Last Updated: July 27, 2026

Greenlight Guru, together with its parents, subsidiaries and affiliates (collectively, “Greenlight Guru,” “us,” “we,” or “our”) respects your privacy, and takes the responsibility of protecting the Personal Information (as defined herein) that you provide to us very seriously. This Privacy Policy describes how we collect, use, and disclose Personal Information we receive about individuals (collectively, “you” or “users”) using our products and/or services (our “Services”) and/or using our websites or online features (each a “Site” or collectively, our “Sites”). Please note that we maintain a separate Privacy Policy for the Greenlight Guru Clinical product, which may be access here: Greenlight Guru Clinical Privacy Policy

We have adopted this Privacy Policy to explain what Personal Information (also called ‘Personal Data’ in some jurisdictions) may be collected in connection with the use of our Sites and/or Services, the purposes for which we may use that Personal Information, and under what circumstances we may disclose Personal Information to third parties. For purposes of compliance with the EU General Data Protection Regulation (“GDPR”) and similar laws that distinguish Controllers and Processors, where applicable, we are the Controller of the Personal Information that we receive about you in connection with your use of our Sites and/or Services.

This Privacy Policy also describes your rights, where applicable, and how to exercise them. You may contact us at any time with questions related to our Privacy Policy and the processing of Personal Information and privacy at privacy@greenlight.guru.

This Privacy Policy applies regardless of whether you use our Sites and/or Services via a computer, mobile device, or any other platform or equipment (collectively, your “Equipment”).

OVERVIEW OF PERSONAL INFORMATION PROCESSING & NOTICE AT COLLECTION

CATEGORY OF PERSONAL INFORMATION	PURPOSE FOR COLLECTION AND PROCESSING	WHO MAY RECEIVE THE INFORMATION
Identifiers such as names, addresses, phone numbers, email address, and Staff ID	To operate our business and provide our Services To conduct marketing and personalization To communicate with you For business analysis and to improve our products and Services To fulfill legal obligations	Payment processors Vendors providing services to us
Commercial information, such as records of your transactions with us	To operate our business and provide our Services To conduct marketing and personalization To communicate with you For business analysis and to	Payment processors Vendors providing services to us

	improve our Services To fulfill legal obligations	
Sensitive Personal Information	We generally do not knowingly collect such information	N/A
General Geolocation	To operate our business and provide our Services To conduct marketing and personalization To communicate with you For business analysis and to improve our Services To fulfill legal obligations	Payment processors Vendors providing services to us
Internet or other electronic network activity and device information	To operate our business and provide our Services To conduct marketing and personalization To communicate with you For business analysis and to improve our Services To fulfill legal obligations	Payment processors Vendors providing services to us
Other Information you directly provide us when interacting with us	To operate our business and provide our Services To conduct marketing and personalization To communicate with you For business analysis and to improve our Services To fulfill legal obligations	Payment processors Vendors providing services to us

1. HOW WE COLLECT PERSONAL INFORMATION

We may collect personal information when you visit our website(s), contact us, or use our products and Services. We may collect the information directly from you, from third parties or publicly available data, or automatically through the use of technologies such as, but not limited to, electronic communication protocols, cookies, widget buttons, or tools. We may also use third-party web and mobile app analytics services, such as Google Analytics and Hubspot Analytics, to help us understand and analyze how visitors use our products and services or serve ads on our behalf across the Internet and in different channels. We or our third-party vendors may detect your location (including precise location) to provide us with aggregated information about how our advertising campaigns are performing in certain geographic areas. Please check your browser and device settings to control the location data you allow your browser and device to collect and share with third parties.

2. TYPES OF INFORMATION COLLECTED

We collect the following kinds of information about users:

2.1. **Personal Information:** For purposes of this Privacy Policy, Personal Information means any information relating to an identified or identifiable natural person. This includes *any information that may be used to directly identify or contact you,* such as your name, address, or phone number. Personal Information also includes *information that may be used to indirectly identify you* in combination with other readily available information, including by reference, for example, to an online identifier, location data, or an identification number. Certain information may not be Personal Information when standing alone (e.g., your age), but may become so when combined with other information (e.g., your age and address). Personal Information, as defined herein, is intended to cover all information subject to personal data processing and privacy laws applicable to our business.

Examples of Personal Information that we may collect from or about you include, among other things, your name, mailing address, phone number, email address, business contact information, staff ID payment information, username and password, demographic information, and any other information that meets the definition of Personal Information provided herein.

2.2. **Non-Personal Information:** For purposes of this Privacy Policy, Non-Personal Information is any information that does not identify an individual, and cannot be used in combination with other readily available information to identify an individual.

2.3. **Device Information**: For purposes of this Privacy Policy, Device Information refers to information that may be automatically collected from devices that you use when visiting or using our Sites or using our Services. Examples of Device Information that we may collect from or about you include, among other things, IP address, device identifier, cookies, log files, and any other information that may be collected from your devices. Under some circumstances, Device Information may constitute Personal Information (i.e., if it can be combined with other information to identify an individual). However, Device Information does not always constitute Personal Information, and whether it does will depend on the circumstances.

2.4. **Data Brokers**: For purposes of this Privacy Policy, a data broker is a company or individual that collects and sells personal information about people to other companies. Data brokers collect information from a variety of sources, including public records and private sources, to create a detailed profile of a person. They can then sell or license this information to third parties for a variety of uses, such as marketing. The typical Personal Information we collect and store from data brokers may include contact information like first and last names, email addresses, phone numbers, and job titles, professional details like company names, job functions or departments, work history, and LinkedIn profile URLs, and demographic information, including location (city, state, country) and industry.

3. HOW WE USE AND SHARE YOUR INFORMATION

3.1. **General Uses:** We may use the information we collect from you for the purposes described below. When necessary to comply with applicable law, we will obtain your consent before using your Personal Information for any of these purposes:

- *Provision of Services to Users of Our Sites.* If you use our Sites, we may use your information, including your Personal Information, to provide you with our Services, and to process and respond to your requests, comments, inquiries, and other forms you submit through our Sites.
- *Processing Online Purchases.* We may use your information, including your Personal Information, to process any purchases made on our Sites, including, when necessary, disclosure of your Personal Information to third-party payment processors.
- *Improving our Services.* We may use your information, including your Personal Information, to enhance our understanding of our users' preferences in order to improve the quality, performance, and delivery of our Sites and/or Services.
- *Disclosures to Service Providers*. We may share your information, including your Personal Information, with third-party service providers that assist us with hosting and maintaining the Sites, processing credit card information, analyzing online activity on the Sites, marketing our services, and managing our daily business operations and delivery of the Sites. We share only the minimum amount of Personal Information with these third-party service providers that they need to perform their tasks. We also enter into contracts with these third-party service providers that require them to protect Personal Information.
- *Compliance with Legal Obligations.* We will share your information, including your Personal Information with law enforcement, government officials, regulatory agencies, or other parties when we are required to do so by applicable law. We will also disclose your Personal Information to comply with a judicial proceeding, court order, subpoena, or legal process.
- *Protection of Individual's Vital Interests*. In emergency situations, we will use or share your Personal Information when doing so is necessary to protect an interest that is essential for an individual's life.
- *Other Legitimate Interests.* We may use and disclose your Personal Information when necessary for our legitimate interests, including our legitimate business interests, as long as our legitimate interests are not overridden by your interests, rights, and freedoms with respect to your Personal Information.
- *De-Identified Information.* We may also share and otherwise process aggregated or de-identified information that does not identify you individually, and such information may be shared with other parties. For example, from time to time, we may collect survey information from you on an aggregate and/or de-identified basis. We also de-identified information for various business purposes, including the creation, marketing, and sale of products and Services to our customers and prospective customers. Such information is not traceable to any particular individual and will not be used by a third party to contact you.

3.2. **Legal Bases for Processing for Data Subjects in the EEA, U.K., and Switzerland:** To the extent required by applicable law, the legal bases for processing your Personal Information for the purposes described above or elsewhere in this Privacy Policy include, without limitation, that (1) you have given consent to the processing of your Personal

Information for one or more specific purposes, (2) it is necessary to perform a contract with you (e.g., for the sale of goods or services) or in order to take steps at your request prior to entering into a contract; (3) it is necessary to comply with a legal obligation (such as notifying you of Privacy Policy changes); (4) it is necessary for the pursuit of our legitimate interests or those of a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of Personal Information; (5) it is necessary for your vital interests or those of another individual; and/or (6) it is necessary for the performance of a task carried out in the public interest.

The following is an overview of the purposes for which Greenlight Guru may process your Personal Information, and, where required by applicable law, the one or more legal bases that support such processing. (Here is a link to the Greenlight Guru approved sub-processors).

Purpose of Processing	Legal Bases for Processing
Provide you with Services and/or communicate with you (or your company/organization) about your accounts or your use of our Sites and/or Services.	• Perform or enter into a contract • Legitimate business interests • Comply with a legal obligation
Register or establish an account for you (or your company/organization) as a customer, and/or register you (or your company/organization) to receive information regarding our Sites and or/Services.	• Perform or enter into a contract • Legitimate business interests • Comply with a legal obligation • Consent
Process transactions that you initiate through one of our Sites and/or Services.	• Perform or enter into a contract • Legitimate business interests • Comply with a legal obligation
Manage our relationship with you (or your company/organization) as a customer or prospective customer.	• Perform or enter into a contract • Legitimate business interest
Identify you (or your company/organization) as a prospective or repeat customer and directly market our Sites and/or Services to you.	• Legitimate business interests • Consent
Using metadata (e.g., usage statistics, access activity, customer data storage profiles, etc.) for internal purposes such as marketing, research, pricing, and technical/product development.	• Perform or enter into a contract • Legitimate business interests

Using copies of any user-entered repository content for purposes of testing operations, scalability, and/or performance, or for other internal uses.	• Perform or enter into a contract • Legitimate business interests
Monitor for and prevent security threats and fraud involving the user of our Sites and/or Services.	• Legitimate business interests • Comply with a legal obligation
Communicate with you (and/or your company or organization) about your account or use of our Sites and/or Services.	• Legitimate business interests • Consent
To enforce our legal rights related to our Sites and/or Services and/or defend against claims made against us.	• Perform or enter into a contract • Legitimate business interests
Improve the quality of our Sites and/or Services.	• Legitimate business interests
Share information with third-party service providers who perform functions on our behalf (e.g., assisting us with hosting and maintaining the Sites, processing credit card information, analyzing online activity on the Sites, marketing our Services, and managing our daily business operations and delivery of the Sites and/or Services).	• Perform or enter into a contract • Legitimate business interests • Comply with a legal obligation • Consent

3.3. **Processing for Direct-Marketing Purposes:** For customers or users of our Sites and/or Services, we may use Personal Information gathered from your use of our Sites and/or Services for direct-marketing purposes.

To the extent required by applicable law, you have the right to object at any time to the processing of your Personal Information for direct-marketing purposes, and to opt-out from receiving such communications. If you no longer wish to receive electronic direct-marketing communications from Greenlight Guru, you may opt out of receiving such communications by using the unsubscribe method provided in our communications or by contacting us directly at privacy@greenlight.guru. You also have the right to object to our use of your Personal Information for direct-marketing purposes, where required by applicable law, by contacting us at privacy@greenlight.guru.

3.4. **Our use of Cookies:** Our Website may store or retrieve information on your browser, mostly in the form of cookies. A cookie is a small piece of data (text file) that a website – when visited by a user – places on the user's device to remember information about the user, such as the user's language preference or login information. This type of cookie is set by us and is referred to as "first-party cookies." We use first-party cookies primarily to make the Website work as you expect it to. For example, we use the information we collect through first-party cookies to allow you to navigate between pages efficiently, analyze how well our Website is performing, and understand the content that you spent

the most time reviewing. Analytics cookies allow us to count visits to our Website and understand traffic sources (the website you came from) so we can measure and improve the performance of our Website. They help us to know which pages are the most and least popular and see how visitors move around our Website. We may collect identifiers, such as a session ID that is automatically generated when a visitor lands on our Website, visitor's IP address, the device identifier of the device a visitor used to visit our Website, and activity on our Website associated with these identifiers, and similar information. Functional cookies enable our Website to provide enhanced functionality and personalization for site visitors and may help provide more specialized, but non-essential, services that a visitor requests and to collect and "remember" visitor choices and preferences (e.g. what language the visitor prefers, user name and password to allow automatic log in, what region a user is located in). Functional cookies may be set by us or by third party service providers whose services we have added to our Website. We will disclose this type of information to third party service providers to help us run these analytics. In some cases, we use first-party cookies to store information that we use for targeted advertising and sending communications to email addresses. Essential cookies are necessary for the Website to function properly and cannot be switched off in our systems. They are usually only set in response to a site visitor's request for services, such as a visitor setting their privacy preferences, logging in, or filling in forms. You can set your browser to block or alert you about these cookies, but blocking these cookies will prevent the Website from working correctly or might prevent the Website from working at all.

We may also incorporate cookies and similar technologies, such as pixels and tags, from outside Greenlight Guru's domain ("third-party cookies"). Third-party cookies gather information to enable our vendors to provide a range of services to us, including targeted advertising and measuring the success of our advertising campaigns.

At this time, we are not able to honor all do-not-track signals or global opt-out signals, however in certain instances we honor the Global Privacy Control supported by Take Control Of Your Privacy. To download and use a browser supporting the GPC browser signal, click here: https://globalprivacycontrol.org/orgs.

3.5. **Transfer of Assets:** As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or all (or substantially all) of our assets, the Personal Information and Non-Personal Information we have about you will be transferred to and used by this acquiring entity, though we will take reasonable steps to ensure that your preferences are followed. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

3.6. **Other:** Regardless of any other provision in this Privacy Policy, we reserve the right to disclose any Personal Information or Non-Personal Information about you if we are required to do so by law, with respect to copyright and other intellectual property infringement claims, or if we believe that such action is necessary to: (a) fulfill a government request; (b) conform with the requirements of the law or legal process; (c)

protect or defend our legal rights or property of our Services, or other users; or (d) in an emergency to protect the health and safety of our customers or the general public.

4. CHILDREN

The features, programs, promotions, and other aspects of our Services requiring the submission of Personal Information are not intended for children. We do not market and do not knowingly collect Personal Information from children under the age of 16. Certain benefits of our Services may be restricted to adults, age 18 or older. If you are a parent or guardian of a child under the age of 16 and believe he or she has disclosed Personal Information to us, please contact us as provided in Section 7 below. A parent or guardian of a child under the age of 13 may review and request deletion of such child's personally identifiable information as well as prohibit the use thereof. If we discover that we have inadvertently collected information from a child under 13 years of age, we will promptly take all reasonable measures to delete such information from our systems.

5. KEEPING YOUR INFORMATION SECURE

We have implemented security measures we consider reasonable and appropriate to protect against the loss, misuse, and alteration of the information under our control. Please be advised, however, that while we strive to protect your personal data and privacy, we cannot guarantee or warrant the security of any information you disclose or transmit to us online or through our Services, and are not responsible for the theft, destruction, or inadvertent disclosure of your Personal Information. In the unfortunate event that your Personal Information (as the term or similar terms are defined by any applicable law requiring notice upon a security breach) is compromised, we may notify you by email (at our sole and absolute discretion) to the last email address you have provided us in the most expedient time reasonable under the circumstances; provided, however, delays in notification may occur while we take necessary measures to determine the scope of the breach and restore reasonable integrity to the system as well as for the legitimate needs of law enforcement if notification would impede a criminal investigation. From time to time we evaluate new technology for protecting information, and when appropriate, we upgrade our information security systems.

6. OTHER SITES/THIRD-PARTY LINKS

Our Services may link to or contain links to third party websites that we do not control or maintain, such as in connection with purchasing products we may recommend or reference via our Services and/or advertisements you may see while using our Services. We are not responsible for the privacy practices employed by any third party website. We encourage you to note when you leave our Site and to read the privacy statements of all third party websites before submitting any Personal Information.

7. CONTACT & OPT-OUT INFORMATION

You may contact us as provided below if: (a) you have questions or comments about our Privacy Policy; (b) wish to make corrections to any Personal Information you have provided or ask us to delete certain Personal Information; (c) want to opt-out from receiving future commercial correspondence, including emails, from us or our affiliated companies; or (d) wish to withdraw your consent to sharing your Personal Information with others.

Email: privacy@greenlight.guru

Phone: 317-960-4220
Mail: 601 S. Meridian St., Ste 2H, Indianapolis, IN 46225

We will respond to your request and, if applicable and appropriate, make the requested change in our active databases as soon as reasonably practicable, to the extent required by applicable law. Please note that we may not be able to fulfill certain requests while allowing you access to certain benefits and features of our Services.

8. SOLE STATEMENT

This Privacy Policy as posted on this Site is the sole statement of our privacy policy with respect to our Services, and no summary, modification, restatement or other version thereof, or other privacy statement or policy, in any form, is valid unless we post a new or revised policy to the Site.

9. YOUR RIGHTS

Depending on your location, you may have certain privacy rights regarding your Personal Information. For example, certain consumers or users from the European Economic Area (the "EEA"), or in other jurisdictions as required by applicable law, may have the following rights:

- To access the Personal Information we maintain about you;
- To be provided with information about how we process your Personal Information;
- To correct your Personal Information;
- To have your Personal Information erased;
- To object to or restrict how we process your Personal Information; and
- To request your Personal Information to be transferred to a third party.

To exercise the above rights, please contact us at the information provided above in Section 7 labeled 'Contact'. We will consider and process your request within a reasonable period of time and as required by law. Please be aware that under certain circumstances, the GDPR or other applicable law may limit your exercise of these rights. If we reject or deny your request, we will, where required by law or otherwise at our option, explain why and offer you the opportunity to appeal by contacting us at the same address and will resolve your appeal within the time required by applicable law.

10. RETENTION OF PERSONAL DATA

For users from the EEA or as required by applicable law, we will retain your Personal Information only as long as necessary to process your request or other submission, fulfill the terms of our service contract with you, and comply with applicable law.

11. HOW TO WITHDRAW CONSENT

At any time, users from the EEA (or other users to the extent required by applicable law) may withdraw consent you have provided to us for using, disclosing, or otherwise processing your Personal Information. You may withdraw your consent by emailing us at (privacy@greenlight.guru) and following the instructions in our communication to you.

Please note that your withdrawal of consent to process certain Personal Information about you (1) may limit our ability to deliver Services to you and (2) does not affect the lawfulness of our processing activities based on your consent before its withdrawal.

12. HOW TO FILE A COMPLAINT

You may file a complaint regarding the Privacy Policy or our privacy practices by contacting us at the information we provide in Section 7. Additionally, users from the EEA may file a complaint with EU data protection authorities (DPAs). A list of DPAs from the European Commission may be found here:

http://ec.europa.eu/newsroom/article29/document.cfm?action=display&doc_id=50061.

You may also contact us using the contact information provided above in Section 7 to be directed to the appropriate DPA contact(s).

13. MODIFICATIONS TO THIS PRIVACY POLICY

We generally keep this Privacy Policy posted on our Site. You should review this Privacy Policy frequently, as it may change from time to time without notice. Any changes will be effective immediately upon the posting of the revised Privacy Policy. WHEN YOU USE OUR SERVICES, YOU AGREE TO THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, OR TO ANY CHANGES WE MAY SUBSEQUENTLY MAKE, IMMEDIATELY STOP USING OUR SERVICES. Please note, however, that if we decide to use your Personal Information in a manner materially different than what is provided in this Privacy Policy or what we advised at the time it was collected, we will notify you of this change by email to the last email address provided to us or through our Sites and/or Services. You will have a choice (by means of an “opt-out” opportunity) as to whether or not we use your information in this different manner. If you opt out, we will use your Personal Information in accordance with the terms in place when the information was collected.

Version 2 - October 08, 2024
Version 1 - August 29, 2018