

**Theranica Privacy Policy**

**Last updated: March 22, 2020**

This privacy policy (“**Privacy Policy**”) governs how we, Theranica Bio-Electronics Ltd. (“**Theranica**” “**we**”, “**our**” or “**us**”) use Personal Information (defined below) that we collect, receive and store pertaining to you (“**User**”, “**you**”) in connection with the following use cases:

- (i) When you make use of the App (a) “*Nerivio*” <https://play.google.com/store/apps/details?id=app.theranica.neriviomigra&hl=en>, mobile software application, and any other mobile software application, that we license. (each individually, and, collectively, the “**App**”).
  - a. When you sign up for an account
  - b. When you purchase a product and/or our Services
  - c. When you make use of our Services through the App and Theranica device
  - d. When you use the App in demo mode (not combined with Theranica's device)
- (ii) When you make use of, or interact with, our website [www.theranica.com](http://www.theranica.com) (“**Website**”)
  - a. When we process your job application
  - b. When you contact us (e.g. customer support or request for information)
- (iii) Other practices
  - a. When you attend a marketing event and provide your Personal Information
  - b. When you exchange business cards with us
  - c. When we acquire your Personal Information from third-party sources (such as lead-generation companies)
  - d. When we use the Personal Information of our service providers
  - e. When we use the Personal Information of our customers
  - f. When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn)

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**1. INTRODUCTION**

The Website and the App are individually and collectively referred to herein as the “**Services**”.

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to recognized cybersecurity standards. Please read this Privacy Policy carefully, so that you can fully understand our practices in relation to Personal Information. “**Personal Information**” means any information that can be used, alone or together with other information, to uniquely identify any living human being. Please note that this is a master privacy policy and some of its provisions only apply to individuals in certain jurisdictions.

You are not legally obligated to provide us Personal Information and providing us Personal Information is at your own free will. To the maximum extent permitted by law, by using the Services, you consent to the terms of this Privacy Policy and to our collection, processing and sharing of Personal Information for the purposes set forth herein.

We reserve the right, at our discretion, to change this Privacy Policy at any time. Such change will be effective ten (10) days following posting of the revised Privacy Policy on the Site, and your continued use of the Services thereafter means that you accept those changes.

**2. TERMS OF USE AND EULA**

This Privacy Policy forms part of our Terms of Use which are available at <http://theranica.com/terms-of-use/> (“**Terms**”) and the App’s End User License Agreement which can be viewed from within the App and which you accepted prior to downloading, installing and/or using the App for the first time (“**EULA**”).

You may have additional rights under our HIPAA Notice of Privacy Practices available at <http://theranica.com/notice-of-privacy-practices>

**3. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED**

Information we collect	Why is the Information collected and for what purposes?	Third parties with whom we share your Information	Consequences of not providing the Information
<b>When you make use of the App “Nerivio” <a href="https://play.google.com/store/apps/details?id=app.theranica.neriviomigra&amp;hl=en">https://play.google.com/store/apps/details?id=app.theranica.neriviomigra&amp;hl=en</a>, mobile software application, and any other mobile software application, that we license</b>			
<b>When you sign up for an account</b>			
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• User and password (optional through Facebook account and/or Gmail account)</li> <li>• Any other information you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>• To create an account</li> <li>• To contact you in connection with the Services/products that you have registered for</li> </ul>	3 <sup>rd</sup> party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• Microsoft office 365</li> <li>• Facebook (Custom Audience and Lookalike Audience) – We share your email address (hashed) with Facebook in</li> </ul>	Cannot create or maintain an account  Cannot contact you in connection with the Services/products that you have registered for

		order to create "custom audiences" based on your information publicly available on Facebook and deliver advertisements to people who have similar characteristics to people on your custom audience list	
<b>When you purchase a product and/or our Service</b>			
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Billing information</li> <li>• Any other information you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>• To process the order of the product</li> <li>• To perform/execute the agreement</li> <li>• To contact you in connection with the Services/products that you have purchased</li> </ul>	3 <sup>rd</sup> party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• Microsoft office 365</li> <li>• Facebook (Custom Audience and Lookalike Audience) – We share your email address (hashed) with Facebook in order to create "custom audiences" based on your information publicly available on Facebook and deliver advertisements to people who have similar characteristics to people on your custom audience list</li> </ul>	<ul style="list-style-type: none"> <li>Cannot process the product order</li> <li>Cannot perform the agreement</li> <li>Cannot contact you in connection with the Services/products that you have purchased</li> </ul>
<b>When you make us of our Services through the App and Theranica device</b>			
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Geolocation</li> <li>• Weather conditions at the location</li> <li>• Information regarding their migraine episodes (Optional via user input: Symptoms related to the migraine episode: Pain level, Presence of nausea, Presence of aura (interferences to field of vision), Presence of phonophobia (sensitivity to sound), Presence of photophobia (sensitivity to light), On which side of the head did the pain appear)</li> <li>• Your smartphone's model and version of the OS</li> <li>• Any other information you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>• To make use of the Service</li> <li>• To register and/or record your migraine episodes</li> <li>• To keep track of a migraine diary</li> <li>• To control and program the device</li> <li>• To contact you in connection with the Services you use</li> <li>• To create and publish deidentified clinical researches based on statistical analysis of mass quantities of patients.</li> </ul>	None. All data is stored locally on the phone	<ul style="list-style-type: none"> <li>Cannot make use of the Service</li> <li>Cannot register and/or record your migraine episodes</li> <li>Cannot keep track of a migraine diary</li> <li>Cannot control and program the device</li> <li>Cannot contact you in connection with the Services you use</li> </ul>
<b>When you use the app in demo mode (no combined with Theranica's device)</b>			
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Geolocation</li> <li>• Weather conditions at the location</li> <li>• Information regarding their migraine episodes (Optional via user input: Symptoms related to the migraine episode: Pain level, Presence of nausea, Presence of aura (interferences to field of vision), Presence of phonophobia (sensitivity to sound), Presence of photophobia (sensitivity to</li> </ul>	<ul style="list-style-type: none"> <li>• To make use of the App</li> <li>• To register and/or record your migraine episodes</li> <li>• To keep track of a migraine diary</li> </ul>	None. All data is stored locally on the phone	<ul style="list-style-type: none"> <li>Cannot make use of the App</li> <li>Cannot register and/or record your migraine episodes</li> <li>Cannot keep track of a migraine diary</li> </ul>

light), On which side of the head did the pain appear) <ul style="list-style-type: none"> <li>Any other information you decide to provide/supply</li> </ul>			
<b>When you make use of, or interact with, our Website</b>			
<ul style="list-style-type: none"> <li>Full name</li> <li>Geolocation</li> <li>Email address</li> <li>ISP address</li> </ul>	To make use of the Website	None	Need to agree to the use of cookies
<b>When we process your job application</b>			
<ul style="list-style-type: none"> <li>Full name</li> <li>Email address</li> <li>Phone number</li> <li>Email address</li> <li>Resume</li> <li>Any other information you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>To process your job application</li> <li>To assess the candidate</li> <li>To communicate with you</li> </ul>	3 <sup>rd</sup> party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>Microsoft office 365</li> </ul>	Cannot process your job application  Cannot assess your suitability  Cannot communicate with you
<b>When you contact us (e.g. customer support)</b>			
<ul style="list-style-type: none"> <li>Full name</li> <li>Email address</li> <li>Message</li> <li>Any other information you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>To process and answer questions</li> <li>To provide support (e.g., to solve problems)</li> <li>To customize your experience</li> <li>To send marketing communications</li> </ul>	3 <sup>rd</sup> party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>Microsoft office 365</li> <li>Facebook (Custom Audience and Lookalike Audience) – We share your email address (hashed) with Facebook in order to create "custom audiences" based on your information publicly available on Facebook and deliver advertisements to people who have similar characteristics to people on your custom audience list</li> </ul>	Cannot assist you and respond your query  Cannot provide support  Cannot customize your experience  Cannot send you marketing communications
<b>Other practices</b>			
<b>When you attend a marketing event and provide Personal Information</b>			
<ul style="list-style-type: none"> <li>Full name</li> <li>Email address</li> <li>Company or institute of affiliation</li> <li>Position or role</li> <li>Any other information you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>To establish a business connection</li> <li>To send marketing communications</li> </ul>	3 <sup>rd</sup> party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>Microsoft office 365</li> </ul>	Cannot establish a business connection  Cannot send you marketing communications
<b>When you exchange business cards with us</b>			
<ul style="list-style-type: none"> <li>Full name</li> <li>Email address</li> <li>Company or institute of affiliation</li> <li>Position or role</li> <li>Any other Information you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>To establish a business connection/discussion</li> <li>To send marketing communications</li> </ul>	3 <sup>rd</sup> party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>Microsoft office 365</li> </ul>	Cannot send you marketing communications
<b>When we acquire your Personal Information from third-party sources (such as lead-generation companies)</b>			
<ul style="list-style-type: none"> <li>Contact information</li> </ul>	<ul style="list-style-type: none"> <li>To establish a business connection/discussion</li> <li>To send marketing communications.</li> </ul>	3 <sup>rd</sup> party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>Microsoft office 365</li> </ul>	Cannot establish a business connection  Cannot send you marketing communications
<b>When we use the Personal Information of our service providers</b>			

<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Company or institute/organization name</li> <li>• Role/position</li> <li>• Any other Information you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>• To contact our service providers</li> <li>• To process the order of the service</li> </ul>	3 <sup>rd</sup> party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• Microsoft office 365</li> </ul>	Cannot communicate with you  Cannot process the order of the service  Cannot perform the agreement
<b><i>When we use the Personal Information of our customers</i></b>			
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Company or institute/organization name</li> <li>• Role/position</li> </ul>	<ul style="list-style-type: none"> <li>• To provide our products and services</li> <li>• To perform the applicable agreement</li> <li>• To communicate with our customers/clients</li> </ul>	3 <sup>rd</sup> party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• Microsoft office 365</li> <li>• Facebook (Custom Audience and Lookalike Audience) – We share your email address (hashed) with Facebook in order to create "custom audiences" based on your information publicly available on Facebook and deliver advertisements to people who have similar characteristics to people on your custom audience list</li> </ul>	Cannot provide the services and/or our products  Cannot perform the agreement  Cannot communicate with you
<b><i>When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn)</i></b>			
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Company or institute/organization name</li> <li>• Role/position</li> <li>• Any other Information you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>• To reply and/or respond to your request or question</li> <li>• To establish a first business connection/discussion</li> </ul>	3 <sup>rd</sup> party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• Microsoft office 365</li> </ul>	Cannot reply or respond to your request  Cannot establish a business connection

**4. PERIOD OF STORAGE OF COLLECTED INFORMATION**

Personal Information. Your Personal Information (as described above) will be stored until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws. We have an internal data retention policy to ensure that we do not retain your Personal Information perpetually, unless it is de-identified.

Cookies. We use cookies and other tracking technologies to improve your browsing experience on our website, to analyze our website traffic, and to monitor how people use the website, aiming to improve the website and make it more useful. By browsing our website, you consent to our use of cookies and other tracking technologies. The period of storage and collected information depends on the cookie. You may also control and delete these cookies through your browser settings. Some cookies (e.g. essential cookies) cannot be disabled.

**5. HOW WE PROTECT AND STORE YOUR INFORMATION**

- a. Security. We have implemented appropriate technical, organizational and security measures designed to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to such information appropriate to the nature of the information concerned. However, please note that we cannot guarantee that the information will not be exposed as a result of unauthorized penetration to our servers. Nevertheless, we make commercially reasonable efforts to make the collection and security of such information consistent with this Privacy Policy and all applicable laws and regulations. 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.
- b. Retention of your Personal Information. In addition to the retention periods mentioned in Section 4 above, in some circumstances we may store your Personal Information 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 Information or dealings.

**6. HOW WE SHARE YOUR PERSONAL INFORMATION**

In addition to the recipients described above, we may share your information as follows:

- To the extent necessary, with regulators, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- If, in the future, we sell or transfer some or all of our business or assets to a third party, we will (to the minimum extent required) disclose information to a potential or actual third party purchaser of our business or assets. 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 or assign Personal Information in connection with the foregoing events.

- Where you have provided your consent to us sharing the Personal Information (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality); and
- Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any Personal Information is disclosed.

## 7. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL INFORMATION

Where we transfer your Personal Information outside of EU/EEA, for example to third parties who help provide our products and services, we will obtain contractual commitments from them to protect your Personal Information;

Some of these assurances are well recognized certification schemes like the EU - US Privacy Shield for the protection of Personal Information transferred from within the EU to the United States; or

Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any Personal Information is disclosed.

## 8. USE BY CHILDREN

We do not offer our products or services for use by children. If you are under 18 years old, you may not use the Website, or provide any information to the Website without involvement of a parent or a guardian. We do not knowingly collect information from, and/or about children.

## 9. HOW CAN I DELETE MY ACCOUNT?

Should you ever decide to delete your Account, you may do so by emailing [info@theranica.com](mailto:info@theranica.com). If you terminate your Account, any association between your Account and information we store will no longer be accessible through your Account. However, given the nature of sharing on the Services, any public activity on your Account prior to deletion will remain stored on our servers and will remain accessible to the public, unless otherwise prohibited by law.

## 10. LINKS TO AND INTERACTION WITH THIRD PARTY PRODUCTS

The Website may enable you to interact with or contain links to your Third Party Account and other third party Websites, mobile software applications and 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 may collect Personal Information from you. Accordingly, we encourage you to read the terms and conditions and privacy policy of each Third Party Service that you choose to use or interact with.

## 11. LOG FILES

We make use of log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us. We may use such information to analyze trends, administer the Website, track users’ movement around the Website, and gather demographic information.

## 12. 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 site, what pages they visit when they do so, and what other sites 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 personally identifiable information. 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 <http://www.google.com/analytics/terms/us.html/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes Information specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your Information 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/>.

## 13. ACCESS/ACCURACY

To the extent that you do provide us with Personal Information, we wish to maintain accurate Personal Information. If you would like to delete or correct any of your other Personal Information that we may be storing, you may submit an access request by sending an email to [info@theranica.com](mailto:info@theranica.com). Your email should include adequate details of your request.

## 14. 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 [info@theranica.com](mailto:info@theranica.com). Please note that we are only required to respond to one request per customer each year.

## 15. OUR CALIFORNIA DO NOT TRACK NOTICE

We do not track consumers over time and across third party websites and therefore do not respond to Do Not Track signals. We do not allow third parties to collect personally identifiable information about an individual consumer’s online activities over time and across different websites when a consumer uses the Services.

## 16. DELETION OF CONTENT FROM CALIFORNIA RESIDENTS

If you are a California resident under the age of 18 and a registered user, California Business and Professions Code Section 22581 permits you to remove content or Personal Information you have publicly posted. To remove, please send an email to [info@theranica.com](mailto:info@theranica.com). Please be aware that after removal you will not be able to restore removed content. In addition, such removal does not ensure complete or comprehensive removal of the content or Personal Information you have posted and that there may be circumstances in which the law does not require us to enable removal of content.

## 17. CONTACT US

If you have any questions, concerns or complaints regarding our compliance with this notice and the Information protection laws, or if you wish to exercise your rights, or opt-out from the use and disclosure of your personal data to Facebook, we encourage you to first contact us at [info@theranica.com](mailto:info@theranica.com).