

# Privacy Policy

## Sound Off

[Effective Date: 8/17/21]

Sound Off , Inc. (“Sound Off” or the “Company”) believes in your right to privacy when using the Internet for your communication, and protecting your private information is our priority. As such, Sound Off has created this Privacy Policy in compliance with applicable law and in order to demonstrate our firm commitment to privacy. This Privacy Policy describes how Sound Off collects, uses, discloses, transfers, stores, retains or otherwise processes your information when you access or use in any manner Sound Off’s mobile application (the “Application”) to obtain support (the “Services”) from licensed mental health professionals (“Clinicians”) and/or from other veterans (referred to as “Battle Buddies”).

We refer to the above mobile application/system as the “Application.” When we refer to “we,” “us,” or “our,” we mean Sound Off, Inc., which operates the Application, provides its content, or processes information received through it, each as appropriate and applicable. When we refer to “you” or “your,” we mean the individual United States veteran or active duty serviceman or servicewoman or others accessing the Application; Sound Off’s Application may also be made available in the near future to members of the United States intelligence community and to family members of United States military veterans and military service members and intelligence community members, or to first responders or such other services populations as Sound Off may from time to time determine (each as so authorized from time to time also included as a “User” or as “you” or “your” herein, if so authorized). If the person actually accessing the Application does so on behalf of, or for the purposes of, another person that is an individual US veteran or active duty serviceman or servicewoman, “you” or “your” also means that other person. To be clear, Sound Off, Inc. and references to “we,” “us,” “our” or, on the other hand, references to “you” or “your” or similar terms do not include the Clinicians or Battle Buddies who provide such Services to you through the Application. When we refer to a Clinician or Battle Buddy in this Policy, we mean the individual who is providing Services through the Application to you. Clinicians and Battle Buddies should refer to their own relationship agreements with Sound Off for additional information concerning Sound Off’s Privacy Policy and Terms of Use for the Application as it relates to such persons.

This Privacy Policy applies to your use of the Application and our Services, and covers information collected in connection with your access to the Application and use of our Services. Please read this Privacy Policy carefully. By continuing to interact with the Application and our Services, you are consenting to the practices described in this Privacy Policy.

### GENERAL DISCLOSURES

Your privacy and the protection of your anonymity is our foremost concern. We take your privacy and the protection of your personal data seriously. We have gone to great lengths to engineer our Application so that neither Sound Off nor our technical and service partners or other affiliates will acquire or hold personally identifying information about you through the

anticipated function of the Application and Services; **however, in the event that you choose to provide any personally identifying information about yourself (“Identifying Information”) in connection with Services provided to you by a Clinician or Battle Buddy that Identifying Information will not be shared with or collected by Sound Off, and in our relationship agreements with Clinicians and Battle Buddies we will require them to maintain any such Identifying Information on a confidential basis, except as you may otherwise authorize them or as may be required by applicable law or their professional ethics.** Should you choose to disclose or inadvertently disclose identifying information in the text, please use the “clear history” function of the text exchange.

Sound Off itself will not acquire or store any such Identifying Information and will only store, process and disclose your other non-identifying personal information that we collect, such as gender, State of residence, and service type, and non-Identifying Information concerning the general nature of matters and topics upon which you consult with Clinicians and Battle Buddies (“Non-Identifying Information”) in accordance with applicable law. However, it is important that the information you submit concerning yourself be accurate since Sound Off also relies upon your information as to residency, military service and other demographic details to pair you with appropriate Clinicians (who are each licensed in only one or more states and who in general must hold a license to practice in the state in which a User to whom they provide counseling resides) or with Battle Buddies (where such Battle Buddies or affiliated sponsoring organizations for Battle Buddies and Clinicians may have support programs designed for particular service branches or units). We will make it clear when we are or will be collecting Non-Identifying Information and will generally explain what we intend to do with it. We do our best to protect your privacy through the appropriate use of information security measures, including implementing systems to limit access to the Application and to your Non-Identifying Information to only those individuals within the Company and with our technical and service partners and other business affiliates who have a need for such access.

## **WHAT INFORMATION WE COLLECT**

Sound Off will collect only the information that you voluntarily upload and submit through the Application – namely information required for operation of the Application (e.g. password) and “survey” information. This may include some basic demographic information, but will never include Identifying Information that could reasonably be expected to identify you, such as name, address, date of birth, social security number or any financial bank account or credit information. If and when we find we have access to technical information that may be uniquely identifying, as a matter of policy we intend to purge such information. We will assign a unique random and anonymous User Name to you when you register for the Services through the Application. It will be important for you to maintain an accurate record of such assigned User Name in a location where you can dependably retrieve it for purposes of any follow-up communications you wish to initiate with Sound Off or the Clinicians or Battle Buddies with whom you consult, since unlike with most websites and applications you will access our Application and Services on an anonymous basis and we do not obtain email addresses or other Identifying Information from you through which we can initiate communications with you or retrieve your assigned User Name to forward to you by email in the event that you lose or misplace it.

## HOW WE USE YOUR INFORMATION

We will use your Non-Identifying Information only for the purpose of assisting you to obtain the Services from Clinician mental health professionals or from Battle Buddies. Your geographic location allows us to identify appropriate Clinicians and Battle Buddies to provide you with support. Your anonymous User Name will be used to connect you with the Clinicians and Battle Buddies. We may also measure, track and analyze trends and usage of the Application in connection with your use or the performance of our Services.

We will also use your anonymous User Name to communicate with you about our Services, including to respond to questions and concerns and send you information which we think you may find useful by posting to your User Name account on the Application. We will also use your anonymous User Name and geographic location to manage your account preferences, establish your profile and registration information and conduct surveys and collect feedback about the Application and our Services.

The Company has worked with a third party technical and service partner to develop a set of survey questions – to include demographic questions – to be used for program evaluation and research purposes. A subset of the data acquired by the Company will be published on the Company’s website and other publications. Complete access will be provided to a more limited pool of users (to include certain of such third party technical and service partners and other researchers).

We also may use your submitted anonymous Non-Identifying Information for any other purpose in connection with our Services but we will disclose this to you before we use your information, including by posted updates in our Terms of Use, which you should periodically review.

## WHEN AND WITH WHOM DO WE SHARE YOUR INFORMATION

We will share your anonymous User Name with the Clinician or Battle Buddy with whom you will be consulting. We ask that these individuals never solicit any personally identifying information from you, unless during the course of performing Services they become aware in their judgment of a crisis or emergency condition that warrants it and under our relationship agreements with these individuals we require them to respect the privacy and security of any personal data that you may provide to them or that they may learn about you. **IF YOU WISH TO PRESERVE YOUR ANONYMITY, YOU SHOULD NOT SUBMIT OR SHARE ANY IDENTIFYING INFORMATION WITH CLINICIANS OR BATTLE BUDDIES.** These Clinicians and Battle Buddies may access your information only through the Application and may only use it for purposes of providing support services to you. We do not allow the Clinicians or Battle Buddies with whom we work to use your information for purposes other than providing Services to you and, in the case of some Clinicians, for more general research and data evaluation purposes (See “How We Use Your Information” above), and they are only permitted to access the Application and process your data in accordance with our instructions and the terms of their relationship agreements with us. We also associate with certain charitable or military-affiliated or other sponsoring organizations that in certain cases also arrange the availability of participating Clinicians and/or Battle Buddies, or arrange in certain cases for

funding support for such Clinicians and/or Battle Buddies and we may similarly share such Non-Identifying Information with such sponsoring organizations for more general research and data evaluation purposes.

Sound Off may disclose “line-item” information about you (including your assigned User name) with individuals or companies who are performing services for the Company, subject to their agreement to hold the information confidential.

The Clinicians and Battle Buddies associated with Sound Off may also disclose the Identifying Information they may acquire concerning you, to the extent that you submit such information to them or otherwise in the unanticipated event that we or they should otherwise acquire it, when we or they are required by law or any professional requirements to do so or to defend Sound Off or them against legal claims.

We may disclose or use aggregated or de-identified Non-Identifying Information that does not identify you for any purpose. Such aggregated or de-identified data may be derived from your submitted Non-Identifying Information but does not directly or indirectly reveal your identity.

## **X2.AI**

An important part of the Sound Off Application is a “chatbot” telemedicine artificial intelligence “Clara” program operated in affiliation and collaboration with the X2 Foundation and X2AI. In the event that you elect to utilize the Services of the Clara chatbox on the Sound Off Application, you should also familiarize yourself with the X2AI “Terms of Use” which may be accessed at the following hyperlink. However, Sound Off’s privacy policy supersedes any privacy policy that X2AI may have in place from time to time.

<https://www.x2ai.com/terms>

## **THIRD-PARTY ADVERTISING AND ANALYTICS**

Our Application does not contain any advertisements and we will not load cookies or other “trackers” on our Application.

This Privacy Policy does not apply to, and we are not responsible for, third-party cookies, web beacons or other tracking technologies on third party platforms, which are covered by such third-parties’ privacy policies. For more information, we encourage you to check the privacy policies of these third parties to learn about their privacy practices. For more information about targeted advertising specifically, please visit <http://www.aboutads.info/choices>.

## **HOW LONG WE RETAIN YOUR INFORMATION**

We generally retain your information as long as reasonably necessary to provide you the Services or to comply with applicable law and in accordance with our document retention policy. We may retain copies of information about you and any transactions or Services you have used for a period of time that is consistent with applicable law, applicable statutes of limitations, or as we

believe is reasonably necessary to comply with applicable law, regulation, legal process or governmental request, to detect or prevent fraud, to resolve disputes, to address problems with our Services, to assist with investigations, to enforce other applicable agreements, or policies or to take any other actions consistent with applicable law.

## **SECURITY**

We take reasonable measures, including administrative, technical, and physical safeguards, to protect your Non-Identifying Information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. Sound Off avoids acquiring Identifying Information concerning you, although in the event you elect to submit such Identifying Information to Clinicians or Battle Buddies our relationship agreements with such persons requires them also to take reasonable measures, including administrative, technical, and physical safeguards, to protect your Identifying Information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction, except as you may otherwise authorize them or as any disclosure thereof may be required by applicable law or their professional ethics. Nevertheless, no online or computer environment is 100% secure, and we cannot guarantee absolute security of the transmission or storage of your information. We hold Non-Identifying Information about you both at our own premises and with the assistance of third-party service providers. Further public disclosure here of our security measures could aid those who might attempt to circumvent those security measures. If you have additional questions regarding security, please feel free to contact us directly using the information provided under [CONTACT US](#).

## **CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy may be revised from time to time as laws change and as industry privacy and security best practices evolve. We display an effective date on this Privacy Policy at the top of this Privacy Policy so that it will be easier for you to know when there has been a change. If we make any material change to this Privacy Policy regarding use or disclosure of information that you submit to us on the Application, we will provide advance notice on the Application. Changes will apply to information collected after the change is effective. Please check this Privacy Policy periodically for changes. Small changes or changes that do not significantly affect individual privacy interests may be made at any time and without prior notice. Your use of the Application constitutes acceptance of the provisions of this Privacy Policy and your continued usage after such changes are posted constitutes acceptance of each revised Privacy Policy. If you have any questions about this Privacy Policy, the Application or your dealings with the Application, you can contact us by using the information provided under [CONTACT US](#).

## **CONTACT US**

Please contact Sound Off with any questions or concerns regarding this Privacy Notice at Sound Off, Inc., 4040 Broadway, Suite 501, San Antonio, Texas 78209; telephone 800-227-4460.

If you have any questions or concerns regarding our Privacy Policy, or if you believe our Privacy Policy or applicable laws relating to the protection of your personal information have not been respected, you may file a complaint with Sound Off using the contact information listed above,

and we will respond to let you know who will be handling your matter and when you can expect a further response. We may request additional details from you regarding your concerns and may need to engage or consult with other parties in order to investigate and address your issue. We may keep records of your request and any resolution.