

WEB PRIVACY POLICY

This privacy policy (“Privacy Policy”) for Notal Vision™, Inc. (“Notal”) governs how Notal treats personal, medical and financial information that we collect and receive about you in connection with your use of www.notalvision.com, including all of the content therein and other websites operated by Notal (the “Site”). Please be aware that other Notal privacy practices and policies may apply to personal information collected and used in venues outside of the Site.

Introduction

We are committed to respecting your privacy and recognize your need for appropriate protection and management of any personally identifiable information (“Personal Information”) you or your eye care professional shares with us. “Personal Information” means any information about or that may be used to identify you as an individual, including, but not limited to, your name, date of birth, personal profile, home or other physical address, email address or other contact information, credit card information, and medical and health-related information.

HIPAA and HITECH Act

Our privacy practices are intended to comply with the Health Insurance Portability and Accountability Act (“HIPAA”) and the Health Information Technology for Economic and Clinical Health Act (“HITECH Act”). We will maintain the privacy of any Personal Information as required by HIPAA or the HITECH Act. Furthermore, we will seek to hold any third party receiving any of your Personal Information to the same privacy practices as Notal. We encourage you to review our Notice of Privacy Practices, which describes how we may use and disclose health information that you provide to us.

Collection of Information

Currently, we do not require you to provide Personal Information in order to have access to information available on our Site.

However, we may collect Personal Information from you when you register on the Site.

In addition, we may collect Personal Information as a result of your use of the Site, such as an activity log unique to you that collects certain administrative and traffic information including without limitation source IP address (and other identifying information about the computer or device you use to complete a transaction), time of access, and date of access.

The Way We Use Personal Information

Subject to the restrictions on the use and disclosure of your health information described in our notice of privacy practices and provided under HIPAA or other applicable law, we may use Personal Information for the following purposes: (i) to improve the Site, (ii) to contact you, (iii) to provide customer support, (iv) to identify and authenticate your access, as necessary, to certain areas of the Site and our products and services, including security and identity verification checks, (v) to process any of your transactions (whether online or by telephone, fax, or regular post), (vi) to meet certain business requirements, (vii) to provide you with information related to your specific treatment regarding our products and services, and (viii) to track your use of our Site and for other internal purposes, such as evaluating, providing, and improving our services and our Site.

Subject to the restrictions on the use and disclosure of your health information described in our notice of privacy practices or provided under HIPAA or other applicable law, we may also share, transfer or disclose your Personal Information: (i) to a Notal third party service provider, bank, or credit card company, solely for the purpose of executing a transaction; (ii) to our subsidiaries, affiliated companies, or other businesses or persons for the purpose of processing Personal Information on our behalf. We require that these parties agree to process such information in compliance with our privacy policies, and we use reasonable efforts to limit their use of such information and to use other appropriate confidentiality and security measures; (iii) to your personal representative or a family member, subject to your express authorization and applicable legal requirements; and/or (iv) if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to (a) comply with any applicable law, regulation, legal process or governmental request, (b) detect, prevent, or otherwise address fraud, security or technical issues, or (c) protect against harm to the rights, property or safety of Notal, its users, yourself or the public.

Credit card numbers will be used only for payment processing and are not retained for marketing purposes.

Cookies and Other Tracking Technologies

Some of our Site pages utilize “cookies” and other tracking technologies. A “cookie” is a small text file that may be used, for example, to collect information about Site activity. Some cookies and other technologies may serve to recall Personal Information previously indicated by a Site user. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them.

You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser, but please note that if you choose to erase or block your cookies, you will need to re-enter certain identifying information, should we in the future require such information, to gain access to certain parts of the Site.

Tracking technologies may record information such as Internet domain and host names; Internet protocol (IP) addresses; browser software and operating system types; clickstream patterns; and dates and times that our Site is accessed. Our use of cookies and other tracking technologies allows us to improve our Site and your web experience.

Notice

Except as set forth in this Privacy Policy and Notal’s Notice of Privacy Practices with respect to health information, we do not currently provide your Personal Information to third parties, except for third parties who may perform services on the Site or for you. Nevertheless, we may at a later time choose to make certain offers or services available to our users from third parties. If we do, during the registration process and at certain points thereafter in connection with specific offers, we may ask you whether specific aspects of your Personal Information (not including credit card, medical or health-related information) may be sent to third parties who have products, services and opportunities which may be useful to you. If you give your permission to allow third parties to contact you, your Personal Information (such as your contact information and other information collected during your visit to our Site) may be shared with data aggregators, marketers (possibly in the form of list rental), and other organizations. Notal does not intend to transfer Personal Information without your consent to third parties who are not bound to act on Notal’s behalf unless such transfer is legally required. Regardless of your decision regarding the sharing of your Personal Information, we may share broad aggregate demographic data and related usage information that is not attributed to you

personally with our business partners. This aggregate information does not contain any Personal Information that can identify an individual user.

Choice

You may choose whether or not to provide Personal Information to Notal. If you choose not to provide the Personal Information (i) you can still visit most of the Site, but you may be unable to access or use certain options, offers, and services; and/or (ii) you may not be able to use our Products and Services that require the provision of Personal Information.

In addition, you have the option to choose to receive occasional email updates, including marketing materials, from Notal. We provide you with the opportunity to 'opt-out' of having your Personal Information used for such purposes when we ask for this information and thereafter at any time by contacting us.

Access/Accuracy

You are responsible for ensuring the accuracy of your Personal Information and all other information you submit to us. Inaccurate information will affect the information you receive when using the Site, Products and Services, as well as our ability to contact you as contemplated in this Privacy Policy.

Links to Other Sites

The Site may contain links to other sites. Other sites may also reference or link to our Site. We are not responsible for the privacy practices or the content of such other sites.

Children's Privacy

Except with respect to our Products and Services, we do not knowingly collect information from children under the age of 18.

In the Event of Merger, Sale, or Bankruptcy

In the event that Notal is acquired by or merged with a third party entity, we reserve the right, in any of these circumstances, to transfer or assign Personal Information as part of such merger, acquisition, sale, or other change of control. In the unlikely event of our bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how your Personal Information is treated, transferred, or used.

Security

The security of your Personal Information is important to us. We follow generally accepted industry standards to protect the Personal Information submitted to us, both during transmission and once received. If you provide sensitive or confidential information to Notal (such as credit card, medical, or health related information), Notal will take commercially reasonable steps to protect such information (for example, by establishing a secure connection with your web browser). However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, although we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. In the unlikely event of a breach, we will promptly take appropriate remedial steps and, if required, carry out any notification requirements in accordance with HIPAA.

We will use reasonable measures to limit access and distribution of Personal Information to the minimum extent necessary. In addition, you have the following rights with respect to your Personal Information that we store: You have a general right to inspect and copy Personal Information related to your care, such as medical and billing records. This right is subject to certain specific exceptions, and you may be charged a reasonable fee for any copies that you request.

1. If you feel that Personal Information we are holding is incorrect or incomplete, you may ask us to amend the information. We may deny your request for certain specific reasons, in which case we will provide you with a written explanation for the denial and information regarding further rights you may have at that point.
2. You have the right to request an accounting of disclosures subject to the limitation period imposed by statute.
3. You may ask us to restrict certain uses and disclosures of your medical information, although we may not be required to agree to your request.
4. You have the right to receive communications from us in a confidential manner.
5. To have the right to request a paper copy of the privacy notice contained in this Privacy Policy.
6. You have the right to complain to us and/or to the U.S. Department of Health and Human Services if you believe that we have violated your privacy rights. If you choose to file a complaint, you will not be retaliated against in any way.

If you would like additional information, or otherwise have comments regarding this privacy policy or its implementation, please contact:

Osnat Ehrman
Privacy Officer
10440 Balls Ford Road
Suite 180
Manassas, VA 20109
Tel: 1-877-322-2207
osnat@notalvision.com

Your Consent

By using the Products and Services or the Site, you consent to the terms of this Privacy Policy and to our collection and processing of Personal Information for the purposes given above. If you do not agree to this Privacy Policy, please do not use the Products and Services or the Site. We reserve the right, at our discretion, to change, modify, add, or remove portions from this Privacy Policy at any time. Any such changes will be posted on the Site. Your continued use of our Site and/or Products and Services following the posting of changes to these terms means you accept these changes.

Last modified: September 2013