

Updated as of April 27, 2020

PRIVACY POLICY

I. Introduction

CDL Consulting Inc., a Delaware corporation, and The Center for Dying and Living, a sole proprietorship (together, the "Company") values your privacy and is committed to maintaining your trust. We provide this Privacy Policy to inform you of our policies and procedures regarding the collection, use, and disclosure of personally identifiable information received from users of this websites located at:

- www.thecenterforlivinganddying.org
- www.dyingandliving.org
- www.mysofia.org
- www.mysophia.org
- www.thecenterfordyingandliving.com
- www.thecenterforlivinganddying.com
- www.cdl.health
- www.thecenterfordyingandliving.org
- www.mettle.health
- www.mettlehealth.org

(hereinafter collectively referred to as the "Website") and all of the Company's other products and/or services, mobile application ("App"), and/or other online services that post a link to this Privacy Policy, and all content offered as a part thereof (the "Services").

II. General Data Protection Regulation

This Company is headquartered in California. As a California-based company, we do not knowingly advertise in the European Union (EU), or market our Services to residents of the EU. However, our Website and/or App do not restrict visitors from the EU; we do not have in place any protections to prevent EU residents from accessing our Website and/or App. As a result, we provide the foregoing disclosure to EU data subjects.

The Company's processing¹ of the Personal Information², such as the name, address, email address, or telephone number of an EU data subject (hereinafter, "Personal Information" or

¹ **Processing.** "Processing" covers a wide range of operations performed on personal data, including by manual or automated means. It includes the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data. See Article 4(2) and (6) of the GDPR.

² **Personal Information.** "Personal Information" may include, but is not limited to information that identifies you as an individual or relates to an identifiable person, such as name, postal address, telephone number, email address, etc. The Company does not collect any Personal Information from

“Personal Data”) that is voluntarily supplied by the individual, or supplied by an authorized third party,³ shall always be in line with the General Data Protection Regulation (“GDPR”), and in accordance with the country-specific data protection regulations applicable to the Company.

By means of this Privacy Policy, our Company would like to inform you of the nature, scope, and purpose of the Personal Information we collect, use and process, as defined herein. Specifically, if you are an EU data subject visiting our Website or downloading our App, you are hereby informed, by means of this section of our Privacy Policy, of the rights to which you are entitled, and the recourse you may seek if you have any questions regarding the collection, use, and processing of Personal Information by the Company.

Your Privacy Rights under the GDPR. The GDPR includes the following rights for you, as an EU data subject, if you provide Personal Information to the Company in connection with accessing the Services or visiting our Website:

- The right to be informed about how we store, use, or share your data;
- The right to access your data;
- The right to rectify your data;
- The right to have us erase your data;
- The right to prevent us from processing your data;
- The right to request copies of your data from us⁴ in a commonly-used and machine-readable format, free of charge, for the purposes of transfer to a third party, where technically feasible;
- The right to object to use or sharing of your data; and
- The right not to be subject to automated decision-making, including profiling

Legitimate Business Interest under the GDPR. Our use of your Personal Information is based on the legitimate business grounds that:

- The use is necessary in order to fulfill our commitments to you under our Terms of Service or other agreements with you or is necessary to administer your account – for example, in order to enable access to our Website on your device or charge you for our Services;
- The use is necessary for compliance with a legal obligation;

visitors to its website that is not voluntarily provided. The Company only collects your Personal Information if you register for an account with the Company’s Website, when you use the Company’s Services, and when you send the Company communications in connection with your use of the Services.

³ ***Third Party Personal Information.*** We may obtain your Personal Information from third parties, such as third parties with whom we affiliate in providing the Company’s services. If you provide the Company with Personal Information about third parties, you warrant to the Company that any Personal Information that you provide to the Company about any third party individuals was obtained by you with full consent, that you have the legal authority to provide us with such information, and that the individual has not communicated to you that they wish to opt out of receiving communications from the Company or having the Company collect information about him or her.

⁴ You may email us with requests at info@thecenterfordyingandliving.org.

- The use is necessary in order to protect your vital interests or those of another person or entity;
- We have a legitimate interest in using your information – for example, to provide and update our Website or Services, to improve our Website or Services so that we can offer you an even better user experience, to safeguard our Website or Services, to communicate with you, to measure, gauge, and improve the effectiveness of our advertising, and better understand user retention and attrition, to monitor and prevent any problems with our Services, and to personalize your experience; and/or
- You have given us your consent.

Data Retention/Erasure. We will retain your Personal Information for as long as needed to provide the applicable Services, or for a minimum period of four (4) years. If, at any time after agreeing to this Privacy Policy, you: (1) change your mind about receiving information from us; (2) wish to revoke permission for us to retain and use your Personal Information; (3) wish to object to the processing of your Personal Information; or (4) wish for us to erase a copy of your data, please make a request to the Company at info@thecenterfordyingandliving.org. If you request erasure of your data, we may retain some of your Personal Information only for legitimate business interests, such as fraud detection, prevention, and enhancing the safety of our Website; and to comply with our legal obligations, specifically our tax, legal reporting, and auditing obligations.

Our Response to Your Requests. If you make any requests regarding your Personal Information, we will not charge you for compliance with the request. The Company will respond and comply within one month. The Company reserves the right to refuse or charge for requests that are **manifestly unfounded or excessive**. If we refuse your request, we will tell you why we are refusing your request. You have the right to complain to the relevant supervisory authority and to a judicial remedy, but you must do so within one month of our refusal.

Data Controller. With the exception of processing payments, for which PayPal is the Payments Data Controller; the Company is the “data controller,” as defined under the GDPR, or the legal entity which determines the purposes and means of the processing of Personal Information of the customers of the Company and visitors to its Website. The Company is responsible for collecting your consent, managing consent-revoking, enabling right to access, etc. If you wish to revoke consent for us to store, use, or share your Personal Information, you may contact us at info@thecenterfordyingandliving.org.

Data Processor. The Company is the “data processor,” as defined under the GDPR, or the legal entity which processes, as this term is defined here in footnote 1, your Personal Information. The Company has not retained any third-party service provider to process your Personal Information. Any processing of Personal Information shall be done solely by the Company. The Company maintains records of any processing activities it performs, and is able to show how the Company complies with the data protection principles under the GDPR. It has effective policies and procedures in place. If you have questions regarding the processing of your Personal Data, you may contact us at info@thecenterfordyingandliving.org.

Data Protection Officer. The Company is not formally required to designate a Data Protection Officer (“DPO”) because it is not: (1) a public authority; (2) an organization that carries out regular and systematic monitoring of individuals on a **large scale**; or (3) an organization that carries out **large scale** processing of special categories of data, such as health information or information about criminal convictions. Nonetheless, the Company voluntarily elects to appoint Sonya Dolan, Secretary of the Company, as the DPO for this Company. Ms. Dolan is responsible for data protection compliance and can answer any questions you may have about your Personal Information. She may be reached at sonya@thecenterfordyingandliving.org.

Breach. The Company has reasonable internal policies and procedures in place to effectively detect, report, and investigate a data breach. The GDPR defines a Personal Information breach as “a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Information.” Pursuant to the GDPR, the Company will notify you of a Personal Information breach where the Personal Information breaches are likely to present a risk to data subjects to data protection authorities (“DPAs”) without undue delay, and within 72 hours if feasible, after becoming aware of the breach; and communicate high-risk breaches to affected data subjects without undue delay. In the unfortunate event of breach, the Company shall provide you with: (i) contact details of the DPO or other contact person for the Company, (ii) a description of the nature of the breach, (iii) likely consequences of the breach, (iv) measures the Company has taken or proposes to take to address the breach, and (v) advice on steps data subjects can take to protect themselves.

Note: Data Protection Impact Assessment (DPIA). The Company is not required to undergo a DPIA because the Company’s data processing is not likely to result in a high risk to data subjects, such as in cases where: (1) new technology is being deployed; (2) profiling operations may significantly affect individuals; or (3) processing is on a **large scale** and involves special categories of data. If you have any questions regarding DPIA compliance by the Company, please contact the Company’s Data Protection Officer.

Complaints. Without prejudice to any other administrative or judicial remedy, every EU data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement of the data subject considers that the processing of Personal Information relating to him or her infringes this Regulation.

III. Use, Processing, and Sharing of Personal Information

The following information applies to anyone who shares with us his, her, or a third-party's⁵ Personal Information⁶. We may use, process,⁷ and/or share your Personal Information (and we have done so in the past 12 months):

- To respond to your inquiries and your requests regarding our Website or Services.
- To send you information regarding our services and changes to our terms, conditions, and policies.
- To complete your user account registration and communicate with you regarding your purchase of our Services.
- To send you marketing communication and newsletters about our Services. To facilitate social sharing functionality.
- To collaborate with business affiliates, partners, vendors, or service providers to provide you with our Services.
- In connection with our business purposes, as described above, including but not limited to data analysis, audits, fraud monitoring and prevention, developing or enhancing new and existing products and/or services, expanding our business activities, etc.

We will not use and/or share your Personal Information:

⁵ ***Third Party Personal Information.*** We may obtain your Personal Information from third parties, such as third parties with whom we affiliate in providing the Company's services. If you provide the Company with Personal Information about third parties, you warrant to the Company that any Personal Information that you provide to the Company about any third party individuals was obtained by you with full consent, that you have the legal authority to provide us with such information, and that the individual has not communicated to you that they wish to opt out of receiving communications from the Company or having the Company collect information about him or her.

⁶ ***Personal Information.*** "Personal Information" may include, but is not limited to information that identifies you as an individual or relates to an identifiable person, such as name, postal address, telephone number, email address, etc. The Company does not collect any Personal Information from visitors to its website that is not voluntarily provided. The Company only collects your Personal Information if you register for an account with the Company's Website, when you use the Company's Services, and when you send the Company communications in connection with your use of the Services.

⁷ ***Process.*** "Processing" covers a wide range of operations performed on personal data, including by manual or automated means. It includes the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data.

- With anyone except for our Company's authorized service providers,⁸ business affiliates,⁹ and business partners¹⁰, and strictly for business purposes; or unless we specifically inform you, and give you an opportunity to opt out of our sharing your Personal Information.
- To run interest-based advertising campaigns that collect Personal Information such as email addresses, telephone numbers, and credit card numbers.
- To use or associate Personal Information with remarketing lists, cookies, data feeds, or other anonymous identifiers.
- To use or associate targeting information, such as demographics or location, with any Personal Information collected from the ad or its landing page.
- To share any Personal Information with Google or third party companies through our remarketing tag or any product data feeds which might be associated with our ads.
- To send Google or third party companies precise location information without obtaining your consent.

However, we reserve the right to disclose Personal Information that we believe, in our sole discretion, to be necessary or appropriate in the following circumstances:

- As required by law, such as to comply with a subpoena, or similar legal process.
- When we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.
- To enforce our Terms and Conditions.
- To allow us to pursue available remedies or limit the damages that we may sustain.

IV. Collection of Other Information

Personally Non-Identifiable Information: We may collect personally non-identifiable information, including but not limited to demographic data, age, education level, profession,

⁸ Authorized service providers are companies that perform certain services including, but not limited to, fulfilling orders, processing credit card payments, delivering packages, providing customer service and marketing assistance, performing business and sales analyses, supporting the functionality of the Services, and supporting contests, sweepstakes, surveys and other features we offer, on our behalf. These service providers may have access to your Personal Information, but to the extent necessary to perform or fulfill their business purpose. We do not permit them to share or use any of your Personal Information for any other purpose.

⁹ Affiliate businesses are those businesses with whom we may affiliate to sell our products or Services. We may share information we collect, including Personal Information, with affiliated businesses. Sharing such information with our affiliates enables us to provide you with information about a variety of products and Services that might interest you. We instruct all affiliated businesses to comply with applicable privacy and security laws and, at a minimum, in any commercial email they send to you, to give you the opportunity to choose not to receive such email messages in the future.

¹⁰ Business partners are typically merchants offering the products, services, promotions, contests and/or sweepstakes in connection with or somehow related to our own products and Services. We will not share your Personal Information with business partners unless you choose to participate in their offer or program. When you choose to engage in a particular offer or program, you authorize us to share your email address and other Personal Information with the relevant business partner.

geographic location or gender, from you at the time of registration on our Website or app, or when you choose to use our Services. This information is not, by itself, sufficient to identify or contact you. The Company may store such information, or it may be included in databases owned and maintained by partners, affiliates, agents, or service providers of the Company. The Company may use such information and pool it with other information to track data related to growing the business, such as the total number of visitors to our Website and the domain names of our visitors' Internet service providers.

Customer Credit Card Information. The Company uses a third party service provider, PayPal, to process your payments and keep a protected copy of your credit card number. This billing data belongs to you, and by utilizing the Service, you grant the Company a license to use this data to bill you for services rendered.

V. Authorized Service Providers

As set forth in Section III, we may share your Personal Information for business purposes with authorized service providers, including Acuity Scheduling, PayPal, and Go-To Meeting. For more information about how these companies store your Personal Information, the Company refers you to each of their respective Privacy Policies here at:

- <https://help.acuityscheduling.com/hc/en-us/articles/219149587-Security-Privacy-Compliance>,
- <https://www.paypal.com/us/webapps/mpp/ua/privacy-full>, and
- <https://www.logmeininc.com/legal/privacy>

The Company incorporates the aforementioned Privacy Policies in full by reference.

VI. Tracking Technologies on our Website

The Company may use the foregoing technologies to track your activity on our Website:

Cookies. When you visit our Website or otherwise interact with the Service, we may send one or more “cookies” to your computer or other devices. Cookies are alphanumeric identifiers stored on your computer through your web browser and are used by most websites to help personalize your web experience. Some cookies may facilitate additional site features for enhanced performance and functionality such as remembering preferences, allowing social interactions, analyzing usage for site optimization, providing custom content, allowing third parties to provide social sharing tools, and serving images or videos from third party websites. Some features on this site will not function if you do not allow cookies. We may link the information we store in cookies to any Personal Information that you submit while visiting our Website.

We may use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period

of time. Persistent cookies enable us to track and target the interests of our users to enhance the experience on our site.

Functional cookies, persistent and session type, store information to enable core site functionality, such as Live Chat and Client ID remembrance.

Analytics cookies allow us to count page visits and traffic sources so we can measure and improve the performance of our site and our marketing campaigns.

Advertising cookies may be set through our Website by our advertising partners. Data may be collected by these companies that enable the companies to serve up advertisements on other sites that are relevant to your interests.

If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to automatically decline cookies, or be given the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. You may also wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html>.

If you reject cookies, you may still use our site, but some features on the site will not function properly.

Web Beacons. Web beacons are electronic files that signal when a webpage, advertisement, video, other content, an email or newsletter has been viewed. They are usually invisible to you. We may use web beacons alone or in conjunction with cookies to compile information about our Service. Web beacons may be used within the Service to track email open rates, web page visits or form submissions. In some cases, we tie the information gathered by web beacons to your Personal Information to gauge the effectiveness of certain communications and our marketing campaigns.

Log Files. A Log File is a file that records either events that occur in an operating system or other software runs, or messages between different users of a communication software. Log file information is automatically reported by your browser or mobile application each time you access the Website or our Services. Along with cookies and web beacons, log files help provide additional functionality to the Website and Services and help us analyze Website and Services usage more accurately. We and our third party tracking-utility partners may use log files on our Service to gather automatically gather and store information including, but not limited to, internet protocol ("IP") addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data, for business purposes. We may use Google Analytics, which uses cookies and other similar technologies to collect and analyze information about the use of the Service and report on activities and trends. This service may also collect information regarding the use of other websites, apps and online resources. You can learn about Google's practices by going to

www.google.com/policies/privacy/partners/, and opt out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

Embedded Scripts. An embedded script is programming code that is designed to collect information about your interactions with the Service, such as the links you click on. The code is temporarily downloaded onto your Device from our web server or a third party service provider, is active only while you are connected to the Service, and is deactivated or deleted thereafter.

Browser Fingerprinting. Collection and analysis of information from your Device, such as, without limitation, your operating system, plugins, system fonts and other data, for purposes of identification.

ETag, or entity tag. A feature of the cache in browsers. It is an opaque identifier assigned by a web server to a specific version of a resource found at a URL. If the resource content at that URL ever changes, a new and different ETag is assigned. Used in this manner ETags are a form of Device Identifier. ETag tracking may generate unique tracking values even where the consumer blocks HTTP, Flash and/or HTML5 cookies.

VII. Children

The Children's Online Privacy Protection Act of 1998 (COPPA) and its accompanying FTC regulation protects the privacy of American children aged 13 and under, who are using the Internet. The GDPR sets the age at which an EU child can give their own consent in order to process their Personal Data at 16 years of age.

The Website and our related Services are not intended for anyone under 16, and we do not knowingly collect information from anyone under the age of 16. Anyone aged 16 or under should not submit any Personal Information without the permission of their parents or guardians. Parents or guardians may, on behalf of their children, submit their children's Personal Information. By using the Website and our related Services, you are representing that you are at least 16 years old and that you have the relevant legal authority to submit your Personal Information or that of a third-party minor, to the Company or on the Company's Website.

VIII. Links to Other Websites

This Privacy Policy does not address, and we are not responsible for the privacy, information or other practices of any third parties. This Privacy Policy applies only to this Website and the Company's Services. It does not apply to any third-party sites, and the inclusion of a link does not imply endorsement of the linked site or service by us or by our affiliates.

We are not responsible for the collection, usage and disclosure policies and practices (including the data security practices) of other organizations, such as Facebook, Apple, Google, Microsoft, YouTube or any other app developers, app provider, social media platform provider, operating system provider, content provider, wireless service provider or device manufacturer, including

any Personal Information you disclose to other organizations through or in connection with the Website, app, or Services.

IX. Security

We maintain reasonable and appropriate, although not infallible, security precautions. However, we cannot guarantee that hackers or unauthorized personnel will not gain access to your Personal Information, despite our reasonable efforts. You should note that in using the Website, app, and/or our related Services, your information will travel through third-party infrastructures which are not under our control. Please feel free to raise any questions, concerns or specific directions you may have regarding the privacy and security of your information to info@thecenterfordyingandliving.org.

X. Data Retention

We will retain your Personal Information for four (4) years, or as long as needed to provide the applicable Services. Our data retention period may change in the future if a longer retention period is required or permitted by law.

XI. Do Not Track

Your browser setting may allow you to automatically transmit a "Do Not Track" signal to websites you visit. The Company's Website does not respond to "Do Not Track" signals or other mechanisms from a visitor's browser. If, in the future, we create a program or protocol to respond to such web browser "Do Not Track" signals, we will inform you of the details of that protocol in this Privacy Policy. To find out more about "Do Not Track," please visit <https://www.allaboutdnt.com>.

XII. Your California Privacy Rights

California "Shine the Light" Law

Under California Civil Code Section 1798.83, California customers are entitled to request information relating to whether a business has disclosed Personal Information to any third parties for the third parties' direct marketing purposes. This code section applies to businesses with 20 or more full or part-time employees.

You may request and obtain from us once a year, free of charge, certain information about the Personal Information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of Personal Information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to info@thecenterfordyingandliving.org.

California Consumer Privacy Act

If you are a California resident, the processing of certain personal data about you may be subject to the California Consumer Privacy Act (“CCPA”) and other applicable California state privacy laws. Beginning January 1, 2020, the CCPA gives you certain rights with respect to the processing of your personal data (known as “personal information”, as described under the CCPA).

RIGHT TO KNOW REQUEST - Under the CCPA, you may have a right to request information about our collection, use, and disclosure of your personal information over the prior 12 months, and ask that we provide you with the following information:

Categories of and specific pieces of personal information we have collected about you.

Categories of sources from which we collect personal information.

Purposes for collecting, using, or selling personal information.

Categories of third parties with which we share personal information.

Categories of personal information disclosed about you for a business purpose.

If applicable, categories of personal information sold about you and the categories of third parties to which the personal information was sold, by category or categories of personal information for each third party to which the personal information was sold.

RIGHT TO DELETE REQUEST - You may also have a right to request that we delete personal information, subject to certain exceptions.

DISCLOSURES OF PERSONAL INFORMATION FOR BUSINESS PURPOSE - In the preceding 12 months, we may have disclosed certain personal information to the categories of recipients listed in Section III of this Privacy Policy for one or more business purposes.

If you are a California resident and would like to make a verifiable request for information about the personal information we have collected about you or a request for deletion of such personal information, please submit your request in writing to info@thecenterfordyingandliving.org.

XIII. Open ID Providers/Facebook Connect

You may be able to log into your account on our Website and/or access our Services using sign-in services such as Facebook Connect or an Open ID provider. These services will authenticate your identity and provide you the option to share certain Personal Information with us, such as your name and email address to pre-populate our registration form. Services, like Facebook Connect, give you the option to post information about your activities on this Website to your profile page to share with others within your network if you so choose.

XIV. Forum on our Website

Our Website offers blogs and question and answer forums to which you may contribute. If you would like to contribute, you may submit ideas, photographs, user profiles, writings, music, video, audio recordings, computer graphics, pictures, data, questions, comments, suggestions or other content, including Personal Information (collectively, "User Content"), to the Company directly for inclusion on our Website. We alone determine what User Content to then post on the Website. We, or others who work on behalf of our Company, may store, display, reproduce, publish, distribute or otherwise use User Content online or offline in any media or format (currently existing or hereafter developed), and may or may not attribute it to you.

Please think carefully before deciding what information you share, including Personal Information, in connection with your User Content. Please note that the Company may not control who will have access to the information once it is made public, and cannot ensure that parties who have access to such publicly available information will respect your privacy or keep it secure. Our promises regarding handling of your Personal Information under this Privacy Policy does not apply to any information that you disclose to use for public posting, share with others or otherwise upload onto the publicly available portions of our Website in the future. We are not responsible for the accuracy, use, or misuse of any User Content that you disclose through the Website.

To request removal of your Personal Information from our Website or question and answer forum, contact us at info@thecenterfordyingandliving.org. In some cases, we may not be able to remove your Personal Information, especially if it was already re-posted elsewhere by a third party over whom we have no control. If this is the case, we will let you know if we are unable to do so and why in response to your request.

XV. Changes

This Privacy Policy may be updated from time to time for any reason, at our sole discretion. We will notify you of any material changes to our Privacy Policy by posting the new Privacy Policy on our Website, and emailing you a copy of the revised Privacy Policy or a link to it. You are advised to consult our Website regularly for any changes.

XVI. Incorporation into Terms of Service

By using or accessing the Website or the Services, you are accepting the practices described in this Privacy Policy, and you are consenting to our processing of your information as set forth in this Privacy Policy and as amended by us. This Privacy Policy is incorporated into, and considered a part of, the Company's Terms of Service.

XVII. Opt-Out Policy

If, at any time after registering, you change your mind about receiving information from us or about the use of information volunteered by you, or if you prefer that we do not share your Personal Information with third parties for marketing purposes, please contact us at info@thecenterfordyingandliving.org.

XVIII. Contact Us

If you have any questions or concerns relating to our use of your Personal Information, please email info@thecenterfordyingandliving.org. Additionally, you may reach us by postal mail at:

CDL Consulting, Inc.
279 Hillside Ave.
Mill Valley, CA 94941