

PRIVACY POLICY

Your privacy is important to us. Hypnalgescics, LLC d/b/a Comfort Talk® and its affiliates (“**Comfort Talk**,” “**we**,” or “**us**”), understand your concerns with regard to how information about you is used and shared, and we appreciate your trust that we will use and share information about you carefully and sensibly.

This Privacy Policy describes what information we collect about you, how we collect it, how we use it, with whom we may share it, and what choices you have regarding it. This Privacy Policy applies to your use of our website(s) and mobile application(s) (the “**Site**”) to which this policy links and any other means by which we may collect information about you, including information you may provide to us other than on the Site. We encourage you to become familiar with this Privacy Policy. By accessing and using the Site, you agree that you have read and understand this Privacy Policy and that you accept and consent to the privacy practices (and any uses and disclosures of information about you) that are described in this Privacy Policy.

This Privacy Policy does not apply to any websites operated by third parties. We are not responsible for, and this Privacy Policy does not apply to, the privacy practices of other companies or other websites. We encourage you to seek out and read the privacy policy of each website that you visit.

If you are located in the European Union or other locations outside of the United States, please review the “[International Users and Trainees](#)” section below for important information about your rights.

1. What information do we collect, and how do we collect it?

We collect information directly from you when you provide it to and we obtain information about you from third-party sources, including Clients and Providers (defined below). We and our Providers also automatically collect certain information about you when you use the Site using automated collection methods, such as cookies, pixels, web beacons, scripts, and flash cookies (“automated collection methods”). This information collectively is referred to herein as “Collected Information.”

When institutions or third parties (“Clients”) purchase training for members of their staff (“Trainees”), Clients will provide us Trainees’ contact information and we provide them with training and report to Clients the results of their Trainees’ participation in training, testing and certification activities, and store records relating to Trainees’ testing and certification activities.

We and our third-party service providers (“Providers”) collect certain information from or about you in connection with your use of, your submissions to, the Site, including, but not limited to, email, your name, telephone number, associated institution, credit card number billing address, user-provided answers to test questions, and test results and your communication preferences. In addition, we and our Providers may retain the content of, and metadata regarding, any correspondence you may have with us or our representatives, regardless of the mode of

communication by which such correspondence was made. This information helps us to improve the Site and the online content, materials, and services that we make available on the Site, and to more effectively and efficiently respond to both current and future inquiries.

When you use the Site, and when you read our emails, use our application or otherwise interact with us through a computer or mobile device, we and our Providers may collect certain data pertaining to you and the equipment and communications method that you use to access the Internet and our Site using automated collection methods. For more information on our use of cookies, see next section. Information collected through automated collection methods include, for example, the Internet protocol (“IP”) address assigned to your computer, specific pages that you accessed on the Site or prior to or after visiting the Site, and the length of time you spent at the Site. We and our Providers may use this information to help administer the Site and the servers that provide the Site, generate statistical information, monitor and analyze Site traffic and usage patterns, and improve the Site’s content and content delivery, including any online content, materials, and services that we describe or make available on the Site.

Cookies and Other Automated Collection Technologies

Cookies are small files placed on your computer or device by a website or mobile application. The cookie has a unique ID assigned to your device. Our Site may send one or more “cookies” to your computer or device to improve the utility of the Site, navigate from page to page on a Site, provide secure connections, and remember preferences from a previous visit when you return. Cookies may be either "persistent" cookies or "session" cookies. A persistent cookie consists of a text file sent by a web server to a web browser, which will be stored by the browser and will remain valid until its set expiry date (unless deleted by the user before the expiry date). A session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed. **[We use both persistent and session cookies on our Site.]**

- Analytics and Advertising Cookies and Interest-Based Ads

We use **Google Analytics** to better understand how our users interact with our Site. For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, review Google's Site “How Google uses data when you use our partners' Sites or apps” [here](#). You can learn about Google Analytics’ currently available opt-outs, including the Google Analytics Browser Ad-On [here](#). You can find Google’s Privacy Policy [here](#).

Third-party ad networks like Google use cookies to serve ads based on your past visits to the Site. For more information about how Google Ads uses cookies and other technologies to personalize ads, click [here](#). Google’s ability to use and share information collected by Google Ads is restricted by Google’s [Terms of Service](#) and [Privacy Policy](#). If you would like to learn more about how to manage your Google Ad Settings to opt-out of receiving personalized ads served by Google, click [here](#). We also use the DoubleClick cookies and/or pixels in connection with Google Ads. Click [here](#) if you would like to learn more about how you can install a browser plugin to maintain your preference to opt out of personalized ads from Google, even if you've cleared your cookies.

2. How will we use the information we collect?

In addition to the uses described above, we and our Providers may use Collected Information to analyze and improve the content, materials, and services that we make available on the Site, to notify you of changes made to the Site, to evaluate user needs and improve the Site content based on those needs, to provide customer service or support, improve users' online experience, or support our continuing efforts to offer users the information and services we think they want most. If you contact us for support or assistance, we may use Collected Information for purposes such as verifying whether your system meets the minimum requirements needed to use the Site and our various services.

If you place an order through our Site, we request certain personally identifiable information from you on our order form which is processed through Shopify. To take part of certain functionalities of the Site (i.e., sign up for and receive training), you must provide contact information (such as name, email, and mailing address) and financial information (such as a credit card number and expiration date). We use this information for billing purposes and to fill your orders. If we have trouble processing an order, we will use this information to contact you. We use Shopify, in lieu of directly processing your credit card information. All matters regarding your payment information are subject to any such Provider's privacy policy. See [Shopify's Privacy Policy](#).

We may also use e-mail addresses you provide to us in order to send you announcements regarding new products, services, and/or promotions, and informational newsletters. You may receive these announcements via emails directly from us or through MailChimp. In the latter case also MailChimp's [Privacy Policy](#) applies. You can choose to unsubscribe to our e-mails at any time by clicking on "unsubscribe" in emails delivered via MailChimp or sending an email to privacy@hypnalgessics.com.

3. With whom do we share the information we collect?

We may share Collected Information with certain of our Providers, (such as our web hosting provider and our payment processors) in order to provide the Site to you. We may also share Collected Information with some of our Providers to provide services you have requested or to deliver the content, materials, and services available on or through the Site to you. We may share Collected Information with Providers so that we can market our products and services to you, send our newsletter to you and otherwise communicate with you. For example, we use the third-party email service provider [MailChimp](#) to help us send emails to you. [We and our Providers may also produce reports on Site traffic or usage patterns and share these reports with our business and marketing partners and others.

If you are a Trainee sponsored by a Client, we will share certain Collected Information regarding your use of the Site with the Client that is your sponsoring institution. That information includes whether you sign up for training, which training modules you complete, your progress in training, your test scores, and your certification results.

We may disclose Collected Information if we become subject to a subpoena or court order or if we believe we are otherwise legally required to disclose such information. We may also use and disclose information about you to establish or exercise our legal rights, to assert and defend against legal claims, or if we believe such disclosure is necessary to investigate, prevent, or take other action regarding actual or suspected illegal or fraudulent activities or potential threats to the physical safety or well-being of any person. If all or part of Comfort Talk is sold, merged, or otherwise transferred to another entity, we may transfer Collected Information to such entity as part of that transaction.

Except as otherwise stated above, we will not sell, trade or share your personal information with anyone else, nor will we send mailings on behalf of other organizations, unless you have consented to such sharing and use.

4. What choices do you have?

Information You Give Us

When corresponding with Comfort Talk or our representatives, or when making a request for information or otherwise interacting with us or others through the Site, you choose whether to directly provide us certain information, what questions or comments to submit, whether you wish to receive further information, and by what method of communication such information should be delivered. Please take care to share only such information as is needed or that you believe is appropriate. You may contact us as indicated below if at any time you would like to ask us about our data collection and information security practices. However, that may limit your ability to fully utilize certain benefits of our Site (for example, using our training, testing, and certification services).

Interest Based Advertising

In addition to the opt-out choices in the **Analytics and Advertising Cookies and Interest-Based Ads** section above, you can manage third-party advertising preferences for some of the third parties we work with to serve advertising across the Internet by utilizing the choices available at http://www.networkadvertising.org/managing/opt_out.asp and <http://www.aboutads.info/choices>.

For mobile users, you also have numerous controls in your Operating System that enable you to choose whether to allow cookies, or share your advertising ID with third parties. For some information on controlling your mobile choices, [click here](#). To help control or block certain ads in mobile applications, you may choose to download and utilize the Digital Advertising Alliance's mobile app by clicking [here](#). We do not guarantee that all of the third parties we work with will honor the elections you make using any of these options.

Managing Cookies

For information about managing cookies, please visit www.allaboutcookies.org. For browser-specific information on how to adjust cookie configurations on the following browsers, please click on the relevant link below:

- [Internet Explorer](#)
- [Firefox](#)

- [Chrome](#)
- Safari - [OSX/Mac OS, iOS](#)

Please keep in mind, that we use browser cookies to improve the functionality of the Site and to enhance your experience on our Site. Therefore, changing your browser or device settings to refuse, disable or delete cookies may impact your use of some of the features or services on our Site as they may not function properly without cookies.

Disabling or clearing cookies also may affect cookie-based opt-outs by either preventing you from using such cookie-based opt-outs or clearing opt-outs that you previously set, in which case you would have to revisit the applicable pages and renew your opt-out after clearing cookies. Please also keep in mind that browser cookie management tools will not remove flash cookies or prevent other automatic collection methods from functioning.

Mobile Devices

Your mobile device may offer settings relating to cookies, pixel tags, and other automated collection methods. We encourage to you to visit your device's help menu to learn about your options to limit tracking when using your device.

Email Choices

You may unsubscribe from our newsletter or from marketing emails from us by clicking "Unsubscribe" at the bottom of any newsletter or marketing email from us, as applicable, or by submitting a request to privacy@hynalgesics.com. Please note that opting out of receiving marketing emails or our newsletter will not prevent us from sending you administrative communications or legal notices, for example, emails about changes to our terms, policies or business practices.

Social Media Platforms and Networks

We encourage you to review your privacy options and settings with the social media platforms and networks you use to understand what choices you have about sharing information from those platforms and networks with us. Please be advised that we have implemented social media plug-ins for Facebook and LinkedIn on our website. Your personal data and browser-related information will be transferred to these companies and will be used in accordance with each company's privacy policy. Your browser-related information may be transferred regardless of whether or not you use the social media plug-in.

Do Not Track

Because there currently is not an industry or legal standard for recognizing or honoring Do Not Track ("DNT") signals, we do not respond to them at this time.

5. How Do We Protect Information Collected About You?

We have put in place certain commercially reasonable security measures to safeguard Collected Information, but the storage and communication of Collected Information can never be completely secure. Hence we do not guarantee that information that you transmit or otherwise supply to us, or any communications conducted on or through the Site, is or will be totally secure. If you become aware of any breach of Site security or this Privacy Policy, please notify us immediately.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a username and password for access to certain parts of the Site, you are

responsible for keeping this password confidential. We ask you not to share your username and password with anyone, and to notify us immediately if you become aware of any unauthorized use of your username and password.

6. How long do we retain your personal information?

We will keep your personal information for the period necessary to fulfil the purposes described in this Privacy Policy, unless a longer retention period is permitted or required by law.

In specific circumstances, we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

7. Interactive Areas

Comfort Talk is not liable for information posted in interactive areas of the Site. Comfort Talk provides these interactive areas, such as discussion forums, to enhance the user experience and build a healthy community around the products and services available through the Site. You acknowledge that, should you participate in such interactive areas, the information you voluntarily post about yourself and third parties in such areas might be accessed, collected and used by us, our Providers, or third parties.

8. No Use of Our Site by Persons Under 18.

Our Site is not directed to or intended to be used by individuals under the age of 18. If you are under the age of 18, do not use our Site. We do not knowingly request or collect personal information from any person under the age of 18 without prior verifiable parental consent. It is possible that an individual under 18 could provide us personal information through fraud or deception. If you believe that your child under the age of 18 has submitted personal information to us in connection with our Site, and without prior verifiable parental consent, please email us at privacy@comforttalk.com so that we can take steps to delete the personal information that she or he provided as required in accordance with applicable law.

9. Location of this Site.

This Site is hosted and operated in the United States of America. However, we and our Providers may, in our effort to provide the Site, store Collected Information in the United States, or we may transfer it to, and store it within, other countries.

10. Account Deletion.

When a you request removal from our online system, you will be asked if you wish to be removed from our Online Learning Platform. Upon request for removal from the Online Learning Platform, we will inform the you that upon removal, you will no longer have access to the sign on portal, the online test or your evidence of achievement. We will inform you that you should save a copy

of your evidence of achievement/certificates as once you are removed from the system, we will no longer be able to issue you a replacement. If you were a Trainee, you will also be informed that the Client, which was the sponsoring institution that paid for your account, will be informed of your deletion. You will then be asked to confirm that you want your account to be deleted.

11. Your California Privacy Rights.

Under California Civil Code Section 1798.83, individual customers who reside in California and who have an existing business relationship with us may request information about our disclosure of certain categories of personal information to third parties for the third parties' direct marketing purposes, if any.

To make such a request, send an email with the subject heading "California Privacy Rights" to **privacy@hypnalgescics.com** or write to us by post at Hypnalgescics, LLC d/b/a Comfort Talk®, 157 Ivy Street, Brookline, MA 02446. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is covered by these California privacy rights requirements and only information on covered sharing will be included in our response. This request may be made no more than once per calendar year.

Our Site is not directed to or intended to be used by individuals under the age of 18. If you are under the age of 18, do not use our Site or register an account on the Site. It is possible, through fraud or deception, that an individual under 18 could register an account on the Site. If you are a California resident under the age of 18, and have a registered account on our Website, California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information you have publicly posted. To make such a request, please send an email with a detailed description of the specific content or information to **privacy@hypnalgescics.com**. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

12. International Users and Trainees

Controllers of Personal Data

Hypnalgescics, LLC d/b/a Comfort Talk®, 157 Ivy Street, Brookline, MA 02446 is the data controller of the personal data processed through the Site.

Legal Bases for Processing Personal Data

If you are an individual located in the European Union (EU), we collect and process personal data about you where we have a legal basis for doing so under applicable EU laws. This means we collect and process your data only when:

- It is necessary for a legitimate interest (which is not overridden by your individual privacy interests), such as preventing fraud, improving our Site, and increasing the security of the Site and network infrastructure;

- You have consented to this collection and processing for a specific purpose;
- It is necessary to fulfil our contractual obligations; or
- It is necessary to comply with a legal obligation.

Where we rely on your consent to process your personal data, you have the right to withdraw or decline consent at any time. Some examples of where we rely on your consent to process your personal data include sending you our newsletter and marketing emails. If you wish to withdraw your consent, please contact us at privacy@hypnalgescics.com.

Some examples of our legitimate interests and the personal data being processed include:

- Site and network security
- User/Trainee support and fraud prevention
- Improving our Site

Where we rely on our legitimate interests to process your personal data, you may have the right to object. More information on exercising this right can be found in the Individual Rights section below.

If you have any questions about or need further information concerning the legal basis on which we collect and use your personal data, please contact us at privacy@hypnalgescics.com.

Individual Rights

Access Requests.

You may make a request for access to your personal data that we have on file by contacting us through our Site, sending an email, or writing to us at the address specified in the “[Additional Information and Contacting Us](#)” section below. We are not able to grant all access requests, and we may request additional information from you in order to verify your identity before accommodating an access request.

If you are a resident of the European Union, you may have certain rights under European data protection law with respect to your personal data, including the right to request access to, correct, amend, delete, limit the use of, or withdraw your consent for the processing of your personal data. You may also have the right to receive a copy of your personal data in a commonly used and machine-readable format and to transmit such data to another controller. To request deletion of, access to, or to make changes to information, or to otherwise exercise any of your rights in this paragraph, email us at privacy@comforttalk.com. Please remember that if you delete or limit the use of your personal data, you may not be able to use the services provided and functionalities of the Site.

Transfers, Storage, and Processing - Important Information for Users Outside the U.S.

Our Site is operated from and hosted on servers located in the United States. If you access and use our Site from a location outside of the United States, any personal data you provide to us or that is otherwise collected may be transferred to and processed in the United States or any other

jurisdiction in our sole discretion. Users of our Site should be aware that the laws that apply to the use and protection of personal data in the United States or other countries or jurisdictions to which we transfer, or in which we process, personal data may differ from those of your country of residence. Users and Trainees who access or use our Site from jurisdictions outside of the United States do so at their own choice and risk and are solely responsible for compliance with local law. While we take steps to safeguard your personal data, the United States has NOT been deemed by the European Commission to ensure an adequate level of protection for personal data. Accordingly, the level of protection provided in the United States or other non-EU countries and jurisdictions from which you may access our Site may not be as stringent as that under EU data protection standards or the data protection laws of some other countries, possibly including your home jurisdiction.

By checking the box on our website stating that you consent to having your information transferred to the United States or other jurisdictions outside of the EU, you consent to allow your personal data to be transferred across borders to the United States or to other countries or jurisdictions in which Comfort Talk or its Providers may process personal data.

13. We may change this Notice.

From time to time, we may change our privacy practices, and this Privacy Policy, because of changes in relevant and applicable legal or regulatory requirements, our business practices, or in our attempts to better serve your needs and those of our other customers. We will make efforts to notify you of any such changes, and a revised policy will be posted on this Site. If we make material change, we encourage you to regularly review the current version of this Privacy Policy on the Site to review any such changes.

14. Additional information and contacting us.

For any questions, or to request further information regarding this Privacy Policy or our use and disclosure of Collected Information, please contact us at:

Comfort Talk
157 Ivy Street
Brookline, MA 02446
privacy@hypnalgescics.com

If you are a resident of the EU and your inquiry with us has not been satisfactorily addressed, or if you believe we are processing your personal data not in accordance with the law or this Privacy Policy, you may file a complaint with the supervisory authority in your country of residence.