

LUCI[®] PRIVACY POLICY

LUCI[®] obtains and uses personal information to deliver high quality products and service. This privacy policy explains how LUCI[®] uses, shares and protects personal information that it collects on its web-based platform known as “MyLUCI[®]” (the “LUCI[®] Service”) available at MyLUCI.com and as apps in the Apple App Store and Google Play Store.

By registering, purchasing, or using the LUCI[®] Service and Products, You agree to this Privacy Policy, and other terms and conditions that LUCI[®] may provide from time to time.

“You” (and all of its derivations) means You individually and any person acting as Your agent, under Your authority, or with Your permission and, if You are accepting these Web Portal Terms on behalf of a company or other legal entity, that legal entity. If You are accessing the LUCI[®] Service on behalf of an entity, You hereby agree to these LUCI[®] Service Terms on Your behalf and on behalf of such entity. You represent and warrant that You are: (a) at least 18 years of age (or the minimum age in Your jurisdiction for entering into a binding contract) and (b) capable of entering into a legally binding agreement; *provided however*, that if You are under 18 years old or under a disability that impacts Your ability to enter into a binding contract, then “You” includes Your custodial parent or legal guardian, and You may use the LUCI[®] Service only under the supervision of such parent or legal guardian who agrees to be bound by these LUCI[®] Service Terms. **IF YOU DO NOT AGREE TO THESE TERMS, YOU MAY NOT USE THE LUCI[®] SERVICE.**

I. PERSONAL INFORMATION COLLECTED

LUCI[®] collects personal information from You in various ways, including when You visit the website, create an account with us, configure and authorize different users to view data and receive alerts and when You contact us or send us feedback.

The personal information we collect may be from:

User profile: If You set up a user profile to access the LUCI[®] Service, this information may include Your name, email, phone number, user name and password, street address, payment or banking information, as well as contact information for Your family, guardians, healthcare providers, or other individuals your invite through to the LUCI[®] Service.

If You would like to authorize family members, guardians, emergency contacts, healthcare providers, or other individuals to receive alerts from LUCI[®], You will need to provide us with such individuals’ names and email addresses in order for us to send them an email on Your behalf to (i) notify them of Your request; (ii) require them to create an account; (iii) invite them to view Your data and receive alerts; and (iv) enable them to opt-in to product /service-related notifications from You or LUCI[®].

User content: We may collect information that You submit when You contact LUCI® user support, or otherwise contact LUCI®.

Product use: Depending on Your settings or permissions, we will collect information regarding Your use of the wheelchair system. This includes details regarding the settings on Your wheelchair, product settings, product interventions and overrides, usage and distance traveled, seating system status, wetness events, pressure events, presence in the chair, whether the wheelchair is involved in a collision, tip, or on sloped or uneven ground, last battery charge [collectively, “**triggered events**”], and Your location, as described below.

Location information: We will collect Your precise or approximate location information. In order to capture the geographical location for certain triggered events, we may need to collect routine data related to local detected networks as well as Your range of motion, speed, acceleration and deceleration.

Device information: We may collect information about the device or operating system You use to access our services, including the hardware models, device IP address, operating systems and versions, software, preferred languages, unique device identifiers, serial numbers, device motion information, battery usage, and other device function information.

Cookies: “Cookies” are small text files that may be placed on Your web browser when You visit the LUCI® Service. You can disable cookies on Your device. If You do so, You may not be able to benefit from the full features of the website. When You revisit the LUCI® Service, it may automatically recall the information from Your last visit.

II. USES OF YOUR PERSONAL INFORMATION

We may use Your personal information for internal and external purposes, including but not limited to:

- Administering, facilitating and managing Your relationship and/or account with LUCI®;
- Alerting Your contacts regarding Your use of the LUCI® System, including alerts You have set up through Your account;
- Providing the product or service requested;
- Improving our Site and Products;
- Developing new products and services;
- Providing You with information about related products and services;
- Aggregating data for product and industry improvement purposes;
- Administering LUCI® products, systems and troubleshooting purposes; and
- Facilitating our internal business operations, including assessing and managing risk and fulfilling our legal and regulatory requirements.

We will, whenever practical, de-identify your information for any uses not directly related to administering, facilitating, managing and providing the product or service to you or your contacts.

We may de-identify Your personal information and aggregate data to improve our products and services and to share with third parties for product and industry improvement purposes.

If Your relationship with LUCI® ends, LUCI® will continue to treat Your personal information, to the extent we retain it, in the manner described in this policy.

III. USE AND DISCLOSURE OF COLLECTED PERSONAL INFORMATION

Third Party Service Providers, Agents, Contractors, or Partners: We do not share personal information with unaffiliated third parties for those third parties' own purposes. We may, however, share de-identified personal information with our third party service providers, agents, contractors, or partners in connection with services that these individuals or entities perform for, or with, LUCI®. These service providers, agents, contractors, or partners are required to use Your personal information in accordance with this policy. As stated above, we also may share de-identified data and aggregate data with third parties for product and industry improvement-related purposes.

Family members, guardians, emergency contacts, healthcare providers, or other individuals: If You would like to authorize individuals to receive alerts from LUCI® regarding Your use of the wheelchair system, they will receive alerts based on certain specified triggering events. These individuals may also be able to access Your personal information and view the data contained in Your LUCI® account. You can adjust these settings in Your account as preferred.

As Required by Law or for the Protection of Others: We may disclose information to comply with applicable laws and regulations, such as to respond to a subpoena or similar legal process, to protect against misuse or unauthorized use of the LUCI® Service, to limit our legal liability, and to protect our rights or to protect the rights, property, or safety of users of our products and services or the public, and to otherwise cooperate with law enforcement or regulatory authorities.

Business Transfers: We may transfer or share Your personal information in the event that LUCI® goes through a business transition, such as a merger, being acquired by another company, or selling a portion of its assets. Nothing in this Privacy Policy is intended to interfere with the ability of LUCI® to transfer all or part of its business or assets to an affiliate or independent third party at any time, for any purpose, without any limitation.

California Privacy Rights: Under California Civil Code sections 1798.83-1798.84, California residents are entitled to ask us for a notice describing what categories of personal customer information we share with third parties or corporate affiliates for those third parties or corporate

affiliates' direct marketing purposes. We do not share Your personal information with third parties or corporate affiliates for their direct marketing purposes.

IV. DATA QUALITY, STORAGE, AND ACCESS

While we make every effort to ensure that all information we hold about You is accurate, complete and up to date, You can help us by promptly notifying us if there are any changes to Your personal information.

We store personal information for different periods of time consistent with the purposes for which they were originally collected, as subsequently further authorized, or when required or allowed under applicable law.

V. INTERNATIONAL AUDIENCE

Personal information collected from You, including via the LUCI[®] Service, will be transferred to the United States where this Site is hosted and where we store Your personal information. Such transfer may not provide a similar level of protection to that provided by countries in foreign jurisdictions. By accessing the LUCI[®] Service, You consent to the transfer of Your personal information to the United States as described in this Privacy Policy. Please do not use the LUCI[®] Service if You do not agree to the transfer and processing of Your personal information to LUCI[®] in the United States or if it is illegal to do so in Your home country.

VI. INFORMATION SECURITY: PROTECTING YOUR PRIVACY

LUCI[®] is committed to protecting the privacy and confidentiality of Your personal information. While we implement security measures to help safeguard Your data, no physical or electronic security system is impenetrable. We cannot guarantee the security of our servers or databases, nor can we guarantee that information You supply will not be intercepted while being transmitted to us over the Internet.

VII. CHILDREN'S PRIVACY

We do not knowingly collect personal information from children without parental consent. The LUCI[®] Service may only be used by children under age 13 with the consent of a parent or guardian.

If You would like to grant Your child access to LUCI[®]'s Site and Products, You are required to sign the consent form available at [LUCI.com/legal], which authorizes us to collect Your child's personal information.

We will use the personal information of users under age 13 as set out in this privacy policy. **We do not, however, use or share personal information collected from accounts of children under 13 for marketing or advertising purposes, and we do not permit our third party partners to collect and use such information for advertising purposes.**

If You become aware that Your child has provided us with personal information without Your consent, then please contact us using the details below so that we can remove such information and terminate any account Your child has created with us.

If at any time You would like to review or delete any personal information we have collected from Your child, or to withdraw permission for us to collect any information from the child, please contact us at the information provided below.

VIII. DATA SUBJECT RIGHTS

Individuals in Andorra, Argentina, Australia, California, Canada, Europe, Faroe Islands, Guernsey, Hong Kong, Israel, Isle of Man, Japan, Jersey, Mexico, New Zealand, Singapore, South Korea, Switzerland, Uruguay, and certain other jurisdictions have certain data subject rights. These rights vary but they may include the right to: (i) request access to and rectification or erasure of their personal data; (ii) obtain restriction of processing or to object to processing of their personal data; and (iii) the right to data portability. Individuals may also have the right to lodge a complaint about the processing of personal data with a data protection authority.

If You make a request related to information about You, You may be required to supply a valid means of identification as a security precaution. We will process Your request within the time provided by applicable law.

IX. CHANGES TO POLICY

This policy provides a general statement of the ways in which LUCI® protects Your personal information. We reserve the right to amend, alter, or otherwise change this Privacy Policy at our sole and absolute discretion. If we make any changes regarding the disclosure of personal information to third parties, we will notify all registered users through their respective LUCI® account and require clicked consent to the changes. Clicking the “ACCEPT” button at the end of the notice in Your account constitutes Your agreement to follow and to be bound by the amended Privacy Policy.

The revised policy will be effective immediately upon receiving consent.

Please print or save the Privacy Policy for Your records.

X. CONTACT INFORMATION

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