

Privacy Policy

Updated February, 2022.

MedTrainer, Inc. (“MedTrainer”) and its associated and subsidiary companies, including Accredability (collectively, “we” or “us”) respect the sensitive nature of any personal information you provide to us. We have created this Privacy Policy in order to demonstrate our commitment to the privacy of those who visit our websites www.medtrainer.com, and www.accredability.com (the “Sites”). This Privacy Policy describes our online information collection, storage and disclosure practices and the choices you have regarding how your personal information is collected and used by us. By accessing and using the Sites, you consent to the collection, use and disclosure of information through the Sites as described in this Privacy Policy.

Residents of the European Economic Area (“EEA”), which includes the member states of the European Union (“EU”), should consult the sections of this policy relating to the “Rights of EEA Residents” and “International Data Transfers” for provisions that may apply to them.

California residents should consult the section titled “Your California Privacy Rights” for rights that apply to them.

We reserve the right to change this Privacy Policy at any time. In the event we make changes to this Privacy Policy, such policy will be re-posted in the “Privacy” section of our Sites with the date such modifications were made indicated on the top of the page or we may contact you to inform you about the revisions with a link to the revised Privacy Policy. All changes are effective on the date listed at the top of this page and will apply to all information that we have about you. Your continued use of the Sites or the services that we provide through the Sites (“Services”), which include training and accreditation, after any change is posted indicates your acceptance of the changes and your continued consent to our processing of your personal

data. If at any point you do not agree to any portion of this Privacy Policy, then in effect you should immediately stop using the Sites and the Services. Because this Privacy Policy contains legal obligations, we encourage you to review this Privacy Policy carefully. If you have any questions concerning this Privacy Policy or our information collection, storage and disclosure practices, please contact us at legal@medtrainer.com or mail us at Privacy Compliance, 555 Cajon St., Suite A, Redlands, California 92373.

Personal Information That We Collect and How We Use It

We collect personal data about you when you visit the Sites. "Personal Information" is information that may be used to directly or indirectly identify you, including your name, email address, physical address, phone number or other information about you. The majority of such Personal Information is collected when you register with and access the Sites, use our Services, contact us or otherwise provide us with your contact information. Some of this Personal

Information will be required if you wish to partake in the Services that we provide, including our training and accreditation Services.

In general, the type of Personal Information we collect includes, but is not limited to:

- Personal Information to contact you regarding our Services or to alert you to special offers, features or matters of interest;
- Personal Information necessary to use the Services that you have requested, including establishing and operating an account;
- Un-identifiable and aggregated Personal Information pertaining to your visits to the Sites that help us maintain the appropriate features, functionality and user experience

We use that data to: (i) enable you to log in to the Sites; (ii) allow you to avail yourself of our Services; (iii) guard against potential fraud; (iv) contact you if there is a problem with your account; (v) provide answers to your inquiries or questions; and (v) maintain regular communication with you as may be

necessary to inform you of offers, updates and other information regarding us and our Services.

HIPAA Compliance

Your obligations in regard to any Personal and Protected Health Information gained or provided through the Sites or use of the Services are set forth in the Terms of Service. <https://medtrainer.com/terms-of-use>.

Social Networks

If our Sites offer the possibility that you may connect through a third-party social network such as Facebook and other networks (each, a "Social Network"), we may collect Personal Information from your profile on such Social Network, such as your name, user name, and email address. In addition, our Sites offers features that will allow you to share information from our Sites to a Social Network or share information from our Social Network sites. If you decide to use such features, they may allow the sharing and collection of information both to and from such Social Network so you should check the privacy policy of each Social Network before using such features.

Non-Identifiable Data and Aggregated Personal Information

Regardless of whether you register for an account or submit information to us, we and third parties performing e-commerce services for us may send one or more "cookies" to your computer. Cookies are small text files placed on your web browser when you visit our Sites that store information on your computer, such as your Site preferences. We use cookies when you sign in to keep track of your personal session. We also use cookies to track your activity on the Sites as a unique person. For security purposes, all of this information is

stored in encrypted form. This data may be used to display information about our Services on websites operated by third parties.

You can set your web browser to inform you when cookies are set, or to prevent cookies from being set altogether. Please note, however, that if you decline to use cookies, you may experience reduced functionality and slower site response times.

We or our service providers may also collect web surfing data related to your use of the Sites. Such information may include: your Internet Protocol (IP) address, browser type, and internet service provider (ISP); your operating system; which of our web pages you access and how frequently you access them; referral or exit pages; click stream data; and the dates and times that you visit the Sites. This data may be collected using cookies, web beacons, page tags or similar tools. As with cookies, the web surfing information is anonymous, "click stream" transactional data that is not associated with any users as individuals.

Web surfing data and similar information may be aggregated for business analytic and administrative purposes. We may, for example, use this aggregated information in the administration of the Sites to improve their usability, search engine optimization strategies, and other activities. We also use it to help optimize the Sites based on the needs of our users.

How and When Your Information Is Shared With Other Parties

We do not sell, trade or license Personal Information about our users for marketing purposes. We work with a number of trusted partners who perform vital functions as part of our operations, including processing payments for orders and fulfilling orders. Except as noted above, we do not share your Personal Information unless it is necessary to fulfill our responsibilities, including providing information or Services to you.

Additional Sharing of Information

We may engage third parties to help us carry out certain other internal functions such as account processing, client services, or other data collection relevant to our business. We may also use third parties to deploy marketing to our customers and users. Personal Information is shared with these third parties only to the extent necessary for us to process the transactions you initiate or perform other specific services. Our partners are legally required to keep your Personal Information private and secure.

We may share your Personal Information with law enforcement or other government agencies as required by law or for the purposes of limiting fraud. We reserve the right to disclose your Personal Information when we believe that disclosure is necessary to protect our rights or to comply with a judicial proceeding, court order or legal process. We further reserve the right to disclose any of your Personal Information that we believe, in good faith, appropriate or necessary to take precautions against liability, to investigate and defend against any third-party claims or allegations, to assist government enforcement agencies, to protect the security or integrity of the Sites or our services, or to protect the rights, property or personal safety of us, our users or others.

We may share your Personal Information in connection with a corporate reorganization or transaction, such as a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

Notwithstanding any of the above, we will not share your Personal Information if such sharing is prohibited by applicable privacy and data protection law, including, without limitation, the EEA's General Data Protection Regulation and the California Consumer Protection Act ("CCPA").

Rights of EEA Residents

This section of this Privacy Policy is applicable to residents of the European Economic Area ("EEA"). The EEA consists of the member states of the European Union, i.e., Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland,

Portugal, Romania, Slovakia, Slovenia, Spain, Sweden and the United Kingdom, and Iceland, Liechtenstein, and Norway. This section also applies to residents of Switzerland and, in the event of its departure from the EU, residents of the United Kingdom. Residents of the EEA and Switzerland are referred to here as “EEA Residents.”

From May 25, 2018, all processing of Personal Information of EEA Residents is performed by us in accordance with the General Data Protection Regulation (2016/679) of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons regarding the processing of Personal Information and on the free movement of such data (“GDPR”).

Although the Site is accessible anywhere in the world, we do not directly provide our Services currently to residents in the European Union. Notwithstanding the foregoing, it is possible that EEA Residents provide Personal Information by signing up for our mailing list.

EEA Residents may obtain information about the Personal Information that we hold about them by contacting us at legal@medtrainer.com.

International Data Transfers

If you are resident outside the United States, including in the EEA, we transfer Personal Information provided by you for processing in the United States. Under the GDPR, we are considered a “controller” and a “co-processor” of the Personal Information of EEA Residents. By providing Personal Information to us for the purpose of contacting us or subscribing to our mailing lists, you consent to the processing of such data in the United States.

Please note that the United States does not have data protection laws equivalent to those in the EEA and other jurisdictions.

Notifications and Communications from Our Sites

[Communications Regarding Our Services](#)

We will send you email notifications and free newsletters from time to time with offers, suggestions and other information. Some notifications are communications relating to us and our Services. You may “opt-out” from receiving such communications by following the “Unsubscribe” instructions provided in the email.

Legal or Security Communications

We also send out notices that are required for legal or security purposes. For example, certain notifications are sent for your own protection. In other cases, these notifications involve changes to various legal agreements, such as this Privacy Policy or the Terms of Use. Generally, you may not opt out of such emails.

Account and Order Communications

If you obtain Services, we may send you communications regarding such Services. We may also send communications providing customer support or responses to questions regarding the operation of the Services. Generally, you may not opt out of such emails.

Deleting Your Information

If you want us to delete your Personal Information and your account, please contact us at legal@medtrainer.com with your request. We will take steps to delete your information as soon as we can, but some information may remain in archived/backup copies for our records or as otherwise required by law.

Personal Information Retention

We retain the Personal Information we receive as described in this Privacy Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

Links to Other Sites

If you follow any links that direct you away from the Sites, including links to social media sites or to other Sites, this Privacy Policy will not apply to your activity on the other sites you visit. We do not control the privacy policies or the privacy practices of any third parties.

Materials Submitted Through The Sites

Any materials submitted through the Sites and your use of the Sites are subject to the Terms and Conditions that apply to the Sites which may be accessed [here](#).

Security Policy

We take commercially reasonable steps to protect our customers' Personal Information against unauthorized disclosure or loss. However, no data transmission over the Internet can be guaranteed to be 100% secure. Therefore, while we strive to protect user information we cannot ensure or warrant the security of any information you transmit to us or from the Sites. You engage in such transmissions at your own risk.

If you believe your Personal Information is being improperly used by us or any third party, please immediately notify us via email at legal@medtrainer.com.

Children Under 13

The Sites is restricted to the use of adults over the age of majority in their place of residence. No portion of the Sites is directed to children under the age of 13. Consequently, we do not knowingly collect personal identifying information from any person we know is a child under the age of 13. If we learn that we have collected personal information from a child under age 13 we will delete that information as quickly as possible. If you are a parent or guardian

of a child under 13 years of age and you believe your child has provided us with Personal Information, please contact us at legal@medtrainer.com.

Your California Privacy Rights

The following section pertains to the rights of individuals or households in California (“California consumers”).

- *Civil Code Section 1798.83*
Under certain circumstances, California Civil Code Section 1798.83 states that, upon receipt of a request by a California consumer, a business may be required to provide detailed information regarding how that business has shared that customer’s Personal Information with third parties for direct marketing purposes. However, the foregoing does not apply to businesses like ours that do not disclose Personal Information to third parties for direct marketing purposes without prior approval or give customers a free mechanism to opt out of having their Personal Information disclosed to third parties for their direct marketing purposes.
- *Rights under the CCPA*
As of January 1, 2020, the CCPA (California Civil Code Section 1798.100 et seq.) provides California consumers with additional rights regarding Personal Information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. The categories of Personal Information we collect are generally described above but differ for individual consumers depending on the Services used by such consumers.

Under the CCPA, qualifying California consumers may have the following rights:

- Right to Know and Right to Delete

A California consumer has the right to request that we disclose what Personal Information we collect, use, disclose and sell. A California consumer also has the right to submit requests to delete Personal Information.

When we receive a request to know or delete from a California consumer, we will confirm receipt of the request within 10 business days and provide information about how we will process the request, including our verification process. We will respond to such requests within 45 days.

- Right for Disclosure of Personal Information

A California consumer may also submit requests that we disclose specific types or categories of Personal Information that we collect.

Under certain circumstances, we will not provide such information, including where the disclosure creates a substantial, articulable and unreasonable risk to the security of that Personal Information, customers' accounts with us, or the security of our systems or networks. We also will not disclose California consumers' social security numbers, driver's license numbers or other government-issued identification numbers, financial account numbers, any health insurance or medical identification numbers, or account passwords and security questions and answers.

- Submitting Requests

If you are a California consumer and would like to make any requests under the CCPA, please direct them as follows:

Privacy Compliance, 555 Cajon St., Suite A, Redlands, California 92373.

legal@medtrainer.com

- Verifying Requests

If we receive any request, we will use a two-step process for online requests where the California consumer must first, clearly submit the request and then second, separately confirm the request. We will use other appropriate measures to verify requests received by mail or telephone.

In submitting a request, a California consumer must provide sufficient information to identify the consumer, such as name, email address, home or work address, or other such information that is on record with us so that we can match such information to the Personal Information that we maintain. Do not provide social security numbers, driver's license numbers, account numbers, credit or debit card numbers, medical information or health

information with requests. If requests are unclear or submitted through means other than as outlined above, we will provide the California consumer with specific directions on how to submit the request or remedy any deficiencies. If we cannot verify the identity of the requestor, we may deny the request.

- California Do Not Track Disclosures

Although some browsers currently offer a “do not track (‘DNT’) option,” no common industry standard for DNT exists. We therefore do not currently commit to responding to browsers’ DNT signals.

Your Rights and Obligations

We ask that you keep the Personal Information that you provide to us current and that you correct any information you have provided to us by contacting us at legal@medtrainer.com. You represent and warrant that all Personal Information you provide to us is true and correct and relates to you and not to any other person.

If you use the Sites, you are responsible for maintaining the confidentiality of your account and for restricting access to your computer or device, and you agree to accept responsibility for all activities that occur under your account.