

Effective Date: February 2, 2024.

MGM Healthcare IT Consulting Corp. (“MGM Healthcare”, “we” or “us” in this Privacy Policy) and is committed to protecting your privacy. The purpose of this Privacy Policy is to inform you about the types of information we gather about you, how we may use and share that information, specific use controls, and how we safeguard your information. The Privacy Policy applies to information collected through our website, www.marioiltenore.com and our social media accounts (collectively, the “Site”). The MGM Healthcare Terms of Use is incorporated by reference into this Privacy Policy.

Information You Provide to Us

We collect information about you directly from you and from third parties, as well as automatically through your use of our Site. Upon request, we will provide you with information as to whether and what Personal Information we store in relation to you. Should your Personal Information be incorrect, you may request to have it rectified. You may also revoke your consent to use your Personal Information in the future, in whole or in part, or request deletion of your Personal Information.

When you provide us with information through this Site, such as inquiring about our services, we may collect various information including your name, email address, phone number, event address and any other information that may be collected in accordance with the Terms of Use (“Personal Information”). In addition, we may collect the information you provide us through various social media services or joint promotions with partners.

There may also be times where you provide us with information in the course of our marketing or customer service activities using our online contact form or service feedback.

In addition, we may also collect non-personally identifiable information, such as IP addresses (which identify your device), pages viewed, computer type, screen resolution, operating system version, Internet browser type and version, information collected through cookies, pixel tags, web beacons, and other technologies, and other data (“Non-Personal Information”). Because Non-Personal Information does not personally identify you, we may collect, use and disclose Non-Personal Information for any purpose. Non-Personal Information will be retained only for so long as to fulfill a legitimate business need.

We may aggregate Personal Information so that the aggregated information does not personally identify you or anyone else, such as by using Personal Information to calculate the percentage of our customers who live in a particular area (“Aggregate Information”). In some instances, we may combine Non-Personal Information with Personal Information (such as combining your name with your geographical location). If we combine any Non-Personal Information with Personal Information, the combined information will be treated by us as Personal Information as long as it is combined, and we may aggregate any information collected in a manner which does not identify any individual.

We do not collect any types of Sensitive Data from our users. Types of Sensitive Data includes any personally identifiable information pertaining to: race or ethnic origin, political opinions,

religious or philosophical beliefs, medical or health records, trade union memberships, genetic or biometric data, and sex life or sexual orientation. Please immediately notify us if you have accidentally submitted any Sensitive Data and we shall promptly remove such information.

Information from Other Sources

In order to improve our Site or marketing efforts, we may collect information about you from third party sources. The information may include demographic information, psychographic information, and geographic location-based information. These third-party sources may include public record databases, marketing data providers, data sharing cooperatives, and others.

We may use automated devices and applications, such as Google Analytics, to evaluate usage of our Site. We also may use other analytic means to evaluate our Site. We use these tools to help us improve our Site, performance and user experiences. These entities may use cookies and other tracking technologies to perform their services. We do not share your Personal Information with these third parties.

Automatically Collected Information

When you visit our Site, read our emails or interact with our Service Providers, we may collect certain types of technology-specific information from you. This information will help us optimize your visit and track the performance of our marketing efforts.

Use of Your Information

MGM Healthcare will primarily use your Personal Information to provide our services, and to complete core business functions such as authentication, order fulfillment, internal business processes, marketing, loss and fraud prevention, and legal functions. Currently, we use your information on the Site for the following purposes:

- a. Respond to your requests for information, including regular email communications through newsletters or promotions
- b. Combine information we collect with third-party information to better understand our customers, and conduct more relevant marketing or advertising
- c. Provide customer service and respond to service inquiries
- d. Help us improve our services
- e. Protect the security or integrity of our business.
- f. To tailor the content and information that we may send or display to you, to offer location customization, and personalized help and instructions, and to otherwise personalize your experiences while using the Site.
- g. For marketing and promotional purposes. For example, we may use your information, such as your email address, to send you news and newsletters, special offers, and promotions, or to otherwise contact you about services or information we think may interest you. We also may use the information that we learn about you to assist us in advertising our Site on third party websites or mobile applications.

- h. To better understand how users access and use our Site, both on an aggregated and individualized basis, in order to improve our Site and respond to user desires and preferences, and for other research and analytical purposes.
- i. To protect our own rights and interests, such as to resolve any disputes, enforce our Terms of Use or to respond to legal process.
- j. In addition to the uses outlined above, by using the Site, you agree to allow us to anonymously use the information from you and your experiences to improve the Site experience. This research may be published in our blogs or on social media. However, all of your responses will be kept anonymous, and we assure you that no Personal Information will be published.

How We Share Your Information:

We may share your information, including Personal Information, as follows:

Service Providers. We will not sell, trade, or rent your Personal Information to others. However, we do provide some of our services through contractual arrangements made with affiliates, service providers, partners and other third parties (“Service Providers”). We and our Service Providers may need to use some Personal Information in order to perform tasks between our Sites or to deliver services to you.

We may also share information in the following circumstances:

- a. **Business Transfers.** If we are acquired by or merged with another company, if substantially all of our assets are transferred to another company, or as part of a bankruptcy proceeding, we may transfer the information we have collected from you to the other company.
- b. **In Response to Legal Process.** We also may disclose the information we collect from you in order to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.
- c. **To Protect Us and Others.** We also may disclose the information we collect from you where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Use or this Privacy Policy, or as evidence in litigation in which we are involved.
- d. **Aggregate and De-Identified Information.** We may share aggregate or de-identified information about users with third parties for marketing, advertising, research or similar purposes.

We may also disclose information about you that is not personally identifiable. For example, we may provide merchants, business partners, or other third parties with reports that contain aggregated and statistical data about our users.

CAN-SPAM Act and Opting Out of Emails:

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations. We collect your email address in order to:

- Send information, respond to inquiries, and/or other requests or questions.
- We may also send you additional information related to our Services.

- Market to our mailing list or continue to send emails to our users after a service inquiry has been submitted

To be in accordance with CAN-SPAM we agree to the following:

- NOT use false, or misleading subjects or email addresses
- Identify the message as an advertisement in some reasonable way
- Include the physical address of our business or site headquarters
- Monitor third party email marketing services for compliance.
- Honor opt-out/unsubscribe requests quickly
- Allow users to unsubscribe by using the link at the bottom of each email

We may send periodic promotional or informational emails to you. You may opt-out of such communications by following the opt-out instructions directly on our Site. Please note that it may take up to 10 business days for us to process opt-out requests. Even if you opt-out, we may still communicate with you about your account or any purchase you make from us.

Third-Party Advertising

Advertising on our Site is based on cookies and similar technology.

We use personalized online advertising on our Services. This allows us to deliver more relevant advertising to people who visit our Site. It works by showing you advertisements that are based on your browsing patterns and the way you have interacted with our Site. It then shows you ads which we believe may interest you.

When you use our Services, some of the cookies and similar technology we place on your device are advertising cookies, so we can understand what sort of pages you are interested in. We can then display advertising on your browser based on these interests. For instance, if you have been viewing a lot of food related videos, we may show you more advertisements for food and drink.

We do not collect or use information such as your name or email address for personalized online advertising.

We may also show you advertising on our Site based on your browsing patterns on other websites or mobile applications that we have obtained from our advertising partners.

Online retargeting is another form of online advertising that allows us and some of our advertising partners to show you advertising based on your browsing patterns and interactions with a website or mobile applications away from our Services.

Cookies:

MGM Healthcare uses cookies and other tracking mechanisms to track information about your use of our Site. We may combine this information with other Personal Information we collect from you. Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Site, while others allow us to track your activities on our Site.

WHAT ARE THE DIFFERENT TYPES OF COOKIES AND HOW DO WE USE THEM?

- a) Essential: These are cookies which are essential for the running of our Site. Without these cookies, parts of our Site would not function. These cookies do not track where you have been on the internet and do not gather information about you that could be used for marketing purposes.

Examples of how we may use essential Cookies include:

- Setting unique identifiers for each unique visitor, so that user numbers can be analyzed.

- b) Functional: These cookies are used to remember your preferences and login information on our Site and to provide enhanced, more personal features. The information collected by these cookies is usually anonymized, so we cannot identify you personally. Functional cookies do not track your internet usage or gather information which could be used for selling advertising.

Examples of how we may use functional Cookies include:

- Gathering data about visits to our Site, including numbers of visitors and visits, length of time spent on the Site, or where visitors have come from.

- c) Third Party Cookies: You may notice on some pages of our Site that cookies have been set that are not related to us. When you visit a page with content embedded from these third-party service providers, they may set their own cookies on your mobile device. We do not control the use of these third-party cookies and cannot access them due to the way that cookies work, as cookies can only be accessed by the party who originally set them. Please check the third-party websites or mobile applications for more information about these cookies.

- d) Analytical Performance: Analytical performance cookies are used to monitor the performance of our Site, for example, to determine the number of page views and the number of unique users our Site has. We use this information to improve user experience or identify areas of the Site which may require maintenance. The information is anonymous (i.e. it cannot be used to identify you and does not contain personal information such as your name and email address) and it is only used for statistical purposes.

Examples of how we may use analytical cookies include:

- Measuring users' behavior
- Analyze which pages are viewed and how long for and which links are followed to better develop our Site.

- e) Advertising: Behavioral advertising cookies, which may be placed on your device by us or our trusted third-party service providers, remember that you have visited a website and use that

information to provide you with advertising which is tailored to your interests. This is often called online behavioral advertising and is done by grouping together shared interests based upon web browsing history. Your web browsing history can be used to infer things about you (e.g. your age, gender etc.), and this information may also be used to make advertising on websites more relevant to you. Although behavioral advertising cookies can track your activity around the internet, these cookies cannot identify you personally.

Examples of how we may use advertising cookies include:

- Manage advertising. Our approved advertising partners use cookies together with web beacons to provide advertising to you and to enable us to manage our relationship with those advertisers by, for example, tracking how many unique users have seen a particular advertisement or followed a link in an advertisement.
 - To market to specific users across our Site and third-party sites, so that we and third parties can target advertising to users that will be more relevant to users' interests.
- f) Disabling Cookies: Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If you choose to refuse, disable, or delete cookies, some of the functionality of our Site may no longer be available to you. Without this information, we are not able to provide you with all the requested services, and any differences in services are related to your information.
- Some browsers transmit “do-not-track” signals to websites. Because of differences in how browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. We currently do not take action in response to these signals.
- g) Clear GIFs, pixel tags and other technologies: Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your computer's hard drive, clear GIFs are embedded invisibly on web pages. We may use clear GIFs (a.k.a. web beacons, web bugs or pixel tags), in connection with our Site and Services to, among other things, track the activities of Site visitors, help us manage content, and compile statistics about Site usage. We and our third party service providers also use clear GIFs in HTML emails to our customers, to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

Payment:

In order to purchase any of the goods on the Site or to pay for separate services you have purchased, you will be asked to provide certain credit card and billing address information, and possibly additional specific information so that you may be properly charged for your purchases. This payment and billing information will not be stored by us and will be used exclusively to assist with your purchase of the goods or services.

If you choose to make a purchase, all purchases are processed solely through Square. Please refer to the Square privacy policy at <https://squareup.com/us/en/legal/general/privacy-no-account> for information regarding their own security protections and use of your Personal Information.

Other Websites:

Our Site may contain links to other websites not maintained by MGM Healthcare. Other websites may also reference or link to our Site. The inclusion of a link on the Site does not imply endorsement of the linked site by us. We are not responsible for the privacy practices of websites operated by third parties that are linked to or integrated with our Site, or for the privacy practices of third-party Internet advertising companies. We encourage you to be aware when you leave our Site, or surf the Internet, and to read the privacy statements of each and every website that you visit.

Information Security:

To protect your Personal Information, we take reasonable precautions and follow industry standard SSL/TLS end-to-end encryption of data in transit to make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed. If you provide us with your financial or any other Personal Information, the information is encrypted using industry standard protections in our database. No payment information is ever stored in our database, as it is solely processed through third parties and is only temporarily stored during the processing of payment. All other information we collect may be stored for as long as you have an active Account or until we receive a request by you to remove such information earlier.

Although we have implemented commercially reasonable precautions to protect the information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction, please be aware that despite our best efforts, no data security measures can guarantee 100% security. You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity.

Privacy of Minors:

We do not intentionally collect or maintain information from persons under the age of 13. If we determine upon collection that a user is under this age, we will not use or maintain his/her Personal Information without the parent/guardian's consent. If we become aware that we have unknowingly collected personally identifiable information from a child under the age of 13, we will make reasonable efforts to delete such information from our records. We also recommend that parents monitor their children's Internet activities and learn and employ software or other tools that can help their children enjoy their online experience without compromising their personal safety or allowing them to use the Internet in a manner inconsistent with their parent/guardian's preferences.

International Data Transfer For Residents Of The European Union, Switzerland Or The United Kingdom:

EU data protection law through GDPR or the UK GDPR and UK Data Protection Act makes a distinction between organizations that process Personal Information for their own purposes

(known as “data controllers”) and organizations that process Personal Information on behalf of other organizations (known as “data processors”). If you have a question or complaint about how your Personal Information is handled, these should always be directed to the relevant data controller since they are the ones with primary responsibility for your Personal Information.

▪ **Legal Grounds for Processing your Personal Information**

The GDPR requires us to tell you about the legal ground we're relying upon to process any Personal Information about you. The legal basis for us processing your Personal Information for the purposes set out in this Privacy Policy will typically be because:

- you provided your consent;
- it is necessary for our contractual relationship;
- the processing is necessary for us to comply with our legal or regulatory obligations; and/or
- the processing is in our legitimate interest as an event organizing and content providing platform (for example, to protect the security and integrity of our systems and to provide you with customer service, etc.).

▪ **MGM Healthcare as a Data Controller**

EU data protection law makes a distinction between organizations that process Personal Information for their own purposes (known as “data controllers”) and organizations that process Personal Information on behalf of other organizations (known as “data processors”). If you have a question or complaint about how your Personal Information is handled, these should always be directed to the relevant data controller since they are the ones with primary responsibility for your Personal Information.

MGM Healthcare will act as a data controller concerning Personal Information. For example, if you submit a services inquiry or access the message boards or forums, MGM Healthcare will be a data controller for the Personal Information you provide through the Site.

We will also be a data controller of the Personal Information we may obtain through the use of the Services. We use this to conduct research and analysis to help better understand and serve users of the Services as well as to improve our Services.

○ **Transfers of Personal Information**

Your information, including Personal Information, may be transferred to — and maintained on — computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside the United States and choose to provide information to us, please note we transfer the data, including Personal Information, to the United States and process it here. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer. When we transfer your information to the U.S., we will protect it as described in this Privacy Policy. By visiting the Site, using our Services or providing MGM Healthcare with any information, you fully understand and unambiguously consent to this transfer, processing and storage of your information in the United States.

We retain your Personal Information for as long as necessary to provide you with our Services or for other important purposes such as complying with legal obligations, resolving disputes, and enforcing our agreements. MGM Healthcare may retain non-Personal Information for as long as necessary for the purposes and uses described in this Privacy Policy, including as necessary for MGM Healthcare to pursue legitimate and lawful business interests.

Data Access and Data Deletion

Data protection law provides you with rights regarding Personal Information that we hold about you, including the right to request a copy of the Personal Information, request that we rectify, restrict or delete your Personal Information, and unsubscribe from marketing communications. There may be circumstances where we are not legally required to comply with your request because of the laws in your jurisdiction or because of exemptions provided for in data protection legislation. If you have a complaint about how we handle your Personal Information, please get in touch with us as at [INSERT WEBSITE EMAIL](#) to receive further clarification. If you are not happy with how we have attempted to resolve your complaint, you may contact the relevant data protection authority.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site or the Services; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features in an effort to prevent loss, theft and unauthorized access, use and disclosure.

Users In Brazil

• **Legal Basis For Processing Your Information**

Depending on what information we collect from you and how we collect it, we process your information for the following reasons:

- In order to administer our contractual relationship, including setting up your requested Services, payments, renewals and processes;
- Because it is in our legitimate interest to run a successful and efficient business and provide you with the Services and other useful content;
- In order to fulfill any legal obligations we may have to collect this information from you; and/or
- Because you have provided your consent for us to do so.

SHARING WITH THIRD PARTY SERVICE PROVIDERS AND VENDORS

Occasionally, we enter into contracts with selected third parties to assist us in servicing you (for example, providing you with customer service, fraud detection and deterrence or access to advertising assets and providing us with information technology and storage services) or to assist us in our own marketing and advertising activities (including providing us with analytic information and search engine optimization services). Additional information about certain third-party service providers we share Personal Information with is available here. Our contracts with such third parties prohibit them from using any of your Personal Information for any purpose beyond the purpose for which it was shared.

DATA TRANSFERS

In order for us to provide the Services to you and comply with our legal obligations, Personal Information you provide to us and information we collect about you, your usage and devices will be transferred to, stored and processed in the United States. Your information may also be processed by staff operating outside of the United States who work for one of our Third Party

Service Providers. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this Brazil Privacy Addendum.

COOKIES

You can select your cookie preferences upon your first visit to our Site. If you choose to change your preferences, you may do so at any time by clicking the “Cookie Preferences” link in the footer of our Site homepage.

When you opt out of cookies, you will be opted out of all non-required cookies. You cannot opt out of required cookies because these cookies and tracking technologies are required to help our websites work correctly. These cookies allow you to navigate our Services and use essential features.

YOUR PRIVACY RIGHTS

As a user located in Brazil, you may be able to exercise the following rights with respect to your Personal Information that we have collected, subject to certain limitations:

The right to ask that we provide confirmation of the existence of data processing	You have the right to ask that we provide confirmation of the existence of the processing of your personal data.
The right to access your information	You have the right to access the personal data we hold about you and certain information about how we use it and who we share it with including information about any public and private entities we have shared your personal data with.
The right to correction	You have the right to ask us to update or correct personal information if it is inaccurate, incomplete or out-of-date data.
The right to request deletion	You have the right to request the deletion of personal information we have collected from you, subject to certain exceptions.
The right to request anonymization and blocking	You have the right to ask us to anonymize, block, or delete unnecessary or excessive data or data that is not being processed in compliance with the LGPD.
The right to data portability	You have the right to ask us to port your data to another service or product provider.
The right to ask information about the possibility of denying consent	You have the right to ask us to provide information about the possibility of denying consent for the processing of your personal data and the consequences of such denial.

To exercise your rights under the LGPD, please submit a request to us by:

- Sending an email to XXXXX

We will need to verify your identity before processing your request. In order to verify your identity, we will generally require the matching of sufficient information you provide us to the information we maintain about you in our systems.

COMPLAINTS

If you have any questions about this Brazil Privacy Addendum or our data handling practices, or you wish to make a complaint, you may contact our Data Protection Officer at XXXXX.

In addition to the rights outlined above, where the Lei Geral de Proteção de Dados (LGPD) applies, you may:

- Ask that we provide confirmation of the existence of the processing of your personal data.
- Access the personal data we hold about you and certain information about how we use it and who we share it with including information about any public and private entities.
- Request the deletion of Personal Information we have collected from you, subject to certain exceptions.
- Ask us to anonymize, block, or delete unnecessary or excessive data or data that is not being processed in compliance with the LGPD.
- Ask us to provide information about the possibility of denying consent for the processing of your personal data and the consequences of such denial.

California Privacy Rights:

The California Consumer Privacy Act (CCPA) provides consumers who are residents of the State of California with specific rights related to their Personal Information, subject to certain exceptions. It also requires us to disclose the information we collect, the purposes for which we collect it, and what we share and disclose.

California Civil Code § 1798.83, also known as the "Shine the Light" law, provides California residents with the right to request, once per year, without charge, information from website operators and owners regarding the Personal Information that they collect online and offline, if any, and the third parties, including affiliates, with which they have shared this information during the preceding calendar year, for the direct marketing purposes of the third party. If such information is collected and shared with third parties for their direct marketing purposes, the website operator or owner is required, upon request, to provide the list of categories of Personal Information they collect, if any, and the names and addresses of all third parties with which it has shared such information for direct marketing purposes.

A website operator or owner may meet its obligations, and be exempt from such disclosures, under the Shine the Light law, if it provides California residents the right to opt-out of, and thereby prohibit, the website operator or owner from sharing such Personal Information with third parties including its affiliates, for the direct marketing purposes of the third party.

In accordance with California Civil Code section 1798.83(c)(2), MGM Healthcare complies with California's "Shine the Light" law by providing all of its users, including its California users, with

a cost-free method to opt-out of the sharing of Personal Information with all third parties for the direct marketing of those third parties, by not disclosing to third parties, for their direct marketing purposes the Personal Information of any customer if the customer has exercised the option to prevent such disclosure, and by disclosing these policies in its Privacy Policy. Consequently, MGM Healthcare is not obligated under Shine the Light to provide California users, who have requested such information, a list of the categories of the Personal Information disclosed by MGM Healthcare to third parties for their direct marketing purposes or the names and addresses of the third parties to which MGM Healthcare has shared such Personal Information for their direct marketing purposes during the preceding calendar year.

California residents may have further rights related to the handling of their Personal Information under the California Consumer Privacy Act. While MGM Healthcare does not "sell" your Personal Information in the traditional sense, it may share your information with third parties. California residents may have certain rights related to this information, including the right to ask that we "Do Not Sell Your Personal Information," the right to ask that we Delete your Personal Information, or the right to request access to the categories or specific pieces of Personal Information we have collected about you. California residents also have the right to not be treated differently by MGM Healthcare in response to your decision to exercise any of these rights.

To learn more about these rights, to opt-out of our sharing of your Personal Information, and to exercise other rights that apply, please contact MGM Healthcare by emailing us at XXXXXX. As part of your request, we may ask for certain information including your name and account information, or the manner in which you have previously interacted with MGM Healthcare. We will use this information only to contact you about your request and to verify your request. You may also designate an authorized agent to submit a request on your behalf.

Changes to this Privacy Policy:

MGM Healthcare reserves the right to change this Privacy Policy from time to time as it sees fit and your continued use of the Site will signify your acceptance of any adjustment to this Privacy Policy. If there are any changes to our Privacy Policy, we will announce that these changes have been made on our home page and on other key pages on our Site. If there are any changes in how we use our customers' Personal Information, notification by e-mail will be made to those affected by this change. Any changes to our Privacy Policy will be posted on our Site 30 days prior to these changes taking place. You are therefore advised to re-read this statement on a regular basis.