

LifeCourseConnect Privacy Policy

Red Road Ventures LLC

Last Updated: March 27, 2024

Red Road Ventures LLC (“us”, “we”, or “our”) operates the <https://myQuillo.com/> website and the Quillo mobile application (hereinafter referred to as the “Service”).

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data. Our Privacy Policy for Red Road Ventures LLC is based on the Privacy Policy Template from Privacy Policies.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our End-User License Agreement (EULA).

Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to you.

Types of Data Collected

PERSONAL DATA

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you (“Personal Data”). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Cookies and Usage Data

USAGE DATA

We may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device (“Usage Data”).

This Usage Data may include information such as your computer’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Service with a mobile device, this Usage Data may include information such as the type of mobile device you use, your mobile device 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.

TRACKING & COOKIES DATA

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device.

Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service. You can learn more about how to manage cookies in the Browser Cookies Guide.

EXAMPLES OF COOKIES WE USE:

- Session Cookies. We use Session Cookies to operate our Service.
- Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
- Security Cookies. We use Security Cookies for security purposes.

Use of Data

Red Road Ventures, LLC uses the collected data for various purposes:

- To provide and maintain the Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer care and support

- To provide analysis or valuable information so that we can improve the Service
- To monitor the usage of the Service
- To detect, prevent and address technical issues

Note: We specifically utilize extremely limited data, your unique identifier for the service, to provide push notifications to you. We share this unique identifier with a third party that provides the push notification. This information is not shared any further by us or the

third party and is only provided to allow push notifications. You may opt into this service within the app or opt out as you choose.

TRANSFER OF DATA

Your information, including 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. If you are located outside the United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Red Road Ventures LLC 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 data and other personal information.

DISCLOSURE OF DATA

LEGAL REQUIREMENTS

Red Road Ventures LLC may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Red Road Ventures LLC
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

SECURITY OF DATA

The security of your 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 acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

SERVICE PROVIDERS

We may employ third party companies and individuals to facilitate our Service (“Service Providers”), to provide the Service on our behalf, to perform Service-related services, to assist us in analyzing how our Service is used, and to conduct research to improve the product.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service.

- Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

Links To Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. 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.

Children's Privacy

Our Service does not address anyone under the age of 15 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 15. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

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 "effective date" at the top of this Privacy Policy.

If you have any questions about this Privacy Policy, please contact us by email: info@myQuillo.com.

LifeCourseOnline

Effective as of January 24, 2025

LifeCourseOnline (LCO) is committed to ensuring that any personal information you share with us when using the LCO Platform is protected and used only in accordance with applicable data protection laws. Our Privacy Policy forms part of our Terms (<https://www.lifecourseonline.com/terms-of-use>) and sets out our practices to meet our privacy and data protection obligations to you. Unless stated otherwise, all defined and capitalized terms in this Privacy Policy have the same meaning as in the Terms.

Information we collect and use in delivery Services

Consumer System Users

When you set up an account with us, we collect your profile and contact information, such as first name, last name, birthdate, photo, telephone number and email address, as well as financial information, such as credit card numbers, and we use this information when providing Services to you, including when using and communicating through the LCO Platform and accessing customer support.

We also collect personal health information, including your medications, sleep monitoring and other information should you choose to upload this information onto the LCO Platform in order to use various features and functionality.

Provider System Users

Through the LCO Platform, we provide tools to help you manage services that you provide to Your Clients. When you create an LCO account, we collect your personal information, such as your full legal name, business address phone number, and valid e-mail address. This information is used to provide our Services, including when using and communicating through the LCO Platform and accessing customer support.

We collect personal information pertaining to Your Clients, including their health information, as inputted by you, your staff or Your Clients themselves.

We also collect personal information pertaining to your staff and their provision of services to Your Clients, if you are using the staff management and scheduling features, as inputted by you or your staff.

The purposes for which we use your information, include, but may not be limited to, enabling and supporting:

- **Service delivery:** in delivering all the features and functionality of the LCO Platform to which you have subscribed or are using, including all related technology and data services;
- **Service performance and improvement:** keeping the Services up-to-date and performant, developing new services, enhancing services, meeting user productivity, reliability, efficacy, quality, privacy, accessibility and security needs;
- **Payment processing:** using your credit card number to process payments for Services;
- **Customer relationship management:** informing you about new Services, features, offers, promotions and other pertinent information relevant to your account with us;

Sharing your personal information

In order to deliver the Services to you, we may share your information with various parties, including, but not limited to those listed below. In doing so, we will respect and protect your privacy by using reasonable measures to minimize the amount of information disclosed, including providing only de-identified information where possible:

- **Service providers:** we may engage third-party providers to support us in the delivery of the Services, including technology and data services and payment processing.
- **Public authorities:** we may disclose personal information to authorized law enforcement, regulators, courts, or other public authorities in response to lawful requests or to protect our rights and safety.
- **Business Partnerships and Corporate Transactions:** we may disclose personal information as permitted by law for strategic business transactions or in the case of a corporate acquisition or merger.

Consumer System Users

For user of the LCO Consumer System, we also share your information with:

LCO Team Members: in accordance with on your account settings, we may disclose your personal information to your LCO Team Members, including staff of Your Support Provider whom you have chosen to connect with using the LCO Platform or if you have joined the LCO Platform as a guest of Your Support Provider who has an LCO Platform account.

Data Security

LCO employs reasonable technical and organizational security measures to protect your information, as well as the personal information of Your Clients and your staff, as applicable, held by us from unauthorized access, disclosure, modification, accidental loss, or destruction.

Data Retention

LCO retains your personal information only as long as necessary to provide the Services, to meet legal obligations and as otherwise set out in the Terms. For purposes of improving and enhancing our Services, LCO may retain de-identified information as permitted by law, including after you have ceased using the Services, and such information will be securely deleted once it is no longer needed for such purposes.

International Transfers

To deliver the Services to you and Your Clients, we may use technology that stores or processes your personal information and that of Your Clients and your staff outside of your jurisdiction. As a result, such information may become subject to the laws of another jurisdiction, which may differ from those in your own jurisdiction. By using our Services, you consent to the transfer of your personal information and that of Your Clients and your staff outside of your jurisdiction when necessary for delivering the Services. It is your responsibility to ensure that you meet any legal requirements, including consent of Your Clients or your staff, as applicable.

Privacy Rights

Subject to certain limitations and depending on the applicable privacy laws applicable, you, Your Clients and your staff, as applicable, may have the following legal rights concerning their personal information:

1. The right to access or correct personal information held by us;
2. Right to have certain personal information that is held by us disposed of or removed;
3. The right to object to the processing of personal information, as permitted by applicable law; and
4. Where we rely on consent to process personal information, the right to withdraw or decline consent at any time. When we rely on legitimate interests, the right to object also applies. Please note that withdrawing consent may affect your access to and ability to use our Services.

You, Your Clients and your staff, as applicable, have the right to file a complaint about how we use or process personal information with the Office of the Privacy Commissioner of Canada or other data protection authority as may be applicable to your jurisdiction. To access or correct personal information, please use the contact details provided in the "Contact Us" section at the end of this policy.

Provider System Users

It is your responsibility to respect and assist Your Clients and your staff to exercise their privacy rights in relation to the personal information that you collect from them in connection with your use of the LCO Platform and Services.

Minors and persons under legal disability

Consumer System Users

The LCO Platform may be used by caregivers or other adult representative on behalf of minors or persons under legal disability (i.e., lacking legal capacity to consent on one's own behalf). Minors under the age of 18 or persons under legal disability are not permitted to register with or use the LCO Platform or provide personal information without an adult representative.

If you are an adult representative and you are contributing personal information, including personal health information, to the LCO Platform on behalf of a minor or a person under legal disability, you confirm that you have the legal authority to make such contributions.

Cookies and Similar Technologies

LCO uses cookies and similar tracking technologies on our website and the LCO Platform to enhance user experience. LCO only uses essential and persistent cookies to track browsing behavior on our website only. If you wish, you may opt out of being tracked by Google Analytics by disabling or refusing the cookies, by disabling JavaScript within your browser or by using the Google Analytics Opt-Out Browser Add-On. Disabling Google Analytics or JavaScript will still permit you to access comparable information or services from our website. Link: <https://tools.google.com/dlpage/gaoptout?hl=en>.

Third-Party Links

The LCO Platform may contain links or enable users to link to other websites that are not under our control, and we assume no responsibility for those links, or the privacy practices of the websites should you choose to navigate to them.

Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes to how we handle your information held by us. Your continued use of our website, the LCO Platform or Services will be deemed acceptance by you of the updated Privacy Policy.

Contact Us

If you have any questions or concerns about our privacy practices or this policy, please contact us by email: Madeleine.Tuer@sonderbloom.com.