

POPULUS MEDIA ONLINE PRIVACY POLICY

Last revised: July 20, 2021

1. INTRODUCTION

The purpose of this online Populus Media privacy policy (this “Privacy Policy”) is to describe how Populus Media, Inc., d/b/a Custom Connect (“Populus Media” or “Custom Connect”) collects, uses and shares information about you through our website located at www.populus-media.com (the “Site”). Populus Media respects your privacy and is committed to protecting it as outlined in this Privacy Policy. If you do not agree with our policies and practices, you may not use our services, including any “Services” as defined in our Terms of Use (referenced below). By accessing or using our services, you agree to this Privacy Policy. This Privacy Policy may change from time to time. Your continued use of our services after we make changes is deemed to be acceptance of those changes. Please read this notice carefully to understand what we do. If you do not understand any aspects of our Privacy Policy, please feel free to [Contact Us](#) as described at the end of this Policy.

Our Privacy Policy explains:

- [Information That We Collect](#)
- [How We Use and Share Your Information](#)
- [Access to Your Information and Choices](#)
- [Security of Your Information](#)
- [Consent to Processing of Personal Data in United States](#)
- [Changes to Our Privacy Policy](#)
- [Questions and How Contact Us](#)

Scope; Third Party Sites. This Privacy Policy applies only to information we collect at and through the Site or from or through any use of our services, including any Services as defined in our Terms of Use (referenced below). Our Site also contains links to third-party sites that are not owned or controlled by Populus Media. Please be aware that we are not responsible for the privacy practices of such other sites. We encourage you to be aware when you leave our Site and to read the privacy statements of each and every website that collects personal information.

Terms of Use. Please note that your use of our Site is also subject to our [Terms of Use, which is accessible at \[www.populus-media.com\]\(http://www.populus-media.com\)](#).

2. INFORMATION THAT WE COLLECT

Information You Provide to Us

We collect information you provide to us when you seek to use any of our services (including the Digital Services as defined in our Terms of Use), request information from us, contact customer support, or otherwise communicate with us or use our Site in a commercial manner. Our services may present preliminary questions that are anonymized (i.e. non-identifying of you or your information) but when and if as a result of those questions, you are then routed to a telehealth consult, more information may be provided and made available to us. This information may include:

- Name

- Address
- Email address
- Telephone number
- Payment information (credit card or debit card number, expiration date and credit card security code – for payment purposes on behalf of telehealth clients of ours, but we do not store and save credit card or other payment information after payment is made).
- Date of birth
- User name and password
- Medical history and other health information

Please note Populus Media does not practice medicine or provide medical care. We do not provide or intend to provide answers to medical-related questions. Furthermore, if you are connected to a medical provider through our platform, you may also be asked to submit certain confidential information during the sign-up process, as well as demographic and other information relevant to diagnosis and treatment, such as lifestyle and general medical history (e.g. conditions, allergies etc.).

Information We Collect Automatically Through Your Use of our Site

Google Analytics

We use Google Analytics, a web analytics service provided by Google, Inc. (“Google”) to collect certain information relating to your use of the Site. Google Analytics uses “cookies”, which are text files placed on your computer, to help the Site analyze how users use the site. You can find out more about how Google uses data when you visit our Site by visiting “How Google uses data when you use our partners' sites or apps”, (located at www.google.com/policies/privacy/partners/). We may also use Google Analytics Advertising Features or other advertising networks to provide you with interest-based advertising based on your online activity. For more information regarding Google Analytics please visit Google's website, and pages that describe Google Analytics, such as www.google.com/analytics/learn/privacy.html. To learn more about interest-based advertisements and your opt-out rights and options, visit the [Digital Advertising Alliance](http://www.aboutads.info) and the [Network Advertising Initiative](http://www.networkadvertising.org) websites (www.aboutads.info and www.networkadvertising.org). You will have the option to opt out via an unsubscribe link. Please note that if you choose to opt out, you will continue to see ads, but they will not be based on your online activity.

Information Collected Through Cookies and Similar Technologies

We and our service providers use cookies, web beacons, and other technologies to receive and store certain types of information whenever you interact with our Site through your computer or mobile device. A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the Site again, the cookie allows the Site to recognize your browser. Cookies may store unique identifiers, user preferences and other information. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some Site features or services may not function properly without cookies. We use cookies to improve the quality of our service, including for storing user preferences, tracking user trends and providing relevant advertising to you. (See, “Advertising” below.)

No Information from Individuals Under the Age of 18

If you are under the age of 18, please do not attempt to register with us at this Site or provide any personal information about yourself to us. If we learn that we have collected personal information from

someone under 18, we will promptly delete that information. If you believe we have collected personal information from someone under the age of 18, please [Contact Us](#) as described below.

3. HOW WE USE AND SHARE YOUR INFORMATION

To Provide Products, Services, and Information. We collect information from you and use the information to:

- provide products and services that you order using the Site;
- provide information that you request from us;
- contact you about our services or information you requested;
- process credit card and debit card transactions;
- to allow you to participate in interactive features of our services;
- send you promotional materials or advertisements about our products and services, as well as new features and offerings;
- enforce our Terms of Use or other legal rights and remedies;
- administer surveys;
- provide interest-based targeted advertising to you; and,
- any other purposes disclosed to you at the time we collect your information or pursuant to your consent.

Sharing with Third Parties.

Healthcare Providers. We share your personal information with various healthcare affiliates, e.g. pharmacies, doctors and relevant medical staff in connection with your diagnosis and treatment.

Vendors and Services Providers. We may provide information to third-party vendors and service providers that help us operate and manage our Site, process orders, and fulfill and deliver products and services that you purchase or request from us. These vendors and service providers will have access to your personal information in order to provide these services, but when this occurs we implement reasonable contractual and technical protections to limit their use of that information to helping us provide the service.

Corporate Affiliates. We may share de-identified and aggregated information with our other companies and people with whom we do business (namely, our customers or other affiliates) .

Advertising. We may use how you browse and shop in order to show you ads for Populus Media or our advertising partners that are more relevant to your interests. We may use cookies and other information to provide relevant interest-based advertising to you. Interest-based ads are ads presented to you based on your browsing behavior in order to provide you with ads more tailored to your interests. These interest-based ads may be presented to you while you are browsing our site or third-party sites not owned by Populus Media.

We belong to ad networks that may use your browsing activity across participating websites to show you interest-based advertisements on those websites. Currently, our Site does not recognize if your browser sends a “do not track” signal or similar mechanism to indicate you do not wish to be tracked or receive interest-based ads. To learn more about interest-based advertisements and your opt-out rights and options, visit the [Digital Advertising Alliance](#) and the [Network Advertising Initiative](#) websites

(www.aboutads.info and www.networkadvertising.org). Please note that if you choose to opt out, you will continue to see ads, but they will not be based on your online activity.

Social Media. If you use third-party services, such as Facebook, Google, or Twitter, to share information about your experience on the Site with others, these third-party services may be able to collect information about you, including information about your activity on the Site, and they may notify your connections on the third-party services about your use of the Site, in accordance with their own privacy policies.

Public Posts and Activities. If you choose to engage in public activities on the Site, you should be aware that any information you share there can be read, collected, or used by other users of these areas. You should use caution in disclosing personal information while participating in these areas. We are not responsible for the information you choose to submit in these public areas. Any user posting in these public areas understands and acknowledges that there is no expectation of privacy for the information in these public areas.

Your Consent. In addition to the sharing described elsewhere in this Policy, we will share personal information with companies, organizations or individuals outside of Populus Media when we have your consent to do so.

Legal Proceedings. We will share personal information with third-party companies, organizations or individuals outside of Populus Media if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- Meet any applicable law, regulation, subpoena, legal process or enforceable governmental request.
- Enforce applicable Terms of Use, including investigation of potential violations.
- Detect, prevent, or otherwise address fraud, security or technical issues.
- Protect against harm to the rights, property or safety of Populus Media, our users, customers or the public as required or permitted by law.

Transfer in the Event of Sale or Change of Control. If the ownership of all or substantially all of our business changes or we otherwise transfer assets relating to our business or the Site to a third party, such as by merger, acquisition, bankruptcy proceeding or otherwise, we may transfer or sell your personal information to the new owner. In such a case, unless permitted otherwise by applicable law, your information would remain subject to the promises made in the applicable privacy policy unless you agree differently.

4. ACCESS TO YOUR INFORMATION AND CHOICES

You can access and update certain information we have relating to your online account by the [Contact Us](#) described below.

5. SECURITY OF YOUR INFORMATION

We use industry standard physical, technical and administrative security measures and safeguards to protect the confidentiality and security of your personal information. However, since the Internet is not a 100% secure environment, we cannot guarantee, ensure, or warrant the security of any information you transmit to us. There is no guarantee that information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. Please note that emails

and other communications you send to us through our Site are not encrypted, and we strongly advise you not to communicate any confidential information through these means.

7. CONSENT TO PROCESSING OF PERSONAL DATA IN UNITED STATES

This Site is intended for use only by residents of the U.S. If you are a citizen of the European Economic Area (EEA) or other jurisdiction outside of the U.S., please note that in order to provide our Site, products and services to you, we may send and store your personal information (also commonly referred to as personal data) outside of the EEA, including to the United States. Accordingly, your personal information may be transferred outside of the country where you reside or are located, including to countries that may not or do not provide the same level of protection for your personal information. We are committed to protecting the privacy and confidentiality of personal information when it is transferred. Where such transfers occur, we take appropriate steps to provide the same level of protection for the processing carried out in any such countries as within the EEA to the extent feasible under applicable law. By using and accessing our Site, users who reside or are located in countries outside of the United States agree and consent to the transfer to and processing of personal information on servers located outside of the country where they reside, and that the protection of such information may be different than required under the laws of their residence or location.

8. CHANGES TO OUR PRIVACY POLICY

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your consent in accordance with applicable law. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

9. QUESTIONS AND HOW TO CONTACT US

If you have any questions, concerns, complaints or suggestions regarding our Privacy Policy or otherwise need to contact us, please Contact Us by emailing us at support@populus-media.com, or contacting us by US postal mail at the following address:

Populus Media, Inc.
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Suite 200
NY, NY, 10023