

PRIVACY POLICY

NeuroTime Health LLC

Clarity for your cognitive future

Effective Date: May 29, 2026 | Last Updated: May 31, 2026

This Privacy Policy (“Policy”) describes how NeuroTime Health LLC (“NeuroTime Health,” “we,” “us,” or “our”) collects, uses, discloses, retains, and protects personal information when you visit our website at <https://neurotime.health> (the “Site”), join our waitlist, or otherwise communicate with us (collectively, the “Services”). We are committed to protecting your privacy and handling your personal information transparently and in accordance with applicable data protection laws, including the EU and UK General Data Protection Regulation (“GDPR”), the California Consumer Privacy Act as amended by the California Privacy Rights Act (“CCPA/CPRA”), and other applicable U.S. federal and state privacy laws.

Important notice regarding health information. NeuroTime Health is developing a cognitive-health monitoring product that is not yet generally available. At this pre-launch stage, the only personal information we collect through this Site is the information you voluntarily provide when you join our waitlist or contact us — primarily your email address — together with limited technical and bot-detection signals processed automatically as described in Section 2. We do not collect cognitive, clinical, or other health data through this Site. If and when our product becomes available and begins processing health-related data, we will provide a supplemental notice describing those practices and any applicable obligations, including under the Health Insurance Portability and Accountability Act (“HIPAA”) where it applies.

1. Scope of This Policy

This Policy applies to personal information we collect through the Site and related communications. It does not apply to third-party websites, services, or platforms that we do not own or control, even if they are linked from the Site. We encourage you to review the privacy policies of any third-party services you access.

2. Information We Collect

2.1 Information You Provide Directly

We collect personal information that you choose to provide to us, including:

- **Email address.** When you sign up for our waitlist or newsletter through a form on the Site, we collect the email address you submit.
- **Communications.** If you contact us by email or through the Site, we collect the contents of your message and any contact details and information you choose to include.

2.2 Information Collected Automatically

When you visit the Site, certain limited technical information may be collected automatically by our hosting and infrastructure providers, such as your IP address, browser type, device type, referring pages, and timestamps of access. This information is used to operate, secure, and improve the Site. We do not use this information to identify you personally, and we do not sell it.

2.3 Bot Detection and Site Security (Cloudflare Turnstile)

To protect our Site and forms (such as our waitlist sign-up) from automated abuse, spam, and other malicious activity, we use Cloudflare Turnstile, a privacy-oriented bot-detection service provided by Cloudflare, Inc. (“Cloudflare”). When you interact with a page or form protected by Turnstile, Cloudflare collects and processes certain client-side signals (“Signals”), which may include your IP address, a TLS fingerprint, your browser’s User-Agent header, and the sitekey and associated origin of the page you are visiting.

According to Cloudflare, these Signals are used solely to distinguish human users from bots and to block malicious traffic, and Cloudflare cannot use them to directly identify you. Turnstile is not used to build advertising profiles or to track you across websites. For more information, see Cloudflare’s [Turnstile Privacy Addendum](#) and Cloudflare’s [Privacy Policy](#).

2.4 Cookies and Similar Technologies

The Site may use a limited number of strictly necessary cookies or similar technologies required for basic functionality and security, including the bot-detection mechanisms described in Section 2.3. We do not use cookies to build advertising profiles. Where required by law, we will request your consent before placing any non-essential cookies, and you can control cookies through your browser settings.

3. How We Use Your Information

We use the personal information we collect for the following purposes:

- To manage our waitlist and notify you about product availability, beta access, and early-supporter opportunities.
- To send updates and communications you have requested, including launch news, product updates, and Kickstarter or campaign announcements.
- To respond to inquiries and provide customer support.
- To operate, maintain, secure, and improve the Site and our Services, including detecting and blocking automated abuse.
- To comply with legal obligations and enforce our terms, protect our rights, and prevent fraud or misuse.

We will only send you marketing or promotional emails where you have signed up to receive them or where otherwise permitted by law. Every marketing email includes an unsubscribe link, and you may opt out at any time (see Section 8).

4. Legal Bases for Processing (GDPR)

If you are located in the European Economic Area or the United Kingdom, we process your personal information only where we have a valid legal basis to do so. Depending on the circumstances, these bases include:

- **Consent** — for sending you marketing communications and joining our waitlist. You may withdraw your consent at any time without affecting the lawfulness of processing carried out before withdrawal.

- **Legitimate interests** — for operating, securing, and improving the Site, including protecting it against bots and automated abuse through Cloudflare Turnstile, and for responding to your inquiries, provided those interests are not overridden by your rights.
- **Legal obligation** — where we must process information to comply with applicable law.

5. How We Share Your Information

We do not sell your personal information, and we do not share it with third parties for their own marketing purposes. We share personal information only in the limited circumstances described below.

5.1 Service Providers and Processors

We use trusted third-party service providers to operate our Services. These providers process personal information on our behalf, under contract, and only for the purposes we specify. Our key processors are:

- **Resend (Resend, Inc.)** — our email delivery and waitlist/newsletter platform. When you submit your email address, it is transmitted to and stored by Resend so that we can manage our mailing list and deliver communications to you. Resend processes this data subject to its own privacy policy and our data processing agreement with it.
- **Cloudflare (Cloudflare, Inc.)** — our bot-detection and site-security provider. We use Cloudflare Turnstile to protect our forms and Site from automated abuse, as described in Section 2.3. When providing this protection for us, Cloudflare acts as our processor and handles the Signals described above on our behalf and in accordance with our instructions. Cloudflare separately acts as an independent data controller when it processes those Signals to maintain and improve the effectiveness of its bot-detection technology, relying on its legitimate interests for that purpose. Cloudflare's handling of this data is governed by its Turnstile Privacy Addendum and its main Privacy Policy.

We may also use providers for website hosting, infrastructure, and security. Each such provider is bound by confidentiality and data-protection obligations.

5.2 Legal and Protective Disclosures

We may disclose personal information where required by law, regulation, legal process, or governmental request, or where necessary to protect the rights, property, or safety of NeuroTime Health, our users, or others.

5.3 Business Transfers

If we are involved in a merger, acquisition, financing, reorganization, or sale of assets, your personal information may be transferred as part of that transaction. We will notify you of any such change and of any choices you may have.

6. International Data Transfers

We are based in the United States, and our service providers may process your information in the United States or other countries. If you access the Site from outside the United States, your personal information may be transferred to, stored in, and processed in a country whose data-

protection laws may differ from those of your jurisdiction. Where we transfer personal information from the EEA or the UK, we rely on appropriate safeguards, such as the European Commission's Standard Contractual Clauses, to protect that information.

7. Data Retention

We retain your email address and related information for as long as you remain on our waitlist or subscriber list, or as needed to fulfill the purposes described in this Policy, unless a longer retention period is required or permitted by law. When you unsubscribe or request deletion, we will remove your personal information from our active systems within a reasonable period, except where we are required to retain it to comply with legal obligations, resolve disputes, or enforce our agreements.

8. Your Choices and Privacy Rights

8.1 Unsubscribing

You may opt out of marketing emails at any time by clicking the "unsubscribe" link in any message we send, or by contacting us at the address in Section 12. After you unsubscribe, we may retain minimal information necessary to honor your request and to maintain a suppression list.

8.2 Rights Under GDPR

If you are in the EEA or the UK, you have the right to: access your personal information; request correction of inaccurate data; request erasure; restrict or object to processing; request data portability; and withdraw consent at any time. You also have the right to lodge a complaint with your local data protection authority.

8.3 Rights Under CCPA/CPRA

If you are a California resident, you have the right to: know what personal information we collect and how we use and disclose it; request access to and a copy of that information; request deletion of your personal information; request correction of inaccurate information; and not be discriminated against for exercising your rights. We do not sell or share your personal information within the meaning of the CCPA/CPRA, and we do not use it for cross-context behavioral advertising. You may exercise your rights using the contact details in Section 12. We will verify your request by confirming control of the email address associated with your information. You may use an authorized agent to submit a request on your behalf, subject to verification.

8.4 Other U.S. State Rights

Residents of other U.S. states with applicable privacy laws may have similar rights to access, correct, delete, and opt out. We honor verifiable requests consistent with applicable law. To exercise any right, contact us as described in Section 12.

8.5 How to Exercise Your Rights

To make a request, email us at neurotime.llc@gmail.com with the nature of your request. We will respond within the timeframes required by applicable law. We will not charge a fee for most requests and will not discriminate against you for exercising your rights.

9. Data Security

We implement reasonable administrative, technical, and organizational measures designed to protect personal information against unauthorized access, loss, misuse, or alteration, including encryption of data in transit and at rest. However, no method of transmission or storage is completely secure, and we cannot guarantee absolute security. You are responsible for keeping any credentials you use confidential.

10. Children's Privacy

The Site and our Services are intended for adults and are not directed to children under the age of 16. We do not knowingly collect personal information from children. If you believe a child has provided us with personal information, please contact us and we will take appropriate steps to delete it.

11. Changes to This Policy

We may update this Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors. When we make material changes, we will revise the "Last Updated" date above and, where appropriate or required by law, provide additional notice. We encourage you to review this Policy periodically.

12. Contact Us

If you have questions, concerns, or requests regarding this Policy or your personal information, please contact us at:

Data Controller: NeuroTime Health LLC

Email: neurotime.llc@gmail.com

Website: <https://neurotime.health>

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