

Privacy Policy

Last updated: December 14, 2020

Effective as of December 14, 2020

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You. By accessing or using the Service, You agree to the collection and use of information in accordance with this Privacy Policy and Our Cookie Policy, which is incorporated herein by reference.

Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions.

The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

- **Application** means the mobile application provided by MedVenture and downloaded by You.
- **Affiliate** means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.
- **Account** means a unique account created for You to access Our Service or parts of Our Service.
- **Business**, for the purpose of the CCPA, refers to MedVenture as the legal entity that collects Consumers' personal information and determines the purposes and means of the processing of Consumers' personal information, or on behalf of which such information is collected and that alone, or jointly with others, determines the purposes and means of the processing of consumers' personal information.
- **CCPA** means the California Consumer Protection Act of 2018, and any amendments or updates thereto.
- **Consumer**, for the purpose of the CCPA, means a natural person who is a California resident.
- **Country** refers to: Washington, United States.
- **Device** means any device that can access the Service such as a computer, a cell phone or a digital tablet.

- **Data Controller**, for the purposes of the GDPR, refers to MedVenture as the legal person which alone or jointly with others determines the purposes and means of the processing of Personal Data.
- **Do Not Track (DNT)** is a concept that has been promoted by US regulatory authorities, in particular the U.S. Federal Trade Commission (FTC), for the Internet industry to develop and implement a mechanism for allowing internet users to control the tracking of their online activities across websites.
- **GDPR** means the General Data Protection Regulation (EU) 2016/679 and all amendments and updates thereto.
- **MedVenture, We, Us or Our** refers to MedVenture for Travelers LLC, with headquarters at 3518 Fremont Ave N #368 Seattle, WA 98103. For the purpose of the GDPR, MedVenture is the Data Controller.
- **Personal Data** is any information that relates to an identified or identifiable individual. For the purposes of the GDPR, Personal Data means any information relating to You such as a Your name, an identification number, location data, online identifier or one or more factors specific to Your physical, physiological, genetic, mental, economic, cultural or social identity. For the purposes of the CCPA, Personal Data means any information that identifies, relates to, describes or is capable of being associated with, or could reasonably be linked, directly or indirectly, with You.
- **Sale**, for the purpose of the CCPA, means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a Consumer's Personal information to another business or a third party for monetary or other valuable consideration.
- **Service** refers to the Application and the Site.
- **Service Provider** means any natural or legal person who processes the data on behalf of MedVenture. It refers to third-party companies or individuals employed by MedVenture to facilitate the Service, to provide the Service on behalf of MedVenture, to perform services related to the Service or to assist MedVenture in analyzing how the Service is used. For the purpose of the GDPR, Service Providers are considered Data Processors.
- **Site** means the website owned and operated by MedVenture available at www.medventurefortravelers.com.
- **Third-party Social Media Service** refers to any website or any social network website through which a User can log in or create an account to use the Service.
- **Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- **User** means an authorized individual who has registered an Account on the Service.
- **You or Your** refers to the individual accessing or using the Service, or the company or other legal entity on whose behalf such individual is accessing or using the Service, as applicable. Under the GDPR, You can be referred to as the Data Subject or as the User as You are the individual using the Service.

Collecting and Using Your Personal Data

Information We Collect

When You access or use Our Service, We may collect certain Personal Data that can be used to identify You. Personal Data may include, but is not limited to:

- Identifiers, such as Your email address, full name, phone number, address, state, province, ZIP/postal code, and city.
- Geolocation information, such as Your precise GPS location, approximate location based on Your IP address, or Your mailing address.
- Professional and employment information, such as Your occupation, specialty, or employer.
- Internet and other electronic activity information, including Usage Data, such as Your Device's IP address, browser type, browser version, the pages of Our Site that You visit, the time and date of Your visit, time spent on specific pages, unique Device identifiers, and other diagnostic data.
- Audio, electronic, visual, thermal, olfactory, or similar information, such as content or media stored on Your Device's camera and photo library.
- Inferences, such as your travel preferences.

Sources of Information

We collect some Personal Data directly from you, such as when You register for an Account, create a User profile, send us communications, post comments or content to the Service, or respond to surveys.

We automatically collect some Personal Data from Your Device when You use the Application or visit the Site, including, but not limited to, the type of mobile device You use, Your mobile device's unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers, and other diagnostic data. You may also give the Application permission to access information or media stored on Your Device, such as pictures and other information from Your Device's camera and photo library, or geolocation information. You can enable or disable the Application's ability to access this information at any time through Your Device settings.

If You visit the Site using a web browser, we may use cookies and other tools to automatically collect information from Your browser, such as Internet and other electronic network activity information or Usage Data.

MedVenture allows You to create an Account and log in to use the Service through Third-party Social Media Services, such as Google and Facebook. If You decide to register through or otherwise grant access to a Third-Party Social Media Service, We may collect Personal Data that is already associated with Your Third-Party Social Media Service's account, such as Your name, Your email address, Your activities or Your contact list

associated with that account. You may also have the option of sharing additional information with MedVenture through Your Third-Party Social Media Service's account. If You consent to providing such information and Personal Data to MedVenture, during registration or otherwise, You are giving MedVenture permission to use, share, and store it in a manner consistent with this Privacy Policy and Our Terms and Conditions.

Use of Your Personal Data

MedVenture may use Your Personal Data for the following purposes:

- **To perform Our contractual obligations to You**, including to provide You with access to the Service and make the Service available to You; register a User Account; notify You when updates to the Service are available; send You communications, push notifications, or communications relating to the Service; and perform Our contractual obligations to You under Our Terms and Conditions.
- **With Your consent**, such as to send You communications that You requested (whether via email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications); or to respond to inquiries and communications that You initiated.
- **For Our legitimate business interests which outweigh the general privacy rights of individual data subjects**, such as to monitor the usage of Our Service; analyze, improve and customize Our Service; web analytics; direct marketing; ensuring the security and availability of the Service; providing You with news, special offers and general information about other goods, services and events which we offer that are similar to those that You have already purchased or enquired about unless You have opted not to receive such information; and monitoring use of the Service to prevent fraud or abuse. You can opt-out of Our use of Your Personal Data for direct marketing purposes by contacting us at hello@medventurefortravelers.com.
- **To comply with a legal obligation or requirement.** We use and process Your Personal Data when we believe doing so is necessary to comply with laws and regulations, pursuant to a judicial authorization, or to exercise or defend Our legal rights or those of a third party.

If we need to process Your Personal Data for a purpose other than that for which it was initially collected, we will provide You with information about that other purpose before We further process Your Personal Data.

How We Disclose Your Personal Data

We may share Your Personal Data under the following circumstances:

- **With Your consent:** We share Your Personal Data if You affirmatively consent to it. If We are legally obligated to obtain Your consent prior to sharing Your Personal Data, We notify You of the specific purpose for which We are obtaining Your consent, and We do not share beyond that purpose without notifying You of and

obtaining additional consent for further disclosure. Please note that some of the information You submit to the Application, such as Your name, occupation, travel destinations, and traveler status will be publicly visible to other Users of the Service. By submitting Personal Data to the Application, You consent to disclosure of that Personal Data to other Users of the Application. You understand and agree that We cannot control the actions of third parties who may view or access the Personal Data You submit to the Application, and consequently, We cannot and do not guarantee that any Personal Data You provide to the Service will not be accessed or viewed by unauthorized persons.

- **With Service Providers:** We may share Your Personal Data, including but not limited to location, age, profession, specialty, years as a traveler, type of traveler (solo, family, couple, pet owner), with Service Providers who process it on Our behalf to provide or improve Our business functions, and who have agreed to privacy restrictions similar to the ones in Our Privacy Policy. For example, We may use Service Providers to monitor and analyze the use of Our Service, to show advertisements to You to help support and maintain Our Service, to contact You, to advertise on third party websites to You after You visited Our Service, or for web and marketing analytics.
- **For Business transfers:** We may share or transfer Your Personal Data in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- **For legal disclosure:** We may share Your Personal Data with third parties when We reasonably believe disclosure is required or permitted in order to comply with a subpoena, court order, or other applicable law, regulation, or legal process.
- **With Affiliates:** We may share Your Personal Data with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- **To protect Us or others:** We may share Your Personal Data with third parties, law enforcement, other governmental agencies, or legal counsel to the extent we believe doing so is necessary to protect the rights, property, or safety of us, Our products or services, Our customers, or others.
- **As aggregate information:** We may share certain aggregated, non-personally identifying information internally or with others for purposes of research, reporting, and benchmarking.
- **With other users:** When You share Personal Data or otherwise interact in the public areas with other Users of the Service, such information may be viewed by all users and may be publicly distributed outside. If You interact with other Users or register through a Third-Party Social Media Service, Your contacts on the Third-Party Social Media Service may see Your name, profile, pictures and description of Your activity. Similarly, other Users will be able to view descriptions of Your activity, communicate with You and view Your profile. If You do not want Your Personal Data to be visible to other Users, You should not post Your Personal

Data to the Service or share Your Personal Data in publicly-accessible areas of the Service; You also should not connect Your User Account with any Third-Party Social Media Service.

Retention of Your Personal Data

MedVenture will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with Our legal obligations (for example, if we are required to retain Your data to comply with applicable laws), resolve disputes, and enforce Our legal agreements and policies.

MedVenture will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

Transfer of Your Personal Data

Your information, including Personal Data, is processed at the MedVenture operating offices in the United States and in any other jurisdictions where Our service providers are located. That means that Your Personal Data may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of Personal Data represents Your consent to the transfer of Your Personal Data to the United States. The United States does not have an adequacy determination from the European Commission. However, MedVenture will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy, and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your Personal Data and other personal information.

Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While We strive to use commercially reasonable means to protect Your Personal Data, We cannot guarantee its absolute security.

Cookies

Our Cookies Policy is incorporated into our Privacy Policy. Please refer to our Cookies Policy to learn more about how we use cookies on our website: www.medventurefortravelers.com.

Data Access and Control

You can request to access, rectify, or delete the Personal Data we have about you by contacting us using the Contact Us information provided below. We will respond to your request in accordance with this Privacy Policy and applicable law.

Behavioral Advertising

We do not sell Personal Data. However, some of advertisers We partner may use technology on the Service that "sells" personal information as defined by the CCPA. If You wish to opt out of the use of Your Personal Data for interest-based advertising purposes, You may do so by following the instructions below.

You can opt-out of interest-based ads by visiting the Network Advertising Initiative's [Consumer Opt Out](#) or the Digital Advertising Alliance's [AdChoices](#).

If You are using a mobile device, You can also opt-out of interest-based ads by visiting [AppChoices](#).

Please note that any opt out is specific to the browser You use. You may need to opt out on every browser that You use.

Mobile Device Settings

You can restrict the information the Application is allowed to access on Your Device (such as location information or media storage) by changing Your Device's privacy settings.

Cookie Settings

Your web browser may allow You to reject or delete cookies. You should refer to Your browser's help menu and privacy settings to reject or delete cookies. Please note that if you reject or delete cookies, the Service may not function properly.

Direct Marketing Opt Out

You can opt-out of Our use of Your Personal Data for direct marketing purposes by contacting us at hello@medventurefortravelers.com.

"Do Not Track"

Our Service does not respond to Do Not Track signals.

However, some third party websites do keep track of Your browsing activities. If You are visiting such websites, You can set Your preferences in Your web browser to inform websites that You do not want to be tracked. You can enable or disable DNT by visiting the preferences or settings page of Your web browser.

Children's Privacy

Our Service is not directed at or intended for anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.

We also may limit how We collect, use, and store some of the information of Users between 13 and 18 years old. In some cases, this means We will be unable to provide certain functionality of the Service to these users.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

Links to Other Websites

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. This Privacy Policy does not apply to any third party sites. We strongly advise You to review the Privacy Policy of every site You visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

GDPR Privacy

Legal Basis for Processing Personal Data under GDPR

We may process Personal Data under the following legal bases:

- **Consent:** You have given Your consent for processing Personal Data for one or more specific purposes.
- **Performance of a contract:** Provision of Personal Data is necessary for the performance of an agreement with You and/or for any pre-contractual obligations thereof, including but not limited to Our Terms and Conditions.
- **Legal obligations:** Processing Personal Data is necessary for compliance with a legal obligation to which MedVenture is subject.
- **Vital interests:** Processing Personal Data is necessary in order to protect Your vital interests or of another natural person.

- **Public interests:** Processing Personal Data is related to a task that is carried out in the public interest or in the exercise of official authority vested in MedVenture.
- **Legitimate interests:** Processing Personal Data is necessary for the purposes of the legitimate interests pursued by the MedVenture, including but not limited to improving, securing, and providing the Service; advertising; and security and fraud prevention.

In any case, MedVenture will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Your Rights under the GDPR

If you are a resident of the EU, You have the rights to the following:

- **Request access to Your Personal Data.** The right to access, update or delete the information We have on You. You may be able to access, update or request deletion of Your Personal Data directly within Your account settings section. If You are unable to perform these actions Yourself, please use the Contact Us information below to submit your request. You may also request to receive a copy of the Personal Data We hold about You.
- **Request correction of the Personal Data that We hold about You.** You have the right to have any incomplete or inaccurate information We hold about You corrected.
- **Object to processing of Your Personal Data.** This right exists where We are relying on a legitimate interest as the legal basis for Our processing and there is something about Your particular situation, which makes You want to object to Our processing of Your Personal Data. You also have the right to object where We are processing Your Personal Data for direct marketing purposes.
- **Request erasure of Your Personal Data.** You have the right to ask Us to delete or remove Personal Data when there is no good reason for Us to continue processing it.
- **Request the transfer of Your Personal Data.** We will provide to You, or to a third-party You have chosen, Your Personal Data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which You initially provided consent for Us to use or where We used the information to perform a contract with You.
- **Withdraw Your consent.** You have the right to withdraw Your consent on using Your Personal Data. If You withdraw Your consent, We may not be able to provide You with access to certain specific functionalities of the Service.

Exercising of Your GDPR Data Protection Rights

You may exercise Your rights of access, rectification, erasure, objection, and transfer by contacting Us using the Contact Us information provided below. Please note that we may ask You to verify Your identity before responding to such requests. If You make a request, We will try Our best to respond to You as soon as possible.

You have the right to complain to a Data Protection Authority about Our collection and use of Your Personal Data. For more information, if You are in the European Economic Area (EEA), please contact Your local data protection authority in the EEA.

CCPA Privacy

Your Rights under the CCPA

Under this Privacy Policy, and by law if You are a resident of California, You have the following rights:

- **The right to notice.** You must be properly notified which categories of Personal Data are being collected and the purposes for which the Personal Data is being used.
- **The right to opt out of the sale of Personal Data.** We do not sell Your Personal Data to third parties.
- **The right to access/know about Your Personal Data.** You may request, up to twice in a 12-month period, the following information :
 - The categories of Personal Data We have collected about You;
 - The sources from which the Personal Data was collected;
 - The business or commercial purpose for collecting or selling the Personal Data;
 - Categories of third parties with whom We share Personal Data; and
 - The categories of Personal Data we have sold or disclosed for a business purpose, and the categories of third parties to whom we sold or disclosed that information.
- **The right to request deletion of Your Personal Data.** You may request that we delete the Personal data we have collected about you, subject to certain limitations under applicable law. We may be unable to delete all of your Personal Data if we need to retain your Personal Data:
 - To complete a transaction for which the Personal Data was collected, provide a good or service requested by you, or perform a contract we have with you;
 - To detect data security incidents;
 - To debug or repair any errors;
 - To protect against fraud or illegal activity or to comply with applicable law or a legal obligation, or exercise rights under the law, such as the right to free speech; or
 - To use your Personal Data, internally, in a lawful manner that is compatible with the context in which you provided the information (i.e., to improve our services).
- **The right not to be discriminated against.** You have the right not to be discriminated against for exercising any of Your Consumer's rights, including by:
 - Denying goods or services to You;

- Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties;
- Providing a different level or quality of goods or services to You; or
- Suggesting that You will receive a different price or rate for goods or services or a different level or quality of goods or services.

Exercising Your CCPA Data Protection Rights

In order to exercise any of Your rights under the CCPA, and if You are a California resident, You can contact Us using the Contact Us information provided below. We may need to verify Your identity before responding to Your request, such as by requesting government-issued identification or confirming Your full name, email address or account access. MedVenture will disclose and deliver the required information free of charge within 60 days of receiving Your verified request. The time period to provide the required information may be extended once by an additional 60 days when reasonably necessary and with prior notice.

Authorized Agents

You may authorize someone to act as Your agent and submit a CCPA request on Your behalf. Before We will respond to any such request: (1) We require Your agent to provide us with written evidence of permission to act on Your behalf, and (2) You must verify Your identity directly with Us, unless Your authorized agent is acting pursuant to a power of attorney under the California Probate Code.

Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page. We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

How to Contact us about a Deceased User

In the event of the death of a MedVenture User, please contact Us. We will usually conduct Our communication via email; should We require any other information, We will contact You at the email address You have provided in Your request.

Contact Us

If You have any questions about this Privacy Policy, You can contact us:

By email: hello@medventurefortravelers.com

By sending Us mail to:

MedVenture for Travelers LLC, 3518 Fremont Ave N #368 Seattle, WA 98103

By visiting this page on Our Site:

<https://www.medventurefortravelers.com/faq-contact-us.html>

Thank You

Please accept Our wholehearted thanks for reading Our Privacy Policy.