

# PRIVACY NOTICE

Last updated March 26, 2026

## SUMMARY

Norma Health is an AI service — not a real person — that you can talk to by phone, text, or online. When you use their services, they collect personal information like your name, phone number, and email, as well as health-related details you share during conversations, such as medications and medical conditions. They also save what you talk about, including your habits, interests, and family members you mention, so Norma can remember you across future conversations. Phone calls may be recorded and turned into text, and text messages are stored as part of your conversation history.

Norma shares your information with companies that help run their service, and they may share it if the law requires it or to keep people safe. They keep your data as long as your account is active, or longer if required by law. You have the right to see, update, or delete your personal information by emailing [privacy@normahealth.com](mailto:privacy@normahealth.com). Norma is not a doctor and cannot give medical advice — any health information they provide is just for general guidance. You must be at least 18 years old to use the service.

## INTRODUCTION

This Privacy Notice for Norma Health, LLC ("Norma," "we," "us," or "our"), describes how and why we might access, collect, store, use, and/or share ("process") your personal information when you use our services ("Services"), including when you:

- Visit our website at [normahealth.com](https://normahealth.com) or any website of ours that links to this Privacy Notice
- Speak with Norma by telephone (voice calls)
- Communicate with Norma via SMS text messaging
- Engage with us in other related ways, including any marketing or events

In some cases, our customer or partner (e.g., a health care provider) may enter into a written agreement with us where we act as a business associate and process protected health information on their behalf through their use of our services ("PHI"). This Privacy Notice does not apply to PHI. Our customers' respective privacy notices govern their use and disclosure of PHI. Our processing of PHI is governed by the business associate agreements that we have in place with our customers, not this Privacy Notice. Any questions or requests relating to PHI should be directed to our customer or partner.

**Questions or concerns?** Reading this Privacy Notice will help you understand your privacy rights and choices. We are responsible for making decisions about how your personal information is processed. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at [privacy@normahealth.com](mailto:privacy@normahealth.com).

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## 1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

**In Short:** We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

**Personal Information Provided by You.** The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- Name and contact information (email addresses, phone numbers)
- Contact preferences
- Account credentials
- Demographic information (age, location)

**Sensitive Information.** When necessary, with your consent or as otherwise permitted by applicable law, we process the following categories of sensitive information:

- Health data (including medications, medical conditions, healthcare providers)
- Information about your healthcare needs and Medicare-related questions

**Conversational Information.** Because Norma is a companion service, we also collect information you share during conversations, including:

- Personal preferences and interests
- Information about family members and caregivers you mention
- Daily routines and activities
- Topics and memories you share with Norma

**Social Media Login Data.** We may provide you with the option to register with us using your existing social media account details. If you choose to register in this way, we will collect certain profile information about you from the social media provider, as described in the section called "HOW DO WE HANDLE YOUR SOCIAL LOGINS?" below.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

## Information automatically collected

**In Short:** Some information - such as your Internet Protocol (IP) address and/or browser and device characteristics - is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information.

Like many businesses, we also collect information through cookies and similar technologies. The information we collect includes:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files.
- **Device Data.** We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services.

## 2. VOICE AND SMS COMMUNICATIONS

**In Short:** We collect and process information differently depending on how you interact with Norma. This section explains the specific practices for each communication channel.

### Voice Calls (Telephone)

When you speak with Norma by phone:

- **Recording Disclosure:** Calls may be recorded for quality assurance, service improvement, and to maintain a record of your conversations. You will be notified at the beginning of each call that recording may occur.
- **Consent:** By continuing the call after the recording disclosure, you consent to the recording. If you do not consent, you may hang up or request to use a different communication channel.
- **Caller ID:** We collect your phone number through caller identification when you call us or when we call you.
- **Transcription:** Voice calls may be transcribed to text using speech recognition technology. These transcriptions are used to improve Norma's understanding and to maintain conversation history.
- **Retention:** Voice recordings are retained for the duration of your account and in the event applicable law requires us to maintain such recordings after your account is closed/deleted, we will keep such recording in accordance with applicable law.

### SMS Text Messaging

When you communicate with Norma via SMS:

- **Phone Number:** We collect and store the phone number you use to send and receive messages.
- **Message Content:** The content of your text messages is stored as part of your conversation history with Norma.
- **Metadata:** We collect timestamps and delivery status information for messages.
- **Opt-Out:** You may opt out of SMS communications at any time by replying STOP to any message or by contacting us.
- **Carrier Data:** Your mobile carrier may have access to message metadata. Please review your carrier's privacy policy for information about their practices.

### Intelligent Memory System

Across all channels, Norma uses an intelligent memory system to provide you with a personalized experience. This system:

- Stores information you share including preferences, family details, medications, and topics you've discussed
- Allows Norma to remember context from previous conversations
- Enables continuity whether you contact Norma by phone, text, or online

### 3. HOW DO WE PROCESS YOUR INFORMATION?

**In Short:** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- To facilitate account creation and authentication and otherwise manage user accounts.
- To deliver and facilitate delivery of services to the user, including companionship conversations and healthcare navigation assistance.
- To respond to user inquiries/offer support to users.
- To personalize your experience using our intelligent memory system.
- To request feedback.
- For internal research and development.
- To evaluate and improve our Services, products, marketing, and your experience.
- For legal, security, or safety reasons, such as protecting our and our users' safety, property, or rights; complying with legal requirements; enforcing our terms, conditions, and policies; detecting, preventing, and responding to security incidents; and protecting against malicious, deceptive, fraudulent, or illegal activity.
- As part of a corporate transaction, such as in connection with the sale of part or all of our assets or business, the acquisition of part or all of another business or another business' assets, or another corporate transaction, including bankruptcy.

### 4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

**In Short:** We may share information in specific situations described in this section and/or with the following third parties.

We may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

- **Service Providers.** We disclose your personal information with the service providers that we use to support our business. We also share information with AI model providers, communication services, and identity providers who help power Norma's capabilities.
- **Legal Obligation or Safety Reasons.** We may disclose personal information to a third party when we have a good faith belief that such disclosure of personal information is reasonably necessary to (a) satisfy or comply with any requirement of law, regulation, legal process, or enforceable governmental request, (b) enforce or investigate a potential violation of any agreement you have with us, (c) detect, prevent, or otherwise respond to fraud, security or technical concerns, (d) support auditing and compliance functions, or (e) protect the rights, property, or safety of Norma, its employees and clients, or the public against harm.

## 5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

**In Short:** We may use cookies and other tracking technologies to collect and store your information.

We use cookies and similar tracking technologies, including web beacons, pixels, analytics tools, and software development kits (SDKs), to collect information about your interactions with our Services. These technologies may be used to help secure our Services, keep them functioning properly, remember your preferences, analyze how users engage with our Services, and support our advertising, marketing, and measurement activities. We may change, replace, or update these technologies from time to time and will describe any material changes in this Privacy Notice accordingly.

## 6. DO WE OFFER ARTIFICIAL INTELLIGENCE-BASED PRODUCTS?

**In Short:** We offer products, features, or tools powered by artificial intelligence, machine learning, or similar technologies. Norma is an AI companion and not a human.

### Critical Disclosure About Norma

Norma is an artificial intelligence (AI) system. When you communicate with Norma through any channel - phone, SMS, or web - you are interacting with AI technology, not a human being.

Norma is not a licensed healthcare provider, medical professional, nurse, doctor, pharmacist, counselor, or insurance agent.

Norma does not provide medical advice, diagnoses, or treatment recommendations. Any health-related information provided through our Services is for general informational and

navigational purposes only and should not be considered a substitute for professional medical advice, diagnosis, or treatment.

## Our AI Products

Our AI Products are designed for the following functions:

- AI-powered companionship and conversation
- Healthcare navigation assistance
- Medicare-related information and guidance
- AI search and information retrieval
- Personalized memory and context retention

## 7. HOW DO WE HANDLE YOUR SOCIAL LOGINS?

**In Short:** If you choose to register or log in to our Services using a social media account, we may have access to certain information about you.

Our Services offer you the ability to register and log in using your third-party social media account details. Where you choose to do this, we will receive certain profile information about you from your social media provider. We will use the information we receive only for the purposes described in this Privacy Notice.

## 8. HOW LONG DO WE KEEP YOUR INFORMATION?

**In Short:** We keep your information for as long as necessary to fulfill the purposes outlined in this Privacy Notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Notice, unless a longer retention period is required or permitted by law. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information.

## 9. HOW DO WE KEEP YOUR INFORMATION SAFE?

**In Short:** We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure.

## 10. DO WE COLLECT INFORMATION FROM MINORS?

**In Short:** We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly collect, solicit data from, or market to children under 18 years of age. By using the Services, you represent that you are at least 18. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data. If you become aware of any data we may have collected from children under age 18, please contact us at [privacy@normahealth.com](mailto:privacy@normahealth.com).

## 11. WHAT ARE YOUR PRIVACY RIGHTS?

**In Short:** You may review, change, or terminate your account at any time, depending on your country, province, or state of residence.

**Privacy Rights:** Based on the applicable laws of your country or state of residence in the US, you may have the right to request access to the personal information we collect from you, details about how we have processed it, correct inaccuracies, or delete your personal information.

To request to review, update, or delete your personal information, please:

- Email us at [privacy@normahealth.com](mailto:privacy@normahealth.com)
- Call us at the number provided on our website

We will respond to your request within the timeframe required by applicable law. Please note that if we are collecting PHI through our relationship with a healthcare provider, you may not have these rights and you may need to contact your applicable healthcare provider.

**Withdrawing your consent:** If we are relying on your consent to process your personal information, you may have the right to withdraw your consent.

**Opting out of marketing and promotional communications:** You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, replying STOP to any SMS message, or by contacting us.

### Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account
- Contact us using the contact information provided
- Request a copy of what Norma "remembers" about you

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

## 12. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems include a Do-Not-Track ("DNT") feature or setting. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Notice.

## 13. DO WE MAKE UPDATES TO THIS NOTICE?

**In Short:** Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this Privacy Notice from time to time. The updated version will be indicated by an updated "Revised" date at the top of this Privacy Notice. If we make material changes, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Notice frequently.

## 14. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at [privacy@normahealth.com](mailto:privacy@normahealth.com) or contact us by post at:

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