



RJL Systems
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Privacy Policy

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Privacy is very important to RJL Systems, and we understand that privacy is very important to you as well. We believe that all information you give us should be considered private and confidential unless you provide us with permission to make it public.

This Privacy Policy tells you what information we collect and how we protect and use the information that we receive from or about you. Please be sure to read it in its entirety before using the RJL Systems website or its products.

This Privacy Policy may be updated at any time for any reason. However, details of these updates are made available on this webpage at the earliest opportunity, and a link to the updated Privacy policy will be sent to our announcement mailing list.

If you have any questions about this Privacy Policy document, please feel free to reach out to us using the following contact information:

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Necessary Disclosures

There are circumstances in which RJL Systems must provide some information to third parties in order to provide you with the products that you have purchased from us, or to meet legal or regulatory requirements imposed upon us as a medical device manufacturer. In all cases, we strive to only disclose the minimum amount of information that is necessary, and to ensure that policies and agreements are in place to ensure that it will be kept private.

Some examples of necessary disclosures may include:

- Payment information (eg: credit card details) and potentially your billing contact information must be provided to a payment processor when you make a purchase. If the purchase occurs via our website, a payment gateway service may be involved.
- We must provide your shipping address and contact information to a package carrier to send you any products that you order from us.
- Legal Proceedings
We will share personal information with third party companies, organizations or individuals outside of RJL Systems if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:
 - a) Meet any applicable law, regulation, subpoena, legal process or enforceable governmental requests.
 - b) Enforce applicable Terms of Use, including investigation of potential violations.
 - c) Detect, prevent, or otherwise address fraud, security or technical issues.
 - d) Protect against harm to the rights, property or safety of RJL Systems, our users, customers or the public as required or permitted by law.

Announcement E-Mail List

RJL Systems maintains an e-mail list for the purpose of alerting our customers to new or updated products, and to provide important information about our products, services, and policies. We take steps to ensure that only officially approved messages are sent to our list subscribers, and the list of subscribers will never be sold to another company or disclosed to anyone outside of RJL Systems, unless that disclosure is required by another section of these policies.

Order Information

When you place an order from RJL Systems, you provide us with contact, shipping, billing, and payment information. Some of this information is sent to a 3rd-party payment processor for the sole purpose of securing payment. Shipping information must be provided to a carrier in order for any physical products you order to be sent to you.

Contact, shipping, and billing information is entered into an internal database-driven system to facilitate fulfilling and shipping your order, and for historical tracking. RJL Systems **DOES NOT** store any payment details electronically.

Medical Records

RJL Systems makes devices and software that are used to estimate human body composition. A body composition assessment meets most definitions of a medical test, making a saved body composition test and a printed or PDF body composition report medical records.

Any medical records created by an RJL Systems analyzer or software product are stored either on the physical device itself, or in a database on the user's computer or local network. No test data is ever sent to RJL Systems or any other person, organization, or computer system without that transmission being explicitly initiated by the user.

Medical Records Received By RJL Systems While Providing Support

If you contact RJL Systems for assistance with one of our products, depending on the nature of the support request, we may ask that you send us a copy of a printed or PDF body composition report or a copy of a body composition database file. The database files and reports generally contain personally-identifiable information.

It is RJL Systems' policy that any personally identifiable medical information sent to us should generally be deleted or otherwise destroyed when our possession of it is determined to no longer be necessary.

Retention of Medical Data

We may, at our discretion, remove any personal identifiers from medical records that we receive and aggregate it with other anonymized records. This collected pool of data may be used for research, demonstration, training, product testing, development, or other purposes.

Website Usage

When you access one of RJL Systems' websites, certain data is automatically collected. This includes:

- **Access Log Data**
Like most websites, ours automatically records certain information when a page is accessed, your computer's Internet Protocol ("IP") address, browser version, the pages of our website that you visit, the time and date of your visit, the time spent on those pages, and other statistics.

This information does not identify you as a person and is generally used for establishing trends, testing the performance of the website, and detecting and analyzing possible problems with the website.

- Cookies

Cookies are files that store a small amount of text data that websites may send to your computer in order to save information between visits. Typically, they contain a seemingly-random block of data that is used to identify a specific web browser across multiple visits to a website.

RJL Systems may use cookies on our websites to help us establish usage patterns and to improve our web offerings. If you log into a service provided by one of our sites, a cookie may be used to allow you to stay logged-in across multiple visits. RJL Systems **DOES NOT** use cookies to track you on any website that is not owned and operated by us, nor do we share any cookie data with any third parties.

You have the option to either accept or refuse these cookies, and to know when a cookie is being sent to your computer. If you choose to refuse our cookies, your experience on our websites may be somewhat degraded.

Access logs and data collected through the use of cookies are not shared with any person or organization outside of RJL Systems unless such disclosure is required for legal or regulatory compliance.

BIA Practitioner Locator Service

(<https://www.rjlsystems.com/locate-a-practitioner/>)

RJL Systems maintains a service on our website that allows people to search for places they can go nearby to get their body composition estimated using RJL Systems' analyzers, at the above URL. RJL Systems **DOES NOT** automatically add customers' contact information to the locator service. Only those customers who submit their information for inclusion in the locator service will be listed.

Online Interactive BIA

(<https://www.rjlsystems.com/interactive-online-bia/>)

RJL Systems maintains a service on our website that can be used to calculate body composition estimates without installing body composition software on your computer, and it can be found at the above URL. The service does not allow personal identifiers to be entered and personal identifiers do not appear on the reports produced. Data entered into or produced by the Interactive BIA service may be retained and used as described in the section of this document titled *Retention of Anonymous Medical Data*.

Cross-Border Information Transfers

RJL Systems is based in the United States and our computer systems, including those involved in the operation of our websites are physically located in the United States, and we must comply with the laws of the United States. As a result, any information sent to us may be subject to access pursuant to the laws of the United States. The laws protecting privacy in the United States may be less stringent or less comprehensive than those in other countries.

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 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 this Privacy Policy unless you agree differently.