

## **SIMPLELAB PRIVACY POLICY**

*Effective Date:* June 25, 2021

This Privacy Policy covers the practices of SimpleLab, Inc. and our affiliates (“SimpleLab,” “we,” “us,” or “our”) concerning personal information that we collect through gosimplelab.com, mytapscore.com and our APIs (collectively, the “Sites”), or that we otherwise collect through our “Testing Services,” which consist of water testing and a variety of other environmental testing and related data services.

In some cases, we sell our Testing Services directly to consumers. In others, we sell to a “Business Partner” (such as a water filtration supply company or a home inspector) or a “Test Sponsor” (such as a local government that wishes to subsidize testing for its citizens). In those cases, we usually share test results (and sometimes address or other contact information) with the Business Partner or Test Sponsor, but their handling of the information is subject to their own practices and policies, not this Privacy Policy.

This Privacy Policy contains the following sections:

- 1. Information We Collect**
- 2. Use of Information**
- 3. Protection of Information**
- 4. Your Rights and Choices**
- 5. Third Party Websites**
- 6. Children’s Privacy**
- 7. Updates and Changes to This Policy**
- 8. Contact Information**

### **1. Information We Collect**

- a. Information You Provide to Us:**

You may provide the following types of personal information to us:

- Contact information, such as name, email address, phone number, address, username, and password;
- Testing results;
- Job application information, such as education and career history; and
- Survey-related information, such as survey responses, product reviews, and other user-generated content;
- Payment data (though users often provide this directly to a payments company and not us); and
- Any other information that you provide us that can be used to identify you.

The payments companies that handle payment for us (e.g., Stripe) handle payment data pursuant to their own terms and privacy policies, not this one, regardless of whether you provide the data directly to them or we do.

b. Cookies and Other Information Collection Technology:

Through our Sites, we and third parties may collect information from your computer or other device by automated means such as cookies, web beacons, local storage, JavaScript, mobile-device functionality and other computer code. This information may include unique browser identifiers, IP address, browser and operating system information, device identifiers (such as advertising identifiers), other device information, Internet connection information, as well as details about your interactions with the relevant website, email or other online property (for example, the URL of the third-party website from which you came, the pages on our website that you visit, and the links you click on in a website). In some cases (such as cookies), the tools described here involve storing unique identifiers or other information on your device for later use.

c. Information From Third Parties

We may also receive personal information from third parties, including Business Partners, Test Sponsors, service providers, affiliates, and business information vendors, as well as from prior customers, third-party referrals, or publicly available sources such as social media platforms and other company websites.

We also may infer personal information about you based on your interactions with us and through the data described in this section.

## 2. Use of Information

We may use the information described above for the following purposes:

- Provide our Testing Services;
- Manage, protect, and improve our operations;
- Conduct business operations in support of our core activities, such as testing, research, development, and analytics;
- Contact you regarding SimpleLab products, services, and other subjects that we think may be of interest to you;
- Respond to your inquiries and comments related to the Sites or our products and services;
- Customize content, preferences, and advertising on the Sites, across the Internet and elsewhere;
- Process your job application and consider you for other positions;
- Create aggregated or de-identified information, which we may use and disclose without restriction;
- Comply with laws, regulations, and other legal process and procedures; and
- Establish, exercise, or defend our legal rights.

### **3. Sharing of Information**

We may share your information as follows:

- With Business Partners and Sponsors: We may share test results and contact information with Business Partners and Test Sponsors, including those who (1) retail or invest in our products and services, such as websites where you may purchase the SimpleLab products and services; (2) assist in providing SimpleLab products and services to you and your community such as local and state government entities; or (3) use our products or services when providing other services to you, such as home inspectors and other home contractors.
- With Providers of Services: We may share your information with companies that provide services to us, such as providers of data storage, marketing, web hosting, security, analytics, and logistics.
- With Affiliates: We may share information with other members of our corporate family for the purposes described in this Privacy Policy.
- Other Users: We may combine your testing data with other data about your area to provide users of our Sites with inferred information about water quality or other environmental conditions in your area. These users include but are not limited to Business Partners and Sponsors. To do this, SimpleLab combines your test result with other data such as other nearby test results, and the identity of relevant utilities and environmental conditions, to create the aggregated inferences. The data may reveal, for example, a calculation as to the estimated water quality in a particular area based on a variety of factors, but this feature does not disclose actual test results.
- Legal: We may share information when we believe disclosure is appropriate due to a subpoena or similar investigative demand, a court order, or other request from a law enforcement or government agency, or as otherwise required by law.
- Protection of SimpleLab and Others: We may share information when we believe disclosure is appropriate in connection with efforts to investigate, prevent, or take other action regarding illegal activity, suspected fraud, or other wrongdoing; to protect and defend the rights, property or safety of our company, our employees, our partners, or others; and to enforce our contracts.
- Corporate Transactions: We may disclose your information as part of, or to take steps in anticipation of, a sale of all or a portion of our business, a divestiture, merger, consolidation, asset sale, bankruptcy, or other significant corporate event.
- Other Lawful Disclosures: We may engage in other sharing of your information that is not legally prohibited including, without limitation, where we have your consent or you otherwise direct us to share your information.

### **4. Protection of Information**

Although we maintain certain security measures, we cannot assure you that your personal information will remain secure.

### **5. Your Rights and Choices**

### *Subscriptions and Marketing Emails*

You can unsubscribe from SimpleLab's marketing emails by clicking the unsubscribe link in a marketing email or contacting us as described below.

### *Cookies*

You may be able to set your browser to refuse certain types of cookies, or to alert you when certain types of cookies are being used. Some browsers offer similar settings for HTML5 local storage and other technologies. However, if you block or otherwise reject cookies, local storage, JavaScript or other technologies, our Sites may not function as expected.

To opt out of Google Analytics cookies on our websites, please visit them only with browsers on which you have installed the [Google Analytics Opt-out Browser Add-on](#).

If you replace, change, upgrade or reset your browser or device, or delete your cookies, you may need to use these opt-out tools again. We do not respond to browser-based do-not-track signals.

We do not honor Do Not Track (DNT) signals.

### *Deletion and Account Closure*

In limited cases, we have agreed with a Test Sponsor or Business Partner to facilitate account closures and deletion of information relating to the tests we perform for them. If we have received your personal information in the context of one of those agreements, you can request that we delete your personal information or close your account by contacting us as described at the end of this Privacy Policy. If you're unsure whether you qualify, please just submit the request, and we'll get back to you promptly. We reserve the right to take steps to verify your identity before addressing your request. Deletion or account closure will eliminate your ability to access your results online or to otherwise use our services. We may perform deletion by deleting either all of your personal information or just sufficient information to render the remaining data anonymous. We may deny or postpone compliance with your request if we are legally required to retain the information or if we have another compelling reason to retain it, such as to investigate fraud or resolve a payment dispute.

## **6. Third Party Websites**

The Sites may contain links to certain third-party websites not owned or operated by us, and our testing services are sold by third-party websites not owned or operated by us. When you click on a link to a third-party website, you leave our Sites and no longer will be subject to our Privacy Policy. SimpleLab does not control and is not responsible for the privacy policies or practices or the content of any third-party websites, and such links are not intended to be an endorsement. We encourage you to review the privacy policies of any third-party website prior to providing them with your personal information.

## **5. Children's Privacy**

Our Sites are not intended for or directed to children under 13, and we do not knowingly collect information directly from children. If we become aware that we have collected information from a child under 13, we will delete such information in accordance with law.

## **7. Updates and Changes to this Policy**

SimpleLab may update this Privacy Policy from time to time, such as to reflect changes in our practices or for legal reasons. We will post those changes here or on a similarly accessible page. Any amended Privacy Policy supersedes all previous versions.

## **8. Contact Information**

If you have any questions or comments regarding our privacy policy and practices, or to exercise any rights you may have with respect to your personal information, please email us at [privacy@gosimplelab.com](mailto:privacy@gosimplelab.com) or use the contact details below:

SimpleLab, Inc.  
450 Sutardja Dai Hall  
University of California  
Berkeley, CA 94720