

LEGATO AUDIO, INC.
GENERAL PRIVACY POLICY

Last Modified: February 22, 2026

Introduction

You are our customer and we highly value both you and your information. As such, we at Legato Audio, Inc. as well as our affiliates (collectively, “we”, “us”, or “our”) respect your privacy and are committed to protecting it through our compliance with this Legato Audio General Privacy Policy (this “Policy”). This Policy describes: (1) the types of information we may collect from you or that you may provide to us when you (i) use our primary public-facing website at <https://www.legatohearing.com>, as well as any successor or subdomains thereof and any other website where we post this Policy (collectively, our “Website”), (ii) use any mobile applications we offer for download and use on your mobile device (collectively, our “Application”), (iii) use Legato hearing screening test, a non-diagnostic screening test we provide on our Website for evaluating hearing health (the “Hearing Screener Test”), (iv) use any of our other sites, products, applications, or services that directly incorporate this Policy (collectively with the Website, Application, and Hearing Screener Tool, our “Properties”), or (v) interact with our customer experience team by email, telephone, text messaging, or other means; and (2) our practices for collecting, using, maintaining, protecting, and disclosing that information. This Policy does not apply to any other information we collect by other means, including information we collect on a strictly anonymized and deidentified basis through our hearing screening test and product demonstration tools we make available at eye care clinics and other partner retail locations.

Notwithstanding the foregoing, this Policy does not apply to our collection and processing of any data that is linked or reasonably linkable to a specific individual and that identifies that individual’s past, present, or future physical or mental health status (“Consumer Health Data”). For information regarding our practices for collecting and using Consumer Health Data, please refer to our Legato Audio Consumer Health Data Privacy Policy. Additionally, this Policy does not apply to our collection and processing of any information that meets the definition of protected health information for purposes of the U.S. Health Insurance Portability and Accountability Act of 1996 (“PHI”). To the extent we collect any PHI about you, we will use and disclose such information only in accordance with the terms of our business associate agreement with the covered entity on whose behalf we are processing such PHI.

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 such policies and practices, you can choose not to use our Properties or provide us with your information. By accessing or using our Properties, you agree to this Policy. This Policy may change from time to time. When we make changes to this Policy, we will post the updated Policy on our Properties and update the Policy’s “Last Modified” date. We will also provide notice of any material changes as explained in the Section below titled “Changes to Our Privacy Policy.” Your continued use of our Properties after we make changes is deemed to be acceptance of those changes.

Information We Collect About You and How We Collect It

Personal Information We Collect

We may collect several types of information from and about users of our Properties. This may include information by which users may be personally identified or information about a user that is maintained in

personally-identifiable form (collectively, “Personal Information”). Specifically, we (or our third-party service providers acting on our behalf) may collect the following:

- Personal identifiers and contact information, such as your full name, postal address, email address, telephone number, and the IP address or mobile device ID associated with your device.
- Payment information, such as your credit card or debit card information, security codes, zip codes (for verification purposes), and other financial information used to process payment transactions through our Properties.
- Information related to your use of our Properties and our products and services, including a history of your purchases and any information you provide in connection with registering for a user account on our Properties (such as a username or password).
- Photos, images, videos, or other information or user-generated content you choose to provide in connection with leaving a review of or otherwise providing feedback related to our products or services.
- Any information you provide in connection with submitting a job application to us (as described below in the Section titled “*Personal Information We Collect – Submitting Job Applications Through The Website*”).
- On an entirely voluntary, optional basis should you choose to provide it to us as part of a customer survey or similar customer outreach we conduct, demographic information or information regarding your membership in certain groups, such as your status as a member of the military, a military veteran, or a health care worker.
- The Technical Information described in the Section below titled “*Traffic, Usage, and Computer/Device Information; Cookie Policy.*”
- Information related to Internet or other similar network activity, including browsing history, search history, and information on your interaction with our Properties or on your interaction with advertisements on our Website or other websites (“Internet Activity”).
- Inferences drawn from the information described above that we use to create a profile about you reflecting your preferences, patterns, and behavior (“Inference Data”).
- Any other information (including Personal Information) you choose to provide in any forms or messages submitted by you to us while using our Properties or in the course of your interactions with our customer experience team by email, telephone, text messaging, or other means.

Personal Information We Collect – Submitting Job Applications Through the Website

If you submit a job application through our Website (or a third-party website we have partnered with for the purposes of collecting and reviewing job applications), we may also collect information related to your suitability for employment by us, including the following:

- Your employment and education background, history, and experience, including a copy of your resume and any other documents you choose to submit in connection with your application.
- Links to your personal social media URLs and any other website URL you choose to provide.
- Information about your interest in and qualifications for the job for which you are applying, and information about how you learned about the job.
- On an entirely voluntary, optional basis should you choose to provide it, demographic survey information such as your citizenship, gender, ethnicity, veteran status, and disability status.

How We Collect Information

Generally, we collect Personal Information directly from you when you provide it or submit it to us voluntarily, including in connection with:

- Registering for and maintaining your account on our Properties;
- Evaluating or making a purchase of our products or services;
- Signing up to obtain additional information from us (such as by signing up to receive our periodic emails, text messages, newsletters, or other marketing and promotional information about us, our affiliates, our partners, or other third parties' products and services);
- Leaving a review or testimonial documenting your experiences with our products or services on our Website (as further discussed in the Section below titled "*User Contributions*");
- Entering into a sweepstakes, contest, giveaway, or other promotion related to our products or services;
- Responding to a voluntary survey you have agreed to complete;
- Contacting us with product or service inquiries or to report a problem with our Properties;
- Submitting a job application through the Website;
- Interacting with our customer experience team by email, telephone, text messaging or other means; or
- Otherwise using our Properties or contacting us about our Properties, our products or services, or our business.

We (or our third-party service providers acting on our behalf) may also collect your Technical Information, Internet Activity, and Inference Data automatically as you navigate through or interact with our Properties (see Section below titled "*Traffic, Usage, and Computer/Device Information; Cookie Policy*").

In addition, we may also receive Personal Information from third-party data brokers, resellers, advertising networks, data analytics providers, or similar service providers from whom we license data used to assist us in our business operations, including for customer analytics, customer outreach, and similar customer relationship management and promotional efforts.

Traffic, Usage, and Computer/Device Information; Cookie Policy

Additionally, as you navigate through and interact with our Properties or interact with the emails and other electronic messages we send to you, we or our third-party service providers may automatically collect Internet Activity, Inference Data, and certain related traffic data, usage information, and information about your computer equipment or mobile device, such as your browser and operating system, your wireless carrier, the geographic region from which you are accessing the Properties, time-stamped logs regarding access times and duration of visits, the pages of our Properties that you visit, whether you opened the email message we sent to you and whether you clicked on any links in the message, configuration data, clickstream analytics, and your actions and patterns when you use our Properties or interact with our electronic messages (collectively, "Technical Information"). The technologies we use for this automatic data collection may include cookies that are stored on the browser of your computer or mobile device, small embedded electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs), and other types of embedded code. We collect this information to facilitate our advertising and promotional activities as described in the Section below titled "*Use of Personal Information for Marketing Purposes*"; to manage our content and improve users' use of our Properties; to count and review the number of users of our Properties and their usage patterns; to track key performance indicators such as pages accessed, frequency of access, conversions (the number

of users who click on our advertisements and then go on to make a product purchase), and other statistical information related to our Properties and messaging (for example, recording the popularity of certain content and verifying system and server integrity); to identify the portion of users who access our Properties via different web browsers or mobile operating systems; to recognize if a user is a return user of our Properties; to store information about a user's visits; to remember a user's preferences; and for similar purposes in connection with monitoring, operating, maintaining, and improving our Properties. Third parties may also collect Technical Information, Internet Activity, Inference Data, and other information on our behalf as further described in the Sections below titled "*Use of Personal Information for Marketing Purposes*," and "*Use of Google Analytics*."

User Contributions

You may provide information to be posted, published, or displayed on public areas of our Properties, such as images, photos, and videos of yourself or others, written feedback related to our products and services, and other information you choose to submit in a publicly-viewable post or comment (collectively, "User Contributions"). Your User Contributions are posted on our Properties and transmitted to others at your own risk. We cannot control the actions of other users of our Properties who may have access to your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

How We Use Your Information

Generally

We may use the information we collect about you or that you provide to us, including Personal Information, to:

- Provide our Properties and their contents to you.
- Create and maintain an account for you on our Properties.
- Provide you with information, products, or services you request from us.
- Authenticate or otherwise verify your identity in connection with your requests and inquiries via the Properties or otherwise.
- Provide you with support and respond to your inquiries and support requests relating to our Properties and our products and services, including to investigate and address your concerns and to monitor and improve our responses.
- Update and maintain customer, email, text messaging, or mailing lists (such as our contact lists for informational and promotional emails and text messages, newsletters, or other alerts).
- Facilitate your participation in sweepstakes, contests, giveaways, or other promotions.
- Develop and administer voluntary user surveys.
- Process purchases you have made through our Properties, including by transmitting your payment information to the third-party providers we use for securely processing payment card purchases.
- Collect and process your application for employment with us and contact you in connection with such application.
- Carry out the advertising, promotional, and marketing purposes as described in the Section below titled "*Use of Personal Information for Marketing Purposes*."

- With respect to Technical Information, Internet Activity, and Inference Data, fulfill the purposes described in the Section above titled *“Traffic, Usage, and Computer/Device Information; Cookie Policy.”*
- With respect to aggregated and de-identified information, fulfill the purposes described in the Section below titled *“Use and Disclosure of Aggregated or De-Identified Data.”*
- Perform research and development activities, which may include, for example, conducting data analyses in order to develop new products and services or to improve existing products and services, and performing related quality control activities.
- Notify you about changes to our Properties, our products or services, or this Policy.
- Notify you about product recalls and share related consumer safety announcements and information.
- Help maintain the safety, security, and integrity of our Properties, databases, and other technology assets and our business.
- Respond to lawful requests for information through court orders, subpoenas, warrants, and other legal processes or obligations.
- Enforce any contracts between you and us, including for billing and collection, or for the establishment, exercise, or defense of legal claims.
- Evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which information (including Personal Information) held by us is among the assets transferred.
- Fulfill any other purpose for which you provide the information.
- Serve any other purpose that we describe when you provide the information and for any other purpose with your consent.

Use of Personal Information for Marketing Purposes

We (and certain third-party service providers acting on our behalf) may use your information (including Personal Information) for advertising, promotional, and other marketing purposes in various ways. This includes:

- Providing you with informational and promotional content and materials regarding the Properties and our own products and services, such as advertising and promotional information about our products and services or information about special offers or promotions related to our products and services.
- Providing you with informational and promotional content and materials regarding the products and services of affiliates or third parties with whom we have partnered that we believe may be of interest to you.
- Personalizing your experience with our Properties and delivering content and promotional information related to your interests or your characteristics, including by delivering personalized email content to you or displaying targeted offers and ads to you on our Properties and third-party sites that you visit.
- Using third-party tools to advertise to third parties with similar interests, hobbies, or demographic information as you.

If you do not want us to use your information in this manner, see the Section below titled *“Your Rights and Choices”* for more information about how to opt out of such uses.

Use and Disclosure of Aggregated or De-Identified Data

We may convert or combine some Personal Information of users into de-identified or aggregated data that does not disclose any of the Personal Information of any individual user. We may use and disclose to third parties any such de-identified or aggregated data (including but not limited to traffic and usage data that does not identify you personally) for any lawful purpose.

Text Message Program

You may be given the option to register to receive SMS text messages from us in connection with your use of our Properties or your purchase of our products and services (the “Text Message Program”). We may provide the Text Message Program to send you informational and promotional communications related to our products and services, such as special offers for our products and services or updates related to the fulfillment and delivery of your orders. By subscribing to the Text Message Program, you voluntarily authorize and direct us to send such text messages using an automated system to the mobile telephone number you have provided. You are not required to use or subscribe to the Text Message Program as a condition of using the Properties or in order to benefit from other features of our products or services that are unrelated to the Text Message Program. Standard message and data rates may apply. Once enrolled in the Text Message Program, you may opt out of the Text Message Program (i.e., stop receiving text messages) at any time. With respect to any text message, you may reply STOP, at which time we will reply by text to give you the option to stop receiving informational communications through the Text Message Program. You may also opt out by contacting us at support@legatohearing.commailto:. If you contact us by email, please include “Text Message Opt Out” or similar language in the subject line of your email, to assist us in our efforts to ensure prompt and proper processing of your email request. Regardless of the method you use to opt out, please allow us up to 10 days to process your opt out request.

Tracking and “DO NOT TRACK”

Tracking involves the use of cookies, web beacons, or other embedded code or tracking technologies to collect, analyze, and store information on a user’s behavior over time on multiple sites, including information on the sites visited, products viewed, products purchased, and other online interactions. Tracking information can be used to enable companies to make interest-based (behavioral) advertising available to users on multiple sites that they visit.

We may (or our third-party service providers may on our behalf) collect Personal Information about your online activities over time and across third-party sites for tracking purposes when you use our Properties. However, we do not currently allow third parties to collect Personal Information through or using our Properties that could be used by them to analyze and store information about your online activities over time and across third-party sites for their own tracking purposes (separate and apart from any services they provide to us in support of our permitted uses of your Personal Information as described in this Policy).

Our Properties do not respond to any “do not track” signals sent by your computer, browser, or mobile device, and if your computer, browser, or mobile device sends a “do not track” signal to our Properties, our Properties will not treat you differently from users who do not send such signals. For more information on how to disable certain tracking technologies, please visit the Digital Advertising Alliance’s Consumer Assistance page at <https://youradchoices.com/>.

Use of Google Analytics

We use Google Analytics to track and analyze certain traffic and usage statistics regarding the use of our Properties, such as the number of visitors to our Properties, how visitors are navigating to our Properties, visitors' general geographic region information, how long individuals are visiting our Properties, and information about the equipment individuals are using to access our Properties (e.g., browser version and operating system). Google Analytics may use a Google Analytics cookie as part of this service, and we may share certain Personal Information with Google Analytics (such as an IP address) as part of this service. We use this traffic and usage information to make improvements to our Properties and our own marketing and promotional efforts.

For more information, please review the following:

- Information about Google's use of cookies:
<https://policies.google.com/technologies/cookies?hl=en-US>
- You can opt out of our use of certain Google Analytics features by updating the "Ads Settings" in your browser (www.adssettings.google.com/authenticated) or mobile device (www.support.google.com/ads/answer/1660762#mob), by enabling the Google Analytics Opt-out Browser Add-on in your browser (<https://tools.google.com/dlpage/gaoptout>), or by visiting the Digital Advertising Alliance's Consumer Assistance page at <https://youradchoices.com>. Because these opt-out and preference control pages are specific to the individual browsers used to visit them, and because those pages are not operated by us, we are unable to perform the opt-outs on your behalf.

Disclosure of Your Information

Generally

We may disclose your Personal Information to third parties in the following circumstances:

- We may disclose Personal Information to our affiliates or to any contractors and other service providers who need to know such information (or such contractors, service providers, or other third parties may collect Personal Information directly from you on our behalf while you use our Properties) to provide services to us that support our hosting, maintenance, operation, and promotion of our Properties and our permitted uses of Personal Information under this Policy. For example and without limitation, we may disclose information to certain third parties who perform the following services on our behalf:
 - Design, development, maintenance, and hosting of our Properties
 - Data analytics and insights
 - Digital marketing (including personalized and non-personalized advertising)
 - Customer engagement and relationship management
 - Customer email and text messaging
 - Payment card processing
 - Recruiting and job application management
 - Product demonstration, design, and customization

- Product research, development, and manufacturing
 - Product returns and repairs
 - Order shipment, logistics, and fulfillment
- We may disclose Personal Information to our affiliates or to a buyer or other successor to our business in the event of a sale of equity or assets, reorganization, merger, divestiture, or a similar corporate transaction, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, and any due diligence review with respect to any such proposed transaction.
 - We may disclose Personal Information to comply with any court order, law, or legal process, including to meet national security and law enforcement requirements or to respond to any government or regulatory request or audit.
 - We may disclose Personal Information to enforce or apply any legal agreements between us and you, or if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of our users or others.
 - We may also disclose your Personal Information for any purpose disclosed when the information is provided, and for any other purpose with your consent.

We may disclose all forms of Personal Information for each of the purposes described above, including but not limited to your Technical Information, Internet Activity, and Inference Data.

No Sales of Personal Information

We do not sell, and in the past 12 months we have not sold, any Personal Information to third parties.

Third-Party Sites and Services

Our Properties and electronic messages to you may include links to blogs, social media, and third-party websites. These third-party sites have their own privacy policies and terms of use and are not controlled by this Policy. You should carefully review any terms, conditions, and policies of such third-party sites before visiting them or supplying them with any Personal Information. If you follow a link from our Properties or electronic messages to any third-party site, any information you provide to that site will be governed by its own terms of use and privacy policy and not this Policy.

We are not responsible for the privacy or security of any information you provide to a third-party website or the information practices used by any third-party site, including those that are accessed via links from our Properties or electronic messages. We make no representations, express or implied, concerning the accuracy, privacy, safety, security, or the information practices of any third-party site. The inclusion of a link to a third-party site on our Properties or in our electronic messages does not constitute any type of endorsement of the linked site by us. We are not responsible for any loss or damage you may sustain resulting from your use of any third-party website or any information you share with a third-party website.

You may also be able to use certain widgets (embedded tools enabling you to access or share third-party content) in connection with our Properties. These widgets may collect your IP address, identify which page you are visiting on our Properties, and make the information you provide available to third parties.

The information collected by widgets is governed by the terms of use and privacy policies of the third-party operators of such widgets.

Your Rights and Choices

Generally

You have certain choices regarding the Personal Information you provide to us. You can set your browser to refuse all or some browser cookies and related tracking technologies, or you can reject certain types of cookies and related tracking technologies by exercising the options available in any cookie prompts, banners, or cookies management tools we present to you. If you choose not to accept cookies, you may be unable to access certain parts or pages of our Properties, or certain parts or features of our Properties may not function properly.

If you do not wish to have your Personal Information used by us to contact you with promotional or informational messages, you may send us an email stating your request to support@legatohearing.com. Alternatively, you can (1) opt out of receiving further promotional emails from us by clicking on the “Unsubscribe” or similar link in the most recent email you received from us and following the prompts that appear; and/or (2) opt out of receiving further promotional text messages from us by replying “STOP” to the most recent text message you received from us. These opt-outs do not apply to information provided as a result of a product purchase, customer service or support service inquiry, or other informational or transactional communication.

Accessing and Correcting Your Information: Generally

You can review, change, and request the deletion of certain portions of your Personal Information by sending us an e-mail at support@legatohearing.com to request access to any Personal Information that you have provided to us, or to request to correct or delete that Personal Information. The following will apply with respect to each such request:

- We will evaluate such requests on a case-by-case basis.
- In certain cases we cannot delete your Personal Information. For example, we cannot continue to maintain your account on our Properties without retaining certain portions of your Personal Information, so a request to delete certain forms of Personal Information may require the deletion of your account and the cessation of services to you.
- We also 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.

Notwithstanding the foregoing, if we determine that your request to review, change, or delete your Personal Information concerns any Consumer Health Data, your rights and our responsibilities with respect to such requests will be as set forth in the Section of the [Legato Audio Consumer Health Data Privacy Policy](#) titled “Your Privacy Rights.”

California “Shine The Light” Disclosure

The California Civil Code permits California residents with whom we have an established business relationship to request that we provide a list of certain categories of Personal Information that we have disclosed to third parties for their direct marketing purposes during the preceding calendar year. To make such a request, please send an email to support@legatohearing.com or otherwise contact us using the information set forth below. Please mention that you are making a “California Shine the Light” inquiry. Please note, however, that we do not (and will not without your separate authorization) disclose any Personal Information to third parties for their direct marketing purposes.

Nevada Residents: Sale Opt-Out Rights

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to this designated address: support@legatohearing.com. Please mention that you are making a “Nevada Sale Opt-Out Right” request. However, please know we do not currently sell data triggering that statute's opt-out requirements.

Users Outside of the United States

Our Properties are hosted in the United States and provided from the United States. It is possible that certain information will be stored on servers in multiple other countries on the “cloud” or other similar distributed hosting platforms. If you are accessing our Properties from Canada, the European Union, Asia, or any other jurisdiction with laws governing personal data collection, use, and disclosure that differ from United States laws, please note that by using our Properties and providing your Personal Information to us, you are expressly and knowingly consenting to the transfer of your Personal Information from your home country to the United States and other jurisdictions as indicated above (where laws may differ from the laws of your jurisdiction), and you are expressly and knowingly consenting to our use of such Personal Information in accordance with this Policy.

Children Under the Age of 18

Our Properties are not intended to be used by children under 18 years of age, and no one under age 18 may provide any information to us using our Properties or otherwise. We do not knowingly collect Personal Information from children under age 18. If you are under 18 years of age, do not use the Properties or provide any information about yourself to us, including your name, address, telephone number, email address, IP address or mobile device ID, or any screen name or username you may use. If we learn we have collected or received Personal Information from a child under 18 years of age without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under age 18, please contact us at support@legatohearing.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. When we have given you (or when you have chosen) a password for access to certain parts of our Properties, you are responsible for keeping that password confidential. We ask you not to share your password with anyone. Unfortunately, the transmission of information over the Internet is not completely secure. Although we have implemented security measures that we think are adequate, we cannot guarantee the security of your Personal Information transmitted to or using our Properties.

Any transmission of Personal Information is at your own risk. We are not responsible for the circumvention of any privacy settings or security measures contained on our Properties.

Changes to Our Privacy Policy

We post any changes we make to our Policy on this page. If we make material changes to how we collect and use Personal Information, we will notify you by email to the primary email address we have on file for you and through a notice on the Website home page. The date the 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 Policy to check for any changes.

Contact Information

We are Legato Audio, Inc., a Delaware corporation. To ask questions or to submit comments about this Policy or our privacy practices, you may contact us:

- **By Postal Mail:** Legato Audio, Inc., Attention: Consumer Data & Privacy Group, 14 Milliston Road #212, Millis, MA 02054
- **By Email:** support@legatohearing.com
- **By Telephone:** 1-866-4LEGATO (1-866-453-4286)