

FIVEBRANE Privacy Policy

We — meaning Fivebrane Inc, (also "we," "our," or "us") — prepared this Privacy Policy to help you understand our practices with respect to the collection, use, and disclosure of personal information (hereinafter, “**Personal Information**” or “**PI**”) we collect from you through <https://fivebrane.com>, its subdomains, and any other website or services owned by us (collectively, the “**Services**”).

1. What PI We Collect from You and How

We collect information from you when you:

- (i) Create or register an account
- (ii) Submit requests, or other communications to us
- (iii) Contact us for customer support or technical support
- (iv) Use our **Services**

We may also collect information about you from our providers, insofar as they help us to provide or promote our product.

We may also obtain publicly-available business contact information.

Below is additional information about what we collect, depending on how you interact with the **Services**:

a. Customer Information

“Customer Information” consists of information related to your access or use of our **Services**, the creation of accounts, or that otherwise identifies you as an end user. Customer Information includes:

Identifiers. This includes your name, surname, email address, and other similar identifiers.

Customer Records. This includes username and password, job title, company name, field of expertise.

Internet/Network Activity Information. This includes your browsing history, IP address, log and analytics data, information about the device(s) used to access the

Services, domain server, search history and information regarding your interaction with our **Services**, and other usage data.

Other Personal Information. This includes personal information you provide to us in relation to a survey, comment, question, request, or inquiry.

Inferences. This includes inferring your location using your IP address, or using data from your use of our Service to make predictions about your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

b. Automatically-Collected Information

We collect information about how you use the **Services** and your actions on it, including your IP addresses, browser types, operating systems, ISPs, platform types, device types, and mobile device identifiers such as make and model, and mobile carrier. We may also use tools, including third-party tools, to collect analytics data. Some of this information is collected through the use of cookies and other tracking technologies, such as web beacons, pixels, session replay scripts, and similar technologies.

c. Aggregated or De-Identified Data

This includes aggregated or de-identified information for a wide variety of statistical, analytical, and Website improvement purposes. The aggregation or de-identification process prevents the information from being reassociated or identified with any one customer account, user, or individual.

2. How We Use the Information We Collect

We use your PI to:

- Fulfill our Contract with You and Provide the Services to You. This includes use for the purpose of: (i) responding to your requests or inquiries; (ii) providing you with support or technical assistance; (iii) contacting you to provide product updates or information about products you have requested or purchased; (iv) creating, managing, or administering your information and account, including identifying you with your account.

- Analyze and Improve our services Pursuant to our Legitimate Interest. This includes use for the purpose of: (i) deriving market insights and performing other business analysis or research; (ii) securing the Services and our systems, and protecting your information and data; (iv) detecting security incidents and protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity; and (v) measuring interest in and engagement with our Services and short-term, transient use.
- Marketing Our Products and Services. This includes use for the purpose of: (i) monitoring the performance of our advertisements and marketing efforts, and (ii) communicating with you about your engagement with our Services.
- Fulfill Legal Obligations and Rights. This includes use for the purpose of: (i) establishing, exercising, investigating, prosecuting, or defending against legal claims; (ii) complying with laws or responding to lawful requests and legal process; (iii) protecting our rights and property, our agents, customers, and others, including to enforce our agreements and policies; (iv) detecting, suppressing, or preventing fraud; (v) reducing credit risk and collecting debts owed to us; (vi) protecting the health and safety of our customers, or any person, including ourselves; or (vii) fulfilling other requirements under applicable law.
- Other Purposes. This includes use for our other, legitimate business purposes, or as permitted by applicable law.

3. How We Disclose Information

We disclose information we collect for specific purposes, including:

- With affiliates and partners to provide you with our services and product;
- With third-party suppliers that help us provide you with aspects of the **Services**, such as data storage, hosting, etc., or that help us with marketing and email campaigns, to advertise, gain insights, and perform analytics into how the Service is used and how it might be improved;

- With third-party providers of marketing services;
- As necessary to comply with applicable law, including governmental requests and law enforcement requests, and otherwise to protect the rights, privacy, safety, or property of you, us, or others;
- As necessary in the event of a proposed or actual reorganization, merger, sale, joint venture, assignment, transfer, financing, or other disposition of all or any portion of our business, assets, or stock;
- With others for any legitimate business purpose that does not conflict with the statements made in this Privacy Policy.

4. Transfers of Information

We may transfer to and process your personal information in countries outside of the jurisdiction where you are located for the purposes described above. When required by law, we will ensure that we rely on an appropriate legal mechanism for the transfer, such as your consent, standard contractual clauses (or their equivalent), or adequacy decisions. You may ask us, using the contact information in this policy, for more information about the specific basis we use for transferring your data.

5. Retention of Information

We store your personal information for no longer than necessary for the purposes for which it was collected, including for the purposes of satisfying any legal or reporting requirements, and in accordance with our legal obligations and legitimate business interests. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data; the potential risk of harm from unauthorized use or disclosure of your personal data; the purposes for which we process your personal data; and the applicable legal requirements.

6. Information from Children

The **Services** is not intended for use by children under the age of 16 (or other age as required by local law) and we do not knowingly collect personal information from children. If we learn that we have collected personal information from a child, we will take reasonable steps to delete such information from our files as soon as is

practicable. If you learn that your child has provided us with personal information without your consent, you may contact us at info@fivebrane.com.

7. Changes to Privacy Policy

Any information that we collect is subject to the Privacy Policy in effect at the time such information is collected. We may, however, revise the Privacy Policy from time to time. If a revision is material, as determined solely by us, we will notify you, for example via email. The current version will always be posted to our Privacy Policy page.

This Policy was last updated on Sep-11-2024.

8. Contact Us

If you have any questions about our privacy practices, including this policy, you may contact us by email at info@fivebrane.com or by mail at Fivebrane, anna@fivebrane.com.

9. EEA, UK, Swiss-Specific Disclosures

The disclosures in this section apply solely to residents of the European Economic Area ("EEA"), Switzerland, and the United Kingdom ("UK"), and describe how we collect, use, disclose, and otherwise process personal data about you. Unless otherwise expressly stated, all terms in this section have the same meaning as defined in the General Data Protection Regulation ("GDPR").

a. Who are we and who processes your personal data?

We are an US company dedicated to the development of a powerful data science platform designed to streamline the development of reliable medical imaging AI solutions and advanced disease analytics. We are the Controller of the personal data we hold about you in connection with your use of the **Services**:

Fivebrane Inc.

2150 Shattuck Avenue, Berkeley, 94704, USA

b. Categories of data processed

We process different types of personal information grouped as follows

Category of data processed	Examples of data processed
Browsing data (Electronic Identification Data)	Country, type of device, IP address, domain name Uniform Resource Identifier, addresses of the requested resources, the time of such requests, the method used for submitting a given request to the server, returned file size, a numerical code relating to server response status, errors, and other parameters related to the user's operating system and computer environment)
Identification data and contact details	Email Full Name
Employment data	Job title/Role Company Name Field of expertise/Interest
Usage data	E.g. actions performed while using the Services, errors experienced and feedbacks
Cookies	Necessary cookies to carry out communications over a network Analytics cookies to improve the Services
Other personal data (user generated data)	Personal information you provide to us in relation to a survey, comment, question, request, or inquiry

c. Purposes and Lawful Bases of Processing

We collect and process your personal data for purposes set forth in the following table.

Purpose	Description	Data Processed	Legal Basis	Are you required to provide the data?
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<p>To provide our website</p>	<p>Website navigation: allowing users to freely connect to the website and navigate it</p>	<p>Browsing Data (Electronic identification data) Strictly necessary cookies</p>	<p>Performance of the contact - art.6(1)(b) GDPR</p>	<p>We collect this data automatically when you join our website. You wouldn't be able to access and navigate the website otherwise.</p>
<p>To analyze and improve our website</p>	<p>Collection of browsing data and cookies to analyze and improve the website</p>	<p>Browsing Data (Electronic identification data)</p>	<p>Our legitimate interest in analyzing and improving our website - art.6(1)(f) GDPR</p>	<p>We collect this data automatically when you navigate our website. In any case, you may oppose the processing at any time.</p>
		<p>Analytics cookies</p>	<p>Your consent, art.6 (1)(a) GDPR, provided when you express your cookie preferences on the cookie banner</p>	<p>No. You can freely access and navigate the website without providing this data. In any case, you may modify your cookie preferences at any time via the cookie banner.</p>
<p>Ensure website security through data monitoring</p>	<p>Collection and analysis of browsing data to ensure website security</p>	<p>Browsing Data (Electronic identification data)</p>	<p>Our legitimate interest in ensuring the security of the Services - art.6(1)(f) GDPR</p>	<p>We collect this data automatically when you navigate our website. In any case, you may oppose the processing at any time.</p>

Replying to your requests	Replying to requests, comments, inquiries and questions that you submit through the website's forms	User generated data	Performance of the contact and execution of precontractual measures on your request - art.6(1)(b) GDPR	No , it is up to you to send us inquiries and requests in case you are interested in our Services.
Legal obligations	Collect and processing of your personal information to comply with legal obligations and requirements we are subject to, including, but not limited to: Tax and accounting laws; Other lawful requests by public authorities.	All data listed above lawfully requested by Public Authorities	Compliance with Legal obligations - art.6(1)(c) GDPR	Yes. All data that you have provided us, whether optional or mandatory, will be disclosed to Public Authorities lawfully requesting it.
Specific processing activities related to the personal data of Registered Users				
Providing Registered Users with FiveBrane Web Platform	Account creation and management Platform access, functionalities usage and service communications sending	Identification data Employment data Usage data	Performance of the contact - art.6(1)(b) GDPR	Yes. These data are required to access and use the service
Ensure system security through data monitoring	Collection and analysis of usage data to ensure system security.	Usage data	Our legitimate interest in ensuring the security of the Services - art.6(1)(f) GDPR	We collect this data automatically when you navigate our website. In any case, you may

				oppose the processing at any time.
Platform Improvement	Collection of platform usage data in order to identify and fix bugs promptly, understand error patterns and prevent recurrence, improve overall platform stability and reliability.	Usage data	Legitimate interests - art. 6(1)(f) GDPR	We collect this data automatically when you use our Platform. In any case, you may oppose the processing at any time.

d. Do we disclose your data to anyone?

We will not disclose personal data to third parties, unless such disclosure is necessary to carry out certain processing activities. In such a case, we ensure that our suppliers, acting as Data Processors under Article 28 GDPR, will only process your personal data under appropriate confidentiality and security obligations and in accordance with our instructions and with this Policy.

Our website may contain links to websites operated by third parties such as Instagram or LinkedIn. We are not responsible and have no control over how they operate or how they process data. We encourage you to read their privacy notices before using those websites.

e. Do we transfer your data outside the EU/EEA?

We are an US based company with facilities in Armenia, so Your personal data will also be processed outside the European Union and the European Economic Area. When your personal data is to be transferred to third countries outside the EU/EEA, such data transfers will take place only to third countries with an Adequacy Decision in place approved by the European Commission.

In the case of Armenia, which is a country without Adequacy Decision, the transfer will be based on Standard Contractual Clauses provided by the European Commission and additional security measures to ensure data security. We take data

protection very seriously and implement suitable safeguards when transferring your data outside the EU. You can obtain a copy of our security measures by contacting us as explained in section "Your privacy rights" below.

f. Your Privacy Rights

We inform you that you have the right to:

- Ask us whether or not your personal data is being processed, and if so, request access or ask for copies of your personal data. You can also ask us for further information related to this Policy (Right of Access);
- Ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete (Right to rectification);
- Ask us to erase your personal data in certain circumstances (Right to erasure 'right to be forgotten');
- Object, under certain circumstances, to the processing of personal data, for reasons relating to your specific situations (Right to object);
- Not be subjected to automated decision-making, including profiling (Rights related to automated individual decision-making, including profiling);
- Withdraw consent given at any time (Right to withdraw consent);
- Receive personal data in a standardized format in case you wish to transfer them to another data controller (Right to data portability);
- Lodge a complaint at any time with the Data Protection Authority, in case of violation of data protection rights (Right to lodge a complaint with a Supervisory Authority);
- Ask us to restrict the processing of your information in certain circumstances (Right to restrict the processing);
- Request that any of the above changes be communicated to other parties to whom the data has been disclosed.

The exercise of rights is not subject to any formal constraints and is free of charge. You may exercise your rights by contacting us at the following address info@fivebrane.com with the subject line "European Rights Request". Due to the confidential nature of data processing we may ask you to provide proof of identity when exercising the above rights.

10. California-Specific Disclosures

The disclosures in this section apply solely to individual residents of the State of California and provide additional information about how we collect, use, disclose, and otherwise process personal information within the scope of the California Consumer Privacy Act of 2018, as amended, including its implementing regulations ("CCPA"). Unless otherwise expressly stated, all terms in this section have the same meaning as defined in the CCPA.

a. Sensitive Personal Information

Certain data elements we collect and use about you may be deemed "sensitive personal information" under CCPA. These include your username and password to access your account and contents of any messages you send through our email integration feature. We do not use or disclose such sensitive personal information to "infer" characteristics as defined under the CCPA, or for any purpose other than that which is necessary to provide the Service as specified in the CCPA.

b. Sales and Sharing of Personal Information (Targeted Advertising)

We use cookies and similar tracking technologies that enable certain advertising campaigns, analytics services, and other third-party businesses to collect and disclose your personal information directly from your browser or device when you visit or interact with our Service or otherwise engage with us online. In some cases, we may upload personal information to certain of these partners for advertising or analytics purposes.

We use Google Analytics for web traffic analysis. Its privacy policy is available at <https://policies.google.com/privacy>.

To opt out of these "sales" or "sharing" of personal information (as these terms are defined under the CCPA or other applicable US state privacy laws), you must:

Toggle cookies off or enable Global Privacy Control ("GPC") in on your browser; and Submit a request using this form or email info@fivebrane.com.

Note that the above opt-out right does not apply where we have appropriately limited our partners to be our "service providers" or "processors" (as these terms are defined

under the CCPA or other applicable US state privacy laws).

To learn more about GPC, please visit <http://globalprivacycontrol.org>.

c. California Privacy Rights

As a California resident, you may be able to exercise the following rights in relation to the personal information about you that we have collected (subject to certain limitations at law):

- The Right to Know any or all of the following information relating to your personal information we have collected and disclosed in the last 12 months, upon verification of your identity:
 - The specific pieces of personal information we have collected about you;
 - The categories of personal information we have collected about you;
 - The categories of sources of the personal information.
 - The categories of personal information that we have disclosed to third parties for a business purpose, and the categories of recipients to whom this information was disclosed.
 - The categories of personal information we have sold or shared and the categories of third parties to whom the information was sold or shared; and
 - The business or commercial purposes for collecting, selling, or sharing the personal information.
- The Right to Request Deletion of personal information we have collected from you, subject to certain exceptions.
- The Right to Request Correction of inaccurate personal information.
- The Right to Opt Out of Personal Information Sales or Sharing to third parties now or in the future.
- You also have the right to be free of discrimination for exercising these rights.

However, please note that if the exercise of these rights limits our ability to process personal information (such as in the case of a deletion request), we may no longer be able to provide you our Service or engage with you in the same manner.

d. How to Exercise Your California Privacy Rights

To exercise your rights to know, correct, or delete, please submit a request by: info@fivebrane.com with the subject line "California Rights Request".

We will need to verify your identity before processing your request. In order to verify your identity, we will generally require either the successful login to your account (if applicable) and/or the matching of sufficient information you provide us to the information we maintain about you in our systems. Although we try to limit the personal information collected in connection with a request to know, correct, or delete, certain requests may require us to obtain additional personal information from you. In certain circumstances, we may decline a request to exercise the right to know, correct, or delete, particularly where we are unable to verify your identity or locate your information in our systems, or as permitted by law.

e. Minors Under Age 16

We do not sell or share the personal information of consumers we know to be less than 16 years of age.

f. California's "Shine the Light" Law

In addition to the rights described above, California's "Shine the Light" law (Civil Code Section §1798.83) permits California residents that have an established business relationship with us to request certain information regarding our disclosure of certain types of personal information to third parties for their direct marketing purposes during the immediately preceding calendar year.

To make such a request, please send an email to the contact email provided in the paragraph above.

11. Do Not Track ("DNT")

Some browsers offer a "do not track" ("DNT") option. We do not respond to DNT signals.

12. Disclosures to residents of Colorado, Connecticut, Virginia, and Utah

The disclosures in this section apply solely to individual residents of the States of Colorado, Connecticut, Virginia, and Utah. Privacy laws in these states give residents

certain rights with respect to their personal data, when they take effect over the course of 2023. Those rights include:

- Right to Access Information. You have the right to access and obtain a copy of your personal data.
- Right to Request Deletion. You have the right to request that we delete personal data provided by or obtained about you.
- Right to Correct. You have the right to correct inaccuracies in your personal data.
- Right to Opt-Out of Targeted Advertising. You may ask us not to use or disclose your information for the purposes of targeting advertising to you based on your personal data obtained from your activity across different businesses, services, websites, etc.

- Right to Opt Out of Personal Information Sales to third parties.

To submit a request to exercise your access, deletion, or correction privacy rights, please email us at [info@fivebrane.com] with the subject line "Privacy Rights Request - State name*".

Residents of Colorado, Connecticut, and Virginia may appeal a refusal to take action on a request by contacting us by email at the email address provided above.