and links to other websites which may be used to generate personalized advertisements. Personalized ads, sometimes referred to as interest-based or behavioral ads, are ads based upon information about you, such as your page views on our websites, your information requests or purchases on our websites. We do not provide any personal information to advertisers or to third party sites that display interest-based ads on our websites. However, advertisers and other third-parties (including the ad networks, ad-serving companies, and other service providers they may use) may assume that users who interact with or click on a personalized ad or content displayed on our websites are part of the group that the ad or content is directed towards. Advertisers or ad companies working on their behalf sometimes use technology to serve the ads that appear on our websites directly to your browser. They may also use cookies to measure the effectiveness of their ads and to personalize ad content. We do not have access to or control over cookies or other features that advertisers and third party sites may use, and the information practices of these advertisers and third party websites are not covered by our Privacy Policy. Please contact them directly for more information about their privacy practices. You can also generally opt-out of receiving personalized ads from third party advertisers and ad networks who are members of the Digital Advertising Alliance of Canada. Please visit the [DAAC opt-out page](#) for more information.
- **Social Media:** We may also collect information from social media channels or when you participate or use social media networks (Facebook, Instagram, Pinterest, Twitter, YouTube and Snapchat) ("**Social Media Channels**"). You may also choose to participate in a third party application or feature (such as one of our Facebook or Twitter applications or a similar application or feature on a third party websites) through which you allow us to collect (or the third party to share) information about you, (including personal information) such as details of your friends/connections, "likes", comments you have shared, groups and location. In addition, when authorized by applicable laws, we may receive information about you (including your personal

information) if other users of a third party websites give us access to their profiles and you are one of their friends/connections or information about you is otherwise accessible through your friends'/connections' web page, profile page, or similar page on a Social Media Channel or other third party websites or interactive service. To the extent permitted by applicable privacy laws, we may supplement the information we collect about you directly with the information we receive from third parties in order to enhance our ability to serve you, to tailor our content to you and send you details of promotions and/or offers which we believe may be of interest to you. We may also use third party video hosting service providers to host informational videos on our websites which will also collect user information in a similar manner.

- **Your Choice with Cookies.** You can block the use of cookies by activating the settings in your browser. The “Help” feature on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If you choose to withhold consent, or subsequently block cookies, you may not be able to access all or part of the content of our websites. Additionally, you can disable or delete similar data used by browser add-ons, by changing the add-on’s settings or visiting the website of its manufacturer.
- **Privacy Policies of Third Parties.** This Privacy Policy only addresses the use and disclosure of information by Luminopia. Other websites that may be accessible through the Luminopia websites have their own privacy policies and data collection, use and disclosure practices. We encourage you to familiarize yourself with the privacy statements provided by all third parties prior to providing them with information or taking advantage of an offer or promotion.
- **Satisfaction Survey.** When you visit our websites, you may, from time to time, be invited to participate to a satisfaction survey. In such case and if you decide to participate to our survey, we may collect your postal code, email address and other information deemed important to complete such survey. We will only use your information for quality assurance purposes.
- In some countries, we are not permitted to send cookies to the browser of a user without the prior consent of the affected user. In this case, we will seek such consent. This section assumes that either the use of cookies is not restricted by applicable law, or if it is restricted that the individual has explicitly consented to the use of the cookies.

Children Privacy

We recognize the need to provide further privacy protections with respect to personal information we may collect from children using our Solution. When we collect personal information from children, we take the following steps to protect children’s privacy:

- Informing parents, through this Privacy Policy, about our information practices with regard to children, including the types of personal information we may collect, the uses to which we may put that information, and whether and with whom we may share that information;

- In accordance with applicable law, obtaining consent from parents for the collection of personal information from their children, or for sending information about our products and services directly to their children;
- Limiting our collection of personal information from children to no more than is reasonably necessary to use our Solution; and
- Giving parents access or the ability to request access to personal information we have collected from their children and the ability to request that the personal information be changed through our patient portal.

Security of Personal Information

We will use reasonable security measures to protect your personal information against unauthorized access. Luminopia has implemented security measures that contain administrative, technical and physical controls that are designed to safeguard your personal information. For example, we use industry-standard encryption technology to secure sensitive personal information when it is being collected and transmitted over the Internet as well as firewalls, site monitoring and intrusion detection software. We also comply with security requirements provided under applicable laws when storing data.

Retention

Personal information will be retained only as long as necessary for the fulfilment of the purposes for which it was collected and for which consent was received, unless otherwise required by law. Personal information that is no longer required to fulfil the identified purposes will be destroyed, erased or made anonymous. Luminopia has developed and implemented detailed retention principles, and will ensure destruction of personal information in a method that prevents improper access.

Access and Correction

Luminopia respects individuals' right to access and correct their personal information. If you have purchased our Solution, you can at any time to access and update the information you have provided to us through our patient portal. Additionally, Luminopia complies with all laws regarding access and correction. If you need assistance updating your personal information, please contact us using the contact information detailed in the [How to Contact Us](#) section below.

California Residents

The California Consumer Privacy Act (CCPA) provides California consumers with the right to request access to their personal data, additional details about our information practices and deletion of their personal information (subject to certain exceptions). California consumers also have the right to opt out of sales of personal information, if applicable. We describe how California consumers can exercise their rights



Privacy Policy

under the CCPA below. Please note that you may designate an authorized agent to exercise these rights on your behalf by providing written materials demonstrating that you have granted the authorized agent power of attorney. Please note that if an authorized agent submits a request on your behalf, we may need to contact you to verify your identity and protect the security of your personal information. We will not fulfill your CCPA request unless you have provided sufficient information for us to reasonably verify you are the consumer about whom we collected personal information. We will not discriminate against you if you choose to exercise your rights under the CCPA.

You may request, no more than twice in a twelve (12) month period, access to the specific pieces of personal data we have collected about you in the last twelve (12) months. You may also request additional details about our information practices, including the categories of personal information we have collected about you, the sources of such collection, the categories of personal information we share for a legitimate business or commercial purposes, and the categories of third parties with whom we share your personal information. You may make these requests by contacting using the contact information provided below in the “How to Contact Us” Section below. After submitting your request, please monitor your email for a verification email. We are required by law to verify your identity prior to granting access to your data in order to protect your privacy and security.

You may request, no more than twice in a twelve (12) month period, transportable copies of your personal information that we have collected about you in the last twelve (12) months. You may make these requests by contacting using the contact information provided below in the “How to Contact Us” Section. After submitting your request, please monitor your email for a verification email. We are required by law to verify your identity prior to granting access to your data in order to protect your privacy and security.

You may request that we delete the personal information we have collected about you. Please note that we may retain certain information as required or permitted by applicable law. You may make these requests by contacting us using the contact information provided below in the “How to Contact Us” Section below. After submitting your request, please monitor your email for a verification email. We are required by law to verify your identity prior to granting access to your data in order to protect your privacy and security.

California residents are entitled to ask us for a notice identifying the categories of personal information which we share with our affiliates and/or third parties for marketing purposes and providing contact information for such affiliates and/or third parties. If you are a California Resident and would like to exercise your rights under CCPA, please submit a written request using the information provided in the “How to Contract Us” section below. Our privacy team will examine your request and respond to you as quickly as possible.

EU/EEA Residents

If you are a natural person residing within the European Economic Area (“Data Subject”), the following additional rights as expressed under Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 known as the General Data Protection Regulations (“GDPR”) are applicable to you:



Privacy Policy

Personal Data: For the purposes of this section, “Personal Data” means collectively personally identifiable information (“PII”), including, without limitation, information, which collected together, can lead to personal identification (“Unique Identifiers”), personal identifiers used for advertising purposes (“Advertising Identifiers”), and certain location data (“Location Data”) which you have provided to, or otherwise collected when you use and otherwise access the Website.

Basis for Processing Data: Our Website relies on the consent of the Data Subject to process personal information. Data Subjects must be at least the age of 16 to consent to the processing of their Personal Data. Data Subjects under the age of 16 must obtain their parent’s or legal guardian’s permission to consent to the processing. On other occasions, we may process information when we need to do so to fulfill a contract, provide services or where we are required by law to do so.

Access/Portability: You may access, correct, or modify the Personal Data you provided to the Website and associated with your account. Note that we may request to verify your identification before fulfilling your request. You can also request that your personal information is provided to you in a commonly used electronic format so that you can share it with other organizations. You may do so by contacting our privacy team to process your request.

Forgotten: You may request to have your Personal Data erased, or otherwise request that your Personal Data not be processed. Please note that the Service, or parts of the Service, may become inaccessible or otherwise not function properly if you request to have your Personal Data erased or not be processed. You may do so by contacting our privacy team as described below.

Object, Restrict, or Withdraw Consent: You may withdraw consent you previously provided to website or otherwise object to or restrict the processing of your Personal Data. Please note that the Service, or parts of the Service, may become inaccessible or otherwise not function properly if you withdraw certain consents or otherwise object to restrict the processing of your Personal Data. You may do so by contacting our privacy team to process your request.

Supervisory Authority: If you have a concern with the handling of your Personal Information, you have the right to do so with your local Data Protection Authority in the country in which you reside.

If you would like to exercise above EU General Data Protection Regulation (GDPR) rights about your personal information we hold about you, please submit a written request using the information provided in the “How to Contact Us” section below. Our privacy team will examine your request and respond to you as quickly as possible.

How to Contact Us

If you have questions, concerns or complaints regarding this Privacy Policy or the personal information that Luminopia has about you and/or your child, please contact:

Hank Wu
COO

Luminopia, Inc.



Privacy Policy

955 Massachusetts Ave, #335
Cambridge, MA 02139
By phone: +1 (857) 365-6636
By e-mail: privacy@luminopia.com

Change of Privacy Policy

Luminopia will review and update its policies and procedures as required to keep current with rules and regulations, new technologies, standards and customer concerns. Our Privacy Policy may therefore change from time to time. We will post any privacy policy changes on our websites and, if the changes are significant, we will provide a more prominent notice.

This Privacy Policy was last updated on August 1, 2022.