

Privacy Policy

Last Revised: October 8, 2026

UGen Health Inc. is deeply committed to maintaining the privacy of the users of its website (<https://www.ugen.health/>) and its corresponding provider portal and companion app (the "Apps") (collectively the "Site") and has created the following "Privacy Policy" to inform you of its policies and practices regarding the collection, use and disclosure of information through the Site. The "Platform" refers to the online location and service available after a registered user logs on through the Site and where a registered user's data is stored.

Capitalized terms not defined in this Privacy Policy shall have the meaning attributed in the Terms of Use. By your use of the Site or Platform you accept the terms contained in the Terms of Use and this Privacy Policy.

Your Personal Information

UGEN limits the collection, use and processing of information to that which is required by UGEN to provide the Services and assist in the usability of the Site and the Platform. Information that is personally identifiable to you such as your name, address, email address or phone number is referred to as "Personal Information". By submitting Personal Information to us through the

Site or Platform (when creating your account or assessment, for example), you expressly agree and consent to the processing of your Personal Information in accordance with this Privacy Policy.

Information We Collect

You can visit our Site without telling us who you are or revealing any Personal Information about yourself. When you create an account on the Site or use the Platform, we ask you to provide certain Personal Information, and we collect and store Personal Information for the purposes outlined in this Privacy Policy. The following are some of the types of information we receive from you including certain Personal Information, with additional information and/or data possible:

- Identifiers such as: first and last name, user ID, password;
- Contact information such as: physical address, mailing address, email address, phone number;
- date of birth (to confirm assessment applicability);
- Certain health-related information such as: pain information about your life which often has the ability to impact your health, and exercises, (so that you can share relevant information with outside prescribers);

- Financial information such as: credit card account number, expiration date and security code (for you to pay for the service);
- Internet and Other Electronic Network Activity information such as: browser type and IP address.

We may also collect the following information from you:

- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.

How We Use Your Personal Information

To offer relevant services

UGEN will use your Identifiers and Contact Information to provide the Services, communicate with you, facilitate communication with your physical therapist (and other third party providers) and respond to your requests.

You may choose to share that information with healthcare professionals, but UGEN does not automatically share this information unless you tell the Platform to do so, except that the Platform will share this information with your provider, who may use the information to submit claims to government and/or third party payors for reimbursement for Services rendered on your behalf.

To improve our products and services

UGEN may use Internet and Other Electronic Network Activity information to conduct analytics relating to the functionality of our Site, the Platform, and the Services. To the extent necessary to provide you with the Services, we may provide your Personal Information to other third party contractors or business partners who work on our behalf to help us maintain the Site or services on the Platform. UGEN will only share your Personal Information with third parties necessary to perform these functions or services.

For Communication

We will use your Identifiers and Contact Information to contact you through email or through notices posted on our websites, and other ways through our

Services. We also use that information to send messages about how to use our Services, network updates, reminders, and promotional messages from us. Please be aware that you cannot opt out of receiving service messages from us, including security and legal notices.

We may also use your Identifiers and Contact Information to enable communication between you and prospective healthcare providers.

How We Share Information

We may share your Personal Information with the following third parties for the following purposes.

- Your physical therapist.
- Your healthcare provider, at your request. You may choose to have UGEN share your Personal Information with your healthcare provider. UGEN does not automatically share this information with your healthcare provider. It is only shared with your written consent.
- Government and/or third party payors who reimburse healthcare provides for the provision of healthcare related services

- **Affiliates/Partners.** We may work with our affiliates or partner with other companies in order to provide you with additional benefits, to aid you in use of UGEN Services, to analyze and access the data that we collect, use the data with artificial intelligence or machine learning or to benefit the business of UGEN and/or its partners. In the event that we enter into such a partnership, we may share your Personal Information with those partners. If we share Personal Information, we will require that such partners use the personal information for the limited purpose for which we provide it, maintain reasonable security measures for the protection of such information, and comply with the provisions as outlined in this Privacy Policy.
- **Law Enforcement or pursuant to Legal Processes.** It is possible that we will need to disclose information about you when required by law, subpoena, or other legal process or if we have a good faith belief that disclosure is reasonably necessary to (1) investigate, prevent or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (2) enforce our agreements with you; (3) investigate and defend ourselves against any third-party claims or allegations; (4) protect the security or integrity of our Services); or (5) exercise or protect the rights and safety of UGEN, our Users, personnel or others. UGEN may disclose Personal Information when required by law or in the good-faith belief that such action is necessary in order to

conform to the edicts of the law or comply with legal process served on UGEN.

- **Merger/Sale of Business.** In the event that UGEN enters into an agreement to be purchased by another company or to merge with another company, we may share personal information with that company. We will require that such purchasers continue to comply with the provisions as outlined in this Privacy Policy.

We may also share Internet and other electronic network activity information with select third parties, including advertisers, for marketing or advertising purposes.

Security

UGEN strives to protect your Personal Information. Personal Information is stored on our database and is not publicly accessible. Each employee of UGEN signs a confidentiality and nondisclosure agreement to ensure your privacy. The Site has security measures in place to protect the loss, misuse and alteration of the information under our control, and meets or exceeds all industry standards for the protection and confidentiality of Personal Information. UGEN operates all its services, including any payment

information, across the Internet using secure connections (specifically Transport Layer Security/TLS/"HTTPS"/formerly known as SSL). Despite our efforts to keep your Personal Information protected, please know that we cannot guarantee the security of data, including the security of any data shared with affiliates and/or partners.

Testimonials

Users of the Services and Site can provide testimonials regarding their experiences with UGEN on the Site. From time to time, we may post testimonials on the Site that we receive. Testimonials contain Personal Information such as the individual's first name and their statements about the Services. UGEN will obtain the individual's consent prior to posting the testimonial.

Opt-out

When you create an account on the Site and/or use the Platform, you are opting in to receiving newsletters, emails and promotional materials from UGEN. At any time, you may opt-out of sharing your Personal Information

posted on the Platform or receiving such communications from UGEN by emailing us with your specific request at info@ugen.health or, when available, through the Settings section of the Site. Note that opting out from such communications does not apply to our ability to communicate with you regarding non-marketing related matters regarding your account or use of the Platform.

Data Access and Deletion Requests

Depending on your state or country of residence, you may have the following rights.

- **Right of Access.** You may have the right to access your personal information maintained by us. Upon receipt of a verifiable request to access personal information, we will disclose and deliver, free of charge, the personal information requested.
- **Right of Deletion.** You may have the right to request that we delete any personal information about you which we have collected from you. Upon receipt of a verifiable request for deletion, we will delete your personal information from our records and direct any service providers to delete your personal information from our records, within 45 days.

We will comply with your request to delete personal information unless it is necessary for us to maintain your personal information in order to:

- Complete a transaction, provide requested-for goods/services, and/or perform a contract between you and us;
- Detect security incidents;
- Comply with a legal obligation;
- Enable our internal uses that are aligned with your expectations and your relationship with us.

Submission of Requests for Information. In order to make a request to access, delete, or transmit your personal information, please send an email to info@ugen.health.

Verification. After you submit a request, we will promptly take steps to determine whether your request is a verifiable request. We will take steps to verify that you are who you say you are before honoring your request.

We will disclose and deliver the required information to you free of charge within 45 days of receiving your verifiable request. If necessary, we will

extend the time period to provide the required information once by an additional 45 days, and will provide you with notice of the extension within the first 45-day period. The disclosure shall cover the 12-month period preceding our receipt of the verifiable request.

As noted below, we do not knowingly collect information from or about children, including children aged 16 and under. We do not sell information of minors under 16 years of age.

Authorized Agent. You have the right to designate an authorized agent to submit an access or deletion request on your behalf. If you use an authorized agent to submit such a request, we will require that you:

- Provide the authorized agent written permission to act on your behalf; and
- Verify your own identity with us before we can honor the request.

No Discrimination. We will not discriminate against an individual because the individual exercised any of the rights described here.

Children

We understand and share your concerns regarding your children's access to Internet and the Internet's access to your children. Consistent with the Children's Online Privacy Protection Act of 1998 (COPPA), we do not knowingly request or accept personally identifiable information submitted to the Site by any visitor under 13 years of age. If we become aware that an individual under age 13 has provided information to UGEN through the Site, we will make commercially reasonable efforts to delete such information from our databases.

Correct/Update

If you would like to verify the information we have received from you or to make corrections to it, please log into your account to do so. If you would like to deactivate the use of your Personal Information on the Site or Platform, you may contact us at info@ugen.health, or when available, through the Settings section of the Site.

Use of Cookies

Some pages on the Site may use cookies to identify your browser as you visit pages on the Site. A cookie is a small piece of information which is sent to your browser and may stay on your computer or mobile device when you visit our website, depending on your browser or internet settings. Cookies do not damage your device - they are merely used to "remember" when you visit again as well as provide an additional tool in helping us market and track the success of marketing campaigns. The cookies are used for Site registration, customization the next time you visit the Site, verification of your device's authorization and access roles to utilize our services, and for marketing and analytics of our products and services.

Some parts of the Site may also use cookies to track user traffic patterns to determine the usefulness of information on our Site to our users and to see how effective our tools and user experience are in helping users. Cookies cannot read data off of your hard drive. Your Web browser may allow you to be notified when you are receiving a cookie, giving you the choice to accept it or not. If you prefer not to receive cookies while browsing our Site, you can set your browser or network configuration to warn you before accepting cookies and refuse the cookie when your browser alerts you to its presence. You can also refuse all cookies by turning them off in your browser or network configuration. By not accepting cookies, site services will not fully function and you may not be able to access certain information on the Site.

UGEN and third-party vendors (such as Google) use first-party cookies (such as Google Analytics or cookies provided by UGEN) and third-party cookies together in order to inform, optimize and serve ads based on past visits and behaviors on our website. We have implemented and use display advertising, and we use Google Analytics to implement a feature called remarketing, which allows us to optimize the delivery of ad content specifically targeted to a user's interests based on previous web visits and behaviors. If you would like to opt-out of Google Analytics for display advertising, you can use the Ads Preference Manager. Or you can use the Google Analytics opt-out browser extensions.

Links to Third Party Sites

The Site may contain links to other websites including social media widgets and "like" or "share" buttons. These other websites, third party widgets and buttons are hosted by third parties and not by UGEN. UGEN is not responsible for the privacy practices or the content of such third party websites or links. We encourage you to learn about the privacy practices and terms of use of those other companies, including their opt-out processes.

Protecting the Privacy of Children

Children under 18 years old are not the target audience for our Site. To protect their privacy, we prohibit the solicitation of personal information from children under 13 years old and do not knowingly collect Personal Information from such children. No one under age 13 may provide any personal information to UGEN or on the Platform. If you are under 13, do not use or provide any information on this Website.

Changes to this Privacy Policy

We reserve the right to change, modify or update this Privacy Policy at any time, so please review it frequently. Any material changes in the way we use your Personal Information will be contained in the updated Privacy Policy posted on the Site. Your continued use of the updated Policy will signify acceptance of the changes.

More Information

If you have questions or concerns about our Privacy Policy, please email us at info@ugen.health.