

Privacy Policy

Thank you for visiting Vita Health Services, PLLC. This Vita Health Services, PLLC (“Vita Health Services”) Privacy Policy (“Privacy Policy”) sets out how we use, share and protect Personal Information (as hereinafter defined) and other information that we collect when you:

1. access or use the Offering;
2. register to become a Member; and/or
3. use the Vita Health Services Offerings including, without limitation, the Services and/or Promotions.

Capitalized terms not defined herein shall have the meaning set forth in the Vita Health Services Offering Terms and Conditions (“Terms and Conditions”).

Except where noted, statements in this Privacy Policy with respect to Vita Health Services Offerings apply to mobile device applications (“Apps”) for iPhone, iPad and Android devices.

YOU MUST AFFIRMATIVELY CONSENT TO USE OUR OFFERINGS, AND BY DOING SO, YOU CONSENT TO THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY IN THEIR ENTIRETY, YOU MAY NOT ACCESS OR OTHERWISE USE THE SITE AND/OR VITA HEALTH SERVICES OFFERINGS.

We will only process your Personal Information in accordance with applicable data protection and privacy laws. For the purposes of UK and EU data protection legislation, the data controller is Vita Health Services, 4 Science Park, New Haven, CT 06511

1. Information We Collect

We collect three basic types of information and data: Personal Information, non-Personal Information, and aggregate data.

2. Personal Information

Collected For the purposes of this Privacy Policy, Personal Information shall mean individually identifiable information from or about an individual. We collect Personal Information from end-users primarily in two (2) ways:

- a. when you register to become a Member;
- b. when you access Vita Health Services and provide information in connection with your use of the Offerings

In addition, when you access and use Vita Health Services Offerings, we may collect certain usage data, such as:

- a. the number of times that you visit Vita Health Services;
- b. the frequency and duration of use associated; and
- c. other analyses and data associated with your access to, and use of, Vita Health Services Offerings (collectively, “Usage Data”).

We also may collect information and responses you provide when participating in activities, which may include activity postings, survey responses, assessment responses and any other data you generate in using Vita Health Services Offerings (“User Responses”).

3. Offering Registration

The Personal Information that you must supply in order to obtain access to the Vita Health Services Offerings may include, without limitation:

- a. your full name;
- b. your email address;
- c. your user name and password;
- d. any and all other information requested on the applicable registration form (collectively, “Offering Registration Data”).

4. Use of Personal Information

We may use your Usage Data, and share it with third parties:

- a. to assist us and such third parties in studying, evaluating and improving Vita Health Services Offerings;
- b. determine your preferences and tailor Vita Health Services Offerings to your needs; and
- c. so that we can promote Vita Health Services Offerings to third parties (using Usage Data on an aggregate and anonymous basis in that instance).

Other than in connection with the limited use of Usage Data and Personal Information as specified above, Vita Health Services will never sell, rent, exchange or barter your Personal Information to or with any third party for financial gain or marketing purposes. When you register, we use the Personal Information that you make available to personalize your experience with the Site, facilitate the delivery of the applicable Vita Health Services Offerings to you and for verification purposes. You also agree that we may contact you at any time with updates and any other information that we may deem appropriate for you to receive in connection with your continued use of Vita Health Services Offerings, and to keep you informed of our other products and services. In addition, if you identify yourself to us by sending us an email or some other communication with questions or comments, we may use such information (including Personal Information) to respond to your questions or comments, and we may file your questions or comments for future reference. The Personal Information that you submit to Vita Health Services remains your property, but by making the Personal Information available to Vita Health Services, you grant Vita Health Services the right, subject to applicable state and federal law, to use that Personal Information to bring you certain promotional offers from Vita Health Services and its third party partners that Vita Health Services believes may be of interest to you. We may permit our third-party agents, service providers, vendors and subcontractors (such as vendors and suppliers that provide us with technology, services, advertising and marketing assistance or content in connection with our operation and maintenance of Vita Health Services Offerings) to access Usage Data, but they are only permitted to do so in connection with performing services for us or to operate Vita Health Services Offerings. Third parties are not authorized to use your Personal Information for their own benefit. In addition, we may use, or permit third-party research partners to use, User Responses for research or data analysis purposes.

We may also supplement the information that we collect with information from other sources to assist us in evaluating and improving Vita Health Services Offerings, and to determine your preferences so that we can tailor Vita Health Services Offerings to your needs.

Information that we collect about you also may be combined by us with other information available to us through third parties for research and measurement purposes, including measuring the effectiveness of content, advertising or programs. This information from other sources may include age, gender, demographic, geographic, personal interests, product purchase activity or other information. We may report aggregate information, which is not able to be identified back to an individual user, to our current or prospective advertisers and other business and research partners.

We reserve the right to release current or past Personal Information:

- a. in the event that we believe that Vita Health Services Offerings are being or has been used in violation of the Terms and Conditions or to commit unlawful acts;
- b. if the information is subpoenaed; provided, however, that, where permitted by applicable law, we shall provide you with e-mail notice, and opportunity to challenge the subpoena, prior to disclosure of any Personal Information pursuant to a subpoena; or
- c. if Vita Health Services is sold, merged or acquired; provided, however, that if Vita Health Services is involved in a merger, acquisition or sale of all or a portion of its assets, you will be notified via email, as well as any choices that you may have regarding your Personal Information.

5. Non-Personal Information Collection and Use

We may collect certain non-personally identifiable information about you when you use the Offering, even if you are not a Member. This non-personally identifiable information includes, without limitation, the type of browser that you use (e.g., Safari, Chrome, Internet Explorer), your IP address, the type of operating system that you use (e.g., Windows or iOS) and the domain name of your Internet service provider (e.g., Verizon, AT&T). We use the non-personally identifiable information that we collect to improve the design and content of the Offering and to enable us to personalize your Internet experience. We also may use this information in the aggregate to analyze Offering usage, as well as to offer you products and services.

6. How we may use cookies and other tracking technologies

When providing our Services we may use the following types of cookies and tracking technologies for the purposes set out below.

Cookies and local storage may be set and accessed on your computer. Upon your first visit to the Services, a cookie or local storage may be sent to your computer that uniquely identifies your browser. "Cookies" and local storage are small files containing a string of characters that is sent to your computer's browser and stored on your device when you visit a website. Many major Web services use cookies to provide useful features for their users. Each Web site can send its own cookie to your browser. Most browsers are initially set up to accept cookies. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent; however, if you reject cookies, you will not be able to sign in to the Services or take full advantage of our Services. Additionally, if you clear all cookies on your browser at any point after setting your browser to refuse all cookies or indicate when a cookie is being sent, you will have to again reset your browser to refuse all cookies or indicate when a cookie is being sent.

To support our Services we may use one or more of the following cookies for the purposes set forth below:

- **Analytics and Performance Cookies.** These cookies are used to collect information about traffic to our Services and how users use our Services. The information gathered does not identify any individual visitor. The information is aggregated and therefore anonymous. It includes the number of visitors to our Services, the websites that referred them to our Services, the pages that they visited on our Services, what time of day they visited our Services, whether they have visited our Services before, and other similar information. We use this information to help operate our Services more efficiently, to gather broad demographic information and to monitor the level of activity on our Services. We use Google Analytics for this purpose. Google Analytics uses its own cookies. It is only used to improve how our Services work. You can find out more information about Google Analytics cookies here: [Find out more information about Google Analytics cookies](#). You can find out more about how Google protects your data here: www.google.com/analytics/learn/privacy.html. You can prevent the use of Google Analytics relating to your use of our Services by downloading and installing the browser plugin available via this link: [Google Analytics Opt-out Browser Add-on](#)
- **Essential Cookies.** These cookies are essential to provide you with services available through our Services and to enable you to use some of its features. For example, they allow you to log in to secure areas of our Services and help the content of the pages you request load quickly. Without these cookies, the services that you have asked for cannot be provided, and we only use these cookies to provide you with those services.
- **Functionality Cookies.** These cookies allow our Services to remember choices you make when you use our Services, such as remembering your language preferences, remembering your login details, remembering which polls you have voted in and in some cases, to show you poll results, and remembering the changes you make to other parts of our Services which you can customize. The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you visit our Services.

You can find more information about cookies and how they work, what cookies have been set on your computer or mobile device and how to manage and delete them at <https://www.allaboutcookies.org/>.

We may also use "pixel tags," which are small graphic files that allow us and third parties to monitor the use of the Services and collect Usage Data. A pixel tag can collect information such as the IP address of the computer that downloaded the page on which the tag appears; the URL of the page on which the pixel tag appears; the time (and length of time) the page containing the pixel tag was viewed; the type of browser that retrieved the pixel tag; and the identification number of any cookie previously placed by that server on your computer.

We may use pixel tags, either provided by us or by our third party advertisers, service providers and ad networks, to collect information about your visit, including the pages you view, the links you click and other actions taken in connection with our sites and Services and use them in combination with our cookies to provide offers and information of interest to you. Pixel tags may

also enable ad networks to serve targeted advertisements to you when you visit the Services or other websites.

In addition, we may use a variety of other technologies that collect similar information for security and fraud detection purposes.

7. Location Information

When you use Vita Health Services Offerings, the Services, or Promotions, we may collect location information either provided by a mobile device interacting with one of our applications, or associated with your IP address, where we are permitted by law to process this information.

8. Aggregate Data

Vita Health Services reserves the right to transfer aggregate or group data about Vita Health Services users (including Usage Data where same is not linked to Personal Information) for lawful purposes. Aggregate or group data is data that describes the demographics, usage or other characteristics of Vita Health Services users as a group, without disclosing personally identifiable information.

9. Mobile Devices

One or more of our Apps may require that you be registered and signed in in order to use them. The information that we collect through your use of our Apps and tools will be treated as Personal Information under this Privacy Policy. When you download and install one of our mobile Apps onto your mobile device we assign a random number to your App installation. This number cannot be used to identify you personally, and we cannot identify you personally unless you choose to become a registered user of the App. We use this random number in a manner similar to our use of Cookies as described in this Privacy Policy. Unlike Cookies, the random number is assigned to your installation of the App itself and not a browser, because the App does not work through your browser. Therefore the random number cannot be removed through settings. If you do not want us to use the random number for the purposes for which we use Cookies, please do not use our mobile device Apps.

10. Third-Party Websites

Vita Health Services offerings may contain links to third-party owned and/or operated websites. Vita Health Services is not responsible for the privacy practices or the content of such websites. In some cases, you may be able to make a purchase through one of these third-party websites. In these instances, you may be required to provide certain information, such as a credit card number, to register or complete a transaction at such website. These third-party websites have separate privacy and data collection practices and Vita Health Services has no responsibility or liability relating to them.

11. Security

We endeavor to safeguard and protect our Members' Personal Information. When Members make Personal Information available to us, their Personal Information is protected both online and offline (to the extent that we maintain any Personal Information offline). The privacy of your Personal Information is very important to us. When our registration process asks users to submit sensitive

Personal Information (if any), and when we transmit such sensitive information, that information is encrypted and is protected with SSL encryption software.

Access to your Personal Information is strictly limited, and we take reasonable measures to ensure that your Personal Information is not accessible to the public. The servers that we store Personal Information in are kept in a secure physical environment. We also have security measures in place to protect the loss, misuse and alteration of Personal Information under our control. Please be advised, however, that while we take every reasonable precaution available to protect your data, no storage facility, technology, software, security protocols or data transmission over the Internet can be guaranteed to be 100% secure. Computer hackers that circumvent our security measures may gain access to certain portions of your Personal Information, and technological bugs, errors and glitches may cause inadvertent disclosures of your Personal Information; provided, however, that any attempt to breach the security of the network, our servers, databases or other hardware or software constitutes a crime punishable by law. For the reasons mentioned above, we cannot warrant that your Personal Information will be absolutely secure. Any transmission of data at or through Vita Health Services offerings is at your own risk.

All of our Members' Personal Information, not just the sensitive information mentioned above, is restricted in our offices. Only employees or third party agents who need the Personal Information to perform a specific job are granted access to Personal Information. Our employees are dedicated to ensuring the security and privacy of all user Personal Information. Employees not adhering to our firm policies are subject to disciplinary action. In compliance with applicable federal and state laws or other laws applicable to persons using our Offerings in foreign countries, we shall notify you and any applicable regulatory agencies in the event that we learn of an information security breach with respect to your Personal Information. You will be notified via e-mail in the event of such a breach. Please be advised that notice may be delayed in order to address the needs of law enforcement, determine the scope of network damage, and to engage in remedial measures.

12. Information from users outside the U.S.A. and consent to transfer information

The Services are operated in the United States of America. If you are located in another jurisdiction, please be aware that information you provide to us may be transferred to, stored and processed in the U.S.A. By using the Services or providing us with any information, you consent to this transfer, processing, and storage of your information in the U.S.A., a jurisdiction in which the privacy laws may not be as comprehensive as those in the country where you reside or are a citizen. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

13. Managing Your Settings

Even after consenting to the Privacy Policy and Terms and Conditions, you may opt out of receiving e-mail advertising from us by following the instructions at the end of the applicable e-mail message or by sending us an e-mail at support@vitahealth.care and asking us not to send you email advertising.

Notwithstanding the foregoing, we may continue to contact you for the purpose of communicating information relating to your request for Vita Health Services Offerings, as well as to respond to any inquiry or request made by you. To opt-out of receiving Vita Health Services Offerings-related and inquiry response-related messages from Vita Health Services, you must cease requesting and/or utilizing the Vita Health Services Offerings and cease submitting inquiries to Vita Health Services, as applicable.

14. Identifying, Deleting and Updating Your Information

At your request, we will inform you of what Personal Information we have on file for you. In addition, at your request, we will update, correct, modify or delete Personal Information that you have provided to us, or that we have collected. You may do so by contacting us via email at support@vitahealth.care provided, however, that we ask individual Members to identify themselves and the information requested to be accessed or updated before processing such requests. We will comply with your request as soon as reasonably practicable. However, we may maintain Personal Information whenever we are required to do so by law or regulations or as we believe is reasonably necessary to comply with applicable law or regulations, government requests, to detect or prevent fraud, to resolve disputes, to address problems with the Services, to assist with investigations, or to enforce our terms and conditions or other applicable agreements or policies. We may also need to retain certain information for recordkeeping purposes. We will retain your Personal Information for the period necessary to fulfil the purposes outlined in this Policy unless a longer retention period is required or permitted by law.

15. Children

Vita Health Services is committed to children's privacy. Vita Health Services™ does not knowingly permit any child to register directly for the Vita Health Services Offerings, without parental consent, when required.

16. GDPR Commitment

As has been widely reported, the European Union has taken a large step in protecting the fundamental right to privacy for every EU resident with the General Data Protection Regulation (GDPR), which went into effect on 25th May 2018.

EU residents will now have greater say over what, how, why, where, and when their personal data is used, processed, or disposed of. This rule clarifies how the EU personal data laws apply even beyond the borders of the EU. Any company that works with EU residents' personal data in any manner, irrespective of location, has obligations to protect the data.

At Vita Health Services, we take the trust placed in us to strictly secure and protect our customers' data very seriously and welcome the General Data Protection Regulation (GDPR). We believe that every business should be held accountable to the same high standards to which we hold ourselves and appreciate these new measures of accountability that we can use to improve our practices.

As always, Vita Health Services is committed to protecting our users' privacy. That will never change. These enhancements clarify and provide additional information about:

Our users' privacy rights and how to exercise them;

How we collect, use, share and protect personal data;

How we operate in our capacity as a data processor acting on our users' behalf.

We will continue to actively monitor regulatory guidance and interpretations of key GDPR requirements to make sure we stay current with all legal requirements and privacy best practices.

17. Changes to this Privacy Policy

Vita Health Services reserves the right to change or update this Privacy Policy at any time by posting a notice on the Offering that we are changing our Privacy Policy. If the manner in which we use Personal Information changes, Vita Health Services will notify Members by:

a. sending the modified policy to our Members via email; and/or

- b. by any other reasonable means acceptable under applicable state and federal law.
- c. If you do not agree to the changes, you should discontinue your use of the Offering. Your continued use of the Offering after you have been notified of the changes will signify your consent to such changes.

18. Contact Us

If you have any questions or comments about this Privacy Policy, please email us at support@vitahealth.care, or send a letter to: Vita Health Services, 4 Science Park, New Haven, CT 06511