

WASHINGTON AND NEVADA CONSUMER HEALTH DATA NOTICE

[Last Updated: January 2026]

Neurolif Ltd. (collectively with its subsidiaries and affiliated companies, including Neurolif, Inc., the “**Company**”, “**our**”, “**we**” or “**us**”) provides its End-Users (as such term is defined under our Privacy Policy) with medical devices and related digital services, including a migraine treatment medical device accompanying mobile application (“**Relivion®**”), specifically the Relivion® transcutaneous electrical nerve stimulator is indicated for the acute treatment of migraine with or without aura in patients 18 years of age or older. It is a prescription device to be self-used at home. And a depression treatment medical device accompanying mobile application (“Proliv™Rx external Combined Occipital and Trigeminal Afferent Stimulation (eCOT-AS) (Proliv™Rx System)”, together the “**products**”), specifically the Proliv™Rx System provides focal external Combined Occipital and Trigeminal Afferent Stimulation (eCOT-AS) treatment. It is intended as an adjunctive treatment for Major Depressive Disorder (MDD) in adults who failed to achieve satisfactory improvement from at least one previous antidepressant medication, for use at home or in clinic. It is a prescription-only device, as well as related websites, web-based interfaces and services (collectively, the “**services**”).

This Consumer Health Data Notice (“**Notice**”) supplements our general [Privacy Policy](#) (“**Privacy Policy**”), and is designated to provide residents of Washington or Nevada interacting with our services (in this Notice “**you**” or “**your**”) with information regarding our collection, use, processing, securing and sharing of your Consumer Health Data as defined under the Washington State My Health My Data Act (“**MHMDA**”), and with respect to Nevada residents, only to the extent it is used to identify a consumer’s past, present, or future health status in accordance with Nevada Consumer Health Data Privacy Act (“**CHDPA**”, together, the “**Consumer Health Data Laws**”). Terms not defined herein shall have the meaning ascribed to such terms under the Consumer Health Data Laws or the Privacy Policy.

PLEASE READ THIS NOTICE CAREFULLY BEFORE ACCESSING AND USING OUR SERVICES. BY ACCESSING OR USING OUR SERVICES YOU ARE ACCEPTING THE PRACTICES DESCRIBED IN THIS NOTICE. IF YOU DISAGREE TO ANY TERM PROVIDED HEREIN, YOU MAY NOT ACCESS OR USE THE SERVICES.

CONSUMER HEALTH DATA WE COLLECT

As described in our Privacy Policy, the Personal Data we collect depends on various factors, including the product you use and applicable law. As the definition of Consumer Health Data varies under the Consumer Health Data Laws, certain categories and types of data we collect may be considered Consumer Health Data.

- **Health-Related Information:** Information relating to a consumer’s physical or mental health condition, symptoms, wellbeing, or health status, including information voluntarily provided by you through account registration, direct communications, questionnaires, standardized mental health assessments (such as PHQ-9 or similar clinically-accepted questionnaires), or during use of our products and services.
- **Suitability, Intake, and Onboarding Information:** Health-related and contextual information you choose to provide as part of suitability questionnaires, intake, onboarding, setup, or initial training processes associated with our products and services. This may include demographic information, background information relevant to product suitability or configuration, and contact details provided for follow-up and support.
- **Product and Device Use Data:** Information relating to your interaction with our medical devices, mobile applications, and related services, including usage patterns, configurations, treatment session data, device-generated data, technical measurements, time-based usage patterns or session-related information (to the extent such data may allow inferences regarding treatment or health status) and other data collected automatically through the operation and use of our products. Such information may, alone or in combination with other data, relate to or allow inferences regarding a consumer’s health status or treatment.

- **Inferred or Derived Health-Related Data:** Information that is derived, inferred, or generated from your use of our products and services, including insights, trends, or indicators relating to a consumer's physical or mental health status, treatment progress, or response, to the extent such information relates to health or healthcare. Such information may include scores, indicators, or outputs derived from standardized assessments (e.g., PHQ-9) or in-app evaluations used as part of the services.
- **Support, Communications, and Operational Health Data:** Information exchanged or generated in the context of customer support, onboarding, training, troubleshooting, or other service interactions, including records of communications, support tickets, call notes, and similar materials, where such information relates to or references a consumer's health, treatment, or use of a medical product.
- **Regulatory, Safety, and Medical Reporting Information:** Information collected, retained, or reported in connection with our legal and regulatory obligations as a medical device manufacturer, including adverse event reports, safety complaints, post-market surveillance data, quality or compliance records, and other information required under applicable medical, safety, or healthcare laws and regulations, where such information relates to an identifiable consumer.

To view the complete list of Personal Data we process please see Section 3 of our Privacy Policy.

For clarity, Consumer Health Data does **not** include information that has been de-identified or aggregated such that it can no longer reasonably be used to identify a specific natural person. Once data has been properly anonymized in accordance with applicable law, it is no longer considered Consumer Health Data under the Consumer Health Data Laws.

If you access or use our products or services through, or under the authority of, a Healthcare Provider (as such term is defined in our Privacy Policy), certain Consumer Health Data may be processed by us on behalf of that Healthcare Provider, acting as the data controller. In such cases, the collection and use of your Consumer Health Data are subject to the Healthcare Provider's instructions, applicable agreements (including any DPA or BAA), and the Healthcare Provider's own privacy practices. For additional information, please refer to our general Privacy Policy.

HOW WE COLLECT AND USE CONSUMER HEALTH DATA

As described in our Privacy Policy, we collect Consumer Health Data in connection with your use of our products. This includes information you provide during account registration, when completing a suitability questionnaire and providing prescription-related information, through your use of the products and accompanying applications, and when you contact us for support.

WHY WE COLLECT AND USE CONSUMER HEALTH DATA

We collect and utilize consumer health data primarily to ensure that we can fulfill the requests you make and provide you with the products and services you purchased. This includes:

- **Assessing your Eligibility:** for using any of our products.
- **Operating the Services:** Information pertaining to your migraine-related or depression-related condition, treatment usage, and responses is collected and processed to provide you with guidance regarding your progress while using our products.
- **Ensuring Security and Reliability:** Managing the secure and reliable operation of our services, which involves using data to safeguard against fraud, troubleshooting problems, and facilitate effective system support.
- **Services Improvement:** Analyzing how the services are used and performed, which helps us to troubleshoot, enhance existing features, and develop new functionalities. We will always do so after ensuring our compliance with applicable privacy laws.
- **Meeting our Legal obligations** – such as our legal and regulatory obligations as a medical device manufacturer, including adverse event reports, safety complaints, post-market surveillance data, quality or compliance records, and other information required under applicable medical, safety, or healthcare laws and regulations, where such information relates to an identifiable consumer.

Beyond these primary purposes, we may also use Consumer Health Data for additional objectives, where your choice and consent are appropriately sought and obtained as required by the Consumer Health Data Laws. Please note that currently, we do not process nor use any of your identified Consumer Health Data for targeted advertising and marketing purposes.

OUR SHARING OF CONSUMER HEALTH DATA

This section details how we share your Consumer Health Data, further governed by Section 6 of the Privacy Policy. We share Consumer Health Data with various parties, as required per applicable law and for the operation and fulfillment of your interaction with us, including:

- **Service Providers:** We engage various service providers who perform critical functions on our behalf. These include payment processing, data storage providers, general IT and SaaS providers, etc. Each provider is contractually bound to protect your data and use it solely to deliver the services you have requested, ensuring they adhere to our strict privacy and security standards.
- **Corporate Transactions:** In the event of a corporate transaction (e.g., investment transaction, sale of a substantial part of our business, merger, consolidation, or asset sale) we will share the Consumer Health Data we store with our acquiring company. In any such case, we will oblige the investing or acquiring company to assume the rights and obligations as described in our Privacy Policy.
- **Legal Proceedings and Rights Protection:** There are circumstances where we might disclose your Consumer Health Data to comply with legal obligations, such as responding to a lawful subpoena or regulation. Additionally, we may share data when it is necessary to protect our rights, pursue available remedies, enforce our terms and conditions, or defend against legal claims, subject to our obligations under the Consumer Health Data Laws.
- **Regulatory, Safety, and Post-Marketing Compliance:** We may share Consumer Health Data, including identifiable health-related information, where necessary to comply with our legal and regulatory obligations as a medical device manufacturer. This may include disclosures to competent regulatory authorities, notified bodies, auditors, or other authorized entities for purposes such as adverse event reporting, safety complaints handling, post-market surveillance, vigilance activities, quality management, regulatory audits or inspections, product recalls or corrections, and other obligations imposed under applicable medical devices, safety, or healthcare laws and regulations. Such disclosures are made only to the extent required or permitted by applicable law, are limited to the minimum necessary information, and are subject to appropriate safeguards and confidentiality obligations.

Any sharing of data is conducted transparently and with the intent of providing you with better services while protecting your privacy rights.

YOUR PRIVACY RIGHTS

The general rights granted to you with respect to your Personal Data are further detailed under Section 10 of our Privacy Policy. Under the Consumer Health Data Laws, you may have certain rights concerning your Consumer Health Data, including:

- Confirm whether we are collecting, using, sharing, or selling your Consumer Health Data;
- Access your Consumer Health Data, which may include receiving a list of third parties (and, under Washington law, affiliates) with whom your Consumer Health Data has been shared or sold, along with available contact details for these parties. Please note that under the CHDPA this right does not include the right to receive a copy of the data itself;

- Withdraw consent and/or request that we cease our ongoing collection and sharing of your Consumer Health Data, as applicable; and
- Delete your Consumer Health Data from our records. Please note that under the CHDPA, deletion of data stored in archive or backup systems may be delayed, as permitted by law.

To exercise any of these rights, you may fill out the Data Subject Request (“DSR”) form available [HERE](#), or contact us directly at dpo@neurolif.com . Please note that those rights are not necessarily absolute and are case dependent. We are committed to responding to your requests in compliance with the required legal standards once your identity has been verified.

If your request to exercise a right under the Consumer Health Data Laws is denied, you may appeal that decision by contacting us using the same contact methods. If your appeal is unsuccessful, you can raise a concern or lodge a complaint with the applicable Attorney General: Washington State Attorney General at www.atg.wa.gov/file-complaint, or the Nevada Attorney General at ag.nv.gov/Complaints/File_Complaint/.

This Notice is Effective as of the “Last Update” date at its heading.