

# NODAL HEALTH, INC.

## PRIVACY POLICY

*Last Revised: April 16, 2026*

Nodal Health, Inc. (“Company” or “We”) respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the website <https://www.nodal.com> (our “Website”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- On this Website.
- In email, text, and other electronic messages between you and this Website.
- Through mobile and desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and this Website.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Company or any third party; or
- Any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time (see “Changes to Our Privacy Policy”). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

A pdf version of this Privacy Policy is available [here](#).

### Children Under the Age of 18

Our Website is not intended for children under 18 years of age. No one under age 18 may provide any information to or on the Website. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on this Website or through any of its features, register on the Website, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at [hello@nodal.com](mailto:hello@nodal.com)

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see “Your California Privacy Rights” for more information.

### Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, date of birth, postal address, e-mail address, telephone number, social security number, driver’s license number, medical records, financial records, education credentials, background data, protected health information, and photographic images (“personal information”);
- That is about you but individually does not identify you; and/or
- About your internet connection, the equipment you use to access our Website, and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- From third parties, for example, our business partners, vendors, and service providers.

### **Information You Provide to Us**

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to our service, posting material, or requesting further services. We may also ask you for information when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to questionnaires that we might ask you to complete for determining your eligibility to use our services.
- Your search queries on the Website.

You also may provide information to be published or displayed (hereinafter, "posted") on public areas of the Website, or transmitted to other users of the Website or third parties (collectively, "User Contributions"). Your User Contributions are posted on and transmitted to others at your own risk. Although we limit access to certain pages, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

### **Information We Collect Through Automatic Data Collection Technologies**

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). We do not respond to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking.

The information we collect automatically may include personal information, or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

- **Web Beacons.** Pages of the Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

### **Third-Party Use of Cookies and Other Tracking Technologies**

Some content or applications, including advertisements, on the Website may be served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see "Choices About How We Use and Disclose Your Information".

### **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you. For more information, see "Choices About How We Use and Disclose Your Information".

### **Disclosure of Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Nodal Health, Inc.'s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Nodal Health, Inc. about our Website users is among the assets transferred.
- To third parties to market their products or services to you if you have not opted out of these disclosures. For more information, see "Choices About How We Use and Disclose Your Information".
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms of use <https://nodal.com/terms/> and other agreements.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Nodal Health, Inc., our customers, or others.

## **AI-Powered Chatbot**

### **Overview and Purpose**

Nodal offers an AI-powered chatbot (the “Chatbot”) to provide general informational support and assist users in navigating our services. The Chatbot generates automated responses based on user inputs and available content.

### **Information Submitted Through the Chatbot**

The Chatbot may request limited basic health information necessary to facilitate eligibility, screening, or matching for gestational carrier services. Users must not submit the following categories of highly sensitive data through the Chatbot:

- Detailed medical records or diagnostic reports
- Insurance information
- Social Security numbers
- Financial account information
- Other highly sensitive personal or financial data

Any formal medical, psychological, legal, financial documentation, or other highly sensitive data must be transmitted only through designated secure channels provided by Nodal Health, Inc.

### **No Professional Advice; Limitation of Reliance**

The Chatbot does not provide medical, legal, psychological, tax, or insurance advice. Use of the Chatbot does not establish a physician–patient, attorney–client, fiduciary, or other professional relationship. Users should not rely on Chatbot responses as a substitute for consultation with qualified licensed professionals. Responses may be incomplete, inaccurate, outdated, or not tailored to your individual circumstances. You assume full responsibility for any decisions made based on automated outputs, and Nodal Health, Inc. disclaims liability for actions taken in reliance on Chatbot responses.

### **Retention and Deletion of Chatbot Data**

We retain chatbot conversation data in our systems. If you wish to request deletion of your chatbot conversation data, you may submit a written request to [privacy@nodal.com](mailto:privacy@nodal.com). We will process and complete your deletion request within 30 days of receipt.

### **Third-Party Service Providers**

The Chatbot relies on third-party service providers, including but not limited to Anthropic and Amazon Web Services (AWS), to process user inputs and provide AI and cloud infrastructure functionality. By voluntarily submitting information through the Chatbot, you expressly acknowledge and consent to such third-party processing.

While these providers represent that they do not retain prompts or responses after processing, Nodal Health, Inc. does not own, operate, or control the systems of such third parties and makes no representations or warranties regarding their data handling practices, security measures, or operational reliability.

### **Disclaimer of Liability for Third-Party Processing**

Nodal Health, Inc. disclaims any and all liability arising from or related to the acts, omissions, errors, security incidents, data breaches, system failures, or other conduct of third-party service providers. Under no circumstances shall Nodal Health, Inc. be liable for any indirect, incidental, consequential, special, exemplary, or punitive damages arising out of or related to third-party processing of voluntarily submitted information.

## **Choices About How We Use and Disclose Your Information**

We do not sell, rent, or share your telephone number or consent data (including records of your marketing preferences and opt-in/opt-out choices) with third parties for their own marketing or promotional purposes. Phone numbers collected through this Website are used solely to communicate with you directly in connection with our services and are not disclosed to unaffiliated third parties for marketing use.

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent.
- **Disclosure of Your Information for Third-Party Advertising.** If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by sending us an email with your request to [privacy@nodal.com](mailto:privacy@nodal.com).
- **Promotional Offers from the Company.** If you do not wish to have your contact information used by the Company to promote our own or third parties' products or services, you can opt-out by sending us an email stating your request to [privacy@nodal.com](mailto:privacy@nodal.com). If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt out does not apply to information provided to the Company as a result of your request for services or other transactions.

We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

California residents may have additional personal information rights and choices. Please see "Your California Privacy Rights" for more information.

## **Accessing and Correcting Your Information**

You can review and change your personal information by logging into the Website and visiting your account profile page.

You may also send us an email at [privacy@nodal.com](mailto:privacy@nodal.com) to request access to, correct or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Contributions from the Website, copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other Website users.

California residents may have additional personal information rights and choices. Please see "Your California Privacy Rights" for more information.

## **Your California Privacy Rights**

If you are a California resident, the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA), provides you with specific rights regarding the collection, use, and sharing of your personal information. This section describes those rights and explains how to exercise them.

### **Your Right to Delete**

You have the right to request that we delete personal information we have collected from you, subject to certain exceptions. Once your request is verified and we determine that deletion is required under the CCPA/CPRA, we will delete your personal information and direct our service providers to do the same. We may deny your deletion request if retaining the information is necessary for us to complete a transaction, fulfill a legal obligation, detect security incidents, or for other purposes permitted under applicable law. To submit a request, please contact us at [privacy@nodal.com](mailto:privacy@nodal.com).

### **Your Right to Correct**

You have the right to request that we correct inaccurate personal information we maintain about you, taking into account the nature of that information and the purposes for which it is processed. We will use commercially reasonable efforts to correct such inaccuracies upon verification of your identity and request. To submit a request, please contact us at [privacy@nodal.com](mailto:privacy@nodal.com).

## **Your Right to Limit Use of Sensitive Personal Information**

You have the right to request that we limit our use and disclosure of sensitive personal information (such as Social Security numbers, financial account information, health information, and similar categories) to only those uses necessary to provide the Services or as otherwise permitted under the CCPA/CPRA. To submit a request, please contact us at [privacy@nodal.com](mailto:privacy@nodal.com).

## **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA/CPRA rights. We will not deny you goods or services, charge you different prices, provide you a different level or quality of services, or suggest that you may receive a different price or quality of services as a result of exercising your privacy rights.

Additionally, California's "Shine the Light" law permits California residents to request a list of all third parties to which we have disclosed certain personal information during the preceding calendar year for those third parties' direct marketing purposes. To make such a request, please contact us at [privacy@nodal.com](mailto:privacy@nodal.com).

## **Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

## **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you by email or through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

## **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us at:  
[privacy@nodal.com](mailto:privacy@nodal.com)