

# Little Medical School Privacy Policy

## OVERVIEW

Welcome. This Privacy Policy describes what personal information or personal data (“**Personal Information**”) Little Medical School, LLC and its subsidiaries (collectively “**Little Medical School**”, “**we**” or “**us**”) gather from you, how we use and disclose that information, and what we do to protect it.

This Privacy Policy is incorporated into and is subject to the Little Medical School Terms and Conditions (the “**Terms**”), and capitalized terms used but not defined in this Privacy Policy have the meanings given to them elsewhere in the Terms. The practices described in this Privacy Policy apply only to Little Medical School’ use of Personal Information through the Services. This policy does not apply to the practices of companies that Little Medical School does not own or control, or to people that Little Medical School does not employ or manage, such as third-party websites and services that are linked to, referenced, advertised, or otherwise made available to you through the Services. Before using such third-party services, you should familiarize yourself with the privacy policies provided by such third parties to understand their practices with respect to the collection, use, and disclosure of personal information.

“Personal Information” includes information that can identify an individual or information which relates to an identifiable individual (whether directly or indirectly identifiable). Personal Information may include information about an individual, opinions of that individual (whether true or not), and the preferences of that individual.

## INFORMATION LITTLE MEDICAL SCHOOL COLLECTS ABOUT YOU & SOURCES

- **User-Provided Personal Information:** When using the Services, such as when you register for or complete purchases or interact with customer service or participate in surveys or marketing promotions, you may provide to Little Medical School Personal Information including name, email

address, physical address, telephone number, financial information (including bank account numbers, credit card numbers, branch information, and financial circumstances if applying for a scholarship.).

- **“Cookies” Information:** When you use the Little Medical School Websites, we will send one or more cookies – small text files containing a string of alphanumeric characters – to your computer. Little Medical School may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to the Little Medical School Websites. Persistent cookies can be removed. Please review your web browser “Help” file to learn the proper way to modify your cookie settings. Please note that if you delete, or choose not to accept, cookies from the Little Medical School Websites, you may not be able to utilize the features of the Little Medical School Websites to their fullest potential.
- **Automatically Collected Information:** When you use the Services, the Little Medical School Websites or open one of our HTML emails, we may automatically record certain information from your web browser and/or email client by using different types of technology, including standard logging, “clear gifs,” or “web beacons.” This “automatically collected” information may include Internet Protocol address or other device address or ID, web browser and/or device type and operating system, the web pages or sites that referred you to the Little Medical School Websites, the pages you view on the Little Medical School Websites, and the dates and times that you visit, access, or use the Little Medical School Websites.
- **Information from Other Sources:** We may also obtain information, including Personal Information, from third parties and sources other than the Little Medical School Websites, such as your TV or internet service provider, mobile phone carriers, and financial institutions. If we combine or associate information from other sources with Personal Information that we collect through the Little Medical

School Websites, we will treat the combined information as Personal Information in accordance with this Privacy Policy, provided that if such third party contractually enforces additional requirements, we will be bound to adhere to such additional requirements.

#### **HOW LITTLE MEDICAL SCHOOL USES INFORMATION ABOUT YOU**

We will only process your Personal Information where we have a lawful basis for doing so. In respect of your Personal Information, these bases are: (i) where it is necessary to provide services to you under the performance of the contract we have with you; (ii) where we are required to do so in accordance with legal or regulatory obligations; (iii) where you have given your consent; and, (iv) where it is in our legitimate interests to process your Personal Information, provided that none of these prejudice your own rights, freedoms and interests.

The following are a list of the "Purposes" for which we (including any of our agents, group members, sub-contractors and/or employees) process your Personal Information, and the lawful basis on which we carry out such processing:

<b>Purpose</b>	<b>Lawful Basis</b>
To set-up, administer and manage your account and records	Necessary for the performance of a contract

To conduct sales via our Little Medical School Websites	Necessary for the performance of a contract
To deliver items purchased via our Little Medical School Websites	Necessary for the performance of a contract
To maintain, enhance and develop our Services	Necessary for the performance of a contact
To contact you to confirm a sale on our Little Medical School Websites	Necessary for the performance of a contract
To contact you with service messages regarding the availability of our Services and for administrative purposes, for customer service purposes, or regarding any of your submissions (such as your registration)	Necessary for the performance of a contract
To verify credit for purchases, including by contacting your financial institution and/or card issuer to verify account balances and available credit.	Necessary for the performance of a contract
To personalize your experience of the Little Medical School Websites. For example, if we provide an account log in, we would be able to welcome you back to the Little Medical School Websites by name, present you with a customized user interface, or recommend features or content on the Little Medical School Websites that we think may interest you.	In accordance with our legitimate interests to provide our customers with an enjoyable and personalized service.
To understand and analyze the usage trends, interests, and preferences of our users, to improve the way the Little Medical School Websites works and looks, and to create new features and functionality	In accordance with our legitimate interests to help us to understand trends and customer usage.
To contact you for market research purposes, including how users have found their experience of our Little Medical School Websites and Services.	In accordance with our legitimate interests so we can continue to develop our Little Medical School Websites and Services. You can opt-out of this contact at any time by notifying the person contacting you.
To send promotional emails and newsletters related to the Services that we think may interest you.	Consent. You can withdraw this consent at any time via the method set out in each communication.

To share your data with those third party websites reached through the Little Medical School Websites and whose goods you have purchased in order for them to contact you about other goods and services in which you may be interested, but only where you have consented to receive such communications.	Consent. You can withdraw this consent at any time via the communication sent to you by each Seller.
To record correspondence with our customer services representatives for training and security and identification purposes.	In accordance with our legitimate interests in respect of training so that we improve our customer services, and necessary for a legal or regulatory obligation in respect of security and identification.
To receive and respond to your communications and requests.	Necessary for the performance of a contract where such communication relates specifically to our Services, otherwise consent.

## **COOKIES**

Cookies: Those that are necessary for the operation of the Little Medical School Websites and which personalize the Little Medical School Websites, including remembering your details so you do not have to re-enter them each time.	Necessary for the performance of the contract
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Cookies: Those that provide customized third-party advertisements, content, and information.	Legitimate interest so we can populate ad inventory and provide you with more appropriate advertisements and content.
Cookies: Those that monitor and analyze the effectiveness of Little Medical School and third-party marketing activities.	Legitimate interest so we can continue to analyze and improve our marketing activities and those of our partners.
Cookies: Those that monitor aggregate usage metrics such as total number of visitors, pages viewed, etc.	Legitimate interest so we can better understand our Little Medical School Websites and how it is being used.
Cookies: Those that track your entries, submissions, and status in any promotions or other activities.	Legitimate interest so we can accurately monitor entrants to competitions.

#### **HOW LITTLE MEDICAL SCHOOL SHARES AND DISCLOSES INFORMATION ABOUT YOU**

We are not in the business of selling your information! We do, however, need to disclose your Personal Information in a variety of circumstances in the ordinary course of operating our business or where you have consented for us to share your Personal Information.

#### **DISCLOSURES TO SELLERS:**

We may provide Personal Information to a third party facility or organization or product seller on whose behalf we are providing Services or selling products if you purchase Service or products through Little Medical School. Such third party may use the information for any purpose related to your transactions with such third party through Little Medical School. This disclosure is necessary for the performance of the contract related to your purchase.

Where you have consented to receive marketing from third parties, we will share your Personal Information with such third parties in order for them to be able to contact you. We advise that where you give such consent you visit the website of those third parties and review their privacy policy.

Little Medical School may make certain Automatically-Collected and other aggregate non-Personal Information available to third parties, to assist those parties in understanding our users' interests, habits, and usage patterns for sales or other Services. This information will not include your Personal Information.

**OTHER DISCLOSURES:**

We may share Personal Information with our affiliates, subsidiaries, franchisees and branch offices in order to carry out the above-mentioned information processing purposes.

We may provide Personal Information to trusted partners who work with or on behalf of Little Medical School pursuant to confidentiality and data security obligations. These companies may use your Personal Information to help Little Medical School communicate with you about offers from Little Medical School. However, these companies do not have any independent right to share or process this information.

Little Medical School works with third party service providers to provide website hosting and maintenance as well as other services for us. In the course of performing services for Little Medical School, these providers

may have access to or process your Personal Information. These disclosures are made pursuant to confidentiality and data security obligations and under terms comparable to this Privacy Policy, and the recipients are limited to using the information on our behalf for the purpose for which it was provided.

The Services enables users to communicate in a variety of ways. Any Personal Information that you voluntarily choose to include in a publicly accessible area on the Services will be available to other users who access that content. Once you make your Personal Information available to others, Little Medical School cannot control how it is collected, used, or disclosed by the recipients.

Little Medical School may contact the bank you identify, or the issuer of your credit card, to verify that you have sufficient account balances and/or available credit for purchases, and in such cases Little Medical School will share certain Personal Information with these third parties to the extent reasonably necessary to conduct such verification.

Little Medical School may also disclose your Personal Information if required to do so by applicable law, or in response to a court order, judicial or administrative subpoena or warrant, or to otherwise cooperate with law enforcement investigations. Little Medical School also reserves the right to disclose Personal Information as is necessary to protect Little Medical School or others from fraudulent, abusive, unlawful, or otherwise inappropriate uses of the Little Medical School Websites; to investigate and defend ourselves against third party claims or allegations; to protect the security or integrity of the Little Medical School Websites; or to protect the rights, property, security, and/or safety of Little Medical School, our users, or third parties. We may also share your Personal Information with our professional advisors.

**IN THE EVENT OF A MERGER OR SALE**

In the event that Little Medical School or its assets are acquired by or merged with a third party entity, Little Medical School reserves the right, in any of these circumstances, to transfer or assign the Personal Information that we have collected from you in connection with such merger, acquisition, sale, or other change of control.

#### **YOUR RIGHTS AND CHOICES**

You may, of course, decline to share certain Personal Information with Little Medical School, in which case you may not be able to purchase Services or Little Medical School may not be able to provide some of the Services and/or features and functionality found on the Little Medical School Websites to you. You may update, correct, or delete your profile information and preferences at any time by contacting us. Please note that while your changes may be reflected promptly in active user databases, we may retain all information you submit for a variety of purposes, including backups and archiving, prevention of fraud and abuse, and analytics, to the extent permitted under applicable data protection law.

To protect your privacy and security, we take steps to verify your identity before granting account access to you or making corrections to your information.

Subject to applicable law, you may have certain rights in respect of your Personal Information (particularly if you are based in the European Union or United Kingdom). These rights are as follows:

- a right to access your Personal Information as held by us (also known as a subject access request);
- a right to receive certain Personal Information in machine-readable format;
- a right to object to processing where the lawful basis is that it is in our legitimate interests, but please note that we may still process your Personal Information where there are other relevant lawful bases

or where we have compelling grounds to continue processing your Personal Information in our interests which are not overridden by your rights, interests or freedoms;

- a right to have inaccurate Personal Information rectified;
- a right to have certain Personal Information erased where it is no longer necessary for us to process it, where you have withdrawn your consent, where you have objected to legitimate interests (and there are no overriding reasons for us to keep this Personal Information), where your Personal Information has been unlawfully processed, or where erasing your Personal Information is required in accordance with a legal obligation;
- a right to request an explanation of the logic involved where we make decisions about you solely through automated means;
- a right to complain to your national data protection supervisory authority;
- where we have specifically requested your consent to process your Personal Information and have no other lawful conditions to rely on, you have the right to withdraw this consent; and
- a right to object to direct marketing, which can be done by opting-out of direct marketing either through your account or by opting out via the communication itself. You also have a right to object to any profiling to the extent that it relates to direct marketing only.

You can exercise your rights or withdraw your consent by contacting us at  
[privacy@littlemedicalschool.com](mailto:privacy@littlemedicalschool.com).

If you are unsure about your rights or are concerned about how your Personal Information may be processed, you should contact your national data protection regulator.

Please be aware that while we will try to accommodate any request you make in respect of your rights, they are not absolute rights. This means that we may have to refuse your request or may only be able to comply with it in part.

Where you make a request in respect of your rights we will require proof of identification. We may also ask that you clarify your request. We will aim to respond to any request within one month of verifying your identity. If we receive repeated requests, or have reason to believe requests are being made unreasonably, we reserve the right not to respond.

**INTERNATIONAL VISITORS AND CUSTOMERS**

This website is hosted in the United States. If you are visiting from outside the United States, including without limitation, the European Union and Australia, please note that your Personal Information will be transferred to the United States, which may not have the same data protection laws as your jurisdiction. When we transfer your Personal Information to the United States, we take reasonable steps to comply with applicable data protection law, in particular legal requirements on adequate protection for data transfers. By providing your Personal Information you acknowledge that:

- we will use your Personal Information for the purposes identified above in accordance with this Privacy Policy;
- your Personal Information will be transferred to the United States as indicated above; and
- such transfer is necessary for the purposes of using our Services.

In addition to transferring your Personal Information to the United States, Little Medical School may disclose your Personal Information in the manner described in "How Little Medical School Shares and Discloses Information About You" above to entities located in the European Union and other countries.

#### **CONFIDENTIALITY AND SECURITY**

Little Medical School employs certain physical, administrative, and technical safeguards to help protect Personal Information about you. Please note, however, that this is not a guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our systems or safeguards. We cannot guarantee or warrant the security of any information you transmit to Little Medical School, and you transfer such information to us at your own risk. If Little Medical School learns of a security breach, we may attempt to notify you electronically so that you can take appropriate protective steps. By using this Little Medical School Websites or providing Personal information to us you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of this website. Little Medical School may post a notice on our website if a security breach occurs. Little Medical School may also send an email to you at the email address you have provided to us. Depending on where you live, you may have a legal right to receive notice of a security breach in writing. To receive free written notice of a security breach (or to withdraw your consent from receiving electronic notice) you should notify us at [privacy@littlemedicalschool.com](mailto:privacy@littlemedicalschool.com).

The following is a summary of the measures Little Medical School takes to protect your Personal Information and descriptions of ways we implement these measures for different types of Personal Information you may provide to us:

- **Secure Socket Layer (SSL) encryption:** Little Medical School uses SSL encryption when transmitting certain kinds of information, such as financial services information or payment information. An icon resembling a padlock is displayed on the bottom of most browser windows during SSL transactions. Any time Little Medical School asks you for a credit card number for payment or for verification purposes, it will be SSL encrypted. Once you choose to store or enter your credit card number on Little

Medical School, it will not be displayed back to you in its entirety when you retrieve or edit it in the future. Instead of the entire number, you will only see asterisks and a few digits of your number.

- **Vendors and Partners:** Little Medical School works with vendors and partners to protect the security and privacy of user information.
- **Employee and Contractor Access to Information:** Little Medical School limits access to Personal Information about you to those employees who we reasonably believe need to come into contact with that information to provide products or services to you or in order to do their jobs.

#### **RETENTION**

We will retain your Personal Information for the period necessary for us to provide you with our Services and to comply with our legal and regulatory responsibilities. Accordingly, your Personal Information will be retained for a minimum of seven years following the closure of your account (if applicable).

#### **CHANGES AND UPDATES TO THIS PRIVACY POLICY**

Please revisit this page periodically to stay abreast of any changes to this Privacy Policy, which may be revised periodically at Little Medical School' sole discretion, as provided in the Terms. If we modify the Privacy Policy, we will make the amended policy available through the Little Medical School Websites, and indicate the date of the latest revision. In the event that the modifications materially alter your rights or obligations hereunder, we will make reasonable efforts to notify you of the change. For example, we may send a message to your email address, if we have one on file, or generate a pop-up or similar notification when you access the Little Medical School Websites for the first time after material changes are made. Our amended Privacy Policy will automatically take effect 30 days after it is made available through the Little Medical School Websites. If you do not agree with any changes to the Privacy Policy, you may terminate your account, ceasing use of the Services and Little Medical School Websites. Your continued use of the

Services and/or Little Medical School Websites after a revised Privacy Policy has become effective indicates that you have read, understood and agreed to the current version of the Privacy Policy.

**CONTACT INFORMATION**

Please contact Little Medical School with any questions, comments, or complaints about this Privacy Policy, our handling of your Personal Information, our third party disclosure practices, or your rights and consent choices by email to [privacy@littlemedicalschool.com](mailto:privacy@littlemedicalschool.com), or by mail to:

Round Star NY, LLC

606 Columbus Ave, 2nd Floor

New York, NY 10024

ATTN: Legal Department (Privacy Policy)

We will review any complaints and respond to them within a reasonable period of time.

If you are based in the United Kingdom or the European Union and you are unsatisfied with our processing, you can contact your local supervisory authority.

If you are visiting from Australia and we are unable to satisfactorily resolve your concern or complaint, you can contact the Office of the Australian Information Commissioner (OAIC). To make a query concerning your privacy rights, or to lodge a complaint with the OAIC about how we have handled your personal

information, you can contact the OAIC's hotline at **1300 363 992**. The OAIC has the power to investigate the matter and make a determination.

## **California Consumer Privacy SUPPLEMENT**

California law requires us to meet certain disclosure requirements with respect to our privacy practices. The following supplement applies solely to California consumers and addresses personal information we collect online and offline. It does not apply to personal information we collect from employees, job applicants or contractors.

Our California Consumer Privacy Supplement uses certain terms that have the meaning given to them in the California Consumer Privacy Act of 2018 and its implementing regulations (the "**CCPA**").

### Notice of Collection and Use of Personal Information

For the purposes of this California Consumer Privacy Supplement, "Personal Information" means information that identifies, relates to, describes, is capable of being associated with or could reasonably be linked, directly or indirectly, with a particular consumer or household.

We may collect the following categories of Personal Information about you:

- Identifiers: identifiers such as a real name, alias, postal address, unique personal identifier (meaning a persistent identifier that can be used to recognise a consumer, family or device that is linked to a consumer or family such as a device identifier; cookies, beacons, pixel tags, mobile ad identifiers and similar technology; customer number, unique pseudonym or user alias; telephone number and other forms of persistent or probabilistic identifiers), online identifier, Internet Protocol address, email

address, account name, social security number, driver's license number, passport number or other similar identifiers

- Additional Data Subject to Cal. Civ. Code § 1798.80: signature, physical characteristics or description, telephone number, bank account number, credit card number, debit card number, and other financial information
- Protected Classifications: characteristics of protected classifications under California or federal law, such as race, age, disability, and sex
- Commercial Information: commercial information, including products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies
- Biometric Information: biometric information, including, but not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns and voice recordings, from which an identifier template can be extracted
- Internet Activity: Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with websites, applications or advertisements
- Geolocation Data
- Sensory Information: audio, electronic, visual and similar information (e.g., photographs)
- Inferences: inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.

We may use the categories of personal information listed above for certain business purposes, as described in this list:

- auditing related to a current interaction with you including, but not limited to, counting ad impressions and verifying positioning and quality of ad impressions;
- detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- debugging errors that impair existing intended functionality;
- short-term, transient use, including, but not limited to, the contextual customization of ads shown as part of the same interaction;
- performing services, such as maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytics services, or providing similar services on our behalf;
- undertaking internal research for technological development and demonstration; and
- undertaking activities to verify or maintain the quality or safety of, or upgrade, or enhance the Services.

#### Prior Collection, Use and Disclosure of Personal Information

California law requires that we list the categories of Personal Information that we have disclosed to third parties for business purposes in the last 12 months. In the last 12 months, we have disclosed all of the categories of Personal Information we describe in the “Notice of Collection and Use of Personal Information” section included above for business purposes.

#### California Privacy Rights

You have certain choices regarding our use and disclosure of your Personal Information, as described below.

- Know & Access: You may have the right to request, twice in a 12-month period, that we disclose to you the Personal Information we have collected, used, disclosed and sold about you during the past 12 months.
- Deletion: You have the right to request that we delete certain Personal Information we have collected from you.
- Right to Limit the Sharing and Disclosure of Sensitive Personal Information: You have the right to request us to limit the sharing and disclosure of your Sensitive Personal Information, if applicable.
- Right to Correct Inaccurate Personal Information: You have the right to request that we correct any inaccurate information held by us.
- Opt-Out of Sale or Sharing of Personal Information: You have the right to opt-out of the sale of your Personal Information and to opt out of its sharing for advertising as defined under CCPA.

Shine the Light Request: You also may have the right to request that we provide you with (1) a list of certain categories of Personal Information we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year and (2) the identity of those third parties.

How to Submit a Request: To submit an access or deletion request, opt-out of the sale of your Personal Information, and/or submit a Shine the Light request, email us at [privacy@littlemedicalschool.com](mailto:privacy@littlemedicalschool.com) or call us at 212-877-7171.

Verifying Requests: To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request.

**Additional Information:** If you choose to exercise any of your rights under the CCPA, you have the right to not receive discriminatory treatment by us. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.

**LAST UPDATED: DECEMBER 4TH, 2025**