

Privacy Policy

Effective Date: 17th of April, 2026

This Privacy Policy (“Policy”) describes the Personal Information collected by or on behalf of Ocusell, Inc (“Ocusell,” “we,” “us,” or “our”) through our website www.ocusell.com and online platform services (collectively, the “Site”), and how Personal Information is used, protected and shared.

“Personal Information” means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, device, or household.

If you have questions or concerns about this Policy, please contact us as set forth below.

We may modify this Policy at any time. All changes will be effective immediately upon posting to the Site. Material changes will be conspicuously posted on the Site or otherwise communicated to you.

If you use our Site, you must comply with our Terms of Service (“Terms”) found here: <https://ocusell.com/terms-of-service/>

Notice at Collection

We may collect or process various categories of Personal Information. The sections below titled “We Collect Data You Provide” and “Data Automatically Collected” contain information on the categories of Personal Information collected and our disclosure practices. As an overview, we may collect identifiers; financial information; commercial information; professional or employment information; internet or other electronic network activity information; geolocation information; inferences; and audio, electronic, or visual data. We may share any of the information we collect as outlined in the section “Disclosure of Personal Information.” To exercise any rights that may be afforded to you, please see the “Your Privacy Rights” section.

We Collect Data You Provide

Personal Information. You can visit the Site without submitting Personal Information. If you elect to provide “Personal Information” such as your name, email address, and phone number, we will collect, use, and share such Personal Information pursuant to this Policy and applicable law. Personal Information is required to use certain Site features, for example, to create an online account, contact us via email or phone (where we may retain your message’s content and our response), submit job application materials, receive or request data from us (e.g., newsletters), and respond to communications from us (e.g., surveys and promotional offers). We may collect the following categories of Personal Information:

- Identifiers, such as your first name, last name, email address, mailing address, telephone number, username, or similar identifiers.
- Demographic Information, including marital status, date of birth, and gender.
- Commercial Information, such as records of products or services purchased, obtained, or considered.
- Professional or Employment Information, such as your employer name, work email, work telephone number, and job title.
- Content of Communications, including the content of your phone calls, texts, or emails when you contact us, including your preferences for receiving communications from us.
- Audio, Electronic, Visual, or Similar Data, such as voice recordings when you contact customer support, or the audio, video, or transcripts of virtual meetings we conduct with you.
- Inferences, which is Personal Information derived from other Personal Information that reflects your preferences, characteristics, or other attributes.

Ocusell Account. To create an Ocusell account, you must submit your name and email address, and create a password. This data is used to populate a profile within your account.

Order & Payment Data. We use a PCI-compliant payment processor to help us facilitate payments. We have contracted with such payment processor to ensure they protect and limit the use of your Personal Information. Ocusell does not receive your credit card, debit card or other financial information when you make a payment- such information is provided directly to our payment processor. However, Ocusell does receive information about your purchase and your contact information (e.g. name, email address, mailing address, phone number). Ocusell will keep a record of your purchases.

Marketing Communications; Email Opt-Out. If you provide your email address to us, you understand that we may send you emails, including marketing emails. We may use third-party providers to deliver communications to you. You may opt-out of marketing emails by using the unsubscribe link in the email or contacting us at operations@ocusell.com with “Unsubscribe” in the subject line. To opt out of other communications (e.g., postal marketing and telemarketing), please contact us as set forth below. Opting out of marketing communications does not opt you out of communications about your account or transactions.

Applying to Work with Ocusell. To submit job application materials online to work with Ocusell, you will be redirected from our Site to a website operated by a third party / our services provider. You may be required to create an account with that vendor. We encourage you to review the terms and privacy policy posted on that vendor’s website since this Policy does not govern your use of that website. If you send us your job application materials directly, we will only use and share those job application materials to evaluate your qualifications to work with Ocusell.

Feedback. When you provide comments or feedback about our Site, the content on the Site, or our services (“Feedback”), we will not treat that Feedback as confidential and we may use that Feedback for any purpose in our sole discretion so long as it does not personally identify you. Feedback will be used without attribution or compensation to you.

Data Automatically Collected

Account Activity. We may collect data about how you use (i) your online account, and (ii) the Site when you are logged into your account.

Cookies & Other Tracking Technologies.

What types of online tracking mechanisms do we use? We may use cookies, web beacons, pixel tags and other tracking technologies (collectively “Cookies”) on our Site.

What are cookies and web beacons / pixel tags? A cookie is a small text file that our Site saves onto your computer or device when you use the Site that provides us certain information about your activities. Cookies allow the Site to remember your actions and preferences and recognize you or your browser, along with some information you provided. Web beacons / pixel tags are small graphics on a webpage that monitor your activity when viewing a webpage.

Why do we collect Cookies? We use Cookies to:

- make our Site function properly;
- provide personalized experiences;
- tailor our interactions with you;
- help with our marketing efforts;
- provide us with valuable data and statistics about the usage and effectiveness of our Site and to help us improve our Site; and
- help us improve our services.

What type of information do Cookies collect? The Cookies on our Site may collect information such as:

- IP addresses assigned to the computers and other devices you use;
- your internet service provider;
- device ID number;

- approximate geographic location;
- browser type;
- Site pages visited;
websites you access before and after visiting the Site, and
data related to how and when you use the Site.

How long do Cookies last? A Cookie can either be a “session” Cookie or a “persistent” Cookie. Session Cookies exist only for so long as you are visiting the applicable Site and are typically deleted when you exit your web browser. Persistent Cookies exist for a set period of time, for example, up to several months or years. Each time you visit a Site that has implemented a persistent Cookie, the persistent Cookie is renewed and that Cookie will remain active until its predetermined expiration date. You can manually delete persistent Cookies through your browser settings.

First and Third-party Cookies. Cookies may either be “first-party” or “third-party” Cookies. A first-party Cookie allows your web browser to talk to the actual Site that you are visiting (i.e. our Site). A third-party Cookie allows your web browser to talk to a third-party website, such as the source of an ad that appears on the website you are visiting or a third-party analytics provider. We may not have control over how a third-party uses information collected through third-party Cookies.

How do you manage Cookies or opt-out? Most browsers automatically accept cookies. You can disable this function by changing your browser settings, but disabling cookies may impact your use and enjoyment of the Site. Not all features or functions of the Site may work properly if you disable Cookies. You cannot disable all Cookies, such as Cookies that are essential to the functioning of the Site.

Google Analytics. We use Google Analytics to collect and process information about your use of the Site. Google sets cookies on your browser or device, and then your web browser will automatically send information to Google. Google uses this information to provide us with reports that we use to better understand and measure how users interact with our Site.

We may also implement additional add-on services to Google Analytics, such as Demographics and Interest Reporting, Remarketing, and Display network Impression.

We may also use software tools called “session replay technology” to monitor how you interact with our Site. The Personal Information collected by this technology may include which links you click on, pages and content you view, information that you type into our online forms (excluding payment information), recordings of mouse clicks and movements, and information about your device or browser.

To learn more about how Google uses data, visit Google’s Privacy Policy and Google’s page on “How Google uses data when you use our partners’ sites or apps.” You may download

the Google Analytics Opt-out Browser Add-on for each web browser you use, but this does not prevent the use of other analytics tools. To learn more about Google Analytics cookies, visit [Google Analytics Cookie Usage on Websites](#).

Online Behavioral Advertising. We use third parties and/or service providers to provide interest-based advertising services. These services may serve advertisements on our behalf that are customized based on predictions about your interests generated from your visits to websites (including our Site) over time and across different websites. The data collected may be associated with your Personal Information. These advertisements may appear on the Site and on other websites, and may be sent to you via email.

We use Google Ads to serve ads across various websites. Google uses Cookies to collect data about your visits to the Site to generate targeted advertisements to you on other websites that you visit. To opt-out of this type of advertising by Google, to customize your ad preferences, or to limit Google's collection or use of such data, visit [Google's Safety Center](#) and [Google's Ad Settings](#) and follow Google's personalized ad opt-out instructions. Opting out will not affect your use of the Site.

To change your preferences with respect to certain online ads or to obtain more information about ad networks and online behavioral advertising, visit [National Advertising Initiative Consumer opt-out page](#) or the [Digital Advertising Alliance Self-Regulatory Program](#). Changing your settings with individual browsers or ad networks will not necessarily carry over to other browsers or ad networks. As a result, depending on the opt-outs you request, you may still see our ads. Opting-out of targeted advertising does not opt you out of all ads, just those targeted to you.

Data from Other Sources

We obtain data about individuals from various third-party companies and public sources and we may combine that data with other Personal Information. This enhances our existing data about our users, improves our ability to contact you, and enhances our marketing capabilities.

Social Media

We are active on social media, including Facebook, Instagram, and LinkedIn ("Social Media"). Anything you post on Social Media is public information and will not be treated confidentially. We may post (or re-post) on the Site and our Social Media pages any comments or content that you post on our Social Media pages. The Site may use advertising networks and services offered by Social Media platforms to deliver advertising content. Use of these services requires Social Media platforms to implement cookies or pixel tags to deliver ads to you while you access the Site. Your use of Social Media is governed by the privacy policies and terms of the providers that own and operate those websites and not by this Policy. We encourage you to review those policies and terms.

How We Use Personal Information. We use Personal Information for the following purposes:

As Stated or Agreed to at the Point of Collection. We may use Personal Information for the purposes stated or agreed-to (or as is obvious) at the point of collection. For example, we use Personal Information to respond to your questions, comments, or complaints. We may also use Personal Information as requested or consented to by you.

Administration. We use Personal Information for administrative purposes, such as managing accounts, facilitating transactions, to inform our business strategies, to understand the Site's demographics and user preferences, for evaluating applications, and managing profiles.

Site Management. We use Personal Information for Site management, such as troubleshooting problems, improving the content and functionality of the Site, statistical and other analyses of the Site, and to customize the Site to you and our users.

Advertising and Communications. We may use Personal Information to send you promotions or to perform targeted advertising, to notify you of new services, to notify you of new features of our Site, to notify you of changes to our Terms or this Policy, and for other similar communications.

To Protect Our Rights. We may use Personal Information to protect our legal rights or interests, or those of other parties, including to bring a legal action against you or anyone who may be causing harm to us, our Site, or to other users of the Site. We may also use Personal Information to seek business, financial or legal advice, and to respond to other legal requests.

Retention of Personal Information

We will keep Personal Information for as long as necessary to fulfill the purposes described in this Policy, unless a longer retention period is permitted or required by law. To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Disclosure of Personal Information

We do not sell, rent or lease Personal Information to any third party. We may share Personal Information with the following parties, in compliance with applicable laws:

Employees and Affiliates. We may share Personal Information with our employees and affiliates, including REharpoon LLC and Bright MLS LLC, who have a need to know the information for our business purposes. Our affiliates may use Personal Information for the same purposes described in this Policy.

Third-Parties and/or Service Providers. We may share Personal Information with third parties and/or service providers that provide services for us. For example, we may share Personal Information with vendors to help us host and manage the Site; provide targeted advertising and other marketing; improve the content and functionality of the Site; perform data analysis and statistical analysis; troubleshoot problems with the Site; provide data processing; and support or provide the security of the Site.

Government Officials/Law Enforcement. We will cooperate with law enforcement and other governmental agencies, and may disclose Personal Information: (i) if we believe in good faith we are legally required to disclose that Personal Information, (ii) if we are advised to disclose Personal Information by our legal counsel, or (iii) when necessary to identify, contact or bring a legal action against someone who may cause or be causing harm to, or interfering with the legal rights of, Ocusell or any other party.

Professional Advisors. We may share Personal Information with our professional advisors, such as our attorneys, accountants, financial advisors and business advisors, in their capacity as advisors to Ocusell.

Change in Ownership. In the event Ocusell is the subject of a change of control or in the event the Site changes ownership, in whole or in part, or in the event of a bankruptcy, receivership or a similar transaction, we may provide Personal Information to the subsequent owner(s).

Other. We may share Personal Information with third parties when explicitly requested by or consented to by you, or for the purposes for which you disclosed the Personal Information to us as indicated at the time and point of the disclosure (or as was obvious at the time and point of disclosure).

Use and Disclosure of Non-Personal Information. Ocusell may collect, use, share, transfer and otherwise process de-identified and aggregated information that it receives or creates for any purposes in its sole discretion, in compliance with applicable laws. Ocusell is the sole and exclusive owner of such de-identified and aggregated information, including if Ocusell de-identifies Personal Information so that it no longer considered Personal Information under applicable laws.

Children's Information.

The Site is not directed at children under 18 years of age. We do not knowingly collect, use, or share Personal Information from children under 18. If a parent or legal guardian learns that their child provided us with Personal Information without his or her consent, please contact us and we will delete such Personal Information within the timeframe required by applicable law.

Data Security

We maintain appropriate organizational, technical, administrative, and physical security measures to protect Personal Information from accidental loss, misuse, unauthorized access, alteration, or disclosure. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to process your Personal Information. If a breach of your Personal Information occurs, we will notify you and any applicable regulator where we are legally required to do so. If we learn of a Personal Information breach, we may attempt to notify you electronically so that you can take appropriate protective steps.

You understand that no data transmission over the internet or device can be guaranteed to be 100% secure. While we strive to protect Personal Information, we do not guarantee the security of Personal Information and you provide Personal Information at your own risk.

Access from Outside the United States

If you access the Site from outside the United States, please be aware that Personal Information may be transferred to, stored in, and processed in the United States by Ocusell or our service providers. If you are visiting from the European Economic Area or other regions with laws governing Personal Information collection and use that may differ from United States law, please note that the laws of the United States may not provide the same level of protection of Personal Information as your home country. By providing your Personal Information to us, you acknowledge that your Personal Information will be used for the uses identified in this Policy and may be transferred to the United States in accordance with applicable law.

Third-Party Websites

The Site may link to, or be linked to, websites not controlled by us. We are not responsible for third-parties' privacy policies or practices. This Policy does not apply to any third-party websites or to any data that you provide to third parties. You should read the privacy policy for each website that you visit.

Access & Update Your Personal Information

To access or update your Personal Information as it exists in our records, please visit any account you have created or contact us using the information below.

Your Privacy Rights

California Residents: Pursuant to the California Consumer Privacy Act ("CCPA") and California Civil Code Section 1798.83, if you are a California resident, you have the following rights regarding your Personal Information: You have the right to know and access information about the categories and specific pieces of Personal Information we have collected about you, as well as the categories of sources from which such information is collected, the purpose for collecting such information, and the categories of third

parties with whom we share such information. You have the right to request the deletion of your Personal Information, subject to certain legal exceptions. You have the right to correct your Personal Information if inaccurate. You have the right to opt out of the sale or sharing of your Personal Information to third parties. You have the right to limit the use and disclosure of your sensitive Personal Information. You have the right not to be discriminated against for exercising any of these rights. You also have the right to request information regarding our disclosure of Personal Information to third parties for their direct marketing purposes by emailing us at operations@ocusell.com with "Shine the Light Request" in the subject line.

Colorado and Virginia Residents: If you are a resident of Colorado or Virginia, you have the following rights regarding your Personal Information: You have the right to access and confirm processing of your Personal Information. You have the right to correct your Personal Information. You have the right to delete your Personal Information under certain circumstances. You have the right to obtain your data in a portable format to the extent technically feasible. You have the right to opt out of the sale of Personal Information, targeted advertising, and profiling. You have the right to appeal a denial of your request by contacting us as described in the "Contact Us" section.

Nevada Residents: If you are a Nevada resident, you have the right to opt out of the sale of certain Personal Information to third parties. Currently, we do not engage in such sales. If you would like more information about our data sharing practices, please contact us using the information below. **Exercising Your Rights:** To exercise any of your privacy rights, please contact us using the information in the "Contact Us" section below. We will verify your identity before responding to your request by asking you to provide personal identifiers that we can match against information we may have collected from you previously.

If you are a resident of California, Colorado, or Virginia, you may authorize another individual or business to make requests on your behalf.

Do Not Track and Opt-Out Preference Signals: The "Do Not Track" (DNT) privacy preference is an option that may be made in some web browsers allowing you to opt out of tracking by websites and online services. At this time, we do not recognize DNT signals or opt-out preference signals such as the Global Privacy Control.

Text or SMS Messaging: We may offer text/SMS messaging to you. At any time, you may opt out of receiving particular text messages from us by texting STOP in response to any text message. **Email Unsubscribe:** If you would like to discontinue receiving marketing emails, you may update your email preferences by using the "Unsubscribe" link found in emails we send to you or by contacting us. If you unsubscribe, you may still receive transactional or relationship emails from us.

Contact Us

If you have questions or concerns regarding this Policy, contact us at:

Ocusell, Inc.

1216 Central Parkway

Cincinnati, OH 45202

Attention: Operations

operations@ocusell.com