

TORIC LABS, INC.

PRIVACY POLICY

Introduction

This privacy policy ("Policy") describes how Toric Labs, Inc. ("TORIC LABS", "we" or "us") collects, uses and shares personal information of consumer users of the TORIC LABS websites (the "Sites") or any products or services available on or through the Sites. TORIC LABS is the sole owner of the information collected on the Sites or through your use of the products and services. We will not sell, share, or rent this information to others in ways different from what is disclosed in this Policy.

Further, TORIC LABS respects your privacy and is committed to protecting your personal data in line with the General Data Protection Regulation - Regulation (EU) 2016/679 (GDPR). This Policy will inform you as to how we will look after your personal data when you interact with us, including visiting our Sites. It also tells you about your rights in relation to your personal data.

What Is Personal Data And Who Is Responsible For Looking After My Personal Data?

Personal data is any information about an identifiable individual. TORIC LABS is responsible for personal data which we collect from you and, along with our distributors, resellers, dealers and other sales channels, we are also responsible for how we handle personal data which we collect from TORIC LABS's sales partners.

Data Collected and Its Use

TORIC LABS allows you to voluntarily provide us with contact information through our website and when you are purchasing or redeeming offers or registering products you purchased from other authorized retailers. The information we may collect from you includes your name, email address, phone number, and past purchases. We do not collect or store credit card information. In addition, if you contact us, we may keep a record of your communication to help solve any issues you might be facing. Finally, we may receive contact details or other information about you from publicly and commercially available sources, which we may combine with other information we receive from or about you. We will use the information we collect from third party sources in accordance with this Privacy Policy.

If you have requested information or if you have purchased products or services from us in the past, we may use this information to provide you with news, offers for upgrades, discounts and other marketing information. But we only want to stay in contact with people that are interested in what we're doing. If you do not wish to receive marketing communications from TORIC LABS, you can opt-out in the manner designated in the marketing communication or by contacting us at privacy@toric.com.

If you use a blog, bulletin board or similar means of communication on or through our Sites, you should be aware that any data you submit there can be read, collected, or used by other users of these forums. We use industry standard measures, including administrative, technical, and physical safeguards, to help protect personal data from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. However, no data transmission over the Internet can be guaranteed to be entirely secure. As a result, while we always use all reasonable efforts to protect your personal data, we cannot guarantee the security of your information and the submission of data is thus at your own risk.

Data Integrity and Security

TORIC LABS uses industry standard security measures to protect against the loss, misuse and/or alteration of data located on our systems. We implement appropriate measures and processes, such as using encryption when transmitting certain sensitive information, to help us to keep your information secure and to maintain its quality. We regularly review our security and related policies to adapt the

technology as new threats evolve, and monitor our systems to help ensure the highest level of availability. If you have any questions about the security at our Sites, you can reach out to us at privacy@toric.com.

Lawful Grounds For Using Your Personal Data

There are various lawful grounds on which we use your personal data including the following legitimate interests:

- (a) understanding how our customers use our products and services;
- (b) keeping our records up to date;
- (c) to develop our products and services and to grow our business;
- (d) to inform our marketing strategy including to define customers for our products and services.

Your Right To Make A Complaint And How To Contact Us

Your privacy is very important to us. You have the right to make a complaint at any time to the supervisory authority for data protection issues in your country. We would, however, appreciate the chance to deal with your concerns so if you have any questions or concerns regarding our privacy policies please contact us at privacy@toric.com.

Non-Personal Data

TORIC LABS collects non-personal identification information about you whenever you interact with our website. Non-personal identification information may include browser name, type of computer, and technical information about your means of connecting to our website, such as the operating system, the Internet service provider utilized, and other similar information. We use this information to optimize and improve our website.

Cookies and Web Beacons

TORIC LABS uses cookies on its website. These cookies are stored by your browser for record-keeping purposes. Also, through the use of cookie technology or otherwise, we may track and collect information about your computer and software when you visit the Sites or use our products or services. This information is automatically collected, and may include, but is not limited to: (i) your Internet Protocol ("IP") address; (ii) domain server; (iii) type of computer; (iv) your operating system; (v) type of web browser and browser language; (vi) access times; (vii) pages viewed and how long you spend on a page; (viii) referring websites addresses; and (ix) other information about your use of and actions on our Sites (collectively "Traffic Data"). Traffic Data is anonymous information that does not personally identify you. Traffic Data assists us to design and arrange our web pages in the most user-friendly manner and to continually improve our Sites to better meet the needs of users. TORIC LABS also analyzes the data through the use of Google Analytics and Google AdWords.

We may also use web beacons (small pieces of data that are embedded in images on the pages of websites) and auditing software to track page views and entry and exit points to and from our Sites. In addition, we may use web beacons, cookies, customized links and/or similar technologies to determine whether electronic newsletters sent by us to those who have requested them from us have been opened and which links are clicked. Any data collected will only be used in an aggregate form and will not contain any personal information, as that term is defined below.

You may choose to set your web browser to refuse cookies. You may also opt out of a third-party vendor's use of cookies by using the NIA opt-out site at <http://www.networkadvertising.org/choices/>, or for those in Europe, the EDAA opt out site at <http://www.youronlinechoices.com/>. A user who does not accept cookies from our Sites may not be able to access certain areas of the Sites.

Further, third-party vendors including AdRoll and Google may use the cookie information about your prior visits to the TORIC LABS website in order to place targeted TORIC LABS advertisements on other sites you visit.

Some TORIC LABS downloads or software may generate a computer ID value during installation. This ID does not contain any specific information about you or the data on your computer.

Surveys and Responsive Requests

If you have opted to participate, from time to time, we may request information from users via surveys or similar responsive requests. Participation in these surveys or responsive requests is completely voluntary and the user therefore has a choice whether or not to disclose this information. Information requested may include contact information (such as name, email and shipping address), and demographic information (such as zip code, age level). If you give us personal information about somebody else, such as a spouse or work colleague, we will assume that you have their permission to do so. Survey information may be used to monitor or improve the use and satisfaction of the Sites or our products and services.

Information Sharing and Disclosure

TORIC LABS will not sell or rent any personal data, except to successors in interest, without your consent. TORIC LABS reserves the right to release account information when exchanging information with other companies and organizations for fraud protection and credit risk reduction.

TORIC LABS will share personal data when it is necessary to provide the product or service you have requested. TORIC LABS also shares personal data with service providers as needed for them to provide us with services that help us with our business activities and to provide our services (such as website analytics, email delivery, marketing/advertising and legal and other professional advice). We do not allow these third-party service providers to use your personal data for their own purposes and only permit them to access and process your personal data for specified purposes and in accordance with our instructions.

TORIC LABS will share personal data to respond to subpoenas, court orders or legal process or if TORIC LABS finds that your actions on our Web sites violate our usage guidelines. This policy does not protect information you post to any on-line bulletin board, chat room, newsgroup or other public forum from within our Web sites.

If we are involved in a merger, acquisition or asset sale, such information may be shared with the acquiring entity or successor-in-interest, but we will continue to ensure the confidentiality of any personal data pursuant to the terms of this Policy.

We may also share personal data in the event of an emergency, for the protection and safety of our employees and agents, our customers, or any other person, and we also may be required to disclose an individual's personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

International Transfers

TORIC LABS, Inc. is an entity which is based in the United States of America and many of our service providers are based outside of the European Economic Area (EEA). This means that your personal data will be transferred outside of the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us at privacy@toric.com if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Other Sites

Our website may contain links to other sites on the Web. TORIC LABS has no control over these external sites and is not responsible for the privacy practices or content of these sites. We advise you to read the privacy policies of those websites thoroughly so that you are aware of the manner in which those websites will use your personal data.

TORIC LABS reserves the right to remove content that does not comply with the conduct stated above or is otherwise deemed objectionable. TORIC LABS reserves the right, in its sole discretion, to terminate your access to any part or this entire site without notice.

How Long Will We Keep Your Personal Data For?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see the “Your rights” section below for further information.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. We have explained your rights below; if you wish to exercise any of your rights, please contact us at privacy@toric.com.

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you do not want to receive promotional or other e-mail from TORIC LABS, you can remove yourself from our mailing lists.

No Fee Usually Required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What We May Need From You

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Choice and Access; Time Limit To Respond

We will provide an individual opt-out or opt-in choice before we share their data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized.

To limit the use and disclosure of your personal information, please submit a written request to privacy@toric.com. TORIC LABS acknowledges that EU and Swiss individuals have the right to access the personal information that we maintain about them. An EU or Swiss individual who seeks access, or who seeks to correct, amend, or delete inaccurate data, should direct their query to privacy@toric.com. If requested to remove data, we will respond within a reasonable timeframe.

Acceptance of Privacy Policy

By using the Sites, you consent to the collection, use and storage of your information by us in the manner described in this Policy. We reserve the right to make changes to this Policy at any time. If we decide to change our Policy, we will post those changes on our Sites so our users are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

If you do not agree with this Policy, please do not use our Sites. Your continued use of our Sites following posting of changes to these terms will mean you accept those changes.

Children's Privacy

The Children's Online Privacy Protection Act restricts the collection and use of Personal Information pertaining to children under the age of 13. We do not allow such children to register as users and will not knowingly collect or solicit Personal Information from anyone under the age of 13. No one under the age of 13 should provide any Personal Information on or through this Site or otherwise. In the event we learn that we have collected Personal Information from a child under age 13, we will terminate the any account and communications, and delete such information. If you believe that we might have any information from or about a child under 13, please contact us at privacy@toric.com. Minors aged 13 and over should not use this site or post any information or other content without adult supervision.

California Notices

Users who reside in California and have provided personal data to us have the right to receive: (a) information identifying any third party to whom we may have disclosed, within the past year, personal data pertaining to you and your family for that party's direct marketing purposes; and (b) a description of the categories of personal data disclosed. To obtain such information, please email your request to privacy@toric.com. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted other than to the address specified in this paragraph.

Additional Important Information for California Residents

Scope. This section applies only to California residents. It describes how we collect, use and share Personal Information of California residents when we act as a “business” as defined under the California Consumer Privacy Act of 2018 (“**CCPA**”), and their rights with respect to their Personal Information. For purposes of this section, “**Personal Information**” has the meaning given in the CCPA but does not include information exempted from the scope of the CCPA or information we collect from you in the course of providing services to you or receiving services from you where you are an employee, controlling owner, director, officer or contractor of a company, partnership, sole proprietorship, non-profit or government agency. In some cases, we may provide a different privacy notice to certain categories of California residents, such as job applicants, in which case that notice will apply instead of this section.

Your California privacy rights. As a California resident, you have the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

- **Information.** You can request the following information about how we have collected and used your Personal Information during the past 12 months:
 - The categories of Personal Information that we have collected.
 - The categories of sources from which we collected Personal Information.
 - The business or commercial purpose for collecting and/or selling Personal Information.
 - The categories of third parties with whom we share Personal Information.
 - Whether we have disclosed your Personal Information for a business purpose, and if so, the categories of Personal Information disclosed to each category of third party recipient.
 - Whether we’ve sold your Personal Information, and if so, the categories of Personal Information received by each category of third party recipient.
- **Access.** You can request a copy of the Personal Information that we have collected about you during the past 12 months.
- **Deletion.** You can ask us to delete the Personal Information that we have collected from you.
- **Opt-out of sales.** If we sell your Personal Information, you can opt-out. In addition, if you direct us not to sell your Personal Information, we will consider it a request pursuant to California’s “Shine the Light” law to stop sharing your personal information covered by that law with third parties for their direct marketing purposes.
- **Opt-in.** If we know that you are younger than 16 years old, we will ask for your permission (or if you are younger than 13 years old, your parent’s or guardian’s permission) to sell your Personal Information before we do so.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination in the form of legally prohibited increases in the price or decreases in the quality of our Service.

How to exercise your rights

You may exercise your California privacy rights described above as follows:

- **Right to information, access and deletion.** You may exercise your right to information, access or deletion by contacting us at privacy@toric.com.

Right to opt-out of the “sale” of your Personal Information. Like many companies, we use services that help deliver interest-based ads to you. Our use of some of these services may be classified under California law as a “sale” of your Personal Information to the companies that provide the services because they collect information from our users (e.g., device data and online activity data) to help them serve ads more likely to interest you. You can request to opt-out of this “sale” of your personal information here: privacy@toric.com.

We reserve the right to confirm your California residency to process your requests and will need to confirm your identity to process your requests to exercise these rights. Government identification may be required. You may designate an authorized agent to make a request on your behalf. In order to designate an authorized agent to make a request on your behalf, you must provide a valid power of attorney, the requester's valid government-issued identification, and the authorized agent's valid government issued identification. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

Contact Information

We welcome your comments or questions about this Policy. You may contact us at privacy@toric.com.