

## Nitra Privacy Policy

Last updated: November 2, 2023

At Nitra, Inc. (“**Nitra**”, “**we**”, “**our**”, or “**us**”), we respect your privacy and are committed to protecting it through our compliance with this privacy policy (the “**Privacy Policy**”). This Privacy Policy sets out how we collect, use, process, store, share and disclose your personal information on <https://www.nitra.com> including on Nitra’s medical supply marketplace located at <https://market.nitra.com/> (the “**Marketplace**”) (together, the “**Website**”), and the Nitra financial services including the Nitra Visa Business Card (“**Nitra Card**”) and the Nitra app (the “**App**”), and our supporting financial services (collectively, the “**Services**”). By accessing and using our Website or Services you freely and expressly consent to the collection, use, processing, storage, and disclosure of your personal information as set out in this Privacy Policy.

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#### 1. When We Collect Information

We may collect personal information that you provide when you:

- Visit our Website.
- Visit our App.
- Register for our Services.
- Use our Services.
- Sign up for our email newsletter, SMS, or other communications.
- Contact us.

#### 2. Types Of Personal Information We Collect

- Information you provide:
  - **Business contact Information.** For example, your name, business email address, phone number, and business address.
  - **Identity Data.** Such as your home address, personal phone number, date of birth, Tax Identification Number (TIN), Employee Identification Number, and Social

Security Number (SSN), and copies of your passport, driver's license, or other government issued ID if required to verify your identity.

- **Financial Data.** Including your bank account information, routing and account numbers for reimbursements, transaction history, and related information, and your Nitra account data.
- **Transaction Data.** Including information associated with use of your Nitra Card and transactions such as wire transfers and ACH payments made via a Nitra business account. This also includes information to process your receipts, such as photos and text messages with associated metadata.
- **Company Data.** Any other professional information submitted to us when you apply or maintain a Nitra account such as employee or customer information.
- **Your communications with us.** Information from your contacting us including inquiries into our Services, which may include providing us with your name and work email.
- Information we automatically collect:
  - **Metadata and analytics.** Metadata and analytics for your use of our Website or App, including IP address, device information, date/time of visits, new or returning visits, products viewed, page response times, URL clickstreams, how long you stay on our pages, and what you do on those pages.
  - **Cookies and similar tracking technologies.** We, and third parties we authorize, may use cookies, web beacons, and similar technologies to record your preferences, track the use of our Website and App, and collect information about the use of the Website or Services, as well as about our interactions with you. This information may include Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data, and information about your interactions with the communications we send to you. We may combine this automatically collected log information with other information we collect about you. Learn more about our cookie use below.
- Information from third parties:
  - **Credit and diligence information.** such as information about you from other sources as required or permitted by applicable law, including third parties such as credit bureaus, identity verification services, and public databases. We may combine the information collected from these sources with the information we get from the Website or App in order to verify your identity, comply with our legal obligations, and ensure our Services are not used fraudulently or for other unauthorized activities.
  - **Professional or demographic information.** We may collect information from third parties about your professional history, demographics, education and other information from public or private sources.

Please note that we do not collect or process "Protected Health Information" as defined under the Health Insurance Portability and Accountability Act ("HIPAA").

### **3. How We Use Your Information**

We use the personal information we collect for the following purposes:

- To provide you with and to improve our Website and Services.
- For customer support.
- To communicate with you, including sending you our newsletter or sms messages, and providing you updates about your account such as transaction notifications and statements.
- For marketing and advertising. Please see below for more information on our use of third parties to facilitate our use of cookies and tracking technologies.
- For other business and legal purposes, such as to detect and prevent fraud, to collect amounts owing to us, and to maintain business records.
- Any other lawful purpose with your consent.

### **4. How We Disclose Your Personal Information**

We may disclose your information with your consent. We may also share your information with:

- Subsidiaries and corporate affiliates.
- Vendors and service providers. For example, vendors that help us communicate with you, manage and optimize our Website and Services, and help us advertise our Website and Services. This also includes payment processors who receive financial-related information in order to complete applications and transactions. Nitra does not directly collect or store sensitive personal information associated with your financial account information.
- Credit bureaus in conjunction with our credit products and, where necessary, debt collectors in compliance with our agreements.
- Select joint marketing partners to facilitate a Nitra promotion, such as for the Nitra Card.

In addition:

- We may share your personal information in order to:
  - Protect the legal rights of our company, our employees, our agents, and our affiliates.
  - Protect the safety and security of our customers.
  - Detect and protect against fraud.
  - Comply with law or legal process.
- We may share your personal information as part of a business transition.
  - We may also share your personal information with prospective corporate asset, stock, or debt purchasers exclusively to evaluate the proposed transaction.
  - Following a corporate transaction that involves your personal information, an acquiring company may use and disclose personal information for purposes similar to those described in this Privacy Policy.

We may share de-identified, aggregated, or anonymous information for any purpose, meaning that such information is either combined with other data or otherwise anonymized so that the results are not personally identifiable.

## 5. Your Privacy Choices

You have the right to exercise the following choices with our use of your personal information:

- Access the personal information we maintain about you.
- Delete the personal information we maintain about you. Please note that a deletion request may result in automatic account closure unless otherwise specified. We may also retain any information in order to comply with a legal obligation to do so.
- Correct inaccurate personal information we maintain about you.
- Opt out of certain uses of your personal information, notably:
  - Email marketing. You can unsubscribe to our email list by clicking the unsubscribe link at the bottom of marketing emails.
  - SMS marketing. You can opt out at any time by replying STOP.
  - Tailored advertising using third party cookies or mobile identifiers. Please refer to the 'Use of Cookies and Tracking Technologies' section below to learn how to opt out of tailored ads.

You can exercise these rights by contacting us at [privacy@nitra.com](mailto:privacy@nitra.com) or refer to the information below for cookies and other tracking technologies. If you are an account holder, you can access, correct, and delete your personal information on the Website and on the App.

Please note, the opt out of communications with us does not apply to non-commercial communications and we still may contact you in order to effectuate our Services.

## 6. Use Of Cookies And Tracking Technologies

Like many companies, we use cookies and similar technologies (such as clear gifs, web beacons, tags, and similar technologies) to collect information about your browsing activities, your interactions with websites and our Services, and to serve tailored ads and for the purposes described in this Privacy Policy. Collected and processed information may include IP address, and device or browser-specific information, which may be used to track individual activities throughout our website. This information is used in a pseudonymous fashion exclusively for Nitra's benefit, and our analytics vendors are contractually prohibited from 'selling' the collected information.

There are a number of ways to opt out of having your online activity and device data collected through these services, which we summarize below:

- **Blocking Cookies In Your Browser.** Most browsers let you remove or reject cookies, including cookies used for interest-based advertising. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. For more information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).
- **Advertising Industry Opt-Out Tools.** You can also use these opt-out options to limit use of your information for interest-based advertising online or in apps by visiting <http://optout.aboutads.info>
- **With Each of Our Vendors Individually.** The following advertising or marketing services

partners offer opt-out features that let you opt-out of use of your information for interest-based advertising or profiling:

Third Party Advertising Services	
Facebook	<a href="#">Facebook Advertising Preferences</a>
Google Ads	<a href="#">Google Advertising Opt Out</a>
LinkedIn	<a href="#">LinkedIn Privacy Policy</a>
Analytics	
Google Analytics	<a href="#">Google Analytics Opt Out</a>
Hubspot	<a href="#">Hubspot Privacy Policy</a>
Hotjar	<a href="#">Hotjar Privacy Policy</a>

Please note that because these opt-out mechanisms are specific to the device or browser on which they are exercised, you will need to opt out on every browser and device that you use.

## 7. Mobile Privacy

Our App uses software code provided by our business partners (software development kits or SDKs) that let our software interact with the services those partners provide. Sometimes these interactions will involve that business partner collecting some information from the device on which the software is run.

To view our app privacy disclosure:

*On iOS:*

- Open the **App Store**. Go to the Nitra app page (<https://apps.apple.com/us/app/nitra/id1639599957>). Scroll to the **App Privacy** section. Click **See Details**.

## 8. Security

We protect information we collect about you by maintaining physical, electronic and procedural safeguards designed to prevent unauthorized access to user data retained in our servers, however, due to the inherent open nature of the Internet, we cannot ensure or warrant the security of any information provided online. We take reasonable precautions to protect your information both online and offline. The servers on which we store data are kept in a secure environment.

## **9. Retention**

We will retain your information for as long as your account or inquiry is active or as needed to provide you with the Services, and for a reasonable time thereafter in accordance with our standard procedures or as necessary to comply with our legal obligations, to resolve disputes, and to enforce our agreements. Even if we delete some or all of your personal information, we may continue to retain and use aggregate or anonymous data previously collected and/or anonymize or aggregate your personal information. Please note that we will not be liable for disclosures of your data due to errors or unauthorized acts of third parties.

## **10. Children's Privacy**

We do not intentionally collect any personal information from children under the age of 18. If you are under the age of 18, do not use or provide any information on our Website or Services or on or through any of its features. If you believe we have obtained personal information associated with children under the age of 18, please contact us at [privacy@nitra.com](mailto:privacy@nitra.com) and we will delete it.

## **11. Third-Party Links**

Our Website or Services may contain links to other websites or services. We do not exercise control over the information you provide to or is collected by these third-party websites. We encourage you to read the privacy policies or statements of the other websites you visit.

## **12. Changes To This Privacy Policy**

We may update this Privacy Policy from time to time. If we make material changes, we will post the updated Privacy Policy on this page with a "Last Updated" effective date of the revisions. We encourage you to look for updates and changes to this Privacy Policy by checking this page when you access our Website or Services.

## **13. Contact Us**

If you have any questions about our privacy or security practices, or if you would like to request access to or correction of your personal information, you can contact us by email at [privacy@nitra.com](mailto:privacy@nitra.com) or at:

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