

Nuraleve Inc. respects your privacy and is committed to protecting your personal data in compliance with the General Data Protection Regulation (EU) 2016/679 ("GDPR"). This Privacy Policy explains how we collect, use, store, and protect personal data related to the use of our website, including where we provide electronic Instructions for Use (eIFU) for our medical devices.

## 1. Data Controller

The entity responsible for the processing of personal data is:

Nuraleve Inc

909 Rex Ave, Ottawa, Ontario K2A 2P6, Canada

regulatory@nuraleve.com

1-888-792-7922

## 2. Personal Data We Collect

Access to the eIFU is restricted and is only available to existing users who provide authentication details. We collect the following personal data when users register or log in to access the eIFU:

- Username
- User Email
- First Name
- Last Name

We do not track or store IP addresses of users accessing the website.

## 3. Purpose and Legal Basis for Processing

We process personal data only when necessary and in compliance with GDPR. The purposes and legal bases for processing include:

- Providing access to the eIFU for registered users (contractual necessity).
- User authentication and account management (legitimate interest).
- Responding to user inquiries or support requests (contractual necessity).
- Ensuring website security and functionality (legitimate interest).
- Compliance with legal obligations, including regulatory requirements (legal obligation).

## 4. Data Collection Methods

We collect user data through:

- Direct interactions (e.g., when a user registers an account, logs in, or contacts us for support).
- Automated systems for authentication (e.g., verifying login credentials).

## 5. Data Retention

Nuraleve retains user authentication data (username, email, first name, last name) for a minimum of 10 years, in compliance with applicable regulatory requirements. After this period, the data is securely deleted unless retention is required for legal purposes.

## 6. Data Sharing and Third-Party Processors

User data is securely stored in Cloud Storage (AWS), which implements industry-standard security measures. Nuraleve follows appropriate technical and organizational measures to protect personal data from unauthorized access, alteration, disclosure, or destruction.

## 7. Data Subject Rights

Under GDPR, you have the following rights:

- **Right of Access:** Request a copy of your personal data.
- **Right to Rectification:** Request corrections to inaccurate or incomplete data.
- **Right to Restrict Processing:** Request limitation of how we process your data.
- **Right to Object:** Object to processing based on legitimate interests.
- **Right to Data Portability:** Receive your data in a structured format.
- **Right to Withdraw Consent:** Withdraw consent for processing at any time.
- **Right to Lodge a Complaint:** File a complaint with your local Data Protection Authority.

To exercise these rights, please contact us at: [regulatory@nuraleve.com](mailto:regulatory@nuraleve.com)

## 8. Data Storage & Security

User data is securely stored in Cloud Storage (AWS), which implements industry-standard security measures. Nuraleve follows appropriate technical and organizational measures to protect personal data from unauthorized access, alteration, disclosure, or destruction.

## 9. Cookies and Tracking Technologies

Nuraleve does **not track IP addresses** or use tracking technologies beyond essential authentication mechanisms.

## 10. Third-Party Links

Our website does not contain any links to third-party websites. All content, including the eIFU, is hosted and provided directly by Nuraleve.

## 11. Changes to this Privacy Policy

We may update this Privacy Policy periodically. Any changes will be posted on this page with an updated "Effective Date."

## 12. Contact Information

For any privacy-related inquiries, you can contact us at:

Nuraleve Inc

[regulatory@nuraleve.com](mailto:regulatory@nuraleve.com)

1-888-792-7922