

VRmagic Privacy Policy (version 1.3)

Effective Date: December, 2017

The purpose of this Privacy Policy is to describe how VRmagic Inc. and VRmagic GmbH (“VRmagic”) collect, use and share information about you through our Simulators and VRmNet (collectively referred to herein as “VRmagic Simulators”). Please read this notice carefully to understand what we do. If you do not understand any aspects of our Privacy Policy, please feel free to [Contact Us at: http://www.vrmagic.com/simulators/contact/](http://www.vrmagic.com/simulators/contact/) or as described at the end of this Policy. This Privacy Policy supersedes all previous agreements with respect to the subject matter hereof.

1. Information that we collect

We collect information you provide to us, for example when a user account is created to use VRmagic Simulators. This information includes your name and may optionally include information such as whether you are right or left handed, or unique identifiers like membership identification numbers for professional societies or institutions. You can also provide your email address on a voluntary basis in order to receive email notifications from us. We also collect and store the results of your use of VRmagic Simulators, such as the results of your simulated procedures and scoring results.

2. How we use and share your information

To Provide Products, Services, and Information. We collect information from you so that we can provide you with access to the information and services available using VRmagic Simulators.

Sharing with Third Parties. We share your personal information and results with you, your teacher, institution, facility, employer or other organization for whom you train, work or otherwise provide services. We may provide information to third party service providers that help us operate and manage VRmagic Simulators. These service providers will have access to your personal information in order to provide these services, but when this occurs we implement reasonable contractual and technical protections to limit their use of that information to helping us provide the service.

Aggregated and De-Identified Information. We may use and share aggregated and de-identified information relating to you and our other users. Your information may be combined with information of other users and provided to our customers and business partners to show aggregated results, scores and comparisons from use of VRmagic Simulators. This information will be de-identified and will not include your name or other personal information from which third parties can determine your name or identity.

Legal Proceedings. We will share personal information with third party companies, organizations or individuals outside of VRmagic if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- Meet any applicable law, regulation, subpoena, legal process or enforceable governmental request.
- Enforce applicable Terms of Use, including investigation of potential violations.
- Detect, prevent, or otherwise address fraud, security or technical issues.
- Protect against harm to the rights, property or safety of VRmagic, our users, customers or the public as required or permitted by law.

Transfer in the Event of Sale or Change of Control. If the ownership of all or substantially all of our business changes or we otherwise transfer assets relating to our business to a third party, such as by merger, acquisition, bankruptcy proceeding or otherwise, we may transfer or sell your personal information to the new owner. In such a

case, unless permitted otherwise by applicable law, your information would remain subject to the promises made in the applicable privacy policy unless you agree differently.

3. Access to your information and choices

You can access and update certain information we have relating to your account by signing into your account or contacting us at service@vrmagic.com.

4. Security of your information

We use industry standard physical, technical and administrative security measures and safeguards to protect the confidentiality and security of your personal information. However, since the Internet is not a 100% secure environment, we cannot guarantee, ensure, or warrant the security of any information you transmit to us. There is no guarantee that information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. It is your responsibility to protect the security of your login information. Please note that e-mails and other communications you send to us are not encrypted, and we strongly advise you not to communicate any confidential information through these means.

5. Consent to data processing in USA and Europe

VRmNet is operated and managed on servers located and operated in USA and Europe. By using and accessing VRmagic Simulators, you agree and consent to the transfer to and processing of personal information on servers located in USA and Europe, and that the protection of such information may be different than required under the laws of your residence or location.

6. Changes to our Privacy Policy

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your consent in accordance with applicable law. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

7. Questions and how to contact us

If you have any questions, concerns, complaints or suggestions regarding our Privacy Policy or otherwise need to contact us, please **Contact Us:** <http://www.vrmagic.com/simulators/contact/>, email us at service@vrmagic.com, call us at (617) 444-8761, or contact us by US postal mail at the following address: VRmagic Inc. 245 First Street, 18th floor, Cambridge, MA 02142, USA