

MYORCARE
Privacy Policy

Introduction

Welcome to MyorCare, an advanced analytics web-based platform which provides precision care solutions to help identify infants at risk of developing atopic dermatitis or food allergies (the “Service”). The Service is developed and operated by MYOR Diagnostics Ltd. (“Myor” or “we”, “us”, “our”).

This Privacy Policy (“Policy”) explains how we collect and use your information when you use the Service as a parent of an infant, looking to predict your infant's risk of developing atopic dermatitis or food allergies (“Parent”).

If you are a Parent using our Service through your relationship with a medical professional established in the United States who is a ‘covered entity’ under the rules of the U.S. federal Health Insurance Portability and Accountability Act (HIPAA), then this privacy notice does not apply to you and Myor in regards to your personal information you provide when registering to the Service, which includes protected health information. This is because Myor only handles your registration information as a ‘business associate’ (i.e., service provider) of your attending medical professional. In that case, your medical Professional has overall responsibility for the collection and use of your registration information and is responsible to inform you of its privacy practices through its own privacy notice.

This Policy may be amended from time to time. We will post any change to this Policy on our Service at a reasonable time in advance of the effective date of the change, and we will also make efforts to proactively notify you by email of the changes if we have your email address.

Contact us

If you have any questions, comments or concerns regarding this Policy or our processing of your own and your family's personal information, please contact us at support@myorcare.com.

What we collect and why

Scenario	Purposes	Categories of information processed
Registering and creating your profile on our Service	Providing you with the functionality of the Service; contacting you regarding administrative issues related to the Services, this Policy, our Terms of Service, support and maintenance	Mobile phone number; e-mail address; home address; full name; gender; date of birth; racial or ethnic origin; health and medical information, including medical history; habits (e.g., smoking). When you register to create your profile on the Service, you provide us with personal information of your infant child, their other parent and their siblings. YOU ARE SOLELY LIABLE FOR OBTAINING THE PRIOR CONSENT OF INDIVIDUALS WHOSE PERSONAL INFORMATION YOU PROVIDE DURING REGISTRATION. We refer to this as " Registration Information ". Registering to the Service is mandatory, but you do not have a legal obligation to do so.

Obtaining your consent to use your Registration Information for research purposes	Research and development of our Service	Aggregated and statistical information that does not directly identify you, based on your Registration Information.
Providing you with marketing materials, if you consented to it	Providing you with educational or marketing-related materials; our business development	Mobile phone number; email address. You may opt-out of receiving marketing materials at any time in the manner stipulated in the marketing materials you receive from us.
Purchasing products or services through our Service	providing you with the product or service you requested	Mobile phone number; email address; shipping address; full name; payment information. We refer to this as " purchase Information ".
Contacting us with an inquiry through our email	Responding to your inquiry; our business development	Email address; the subject and text of your inquiry. We refer to this as " Inquiry Information ".
Providing us with your feedback and reviews	Responding to your feedback and reviews; our business development	Email address; the contents of the feedback or review. We refer to this as " Feedback ".
Use of cookies on the Service	Facilitate a Service feature that the user specifically requested; analyze the Service usage to evaluate and improve its performance; improve user experience on the Service; inform and serve personalized ads more relevant to user interests	IP address from which you access the Service, time and date of access, type of device and browser used, language used, links clicked via a mouse or a touch screen, and actions taken while using the Service

We do not knowingly collect information **from** minors under the age of 13; however, due to the nature of our Service, we do collect information **about** minors, with the consent of their parent(s). If you have reason to believe that we have been provided with the information of a minor through the Service without the minor's parent's consent, please contact us and we will endeavor to delete that information from our databases.

Methods and sources for collecting your personal information

We collect the personal information from several sources:

- Directly from you when you register to our Service, when you provide us with your feedback, when you contact us with an inquiry or, where relevant, when you purchase products and services;
- From our service providers helping us to operate the Service;
- Through the device you use to access our Service, including through third party cookies and analytics tools, such as Google Analytics.

You are not legally obligated to provide us with your personal information, but if you choose not to do so, we will not be able to fulfill your request to register or to use our Service functionalities, provide you with the products and services you requested, or handle or respond to your inquiry or feedback.

Sharing your personal information

We will not share your information with third parties, except in the events listed below or when you provide us your explicit and informed consent.

Scenario	Purposes	Third parties involved
<p>We will share your information with our service providers who assist us with the internal operations of the Service. These companies are authorized to use your personal information in this context only as necessary to provide these services to us and not for their own promotional purposes</p>	<p>Operating the Service and our business</p>	<p>MongoDB; Amazon Web Services</p>
<p>We will share your information with the medical professional with whom you actively shared your unique ID</p>	<p>Operating the Service; providing you with the functionality of the Service you requested</p>	<p>The medical professional attending to your child. Please note that we will only share your information with the your attending medical professional if you, by yourself, provided the medical professional with the unique ID assigned to you upon your registration to the Service.</p>
<p>If you abused your rights to use the Service or violated any applicable law while doing business with us</p>	<p>Responding to, handling, and mitigating suspected violations of law in connection with our business</p>	<p>Competent authorities, legal counsels, and advisors</p>
<p>If a judicial, governmental, or regulatory authority requires us to disclose your information</p>	<p>Complying with a binding request from a competent authority</p>	<p>Competent authorities</p>
<p>If the operation of the Service or our business is organized within a different framework, or through another legal structure or entity.</p>	<p>Enabling a structural change in the operation of the Service and our business.</p>	<p>The target entity of the merger or acquisition, legal counsels, and advisors</p>

Data retention and security

We retain your information for as long as needed to operate the Service, and thereafter as needed for record-keeping matters.

We will retain your information for as long as needed to operate the Service. Thereafter, we will still retain your personal information as necessary to comply with our legal obligations, resolve disputes, establish, and defend legal claims and enforce our agreements. The overall period of retention is approximately 7 years.

We implement measures to secure your information.

We implement measures to reduce the risks of damage, loss of information and unauthorized access or use of information, such as WAF, anti-malware, MFA, SSH, data encryption and more. However, these measures do not provide absolute information security. Therefore, although efforts are made to secure your personal information, there is no guarantee that it will be immune from information security risks.

CPRA information for consumers residing in California

If you are an individual residing in California, we provide you with the following information pursuant to the California Privacy Rights Act (CPRA).

This is the personal information we have collected over the past 12 months when we operate as a “business” under the CPRA:

Categories of Personal Information	Specific Types of Personal Information Collected	Source of Information
Identifiers	Mobile phone number; e-mail address; home address; full name; gender; date of birth. Sensitive information: racial or ethnic origin.	The Parent themselves
Health information	Sensitive information indicative of health or medical condition, including medical history.	The Parent themselves
Inferences drawn from any of the information identified above	Habits (e.g., smoking).	Inferences drawn from any of the information identified above
Information that identifies, relates to, describes, or is capable of being associated with, a particular individual	Subject and content of your feedback or inquiry	The Parent themselves
Commercial information, including products or services purchased, obtained, or considered	Payment information, products and/or services purchased on the Service	The Parent themselves
Internet or other electronic network activity information	IP address from which you access the Service, time and date of access, type of browser used, language used, links clicked, and actions taken while using the Service	The Parent’s device

We do not sell your personal information or sensitive personal information and have not done so in the past 12 months.

We also do not share your personal information for online behaviorally-targeted ads and have not done so in the past 12 months.

We do not use or disclose your sensitive personal information for purposes other than those specified in the CCPA regulations.

The following are the CPRA specific business or commercial purposes for which we use each category of personal information. Details about the information we collect for each category are provided in the table above. More details about the business or commercial purposes are provided in the Privacy Policy’s section titled ‘What we collect and why’:

Categories of Personal Information	Business or commercial purposes pursuant to the CPRA
Identifiers	<ul style="list-style-type: none"> • Providing customer service, processing, or fulfilling orders and transactions, verifying customer information • Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, prosecuting those responsible for that activity. • Undertaking internal research for technological development and demonstration.
Health information	
Inferences drawn from any of the information identified above	
Information that identifies, relates to, describes, or is capable of being associated with, a particular individual	
Commercial information, including products or services purchased, obtained, or considered	

Internet or other electronic network activity information	<ul style="list-style-type: none"> • Undertaking activities to verify or maintain the quality of the service and to improve, upgrade or enhance the service. • Debugging to identify and repair errors. • ν
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The chart below explains about the personal information we disclosed for a business purpose to third parties in the preceding 12 months.

Categories of personal information (under the CPRA)	Categories of third parties to whom we disclose your information and the specific business purpose for the disclosure
Identifiers	<ul style="list-style-type: none"> • With our service providers who assist us in operating the Service, for the purpose of operating our service and business, and facilitating the Service's features. • With governmental authorities, where the law or a binding order requires us to disclose your information. Our purpose in doing so complying with our obligations under the law or the binding order. • With outside legal counsels, for the purpose of handling complaints and lawsuits relating to your employment. • With the target entity of our merger, acquisition or reorganization, and legal counsels, and advisors, for the purpose of facilitating the structural change in the operation of our business within a different framework, or through another legal structure or entity (such as due to a merger or acquisition).
Health information	
Inferences drawn from any of the information identified above	
Information that identifies, relates to, describes, or is capable of being associated with, a particular individual	
Commercial information, including products or services purchased, obtained, or considered	
Internet or other electronic network activity information	

Following are your rights under the CPRA if you are a resident of California:

Right to disclosure of Information

You have the right to know:

- The categories of personal information we have collected about you.
- The categories of sources from which the personal information is collected.
- Our business or commercial purpose for collecting personal information.
- The categories of third parties with whom we share personal information, if any.
- The specific pieces of personal information we have collected about you.

Right to deletion

Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:

- Delete your personal information from our records; and
- Direct any service providers to delete your personal information from their records.

Please note that we may not delete your personal information if it is necessary to:

- Perform any contract between you and us.
- Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes.
- Debug to identify and repair errors that impair existing intended functionality.

- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act.
- Engage in public or peer-reviewed scientific, historical, or statistical research that conforms or adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the ability to complete such research, provided we have obtained your informed consent.
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us and compatible with the context in which you provided the information.
- Comply with an existing legal obligation.

We also will deny your request to delete if it proves impossible or involves disproportionate effort, or if another exception to the CPRA applies. We will provide you a detailed explanation that includes enough facts to give you a meaningful understanding as to why we cannot comply with the request to delete your information.

Right to correct inaccurate personal information

If we receive a verifiable request from you to correct your information and we determine the accuracy of the corrected information you provide, we will correct inaccurate personal information that we maintain about you.

In determining the accuracy of the personal information that is the subject of your request to correct, we will consider the totality of the circumstances relating to the contested personal information.

We also may require that you provide documentation if we believe it is necessary to rebut our own documentation that the personal information is accurate.

We may deny your request to correct in the following cases:

- We have a good-faith, reasonable, and documented belief that your request to correct is fraudulent or abusive.
- We determine that the contested personal information is more likely than not accurate based on the totality of the circumstances.
- Conflict with federal or state law.
- Inadequacy in the required documentation
- Compliance proves impossible or involves disproportionate effort.
- Other exception to the CPRA.

We will provide you with a detailed explanation that includes enough facts to give you a meaningful understanding as to why we cannot comply with the request to correct your information.

Protection against discrimination

You have the right to not be discriminated against by us because you exercised any of your rights under the CPRA.

Exercising your rights

If you would like to exercise any of your CPRA rights as described above, you should email us at: support@myorcare.com.

You may also designate an authorized agent to make a request under the CPRA on your behalf. To do so, you need to provide the authorized agent with written permission to do so and the agent will need to submit to us proof that they have been authorized by you. We will also require that you verify your own identity, as explained below.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal data requested to you, by using a two or three points of data verification process, depending on the type of information you require.