

Privacy Policy

Last Updated: September 12, 2023

Cocoon Financial Services, Inc. (“Cocoon,” “Company,” “we,” “us” or “our”) is concerned about protecting the privacy of users of our Services and website located at cocoon.com (the “Site”) and our mobile application. In all circumstances, Cocoon will comply with applicable privacy legislation in the jurisdiction in which you are located (hereinafter “applicable laws”). This Privacy Policy explains how we collect, use, share and otherwise process your personal information in connection with the Site and our services, and the rights and choices that may be available to you with respect to your information.

By using our Services and Site, you agree to the terms of this Privacy Policy.

Description of Services & Information Collected

Cocoon offers a cloud-hosted Software-as-a-Service (SaaS) platform that provides employees with an easy, understandable and fast way to privately design their leave and helps employers administer and manage parental, medical and caregiver leave correctly. This process requires Cocoon to collect and process some personal information on behalf of our employers (“Customers”). Using information provided by Customers and their employees, Cocoon assists with recovering funds from state and insurance sources; coordinating payroll; tracking leave and compliance.

Information Collected from Customers

When we collect personal information directly from our Customers, the relevant Customer determines the processing of your personal information. If you have questions about how the personal information we receive from our Customers is collected, how it is processed or why we process it, please refer to such Customer’s privacy policy or contact the relevant Customer. If you have requests regarding the personal information we process on behalf of the relevant Customer, please direct your inquiries to such Customer.

Personal information means any information about an identifiable individual. The personal information we collect from our Customers may include:

- **Contact and Profile Data**, such as your name and work email.
- **Government-issued Identification Numbers**, such as your Social Security number or Social Insurance Number.
- **Employment Information**, such as your employer’s name, job title, office location, start date, salary, and job duties.
- **Insurance Information**, such as your provider and policy number.

Information Collected Directly from You

We collect personal information that you provide directly to us through the use of our Services. The information we collect in this manner may include:

- **Contact and Profile Data**, such as your name, email and mailing addresses, phone number and demographic information (such as your date of birth).

- **Government-issued Identification Numbers**, such as your Social Security number or Social Insurance Number.
- **Employment Information**, such as your employer's name, job title, office location, start date, salary, and job duties.
- **Account Data**, such as your personal email and password that you may set up to establish an online account with us.
- **Precise Geolocation Information**, such as when you authorize our mobile application to access your location.
- **Information About Your Pregnancy**, such as your expected due date, adoption or foster child placement date, expected delivery method, name and contact information of delivery hospital and doctor, midwife, or other medical professional, and parental leave preferences.
- **Information About Your Medical Leave Request**, such as condition or diagnosis, name and contact information of medical providers and expected dates of disability.
- **Insurance Information**, such as your provider and policy number.
- **Information about Third Parties**. We may collect information that you choose to provide regarding your partner or other third parties, such as their names, email addresses and phone numbers.
- **Feedback**, such as information you provide, and content that you upload when you contact us with questions, feedback, upload attachments, or otherwise correspond with us online.
- **Engagement Data**, such as your preferences for receiving communications about our activities and publications, and details about how you engage with our Site and communications.

Automatically Collected Data

We and our service providers may use cookies, beacons, pixel tags and other tracking technologies to automatically log information about you, your computer or mobile device and your activity over time on the Site and other online services, including:

- **Device Data**, such as your computer or mobile device operating system type and version number, manufacturer and model, browser type, screen resolution, IP address, device identifier (such as the Google Advertising ID or Apple ID for Advertising), the website you visited before browsing our Site and general location information such as city, state or geographic area.
- **Online Activity Data**, such as browsing history, search history, whether you clicked on or opened one of our emails, which of our pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access.

Please visit the "Options" section of this Privacy Policy for information on how to disable or opt-out of certain cookies and similar technologies.

You may refuse to provide certain personal information, but some parts of the Site or our services may not be fully available or functional without submitting such information.

Cocoon will only collect as much information as is required to fulfill the purposes of our business and comply with our contractual obligations with Customers.

Use of Information

We use your personal information for the following purposes or as otherwise described in this Privacy Policy or at the time of collection:

Operations. We may use personal information to operate the Site and provide related services, including to:

- manage the leave management process on behalf of Customers;
- provide, operate and improve the Site and our services;
- establish and maintain your account on the Site;
- enable security features of the Site, such as by sending you security codes via email or SMS, and remembering devices from which you have previously logged in;
- understand your needs and interests, and personalize your experience with the Site and our communications;
- respond to your requests, questions and feedback;
- protect the security of the Site and our systems;
- provide you with customer support when needed; and
- comply with applicable laws.

Research and development. We may analyze use of the Site and mobile application to evaluate and improve the Site, mobile application and our services, and to develop new products and services, including by studying user demographics and use of the Site and mobile application. We may use Google Analytics for this purpose.

Compliance, fraud prevention and safety. We may use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities; to protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims); to audit our internal processes for compliance with legal and contractual requirements and internal policies; to enforce the terms and conditions that govern the Site; and to prevent, protect against, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity.

To create anonymous, aggregated or de-identified data. We may create anonymous, aggregated or de-identified data from your personal information and other individuals whose personal information we collect, by removing the information that makes the data personally identifiable to you. We may use and share such anonymous, aggregated or de-identified data for any purpose we deem appropriate, such as to maintain and improve the Site, mobile application and our current as well as future products and services.

To send you promotional communications. We may send you promotional communications about the products or services that we offer.

With your consent. In some cases, we may specifically ask for your consent to collect, use or share your personal information. Consent is not required where the collection, use or disclosure is authorized by applicable laws.

Sharing of Information

We may share personal information with:

State or Federal Agencies that Administer Family or Medical Leave Benefits. We may share your personal information with the state or federal agencies that administer family or medical leave benefits in order to facilitate your application for disability or parental leave and benefits. We do not control how these state agencies may process your personal information.

Insurance Companies. We may share your personal information with insurance companies to facilitate your claim for short term disability benefits. We do not control how insurance companies process your personal information but we take appropriate steps to protect the privacy of your personal information where required.

Enterprise Customers. If you use our Services through one of our Customers (including your employer), we share your personal information with that Customer in order to facilitate your medical, caregiver or parental leave and state and insurance benefits and to ensure proper payment and communication regarding the length and type of leave. We do not control how the relevant Customer may collect, use or disclose your personal information.

Service providers. We may share your personal information with third-party companies and individuals that provide services on our behalf or help us operate the service (such as payment, customer support, hosting, analytics, email delivery, marketing and database management services).

Professional advisors. We may share your personal information with professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

Authorities and others. We may share your personal information with law enforcement, government authorities, agencies or departments, and private parties, as we believe in good faith to be necessary or appropriate for the compliance, fraud prevention and safety purposes described above or as otherwise required or permitted by applicable laws.

Business acquirers. We may share your personal information with relevant participants in business transactions (or potential transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, or equity interests in, (including, in connection with a bankruptcy or similar proceedings).

Retention of Personal Information

Cocoon retains personal information only as long as is reasonably necessary in accordance with our obligations to our Customers and their employees, regulatory requirements and the needs of our business.

Options

Access, update or delete information. Cocoon uses reasonable efforts to ensure that your personal information is kept as accurate, complete and as up to date as possible. If you have registered for an account with us, you may review and update certain personal information in your account profile by logging into the account. You may delete your account by contacting us at support@cocoon.com.

You may also contact us in writing if you want to access or receive a copy of your personal information or would like to correct, rectify or delete your information. Unless required by applicable laws, these rights are not absolute, and we reserve the right to verify your identity upon receiving such a request and decline your request. If we are unable or not willing to comply with your request, either in whole or in part, we will inform

you. Please know that deletion of some personal information may prevent your further use of our Services. You may make such a request by contacting us at support@meetcocoon.com.

Cookies & browser web storage. Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. To prevent the use of Google Analytics relating to your use of our Site, you can download and install the browser plug-in available here. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Site may not work properly. Similarly, your browser settings may allow you to clear your browser web storage.

Location Data. Users of our mobile application also have the choice whether to provide us with access to your precise location data. Your device settings may provide the ability for you to control our ability to access your location data.

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Opt out of marketing communications. If at any time you wish to opt-out of future newsletters or other promotional emails and communications, you may click the “unsubscribe” link in the email or otherwise contact us at support@cocoon.com. It may take up to 10 business days before you stop receiving promotional emails. This opt-out does not apply to operational communications, for example, confirmation emails.

Information about Children

The Site, mobile application and our services are not directed to children under 16. We do not knowingly collect or solicit personal information from children under 16 on the Site or mobile application. If you are under 16, please do not attempt to register an account or send any information about yourself to us. If we discover that we have collected personal information from children under 16, we will take commercially reasonable measures to promptly delete such information from our systems. If a parent or guardian becomes aware that his or her child has provided us with personal information without their consent, please contact us at support@meetcocoon.com.

Security

We maintain various physical, electronic and procedural safeguards designed to protect the personal information we collect. We protect personal information in a manner appropriate to the sensitivity of the information. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of personal information.

If you have an account with us, your account is protected by a password that you select. It is your responsibility to protect your password appropriately and to limit access to your computer or device and browser by, among other things, signing off after you have finished accessing your account.

Third-Party Websites

The Site contains links to websites, mobile applications, and other online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third-party and we cannot control, and take no responsibility for, the content or privacy practices of such third-party websites, mobile applications or online services operated by third parties. Please carefully review the Privacy Policy and any other applicable terms for such third-party websites, mobile applications or online services operated by third parties.

International Data Transfers

We are headquartered in the United States and may have service providers in other countries, and your personal information may be transferred to the United States or other locations outside of your state, province, or country where privacy laws may not be as protective as those in your state, province, or country. Where required, we will provide a level of protection that is comparable to that provided by the Customer in your jurisdiction of employment.

Policy Updates

We reserve the right to modify this Privacy Policy at any time. If we make changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Site. If required by law, we will also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via email or another manner through the Site. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your continued use of the Site after the effective date of any modified Privacy Policy indicates your acceptance of the modified Privacy Policy.

Contact

If you have any further questions concerning this Privacy Policy, would like to request to correct, update, or delete such information, or have a complaint about the processing of your personal information, please contact support@cocoon.com. We have assigned a privacy officer who will deal with and address your issues as appropriate, subject to certain exceptions as stated in applicable laws. You may also file an inquiry or complaint with any applicable privacy commissioner which may exist in your jurisdiction of employment.