



# GOFORWARD PRIVACY STATEMENT

## Introduction

GoForward Inc. (“**GoForward**,” “**we**,” or “**us**”) owns and operates the GoForward website located at [www.goforward.com](http://www.goforward.com) (<http://www.goforward.com>) and the GoForward mobile application (collectively, the “**Platform**”). Your access and use of the Platform, any part thereof, or anything associated therewith, including its content (“**Content**”), any products or services provided through the Platform, and any affiliated website, software or application owned or operated by GoForward (collectively, including the Platform and the Content, the “**Service**”) are governed by this Privacy Statement (“**Privacy Statement**”).

We are committed to respecting the privacy of users of the Service. We created this Privacy Statement to tell you how GoForward collects, uses and discloses information in order to provide you with the Service, and to explain certain rights you have in connection with and over your personal information. As with our Terms of Use for the Service (the “**Terms of Use**”), if we make any changes to our Privacy Statement, we will post the revised Privacy Statement and update the “Last Revised” date of the Privacy Statement.

By accessing or using the Service, you acknowledge the practices and policies outlined in this Privacy Statement. If you are using the Service on behalf of an individual other than yourself, you represent that you are authorized by such individual to act on such individual’s behalf and that such individual acknowledges the practices and policies outlined in this Privacy Statement.

You may use GoForward's services and visit the site without being a patient of the Medical Group (as defined in our Terms of Use). In the event you are not a patient of the Medical Group, the information below regarding the Medical Group does not apply to you.

## Protected Health Information

GoForward is not a "covered entity" under the Health Insurance Portability and Accountability Act of 1996, Public Law 104-191, and its related regulations and amendments from time to time (collectively, "**HIPAA**"), however, the Medical Group (as defined in our Terms of Use) may be a "covered entity" and, solely in its role providing administrative services to the Medical Group, GoForward may be a "business associate" of the Medical Group. Therefore, the Medical Group and, solely in its role as a business associate, GoForward, may be subject to certain provisions of HIPAA with respect to "protected health information," as defined under HIPAA, that you provide to the Medical Group. PHI does not include information that has been de-identified in accordance with HIPAA ("**De-Identified Health Information**"), and does not include information that you submit to GoForward for purposes other than supporting and facilitating your relationship with the Medical Group or Providers.

Under HIPAA, a "covered entity" is required to provide their patients a Notice of Privacy Practices that describes how the covered entity uses and discloses "protected health information" ("**PHI**"). As a result, the Medical Group has adopted and, if you become a patient of the Medical Group, has separately provided or will provide to you a HIPAA Notice of Privacy Practices that describes how the Medical Group may use or disclose your PHI (the "**Medical Group Notice of Privacy Practices**").

HIPAA also requires a covered entity to obtain a patient authorization that satisfies certain requirements in order for the covered entity or its business associates to use or disclose PHI in certain ways. In order to ensure that the Medical Group and GoForward are able to effectively provide their respective services to you and that you are able to utilize the full functionality of the Service,

the Medical Group and/or GoForward may need to use or disclose your PHI in ways that would require the Medical Group to obtain an authorization under HIPAA. As a result, the Medical Group, if you become a patient of the Medical Group, has obtained or will obtain from you a patient authorization (a **“Patient Authorization”**) that authorizes the Medical Group and GoForward to use and disclose your PHI in certain ways that may not be described in this Privacy Statement or the Medical Group Notice of Privacy Practices.

To the extent that GoForward is in fact a “business associate” of the Medical Group and is collecting, sharing, or using your information as a business associate of the Medical Group, GoForward’s use and disclosure of your PHI will comply with HIPAA and any Patient Authorization. Any information that does not constitute PHI may be used or disclosed in any manner permitted under this Privacy Statement.

## **Collection and Use of Information**

We collect any information you provide when you use the Service, including, but not limited to personally identifying information (**“PII”**). Such collected data may include the following categories of data:

- **Communicated Data:** Data included in any communication you send to us, whether from the contact form(s) located on our Site, through email, text, social media messaging or posting, or any other communication you send us through any medium. We keep and process this communication data for the purposes of (i) communicating with you, (ii) record keeping, (iii) the establishment, pursuit, and/or defense of legal claims, and (iv) other lawful purposes.
- **Customer and Registration Data:** Data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address, email address, phone number, and contact, purchase, and credit card details. We process and store this data to manage your account, supply the goods and/or services you have purchased, and to keep records of such transactions.
- **Marketing Data:** Data about your preferences in receiving marketing from us and your communication preferences. We process this data to deliver relevant website content to you, and to measure or understand its effectiveness.

- **Technical Data:** Data about your use of our Site and Service such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyze your use of our website and other online services, to administer and protect our business and website, to deliver relevant content and advertisements to you and to understand the effectiveness of our advertising.
- **User Data:** Data about how you use our Site and Service together with any data that you post for publication on our Site or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back-ups of our website and/or databases and to enable publication and administration of our website, other online services and business.
- **Medical Group Data:** In addition to the information we collect directly from you, we may also collect certain information from the Medical Group and/or Providers who provide treatment or other services to you in connection with our Service. This information may include, but is not limited to, diagnoses, treatment plans (including prescription details) and notes, and is accessible and visible through certain components of the Service.
- **Third-Party Data:**
  - We may also receive information from third parties that pay for your care or provide you with treatment, laboratory care or prescription medication, which may include, for example, your prescription history, insurance policy, insurance eligibility and coverage, and laboratory test results.
  - We may also receive information about your online and offline actions and purchases from third-party data providers who have the rights to provide us with your information.
- **Device Data:** Data from the device through which you access the Service. This information includes, but is not limited to, your language preferences, your phone number or other unique device identifier (the International Mobile Equipment Identity or the Mobile Equipment ID number), the IP address of your device, the manufacturer, model and operating system of your device, the name and version of our Service you are using, information regarding your browser and information that allows us to personalize our Service. We or our service providers may also collect information about how you interact with our Service and any of our websites to which our Service links, such as how many times you use a specific part of our Service, the amount of time you spend using our Service, how often you use our Service, actions you take in our Service and how you engage with our Service.

- **Location Data:** Data regarding your location or the location of your device through which you access our Service. Information regarding your location may be obtained directly from you when you provide us with information as part of the registration process.
- **Non-Identifiable Data:** When you interact with us through the Service, we receive and store certain personally non-identifiable information. Such information, which is collected passively using various technologies, cannot presently be used to specifically identify you. We may store such information itself or such information may be included in databases owned and maintained by GoForward affiliates, agents or service providers. The Service may use such information and pool it with other information to track, for example, the total number of visitors to our Site, the number of visitors to each page of our Site, and the domain names of our visitors' Internet service providers. It is important to note that no PII is available or used in this process.
- **Cookies:** We may store cookies (e.g., locally stored objects) in your computer's hard drive when you use the Service. These devices are used to help us speed up your future activities or to improve your experience by remembering the information that you have already provided to us. Some of our service providers may also use cookies to provide us with anonymous data and information regarding your use of the Service. At your option, you may block or delete devices from your hard drive. However, by disabling such tracking devices, you may not have access to all features of the Service. For more about cookies, including links to web browser instructions for disabling and managing such tracking devices, visit <https://www.usa.gov/optout-instructions> (<https://www.usa.gov/optout-instructions>).

- Third Party Tools: In addition, we may use third party tools, which will also use your data to enable us to provide or improve the Service. Such tools may include the following:
  - Google Analytics. Google Analytics is a web analytics tool that helps operators (like GoForward) understand how users (like you) engage with their applications. Google Analytics uses cookies to track your interactions with our Service and to collect information about how you use the Service. We then use the information to compile reports that help us improve the Service. Google Analytics collects, processes and creates reports about website trends without identifying individual users. For more information regarding Google Analytics visit “How Google uses data when you use our partners’ sites or apps” located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) ([www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/)).
  - 23&Me. 23&Me enables us to offer certain services related to your DNA. When you opt for such services, we will use 23&Me to process the information, and your data will be subject to the 23&Me privacy statement located at <https://www.23andme.com/about/privacy/> (<https://www.23andme.com/about/privacy/>).
  - Stripe. We use Stripe to process payments. We store stripe tokens internally, but your payment history and customer record is mirrored in Stripe, and is subject to the Stripe privacy policy located at <https://stripe.com/privacy> (<https://stripe.com/privacy>).
  - Meta. We use Meta to serve our ads and let us know, through the use of tags called UTM parameters, if you clicked an ad on Meta to get to our site. We do not receive PII from Meta, and your data on Meta is subject to its privacy policy located at <https://www.facebook.com/privacy/policy> (<https://www.facebook.com/privacy/policy>). You can learn more about our use of cookies with such Meta Business Tools at [https://www.facebook.com/privacy/policies/cookies/version/cookie\\_policy\\_2023/?subpage=subpage-1.3](https://www.facebook.com/privacy/policies/cookies/version/cookie_policy_2023/?subpage=subpage-1.3) ([https://www.facebook.com/privacy/policies/cookies/version/cookie\\_policy\\_2023/?subpage=subpage-1.3](https://www.facebook.com/privacy/policies/cookies/version/cookie_policy_2023/?subpage=subpage-1.3)).
  - Persona. We use a third-party vendor named Persona to verify your identity - that you are who you say you are - when you join Forward. Persona may collect information from you, per its Privacy Policy (<https://withpersona.com/legal/privacy-policy#toc-0>), including a picture of your photo ID, which may constitute “biometric information” under some laws. Forward may have access to information collected by Persona in order to facilitate the verification process, and we process that limited information in accordance with this Privacy Statement.

## Interest-Based or “Personalized” Advertising

In public areas of our Service, we and our third-party vendors may use device identifiers and other automated technologies (including cookie identifiers on our website), along with other collected information, to deliver content or tailor ads when you are on other devices, apps or websites. These ads may be based, for instance, on the types of websites that you visit over time, the types of apps you have on your device, or de-identified information about you and your likely interests, based on your activities off of our Service. Sometimes, we (or our service providers) may use the information we collect—for instance, IP addresses and unique mobile device identifiers—to locate or try to locate the same unique users across multiple browsers or devices (such as smartphones, tablets, or computers), or work with providers that do this, to help identify visitors to the publicly-accessible areas of our Service and serve advertising. If you wish to opt out of cross device tracking for purposes of interest-based advertising, you may do so through your device settings. Partners that we or others work with to do the above may track your activities over time (including across different apps or websites) by collecting information through automated means, and they may use this information, and other information they receive from us or other sources, to deliver advertisements to you.

You can learn more about interest-based advertising on the web, or opt out of receiving those ads, by visiting (i) the Network Advertising Initiative’s Consumer Opt-Out here (<http://www.networkadvertising.org/choices>) or (ii) the Digital Advertising Alliance’s Consumer Opt-Out here here (<http://www.aboutads.info/choices/>) to opt-out of receiving tailored advertising from companies that participate in those programs. To opt out of Google Analytics for display advertising or customize Google display network ads, you can visit the Google Ads Settings page here (<https://www.google.com/settings/ads>). As to cross-app advertising, each operating system (e.g., iOS for Apple phones, Android for Android devices, and Windows for Microsoft devices) provides its own instructions on how to prevent

the delivery of tailored in-application advertisements. You should view your device or system “Settings” to determine how you can opt out of use of your device identifier for “cross-app” personalized advertising.

Please note that to the extent advertising technology is integrated into our Service, you may still receive advertisements even if you opt-out. In that case, the advertising will not be tailored to your interests. Also, we do not control any of the above opt-out links or whether any particular company chooses to participate in these opt-out programs.

## **Additional Use of Information**

In connection with providing the Service, we and our affiliates and service providers may use your information, subject to the limitations addressed in the Protected Health Information Section above, for a number of purposes, including, but not limited to: (a) verifying your identity and administering your user account (“**Account**”), including processing your payments and fulfilling your orders; (b) communicating with you about the Service or your use of the Service, and sending you communications on behalf of the Medical Group or its Providers; (c) providing you customer support and responding to your requests or concerns; (d) facilitating the provision of services to you by the Medical Group or its Providers; (e) making certain information in your medical records accessible and available to you; (f) sending you push notifications (notifications may be enabled or disabled through your device or app settings depending on your device type); (g) processing payments; (h) detecting, preventing, investigating and responding to fraud, intellectual property infringement, violations of our Terms of Use, or other misuse of our Service or the Medical Group’s services; (i) reviewing, monitoring, expanding or improving the Service; (j) reviewing and analyzing the efficacy of some or all of the Service; (k) identifying and creating new Content, software or tools offered through the Service; (l) developing, testing and offering other products and services, whether or not through the Service; (m) providing certain marketing communications or promotional materials relating to the Service that may be of interest to you; and (n) any other use permitted by applicable law.



## Disclosure of Information

GoForward is not in the business of selling your information. We consider this information to be a vital part of our relationship with you. We will use your PII solely to provide the Service and otherwise as described in this Privacy Statement, and we will protect such information and against disclosures that may be made of such information without your authorization. There are, however, certain circumstances in which we may share your PII with certain third parties without further notice to you, as set forth below.

- **The Service:** We may disclose your information to third parties in connection with the provision of our Service or your Provider's provision of services or as otherwise permitted or required by law. For example, we may disclose your information to: (a) our third-party service providers that provide services such as the hosting of the Service, data analysis, IT services and infrastructure, customer service, e-mail delivery, auditing, payment processing, and other similar services; (b) the Medical Group or its Providers to schedule and fulfill appointments and provide healthcare services; (c) the Medical Group or Providers to whom you send messages through our Service; (d) the Medical Group or its Providers for treatment, payment or healthcare operations purposes; (e) third parties as we believe necessary or appropriate to enforce our policies and/or contracts; protect us, you, or others; or to comply with applicable laws.
- **Business Transfers:** As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, PII may be part of the transferred assets. We may also share your PII with our subsidiaries and affiliates for purposes consistent with this Privacy Statement.
- **Agents, Consultants and Related Third Parties:** GoForward, like many businesses, sometimes hires other companies to perform certain business-related functions. Examples of such functions include mailing information, providing business and market intelligence, maintaining databases, and processing payments. When we employ another entity to perform a function of this nature, we only provide them with the information that they need to perform their specific function.
- **Legal Requirements:** GoForward may disclose your PII if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of GoForward, (iii) act in urgent circumstances to protect the personal safety of users of the Service or the public, or (iv) protect against legal liability.

## **Use by Minors**

Our Service is intended for use by individuals who are at least 18 years of age or such older age as may be required by applicable state laws in the jurisdiction in which an individual utilizes the Service.

## **Jurisdictional Issues**

The Service may only be used as set forth in the Terms of Use. This Privacy Statement, and our collection, use, and disclosure of your information, is governed by U.S. and California law.

## **Third Parties**

This Privacy Statement does not address or apply to, and we are not responsible for, the privacy, information or other practices of any third parties, including, without limitation, the Medical Group or its Providers, the manufacturer of your mobile device, and any other third party mobile application or website to which our Service may contain a link. These third parties may at times gather information from or about you. We do not control and are not responsible for the privacy practices of these third parties. We encourage you to review the privacy policies of each website and application you visit and use. To the extent you are or wish to become a patient of the Medical Group, we also encourage you to review its Notice of Privacy Practices.

## **Your Choices**

You can visit the Site without providing any PII. If you choose not to provide any PII (or only provide certain requested PII), you may not be able to use certain services.

Users of the Service are required to inform us about any change concerning their data, in particular about changes of place of residence, changes of surname, and changes of email address. We are not liable for the consequences resulting from providing mistaken data.

California residents have the following additional choices:

- **Data Information:** You may, up to two times during any twelve-month period, request details of personal information which we hold about you. If you would like a copy of the information we keep on our systems about you, please contact us as provided below. If you believe that any information we are holding is incorrect or incomplete, please contact us (through the means provided below) as soon as possible. We will promptly correct any information found to be incorrect. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. We will take action to verify the requestor's identity and/or California residence.
- **Removal of Your PII:** You can ask us at any time to delete the information we hold on you by contacting us through the means provided below. If we are not able to delete such information because we have a need to keep it (for example, to comply with a medical records law or other law requiring us to hold such information), we will not use the information for any purpose other than that specific need. Note that we may need to collect information from you so that we can verify your identity before taking any such requested action. We will respond to your request within 45 days. Also note that in the event you request that we delete your data, we will have to cancel your membership. Such cancellation will be subject to the policies and procedures outlined in our Terms of Use. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. We will take action to verify the requestor's identity and/or California residence.
- **Your California Privacy Rights:** We may disclose your personal information to our affiliates or other related third parties for their use in marketing to you. Pursuant to California's "Shine the Light Act," California residents are permitted to request information about the manner in which we share certain categories of information with third parties for their marketing use. Please send an email to the address provided below to request a copy of our disclosure pursuant to California law. Residents of the State of California have the right to request from certain businesses with whom the California resident has an established business relationship a list of all third parties to which the business, during the immediately preceding calendar year, has disclosed certain personally identifiable information for direct marketing purposes. We are only required to respond to a customer request once during any calendar year. To obtain this information, you should send a written request to the email address provided below with the subject heading "California Privacy Rights." 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 the California Privacy Rights requirements and only information on covered sharing will be included in our response.

- “Do Not Track” Browser Settings: We use technology that recognizes a “do-not-track” signal from your web browser.

## Security

We strive to use reasonable physical, technical and administrative measures to protect information under our control. However, you must keep your Account password secure and your Account confidential, and you are responsible for any and all use of your Account. If you have reason to believe that the security of your Account has been compromised, please notify us immediately in accordance with the “Contacting Us” section below.

To help protect the privacy of data you transmit through the Service, where personally identifiable information is requested, we also use technology designed to encrypt the information that you input before it is sent to us using Secure Sockets Layer (SSL) technology or similar encryption technology. In addition, GoForward takes steps to protect the User data we collect against unauthorized access. However, you should keep in mind that the Service and our services are run on software, hardware, and networks, any component of which may, from time to time, require maintenance or experience problems or breaches of security beyond our control. We do not accept liability for unintentional disclosure. In addition, persons with access to your computer, phone, or other mobile or other devices may be able to access the Service and information about you contained in the Service.

By using the Site or providing Personal Information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Site. If we learn of a security system’s breach, we may attempt to notify you electronically by posting a notice on the Site or sending an e-mail to you. You may have a legal right to receive this notice in writing.

## **Additional Choices**

When using the Service, you may choose not to provide us with certain information, but this may limit the features you are able to use or may prevent you from using the Service all together. You may also choose to opt out of receiving certain communications (e.g., newsletters, promotions) by emailing us your preference. Please note that even if you opt out, we may still send you Service-related communications. We do not currently respond to web browser “do not track” signals or other mechanisms that provide a method to opt out of the collection of information across the networks of websites and online services in which we participate. If we do so in the future, we will describe how we do so in this Privacy Statement.

## **GoForward, Inc. Privacy Statement Supplement for California and Colorado Residents**

Effective Date: 3/29/24

### **Privacy Statement Supplement for California Residents**

This section applies to the personal information (as defined in the California Consumer Privacy Act of 2018 (“CCPA”)) we collect from California residents (“consumers” or “you”). This section does not apply to personal information we collect about current or former employees of GoForward, independent contractors, or job applicants to GoForward . Any terms defined in the CCPA have the same meaning when used in this section.

### **Information We Collect**

When you use the Service, we collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“personal information”). Consistent with the CCPA, this section does not apply to:

- Publicly available information from government records.

- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - Health or medical information covered by the HIPAA or the California Confidentiality of Medical Information Act ("CMIA"), clinical trial data, or other qualifying research data; and
  - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act ("FCRA"), the Gramm-Leach-Bliley Act ("GLBA") or California Financial Information Privacy Act ("FIPA"), and the Driver's Privacy Protection Act of 1994.

GoForward collects some data that are not subject to this section and is therefore not disclosed below. GoForward does not collect or share "sensitive personal information" as that term is defined by the CCPA.

In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

| <b>Category</b>   | <b>Examples</b>  | <b>Collected</b> |
|---|--|------------------|
| A. Identifiers.   | Name, Internet Protocol address, email address, device identifiers.  | YES              |
| B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). | Name, physical characteristics or description, telephone number.   | YES              |
| C. Protected classification characteristics under California or federal law.  | Age (over 40), gender.   | YES              |
| D. Commercial information.  | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. | NO               |

| Category   | Examples  | Collected |
|--|---|-----------|
| E. Biometric information.                          | Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data. | NO        |
| F. Internet or other similar network activity.     | Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.  | YES       |
| G. Geolocation data.                               | Physical location.  | YES       |
| H. Sensory data.                                   | Audio data from phone calls with Forward.   | YES       |
| I. Professional or employment-related information. | Current or past job history or performance evaluations.   | NO        |

| Category   | Examples  | Collected  |
|--|---|------------|
| <p>J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).</p> | <p>Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.</p> | <p>NO</p>  |
| <p>K. Inferences drawn from other personal information.</p>  | <p>Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>  | <p>YES</p> |

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete, products and services you purchase, or information you provide when you contact or interact with us.
- Indirectly from you. For example, from observing your actions on our Website, using cookies and other tracking technology.
- Other parties such as business partners, affiliates, service providers, advertising partners, and individuals providing referrals.

## Use & Retention of Personal Information

We may use or share the personal information we collect for one or more of the following purposes:



- To fulfill or meet the reason you provided the information. For example, if you provide your personal information to purchase Forward membership, we will use that information to process your payment and facilitate membership services. GoForward may use the information provided to create, maintain, customize, and secure your account with us; to process your requests, purchases, transactions, and payments; and to provide you with support and to respond to your inquiries, including to investigate and address your concerns.
- To provide, support, personalize, develop, and improve our Website, products, and services. For example, GoForward uses data analytics technology to develop and improve our products and services.
- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email, mail, telephone call, or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

We may combine the information we collect (“aggregate”) or remove pieces of information (“de-identify”) to limit or prevent identification of any particular consumer. We may use or disclose this aggregated or de-identified information at our discretion.

GoForward may retain your information for as long as it believes necessary; as long as necessary to comply with its legal obligations, resolve disputes, and/or enforce its agreements; and/or as long as needed to provide you with the products and/or services of the Service. GoForward may dispose of or delete any such information at any time except as set forth in any other agreement or document executed by GoForward or as required by law.

## Disclosures, “Selling,” and “Sharing” of Personal Information

We do not sell personal information for monetary consideration. We may disclose your personal information to an unaffiliated party for a business purpose. In the preceding twelve (12) months, GoForward has disclosed personal information for a business purpose to the categories of unaffiliated parties indicated in the chart below.

We may also “share” your personal information with third party advertisers as defined by the CCPA, i.e. for cross-context behavioral advertising, subject to your right to opt-out of personal information sharing. California law defines cross-context behavioral advertising as the targeting of advertising to a consumer based on the consumer’s personal information obtained from the consumer’s activity across businesses, distinctly-branded websites, applications, or services, other than the business, distinctly-branded website, application, or service with which the consumer intentionally interacts.

GoForward does not knowingly collect personal information about individuals we know are under the age of 18. We thus do not knowingly share personal information (i.e. for cross-context behavioral advertising) of individuals under the age of 18. In the preceding twelve (12) months, GoForward has shared the following categories of personal information to the categories of third parties indicated in the chart below. For more on your personal information sharing rights, see Personal Information Sales and Sharing Opt-Out.

| <b>Personal Information Category</b> | <b>Business Purpose</b>   | <b>Categories of Third Parties</b> | <b>Sold or Shared?</b> |
|--------------------------------------|---|------------------------------------|------------------------|
| Identifiers                          | All purposes listed above in the “Use & Retention of Personal Information” section. | Third-party advertisers            | Shared                 |

| <b>Personal Information Category</b>                                     | <b>Business Purpose</b>   | <b>Categories of Third Parties</b> | <b>Sold or Shared?</b> |
|--|---|------------------------------------|------------------------|
| California Customer Records personal information                         | All purposes listed above in the "Use & Retention of Personal Information" section. | Third-party advertisers            | Shared                 |
| Protected classification characteristics under California or federal law | All purposes listed above in the "Use & Retention of Personal Information" section. | Third-party advertisers            | Shared                 |

## Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

### *Right to Know and Data Portability*

You have the right to request that we disclose certain information to you about our collection and use of your personal information over at least the past 12 months (the "right to know"). Once we receive your request and confirm your identity (see Exercising Your Rights to Know, Delete, or Correct), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting, "sharing," or disclosing that personal information.
- The categories of third parties with whom we disclose that personal information.

- If we “shared” your personal information for a business purpose, two separate lists disclosing:
  - the personal information categories we “shared”; and
  - the categories of third parties to whom we “share” the personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).

We provide a right to know or data portability disclosure for B2B personal information

### ***Right to Delete***

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions (the “right to delete”). Once we receive your request and confirm your identity (see Exercising Your Rights to Know, Delete, or Correct), we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by the consumer, or reasonably anticipated by the consumer within the context of a business’s ongoing business relationship with the consumer, or otherwise perform a contract between the business and the consumer.
- Help to ensure security and integrity to the extent the use of the consumer’s personal information is reasonably necessary and proportionate for those purposes.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).

- Engage in public or peer-reviewed scientific, historical, or statistical research that conforms or adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the ability to complete such research, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us and compatible with the context in which you provided the information.
- Comply with a legal obligation.

We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

We provide these deletion rights for B2B personal information.

### ***Right to Correct***

You have a right to request that we correct inaccurate personal information that we have collected from you and retained, subject to certain exceptions (“right to correct”). Once we receive your request and confirm your identity (see Exercising Your Rights to Know, Delete, or Correct), we will approve or deny your request.

We may request documentation to prove that the information at issue is inaccurate.

### ***Exercising Your Rights to Know, Delete, or Correct***

To exercise your rights to know, delete, or correct described above, please submit a request by either:

- Calling us at the following toll-free phone number: 1-833-334-6393
- Emailing us at [info@goforward.com](mailto:info@goforward.com) (<mailto:info@goforward.com>)
- Submitting a request via the following Web link: [www.goforward.com/privacy-request](http://www.goforward.com/privacy-request) (<http://www.goforward.com/privacy-request>)

Only you, or someone legally authorized to act on your behalf, may make a request to know, delete, or correct related to your personal information.

You may only submit a request to know twice within a 12-month period.

Your request to know, delete, or correct must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include:
  - Providing the address of your California residence, which matches the information we have on file.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

You do not need to create an account with us to submit a request to know, delete, or correct.

We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

For instructions on exercising your sale or sharing opt-out rights, see Personal Information Sales and Sharing Opt-Out Rights.

### ***Response Timing and Format***

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact [info@goforward.com](mailto:info@goforward.com) (mailto:info@goforward.com).

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we may deliver our written response to that account. If you do not have an account with us, we may deliver our written response electronically via email.

Any disclosures we provide will cover at least the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### ***Personal Information Sales and Sharing Opt-Out Rights***

You have the right to direct us to not “sell” or “share” your personal information at any time (the “right to opt-out”). As mentioned above, GoForward does not sell your personal information. To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by visiting the following Internet Web page link: [www.goforward.com/privacy-request](http://www.goforward.com/privacy-request) (<http://www.goforward.com/privacy-request>).

Additionally, we use technology that recognizes a “global privacy control” opt-out signal from your web browser. Any opt-out preferences you have exercised through these methods will only apply to the specific device/browser on which you made them. For more information on how to use the Global Privacy Control, see <https://globalprivacycontrol.org> (<https://globalprivacycontrol.org>).

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request. GoForward does not offer or provide services to minors, and does not knowingly collect, sell, or share the information of individuals under the age of 18.

## **Non-Discrimination**

You have the right to not be discriminated against (as provided for in applicable California law) for exercising certain of your rights referenced herein. You may have the right to receive information about the financial incentives that we offer to you.

GoForward does not currently offer financial incentives to you for your personal information. In the case that GoForward does offer financial incentives to you for your personal information, you may have the right to receive information about the financial incentives that we offer you.

## **Other California Privacy Rights**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. Please note that GoForward does not disclose personal information to third parties for their direct marketing purposes.

## **Privacy Statement Supplement for Colorado Residents**

Residents of Colorado may have certain rights regarding the personal data, as defined in the Colorado Privacy Act, that we process about you.

Residents of Colorado may click [here](#) to view more information regarding each category of personal data we process, the purposes for which we process each category and the categories of entities to whom the data is disclosed. Residents of Colorado may click [here](#) to view more information about the categories of personal data that are used for "targeted advertising" (as defined in Colorado law). Please note that we do not engage in profiling that produces legal or similarly significant effects.

Colorado law may permit you to request that we:

- Confirm whether or not we are processing your personal data and provide you with access to such personal data;



- Correct inaccuracies in your personal data, taking into account the nature of the personal data and the purposes of the processing of the personal data;
- Delete your personal data;
- Provide you a copy of personal data that you previously provided to us in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another business, where our processing is carried out by automated means; and
- Opt you out of the processing of the personal data for purposes of profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

Certain information may be exempt from such requests under applicable law.

To exercise any of these rights, please follow the instructions above.

You also have the right to opt out of the processing of your personal data for purposes of “targeted advertising,” as defined in Colorado law. [Click here](#) for more information about how you may exercise your right to opt-out of the processing of your personal data for purposes of “targeted advertising.”

Colorado law may also permit you to appeal any denials of your rights requests; to do so, contact us at [info@goforward.com](mailto:info@goforward.com) (<mailto:info@goforward.com>) and describe in detail why you believe the denial was in error. Your description must include your full name and the email address used for your account with us, along with a copy of the denial notice you received from us.

## **General Information**

We reserve the right to amend this Privacy Statement Supplement at our discretion and at any time. When we make changes to this Privacy Statement Supplement, we will post the updated notice on the Website and update the notice's effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

If you have any questions or comments about this notice, the ways in which GoForward collects and uses your information described here, your choices and rights regarding such use, or wish to exercise your rights under California or Colorado law, please do not hesitate to contact us at:

(Toll-Free) Phone: 1-833-334-6393

Email: [info@goforward.com](mailto:info@goforward.com) (mailto:info@goforward.com)

If you need to access this Policy in an alternative format due to having a disability, please contact the phone number or email listed above.