

Privacy Policy

VTVK Inc. (“VTVK”, “we” or “us”) respects your privacy. This Privacy Policy (this “Policy”) describes how we process Personal Data (as defined below) we gather through our website at getrhythms.ai (“Website”) and when we collect email addresses (together, the “Services”). It also tells you about your rights and choices with respect to your Personal Data, and how you can contact us if you have any queries or concerns.

1. Personal Data We Collect

In this Policy, “**Personal Data**” means any information relating to an identified or identifiable natural person. We may collect and process Personal Data about you in the ways outlined below. Where applicable, we indicate whether and why you must provide us with your Personal Data, as well as the consequences of failing to do so. If you do not provide Personal Data when requested, you may not be able to benefit from our Services if that information is necessary to provide you with them or if we are legally required to collect it.

Information provided by you

Marketing information. If you sign up for our mailing list, you may provide us with Personal Data, such as your email address.

Information collected via automated means

Cookies and similar technologies. We use cookies and similar technologies (collectively “cookies”) to ensure that our Services function properly, to improve our products and services and to assist with marketing campaigns. Cookies are small text files containing a string of alphanumeric characters. We and third-party partners collect information using cookies, pixel tags, or similar technologies. We and third-party service providers may use the following cookies:

Functional cookies. Some cookies are strictly necessary to make our Services available to you. For example, to allow you to fill out forms. We cannot provide you with the Services without this type of cookie.

Analytics cookies. We use cookies for website analytics purposes in order to operate, maintain and improve our Services. We work with third parties such as FullStory and Google Analytics, as explained in more detail in Section 3.

Advertising cookies. We work with third party advertising partners such as [complete] to show you ads that we think may interest you. These advertising partners may set and access their own cookies on our Services and they may otherwise collect or have access to information about you which they may collect over time and across different online services.

The information collected via such cookies may include information such as your IP address, device ID, advertising ID, clicks, URLs visited and other interactions, inferred location data, and advertising interactions.

2. How We Use Personal Data We will only process your Personal Data based on a valid legal ground, which may vary depending on the country where you are located. The table below describes the legal ground by purpose.

Purpose	Description	Legal Ground
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<p>Providing the Services</p>	<p>We use Personal Data about you to operate, maintain, and provide our Services, collecting your email address and setting your language.</p>	<p>You give us consent to do so • The processing is necessary for entering into, or performance of a contract to which you are a party</p> <p>We, or a third party, have a legitimate interest in using your Personal Data for the purpose of developing, hosting, and maintaining the Services</p>
<p>Support</p>	<p>We use Personal Data to provide technical support, including diagnosing and resolving any issues you report.</p>	<p>The processing is necessary for entering into, or performance of a contract to which you are a party</p>
<p>Fraud prevention</p>	<p>We use your Personal Data to keep our Services secure and to identify and prevent fraud in the use of our Services.</p>	<p>The processing is necessary for entering into, or performance of a contract to which you are a party</p> <p>We need it to comply with a legal obligation, for instance to comply with a court order</p> <p>We, or a third party, have a legitimate interest in using your Personal Data for the purpose of protecting against and preventing fraud</p>
<p>Customer relationship management</p>	<p>We may process your Personal Data for customer relationship management purposes.</p>	<p>You give us consent to do so</p> <p>The processing is necessary for entering into, or performance of a contract to which you are a party</p> <p>We, or a third party, have a legitimate interest in using your Personal Data for the purpose of managing customer relationships</p>
<p>Communicating with you</p>	<p>We may use your email address and other Personal Data as necessary to contact you for administrative purposes such as to provide information that you request or to ask you to provide feedback and complete surveys.</p>	<p>You give us consent to do so</p> <p>The processing is necessary for entering into, or performance of a contract to which you are a party</p>
<p>Analytics and product development</p>	<p>We use Personal Data about you to analyze usage trends and preferences to improve our Services, as well as to develop new products, services, features, and functionalities.</p>	<p>You give us consent to do so</p> <p>We, or a third party, have a legitimate interest in using your Personal Data for the purpose of evaluating and improving our products or services</p>

Marketing	We may process your Personal Data for marketing purposes, such as to develop and provide promotional materials or events that may be relevant, valuable or otherwise of interest to you.	<p>You give us consent to do so</p> <p>We, or a third party, have a legitimate interest in using your Personal Data for the purpose of delivering marketing and advertising materials</p>
Administrative and legal purposes	We may use your Personal Data to enforce this Policy, to defend our legal rights and to comply with our legal obligations and internal policies.	<p>The processing is necessary for entering into, or performance of a contract to which you are a party</p> <p>We need it to comply with a legal obligation, for instance to comply with a court order</p> <p>We, or a third party, have a legitimate interest in using your Personal Data for the purpose of addressing administrative and legal issues</p>

3. How We Share Your Personal Data

We may share your Personal Data with third parties in the following circumstances:

Service providers, vendors and analytics partners. We work with service providers and vendors, such as Webflow, FullStory, HubSpot to operate our Services, including for analyzing data, providing IT-hosting and maintenance, assisting with customer relationship management and other services for us. These third parties may have access to or process your Personal Data as part of providing those services to us. In addition, we use analytics service providers such as Google Analytics to collect and process certain analytics data. You can learn more about Google's practices by visiting <https://www.google.com/policies/privacy/partners/>, and opt-out by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

Affiliates. We may share Personal Data with our affiliates, subsidiaries, and branch offices to which it is reasonably necessary or desirable for us to disclose Personal Data for the above-mentioned purposes.

Legal. We may disclose your Personal Data to third parties if required to do so by law or in the good-faith belief that such action is necessary to comply with applicable laws, in response to a court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies. We also reserve the right to disclose your Personal Data that we believe, in good faith, is appropriate or necessary to (i) take precautions against liability, (ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity, (iii) investigate and defend ourselves against any third-party claims or allegations, (iv) protect the security or integrity of our Services and any facilities or equipment used to make our Services available, or (v) protect our property or other legal rights, including to enforce our agreements, or the rights, property, or safety of others.

Merger. We may disclose or otherwise transfer Personal Data to an acquirer, successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets.

Consent. We may also disclose your Personal Data with your permission.

4. Data Retention

We take measures to delete your Personal Data or keep it in a form that does not permit identifying you when this information is no longer necessary for the purposes for which we process it, unless we need to retain certain information as required by law, including to comply with tax requirements, or for as long as is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse or enforce our terms and conditions. When determining the specific retention period, we take into account various criteria, such as the type of service provided to you, the nature and length of our relationship with you, and mandatory retention periods provided by law and the relevant statute of limitations.

5. Your Rights in Relation to Your Personal Data

Depending on where you reside, you may have the following legal rights:

Access and Portability. You may ask us to provide you with a copy of the Personal Data we maintain about you, including a machine-readable copy of the Personal Data that you have provided to us, and request information about its processing.

Rectification and Deletion. You may ask us to update and correct inaccuracies in your Personal Data, or to have the information anonymized or deleted, as appropriate.

Restriction and Objection. You may ask us to restrict the processing of your Personal Data, or object to such processing.

Consent Withdrawal. You may withdraw any consent you previously provided to us regarding the processing of your Personal Data, at any time and free of charge. We will apply your preferences going forward and this will not affect the lawfulness of the processing before you withdrew your consent.

Complaint. You may lodge a complaint with a supervisory authority, including in your country of residence, place of work, or where an incident took place. We would, however, appreciate the chance to deal with your concerns before you approach a supervisory authority, so please contact us in the first instance. You may exercise these rights by contacting us using the contact details at the end of this Policy. Please note that there are exceptions and limitations to each of these rights.

6. Third Parties Our Services may contain links to other websites, products, or services that we do not own or operate. We are not responsible for the privacy practices of these third parties. Please be aware that this Policy does not apply to your activities on these third-party services or any information you disclose to these third parties. We encourage you to read their privacy policies before providing any information to them.

7. Security We make reasonable efforts to protect your Personal Data by using physical and electronic safeguards designed to improve the security of the information we maintain. However, because no electronic transmission or storage of information can be entirely secure, we can make no guarantees as to the security or privacy of your information, to the extent permitted by applicable law.

8. Children's Privacy We do not knowingly collect, maintain, or use Personal Data from children under 16 years of age, and no part of our Services are directed to children. If you learn that a child has provided us with Personal Data in violation of this Policy, then you may alert us by contacting us using the contact details at the end of this Policy.

9. Cross-Border Data Transfers Our Services are hosted in the United States ("U.S."). If you choose to use our Services from regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your Personal Data outside of those regions to the U.S. for storage and processing.

If you are located in the European Economic Area, the United Kingdom or Switzerland ("Europe"), we will comply with applicable data protection laws when transferring your Personal Data outside of your jurisdiction. In particular we will

rely on (i) an EU Commission, UK or Swiss government adequacy decision, (ii) contractual protections for the transfer of your Personal Data, or (iii) another valid data transfer mechanism. If you are located in Europe, you may contact us as specified below for more information about the safeguards we use to transfer Personal Data outside of Europe.

10. Changes to this Policy We may update this Policy from time to time to reflect changes in our privacy practices. If we modify this Policy, we will indicate the date of the latest revision at the top of this Policy. If we materially change the ways in which we use or disclose Personal Data previously collected from you through the Services, we will notify you through the Services, by email, or other communication.

11. Our Contact Information VTVK is the entity responsible or “data controller” for the processing of your Personal Data as described in this Policy. Should you have any queries regarding this Policy, about VTVK’s processing of your Personal Data or if you wish to exercise your rights with respect to your Personal Data, you can contact VTVK by email at support@getrhythms.ai or by writing to us at: 800 Bellevue Way NE, Bellevue, WA 98004.