

SUNSHINE PREMIER WELLNESS CENTER PRIVACY POLICY

Overview

This policy describes the types of information Sunshine Premier Wellness Center, LLC (“SPWC,” “we,” “our,” or “us”) may collect from you or that you may provide when you visit SPWC’s website at www.spwcenter.com (“Website”) and our practices for collecting, using, maintaining, protecting, and disclosing that information. This privacy policy does not apply to any other website operated by SPWC, or to any website operated by third parties. This policy does not apply to information collected by us offline or through any other means, including on any other website operated by SPWC or any third party; or any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Website or the App.

SPWC is committed to protecting your privacy. This policy explains the type of information we collect and informs you of the specific practices and guidelines that protect the security and confidentiality of your personal information, including health information that individually identifies you, or protected health information (“PHI”). If any term in this policy is unacceptable to you, please do not use the Website or provide any personal information. By accessing or using this Website, you signify your acknowledgment of this privacy policy. This policy may change from time to time and your use of the Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

We do not provide any medical services through the Website. You may submit your contact information to us through the Website and we will contact you using the information you provided. Your information will be kept confidential in accordance with this privacy policy.

Carefully read this Privacy Policy in its entirety. If you have any questions, please call us at the phone number listed on the Website.

The Information Collected and How We Collect It

We collect several types of information from and about users of our Website, including: information by which you may be personally identified, such as name, e-mail address, telephone number, country, or any other information collection on the Website that is defined as personal data or personally identifiable information under an applicable law (“personal information”); information that is about you but individually does not identify you, such as whether you are a current user, product interests, information related to your inquiry or request; information about your internet connection, the equipment you use to access our Website and usage details; and/or information about your medical condition, treatment options, physician referrals, prescriptions, and lab results, including PHI or other related health information.

This information is collected:

- Directly from you when you provide it to us; and/or

- Automatically as you navigate through the Website; Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies; and/or

The information we collect on or through our Website may include:

- Information that you provide on our Website. This includes information provided when you inquire about our services; when we process or respond to your inquiries related to requests for treatment, payment, customer service; and when you provide feedback on our Website;
- Details of transactions you carry out through our Website and of the fulfillment of your inquiries or requests; and/or
- Your search queries on the Website.

As with many other websites, as you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including: details of your visits to our Website, including traffic data, location data, logs, language, date and time of access, frequency, and other communication data and the resources that you access and use on the Website; information about your computer and internet connection, including your IP address, operating system, host domain, and browser type; and/or details of referring websites. We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).

The information we collect automatically is statistical data and may include personal information, or we may maintain it or associate it with personal information you provide to us or that we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to: (1) Estimate our audience size and usage patterns; (2) Store information about your preferences, allowing us to customize our Website according to your individual interests; (3) Speed up your searches; and (4) Recognize you when you return to our Website. For tracking and data purposes,

SPWC may use various tracking and data aggregation technologies including cookies. Our Website use two types of cookies: single session (temporary) and multi-session (persistent). Temporary cookies last only as long as your web browser is open, and are used for technical purposes such as enabling better navigation through our Website. Once you close your browser, the cookie disappears. Persistent cookies are stored on your computer for longer periods and are used for purposes including tracking the number of unique visitors to our Website and information such as the number of views a page gets, how much time a user spends on a page, and other pertinent web statistics. Cookies, by themselves, will not be used by **SPWC** to disclose your individual identity. This information identifies your browser, but not you, to our servers when you visit the Website. We do not respond to ‘do not track’ signals in your browser. We may also collect data by using “pixel tags,” “web beacons,” “clear GIFs” or similar means (collectively, “pixel tags”) that allow us to know when you visit our Website. Through pixel tags, we obtain non-

personal information on our Website. Through pixel tags, we obtain non-personal information or aggregate information that can be used to enhance your online experience and understand traffic patterns. Please be advised that if you choose to block, reject, disable, delete or change the management settings for any or all of the aforementioned technologies and/or other tracking, data aggregation and data analysis technologies, then certain areas of the Website might not function properly.

By visiting, accessing or using the Website, you acknowledge and agree in each instance that you are giving **SPWC** permission to monitor or otherwise track your activities on the Website, and that **SPWC** may use the aforementioned technologies and/or other tracking, data aggregation and data analysis technologies.

We also receive information from other sources. These third parties include sub-contractors in technical, advertising networks, analytics providers, and search information providers.

How We Use Your Information

We may use information collected about you, including personal information, in the following ways:

- To provide you with information that you have requested or to respond to your inquiries, to provide you with care and to run our healthcare operations;
- To carry out the services and communicate with healthcare organizations and medical professionals, and to provide you with the information, products and services that you request from us;
- To provide you with technical support and to improve our Website and services;
- In order to ensure that content from our Website is presented in the most effective manner for you and for your computer or mobile phone or other device, to allow you to participate in interactive features of our service (if offered and if you choose to do so), and as part of our efforts to keep our Website safe and secure;
- To communicate with you about our products and services and those of our subsidiaries, affiliates, and parent companies and any of their related businesses and those of our third-party partners;
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- In the event of a sale, merger, consolidation, change in control, transfer of substantial assets, reorganization, or liquidation, we may transfer, sell, or assign to third parties information concerning your relationship with us, including, without limitation, personal information that you provide and other information concerning your relationship with us;

- To notify you about changes to our service or our Website;
- For any purpose where you have given your consent (where legally required); and/or
- To comply with applicable Federal and State law.

If information is received from another source, we will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Sharing of Information Collected

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction. You agree that we have the right to disclose personal information that we collect, or you provide as described in this Privacy Policy:

- To any member of our group, which means our subsidiaries and affiliates, including our ultimate holding company and its subsidiaries;
- To healthcare organizations, medical professionals, pharmacies, contractors, service providers, and other third parties we use to support our business or in connection with the administration and support of the activities noted above;
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of **SPWC**'s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by **SPWC** about our Website users is among the assets transferred;
- To advertisers and advertising networks that require the data to select and serve relevant advertisements to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users;
- To analytics and search engine providers that assist us in the improvement and optimization of our Website;
- To fulfill the purpose for which you provide it. For example, if you email us asking us to contact a third party (including a medical professional), we may transmit the contents of your email to the recipient;
- For any other purpose disclosed by us when you provide the information or with your consent;

- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements, including for billing and collection purposes; or to protect the rights, property, or safety of **SPWC**, our customers, or others. This may include exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction;
- **SPWC** may be allowed or required to share your personal information (including your PHI) in other ways – usually in ways that contribute to the public good, such as public health and research. We may have to meet many conditions in the law before we can share your information for these purposes; and/or
- **SPWC** may share personal information, including PHI, about you for certain situations such as preventing disease, helping with product recalls, reporting adverse reactions to medications, preventing or reducing a serious threat to anyone’s health or safety, and for health research purposes.

Choices Regarding Your Information

We strive to provide you with choices regarding the personal information you provide to us. Here are several considerations when it comes to control over your information:

- 1) You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this Website may then be inaccessible or not function properly.
- 2) We do not currently respond to “do not track” signals as we do not track our customers across third party websites.
- 3) If you do not wish to have your contact information used by **SPWC** to promote our own products or services, you can check certain boxes on the forms we use to collect your data. You can also always exercise your right to ask us not to process your personal information for marketing purposes by contacting us. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions.

We do not control third parties’ collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way.

Transactions

In connection with any transaction that you conduct through the Website (e.g., the payment of any subscription fees, the purchase or sale of any products on or through the Website), you may be asked to supply certain information relevant to the transaction, including, without limitation, your credit card number and expiration date, your billing address, your shipping address, your phone number and/or your email address. By submitting such information, you grant **SPWC** without

charge the irrevocable, unencumbered, universe-wide and perpetual right to provide such information to third parties (e.g., payment processing companies, buyers on the Website, sellers on the Website) for the purpose of facilitating the transaction.

Data Access, Corrections and Deletion

You may contact us to request access to, correct, or delete any personal information that you have provided to us. Unless otherwise required by law, **SPWC** will also erase personal information when the personal information is no longer necessary in relation to the purposes for which it was collected or otherwise processed; when you withdraw your consent (where lawfulness of processing was based on your consent) and there is no other legal ground for the processing; when you object to the processing and there are no overriding legitimate grounds for the processing; when your personal information has been unlawfully processed; and when it is necessary to comply with legal obligations.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. The information you share in public areas may be viewed by any user of the Website. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to our Website; any transmission is at your own risk.

Third-Party Websites, Applications, and Networks

Our Website may contain links or references to other websites outside of our control. Please be aware that this privacy policy does not apply to these websites. **SPWC** encourages you to read the privacy statements and terms and conditions of linked or referenced websites you enter. These third-party websites may send their own cookies and other tracking devices to you, log your IP address, and otherwise collect data or solicit personal information. **SPWC DOES NOT CONTROL AND IS NOT RESPONSIBLE FOR WHAT THIRD PARTIES DO IN CONNECTION WITH THEIR WEBSITES, OR HOW THEY HANDLE YOUR PERSONAL INFORMATION. PLEASE EXERCISE CAUTION AND CONSULT THE PRIVACY POLICIES POSTED ON EACH THIRD-PARTY WEBSITE FOR FURTHER INFORMATION.**

Special Note Regarding Minors

The Website is intended for use by adults only. The Website is not designed or intended to attract, and is not directed to, children under eighteen (18) years of age or younger. **SPWC** does not collect personal information through the Website from any person it actually knows to be under eighteen (18) years of age. If **SPWC** obtains actual knowledge that it has collected personal information

through the Website from a person under eighteen (18) years of age, then it will use reasonable efforts to refrain from further using such personal information or maintaining it in retrievable form.

Furthermore, if you are under eighteen (18) years of age, then you (or your parent or legal guardian) may at any time request that **SPWC** remove content or information about you that is posted on the Website.

Please note that the aforementioned removal does not ensure complete or comprehensive removal of such content or information posted on the Website. Also, please note that **SPWC** is not required to erase or otherwise eliminate, or to enable erasure or elimination of, such content or information in certain circumstances, such as, for example, when an international, federal, state, or local law, rule or regulation requires **SPWC** to maintain the content or information; when the content or information is stored on or posted to the Website by a third party other than you (including any content or information posted by you that was stored, republished or reposted by the third party); when **SPWC** anonymizes the content or information, so that you cannot be individually identified; when you do not follow the aforementioned instructions for requesting the removal of the content or information; and when you have received compensation or other consideration for providing the content or information.

Changes to the Policy

We reserve the right to change this privacy policy at any time. It is our policy to post any changes we make to our privacy policy posted on this page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically monitoring and reviewing any updates to the privacy policy. Your continued use of our Website after such amendments will be deemed your acknowledgement of these changes to this privacy policy.